



---

## Fount Church

---

Lewis P. Trippett [REDACTED]

Wed, Dec 3, 2025 at 12:28 PM

To: Barry Black [REDACTED]

Cc: Joseph Ruta [REDACTED], Lane Paulsen [REDACTED]

Barry,

I regret that I was unable to speak with you personally after the meeting on Monday night. I was encouraged with the path forward that seemed to be agreed to at the meeting.

It strikes me that the consensus at the end of the meeting Monday night was remarkably similar to the consensus that was reached at the end of our zoom meeting on October 22<sup>nd</sup>. I left our zoom meeting believing that we had a plan (i) to jointly develop and discuss by-laws; (ii) have CapinCrouse complete an audit of the expenses in question; (iii) hold an election of trustees, including discussion of mutually acceptable trustees.

As best I can tell since that meeting you have not worked cooperatively with Joe and our client on these matters. Proposed by-laws were never distributed by you. You ignored our second notice for a congregational meeting and pre-empted it with your own notice (faulty, in our opinion); you did not request a full audit from the church's accounting firm; your client selected his own hand-picked trustees who were not announced or discussed with us before the Monday night meeting; and you selected a yet-to-be disclosed law firm to conduct an audit, again without any input from Joe or our client.

This kind of unilateral, non-communicative action by you is not productive for resolving the issues. You, no doubt, were upset that our client provided the staff members of the church with the CapinCrouse report. However, that action was essentially forced upon him by the lack of communication and cooperation by you in taking these unilateral actions.

I hope now that you will commit to working cooperatively with us. January 12<sup>th</sup> will be here before you know it and unless we have some resolution between us, I expect we'll be looking at another contentious meeting. However, the start is not promising. I understand that you said you would reach out to Joe but have not yet done so. Please do so promptly.

As I'm sure you can tell by now, there is a significant portion of the congregation, if not a majority, who share our client's concerns. They are not going to be assuaged by continuing to play "keep away" from us. It is to your client's advantage to get buy-in from Joe and our client. That can only come with cooperation and not stiff-arm tactics.

Speaking of who is your client – at the zoom meeting you specifically stated that you only represented Josh and Georgie and had not been paid by the church. Monday night you stated that you were the attorney for the church. At the zoom meeting you agreed (and I think it is obvious) that there is a conflict of interest between the pastor, whose spending is at issue, and the church. And with Josh and Georgie as the only trustees and interested parties, who authorized you to represent the church? They could not. Who authorized you to unilaterally retain an undisclosed law firm to perform an audit that the church's independent accounting firm was supposed to perform? Who is paying you now? These are matters that will have to be disclosed.

I raise these issues not to be accusatory or confrontational but as a plea to you that non-cooperation tactics will not work. We are prepared to work cooperatively and, if these matters are to be amicably resolved, we need you to do the same.

Lewis

Lewis P. Trippett, Esq.  
Higgins & Trippett LLP  
1120 Avenue of the Americas  
Fourth Floor  
New York, New York 10036  
Tel.: (212) 840-8334  
Fax: (212) 840-8336  
[www.higginstrippett.com](http://www.higginstrippett.com)

**PLEASE NOTE: NEW EMAIL ADDRESS** 

PLEASE TAKE NOTICE: This is a confidential communication from the law offices of Higgins & Trippett LLP, 1120 Avenue of the Americas, Fourth Floor, New York, New York 10036, (212) 840-8334. The information contained in this e-mail and any attachments is privileged, confidential, and protected from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately, and delete it from your network server and/or hard drive. Thank you for your courtesy.



---

## Fount Church

---

Barry Black [REDACTED]

Wed, Dec 3, 2025 at 1:36 PM

To: "Lewis P. Trippett" [REDACTED]

Cc: Joseph Ruta [REDACTED], Lane Paulsen [REDACTED]

Lewis,

While I will not respond to your individual points, I wholly disagree with your total mischaracterization of reality. Indeed, you attended the meeting with the advisors, and should recall that, despite my intentions to sit down *in person* with Joe *in our offices*, the advisory team came up with a 5-point plan which then became the governing position. Indeed, it is my understanding that, as acknowledged by Joe, there was supposed to be a mediation, but your client withdrew and instead got together another "petition."

My suggestion is that you stop pointing fingers, and so will I. I'm happy to discuss next steps, but we can only do so if your client cooperates – including by not contacting church leadership and telling them "don't be his pawns." As a lawyer, I'd relish the opportunity to oppose your client in court. As a person of faith, I hope we