

1 **MANASSERIAN LAW, APC**
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8 Attorney for Judgment Creditor,
9 Shannon P. Sorensen, Trustee of the
10 Shannon P. Sorensen 2011 Irrevocable Trust

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SANTA BARBARA – ANACAPA DIVISION**

13 SHANNON P. SORENSEN as TRUSTEE OF
14 THE SHANNON P. SORENSEN 2011
15 IRREVOCABLE TRUST,

16 Plaintiff,

17 v.

18 SIMON K. HODSON, an individual; DOES 1
19 - 10, inclusive,

20 Defendants.

Case No.: 21CV05018

Assigned for all purposes to
Hon. Judge Colleen K. Sterne

**DECLARATION OF ARMEN
MANASSERIAN IN SUPPORT OF EX
PARTE APPLICATION FOR ORDER
RESTRAINING DISPOSITION OF FUNDS
PENDING ADJUDICATION OF MOTION
FOR ASSIGNMENT ORDER**

[Code Civ. Proc. § 708.520, *et seq.*]

*Filed concurrently with Ex Parte Application
and Proposed Order*

Date: June 15, 2023

Time: 8:30 a.m.

Dept: 5

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1 **DECLARATION OF ARMEN MANASSERIAN**

2 I, Armen Manasserian, declare as follows:

3 1. I am an attorney duly licensed to practice law in the State of California. I am an
4 attorney at Manasserian Law, APC, the counsel of record for Judgment Creditor Shannon P.
5 Sorensen, Trustee of the Shannon P. Sorensen 2011 Irrevocable Trust (“Sorensen”). I submit
6 this Declaration in support of Sorensen’s *Ex Parte* Application for Order Restraining Disposition
7 of Funds Pending Adjudication of Motion for Assignment Order (“Application”).

8 2. Except where stated on information and belief, I have firsthand knowledge of the
9 matters contained in this declaration, or have gained knowledge from the records of my law firm.
10 If called as a witness, I could and would competently testify hereto.

11 3. On February 23, 2023, the Court entered a Stipulated Judgment in favor of
12 Sorensen and against Judgment Debtor Simon K. Hodson (“Hodson”) in the amount of
13 \$5,411,680.54.

14 4. I attach hereto a true and correct copy of the Stipulated Judgment as **Exhibit A**.

15 5. The Stipulated Judgment recites the relevant procedural history of this action,
16 which I summarize below.

17 6. On February 1, 2021, Hodson executed a promissory note in favor of Sorensen.
18 Hodson breached the note by not making a single payment.

19 7. On December 23, 2021, Sorensen filed this action for breach of contract.

20 8. On July 12, 2022, the Court entered a Default Judgment for Sorensen and against
21 Hodson in the amount of \$5,096,138.89, plus interest and attorney fees.

22 9. Thereafter, Hodson induced Sorensen to vacate the Default Judgment in exchange
23 for payment of the full amount of the Default Judgment within three months.

24 10. During that time, Hodson’s then-counsel, J. Nicholson Thomas, represented to me
25 that Hodson was on the verge of obtaining investment funding of over \$500,000,000.00 for a
26 venture in West Virginia, from which Hodson would pay Sorensen in full.

27 11. On October 5, 2022, Sorensen and Hodson executed a settlement agreement by
28 which Sorensen agreed to vacate the Default Judgment, without prejudice, in exchange for

1 Hodson’s satisfaction of the full outstanding sum of the Default Judgment, *i.e.*, \$5,217,608.50
2 (“Settlement Amount”), within three months (“Settlement Agreement”). The parties
3 concurrently executed a Stipulation for Entry of Judgment in the event Hodson breached the
4 Settlement Agreement.

5 12. The three-month period passed and Hodson breached the Settlement Agreement
6 by not satisfying any portion of the Settlement Amount.

7 13. Thus, on February 23, 2023, the Court entered the Stipulated Judgment in the
8 amount of \$5,411,680.54. One day later, the Court issued a Writ of Execution.

9 14. On April 11, 2023, Sorensen served Hodson with post-judgment Special
10 Interrogatories and Request for Production of Documents.

11 15. On April 12, 2023, the Court ordered (1) Hodson to appear for a judgment debtor
12 examination on July 10, 2023, and (2) third party Randall Smith to appear for a third party
13 examination on July 10, 2023.

14 16. On April 25, 2023, Sorensen initiated levies on deposit accounts owned or
15 controlled by Hodson. The levies are presently being conducted by the Los Angeles County
16 Sheriff’s Department, Sacramento County Sheriff’s Department, and Orange County Sheriff’s
17 Department.

18 17. On April 26, 2023, Hodson requested a 30-day extension to respond to Sorensen’s
19 post-judgment Special Interrogatories and Request for Production of Documents. Sorensen
20 granted the extension.

21 18. On May 11, 2023, my firm issued subpoenas to various third party companies
22 owned or controlled by Hodson.

23 19. On June 1, 2023, Hodson requested an additional 30-day extension to respond to
24 Sorensen’s post-judgment Special Interrogatories and Request for Production of Documents.
25 Hodson also offered to pay \$250,000.00 on the Judgment. Sorensen granted the extension and
26 accepted the partial payment, which Hodson made on June 6, 2023.

27 20. The parties applied Hodson’s payment in the following sequence: first, to the
28 attorney fees that Sorensen had incurred; next, to post-judgment interest; next, to principal.

1 Hodson reserved his right to challenge the attorney fees later. After the payment, the balance of
2 the Judgment became roughly \$5,390,103.40.

3 21. On June 8, 2023, I learned that Hodson had loaned \$480,000.00 to Texas
4 Attorney General Kenneth W. Paxton, Jr. on November 7, 2022, *e.g.*, during the three-month
5 period when Hodson was required to satisfy the Settlement Amount in full.

6 22. Specifically, I visited the website of Transparency USA, a nonprofit organization
7 providing transparency in campaign financing, and I discovered the following information:

8 **Loan Details**

9 Amount	\$480,000.00
10 Date	11/07/2022
11 Committee	Paxton, Jr., W. Kenneth (The Honorable)
12 Lender	Simon Hodson
13 Interest Rate	
14 Maturity Date	11/07/2023

15 23. I attach hereto as **Exhibit B** a true and correct copy of the screenshot I took of the
16 website, www.transparencyusa.org/tx/loan/100029339.

17 24. My review of the above website led me to believe that on November 7, 2022,
18 Hodson made a one-year loan to Kenneth W. Paxton, Jr. in the amount of \$480,000.00.

19 25. Thereafter, I obtained a publicly-accessible report from the Texas Ethics
20 Commission, titled "Candidate / Officeholder Campaign Finance Report."

21 26. I attach hereto a true and correct copy of relevant pages of the Campaign Finance
22 Report as **Exhibit C**. A complete version of the 175-page report can be accessed at the
23 following website of the Texas Ethics Commission: <http://204.65.203.5/public/100888682.pdf>

24 27. My review of the Campaign Finance Report also led me to believe that Hodson
25 loaned \$480,000.00 to Kenneth W. Paxton, Jr. on November 7, 2022.

26 28. On June 13, 2023 at 1:25 p.m., I provided *ex parte* notice by email to Hodson's
27 counsel, Michael S. Fauver of Fauver, Large, Archbald & Spray LLP.

28 29. I attach hereto a true and correct copy of my *ex parte* notice to Mr. Fauver on
June 13, 2023 as **Exhibit D**.

30. As of this filing, Mr. Fauver has not indicated whether his client will oppose this

1 Application or appear at the hearing on June 15, 2023.

2 31. Code of Civil Procedure section 708.520 provides the statutory basis for this
3 Application.

4 32. Additionally, my client will suffer irreparable harm and immediate danger in the
5 absence of *ex parte* relief. Hodson's loan to Paxton has a one-year term which expires
6 November 7, 2023. The hearing on my client's Motion for Assignment Order is not until
7 September 11, 2023. During that span, Hodson may assign, encumber or otherwise dispose of
8 the right to receive payment from Paxton under the \$480,000.00 loan, which would nullify the
9 Motion for Assignment Order and cut off a stream of income that can be applied towards
10 satisfaction of the Judgment.

11 33. While the identified income stream will not satisfy the entire balance of the
12 Judgment, it can provide partial satisfaction.

13 34. Preserving the status quo from now until the Court's adjudication of the Motion
14 for Assignment Order will not prejudice Hodson, who can still oppose the Motion for
15 Assignment Order on any grounds he deems appropriate.

16
17 I declare under penalty of perjury, pursuant to the laws of the State of California, that the
18 foregoing is true and correct. Executed on this 13th day of June 2023, at Pasadena, California.

19
20 /s/ Armen Manasserian
21 Armen Manasserian

Exhibit A

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CHORA YOUNG & MANASSERIAN LLP
Paul P. Young (SBN 257571)
Joseph Chora (SBN 284700)
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Attorneys for Judgment Creditor,
Shannon P. Sorensen, Trustee of the
Shannon P. Sorensen 2011 Irrevocable Trust

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA
2/23/23
Darrel E. Parker, Executive Officer
BY Chauvin-Couture, Danae
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA BARBARA – ANACAPA DIVISION

SHANNON P. SORENSEN as TRUSTEE OF
THE SHANNON P. SORENSEN 2011
IRREVOCABLE TRUST,

Plaintiff,

v.

SIMON K. HODSON, an individual; DOES 1-
10, inclusive,

Defendants.

Case No.: 21CV05018
Assigned for All Purposes to:
Hon. Colleen K. Sterne, Dept. 5

STIPULATED JUDGMENT

Complaint Filed: December 12,
2021 Trial Date: N/A

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1 **STIPULATED JUDGMENT**

2 This matter is before the Court on the Stipulation for Entry of Judgment (“Stipulation”)
3 entered between Shannon P. Sorensen, as Trustee of the Shannon P. Sorensen 2011 Irrevocable
4 Trust (“Judgment Creditor”) on one hand, and Simon K. Hodson (“Judgment Debtor”) on the
5 other hand (together, “Parties”).

6 The Court has reviewed the Parties’ Stipulation and incorporates the Stipulation by
7 reference herein. The Court has jurisdiction to enter judgment pursuant to California Code of
8 Civil Procedure § 664.6. Having reviewed the Stipulation and for good cause showing, the Court
9 hereby enters judgment on the Stipulation as follows:

- 10 1. On February 1, 2021, the Parties executed an Amended and Restated Promissory Note.
- 11 2. Judgment Debtor breached the Amended and Restated Promissory Note by not
12 satisfying any portion of the outstanding sum to Judgment Creditor.
- 13 3. On December 23, 2021, Judgment Creditor filed a Complaint in this Court against
14 Judgment Debtor to enforce the Amended and Restated Promissory Note, alleging: (1) Breach of
15 Contract; and (2) Breach of the Implied Covenant of Good Faith and Fair Dealing (“Action”).
- 16 4. On July 12, 2022, the Court entered a Default Judgment in favor of Judgment Creditor
17 and against Judgment Debtor in the amount of \$5,096,138.89.
- 18 5. On October 5, 2022, the Parties entered into a Settlement Agreement by which
19 Judgment Creditor agreed to vacate the Default Judgment without prejudice in exchange for
20 Judgment Debtor satisfying the outstanding sum of the Default Judgment within three months of
21 Judgment Creditor vacating the Default Judgment. As of October 5, 2022, the full outstanding
22 sum of the Default Judgment was \$5,217,608.50 (the “Settlement Amount”), comprised of
23 \$5,096,138.89 in principal and ten percent statutory post-judgment interest.
- 24 6. Judgment Debtor has breached the Settlement Agreement.
- 25 7. Per the Parties’ Stipulation, the Court enters judgment in favor of Judgment Creditor
26 in the amount of \$5,096,138.89 plus ten percent interest from July 12, 2022 through the date of
27 entry of this judgment, for a total of \$5,411,680.54 , plus attorney’s fees and
28

1 costs to be determined by motion, less any payments made by Judgment Debtor and received by
2 Judgment Creditor towards the Settlement Amount.

3 8. Per the Parties' Stipulation and Code of Civil Procedure § 685.040, Judgment Creditor
4 is entitled to recover the reasonable attorney's fees and costs that Judgment Creditor incurs in the
5 enforcement of this judgment.

6 Accordingly, it is hereby **ORDERED, ADJUDGED, and DECREED:**

7 Judgment is hereby entered in favor of Judgment Creditor in the amount of \$5,096,138.89
8 plus ten percent interest from July 12, 2022 through the date of entry of this judgment, for a total
9 of \$5,411,680.64, plus attorney's fees and costs to be determined by motion, less
10 any payments made by Judgment Debtor and received by Judgment Creditor towards the
11 Settlement Amount, which totals \$0.00, resulting in a final amount of
12 \$5,411,680.64 to Judgment Creditor.

13 Per the Parties' Stipulation and Code of Civil Procedure § 685.040, Judgment Creditor is
14 entitled to recover the reasonable attorney's fees and costs that Judgment Creditor incurs in the
15 enforcement of this judgment.

16
17 DATED: 02/23/2023



18 Judge of the Superior Court
19 **Colleen K. Sterne**

Exhibit B

Data through 12/31/2022

Overview > Texas > Loan

Loan Details

Amount \$480,000.00
Date 11/07/2022
Committee Paxton Jr., W. Kenneth (The Honorable)
Lender Simon Hodson
Interest Rate
Maturity Date 11/07/2023

Additional Information

Support Our Work

Exhibit C

CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH
COVER SHEET PG 1

The C/OH Instruction Guide explains how to complete this form.		1 Filer ID (Ethics Commission Filers) 00051407	2 Total pages filed: 175	
3 CANDIDATE / OFFICEHOLDER NAME	MS / MRS / MR The Honorable	FIRST W. Kenneth	MI	OFFICE USE ONLY Date Received ELECTRONICALLY FILED 01/17/2023
	NICKNAME Ken	LAST Paxton	SUFFIX Jr.	
4 CANDIDATE / OFFICEHOLDER MAILING ADDRESS <input type="checkbox"/> Change of Address	ADDRESS / PO BOX; APT / SUITE #; CITY; PO Box 3476 McKinney, TX 75070		ZIP CODE	Date Hand-delivered or Date Postmarked
			Receipt #	Amount
			Date Processed	
			Date Imaged	
5 CAMPAIGN TREASURER NAME	MS / MRS / MR	FIRST Madison P.	MI	
	NICKNAME	LAST Hayworth	SUFFIX	
6 CAMPAIGN TREASURER ADDRESS (Residence or Business)	STREET ADDRESS (NO PO BOX PLEASE); 4616 Indigo Drive Killeen, TX 76542		APT / SUITE #;	CITY; STATE; ZIP CODE
7 CAMPAIGN TREASURER PHONE	AREA CODE (469)	PHONE NUMBER 667-3409	EXTENSION	
8 REPORT TYPE	<input checked="" type="checkbox"/> January 15 <input type="checkbox"/> 30th day before election <input type="checkbox"/> Runoff <input type="checkbox"/> 15th day after campaign treasurer appointment (officeholder only)			
	<input type="checkbox"/> July 15 <input type="checkbox"/> 8th day before election <input type="checkbox"/> Exceeded modified reporting limit <input type="checkbox"/> Final Report (Attach C/OH-FR)			
9 PERIOD COVERED	Month Day Year 10/30/2022	THROUGH	Month Day Year 12/31/2022	
10 ELECTION	ELECTION DATE Month Day Year 11/08/2022		ELECTION TYPE <input type="checkbox"/> Primary <input type="checkbox"/> Runoff <input type="checkbox"/> Other <input checked="" type="checkbox"/> General <input type="checkbox"/> Special	
11 OFFICE	OFFICE HELD (if any) Attorney General		12 OFFICE SOUGHT (if known) Attorney General	

GO TO PAGE 2

CANDIDATE / OFFICEHOLDER REPORT: SUPPORT & TOTALS

FORM C/OH
COVER SHEET PG 2

2 of 175

13 C / OH NAME Paxton Jr., W. Kenneth (The Honorable) **14 Filer ID** (Ethics Commission Filers)
00051407

15 NOTICE FROM POLITICAL COMMITTEE(S)
 Additional Pages

This box is for notice of political contributions accepted or political expenditures made by political committees to support the candidate / officeholder. *These expenditures may have been made without the candidate's or officeholder's knowledge or consent.* Candidates and officeholders are required to report this information only if they receive notice of such expenditures.

<input checked="" type="checkbox"/> GENERAL	COMMITTEE TYPE	COMMITTEE NAME
<input type="checkbox"/> SPECIFIC		Texas Alliance for Life Political Action Committee
	COMMITTEE ADDRESS	8000 Centre Park Dr Ste 380
		Austin, TX 78754
	COMMITTEE CAMPAIGN TREASURER NAME	Shaw, James
	COMMITTEE CAMPAIGN TREASURER ADDRESS	4505 Corazon Cv
		Round Rock, TX 78681

16 CONTRIBUTION TOTALS	1. TOTAL UNITEMIZED POLITICAL CONTRIBUTIONS (OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS, OR CONTRIBUTIONS MADE ELECTRONICALLY)	\$ 0.00
	2. TOTAL POLITICAL CONTRIBUTIONS (OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS)	\$ 699,439.24
EXPENDITURE TOTALS	3. TOTAL UNITEMIZED POLITICAL EXPENDITURES	\$ 0.00
	4. TOTAL POLITICAL EXPENDITURES	\$ 1,767,888.25
CONTRIBUTION BALANCE	5. TOTAL POLITICAL CONTRIBUTIONS MAINTAINED AS OF THE LAST DAY OF THE REPORTING PERIOD	\$ 2,348,423.55
OUTSTANDING LOAN TOTALS	6. TOTAL PRINCIPAL AMOUNT OF ALL OUTSTANDING LOANS AS OF THE LAST DAY OF THE REPORTING PERIOD	\$ 1,330,000.00

17 AFFIDAVIT

I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code.

The Honorable W. Kenneth Paxton Jr.

Signature of Candidate or Officeholder

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this the _____ day of _____, 20_____, to certify which, witness my hand and seal of office.

Signature of officer administering Printed name of officer administering Title of officer administering oath

SUBTOTALS - C/OH**FORM C/OH
COVER SHEET PG 3**

3 of 175

18 FILER NAME Paxton Jr., W. Kenneth (The Honorable)		19 Filer ID 00051407	(Ethics Commission Filers)
20 SCHEDULE SUBTOTALS NAME OF SCHEDULE		SUBTOTAL AMOUNT	
1.	<input checked="" type="checkbox"/> SCHEDULE A1: MONETARY POLITICAL CONTRIBUTIONS	\$	685,485.36
2.	<input checked="" type="checkbox"/> SCHEDULE A2: NON-MONETARY (IN-KIND) POLITICAL CONTRIBUTIONS	\$	13,953.88
3.	<input type="checkbox"/> SCHEDULE B: PLEDGED CONTRIBUTIONS	\$	
4.	<input checked="" type="checkbox"/> SCHEDULE E: LOANS	\$	480,000.00
5.	<input checked="" type="checkbox"/> SCHEDULE F1: POLITICAL EXPENDITURES FROM POLITICAL CONTRIBUTIONS	\$	1,767,888.25
6.	<input type="checkbox"/> SCHEDULE F2: UNPAID INCURRED OBLIGATIONS	\$	
7.	<input type="checkbox"/> SCHEDULE F3: PURCHASE OF INVESTMENTS FROM POLITICAL CONTRIBUTIONS	\$	
8.	<input type="checkbox"/> SCHEDULE F4: EXPENDITURES MADE BY CREDIT CARD	\$	
9.	<input type="checkbox"/> SCHEDULE G: POLITICAL EXPENDITURES FROM PERSONAL FUNDS	\$	
10.	<input type="checkbox"/> SCHEDULE H: PAYMENT FROM POLITICAL CONTRIBUTIONS TO A BUSINESS OF C/OH	\$	
11.	<input type="checkbox"/> SCHEDULE I: NON-POLITICAL EXPENDITURES FROM POLITICAL CONTRIBUTIONS	\$	
12.	<input checked="" type="checkbox"/> SCHEDULE K: INTEREST, CREDITS, GAINS, REFUNDS, AND CONTRIBUTIONS RETURNED TO FILER	\$	549.04

LOANS

SCHEDULE E

The Instruction Guide explains how to complete this form.		1 Total pages Schedule E: Sch: 1/1 Rpt: 139/175
2 FILER NAME Paxton Jr., W. Kenneth (The Honorable)		3 Filer ID (Ethics Commission Filers) 00051407
4 TOTAL OF UNITEMIZED LOANS		\$
5 Date of loan 11/07/2022	7 Name of lender <input type="checkbox"/> out-of-state PAC (ID#: _____) Hodson, Simon	9 Loan Amount (\$) \$480,000.00
6 Is lender a financial institution? No	8 Lender address; City; State; Zip Code Santa Barbara, CA 93105	10 Interest Rate
		11 Maturity Date 11/07/2023
12 Principal occupation / Job title (See Instructions) Doctor		13 Employer (See Instructions) Self
14 Description of Collateral <input checked="" type="checkbox"/> None		15 Check if personal funds were deposited into political account (See Instructions) <input type="checkbox"/>
16 GUARANTOR INFORMATION <input checked="" type="checkbox"/> not applicable	17 Name of guarantor	19 Amount Guaranteed (\$)
	18 Guarantor address; City; State; Zip Code	
20 Principal occupation		21 Employer (See Instructions)

Exhibit D

From: [Armen Manasserian](#)
To: [Michael Fauver](#)
Cc: [Nick Thomas](#); [Jennifer Housholder](#)
Subject: Case No. 21CV05018: Ex Parte Notice
Date: Tuesday, June 13, 2023 1:25:00 PM
Importance: High

Dear Mr. Fauver:

Please take notice that on Thursday, June 15, 2023 at 8:30 a.m. in Department 5 of the Santa Barbara County Superior Court, Anacapa Division, located at 1100 Anacapa Street, Santa Barbara, California 93121, Judgment Creditor Shannon P. Sorensen, as Trustee of the Shannon P. Sorensen 2011 Irrevocable Trust (“Sorensen”) will submit an *Ex Parte* Application for Order Restraining Disposition of Funds Pending Adjudication of Motion for Assignment Order.

As a preliminary matter, today we are filing a Motion for Assignment Order under Code of Civil Procedure section 708.510. The motion seeks an order requiring Judgment Debtor Simon K. Hodson (“Hodson”) to assign to Sorensen the right to payment(s) owed to Hodson by third party Kenneth W. Paxton, Jr. (“Paxton”), pursuant to a loan by Hodson to Paxton in the amount of \$480,000.00 (“Paxton Loan”). The motion seeks to assign and apply payments owed under the Paxton Loan towards satisfaction of the judgment in this action. The motion additionally seeks a monthly accounting by Hodson relating to the requested assignment. The hearing on the motion is September 11, 2023 at 8:30 a.m. in Department 5 of the above-referenced courthouse.

The *ex parte* application is under Code of Civil Procedure section 708.520(a), for an interim order restraining Hodson from assigning, encumbering or otherwise disposing of the right to payment(s) under the Paxton Loan until the Court has adjudicated the Motion for Assignment Order.

Please let me know whether you intend to oppose the application and/or appear at the hearing.

Thank you.

Sincerely,

Armen Manasserian

MANASSERIAN LAW, APC
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Pasadena, California 91101
Tel.: (626) 469-0500
Fax: (626) 469-0510
Email: armen@ml-apc.com

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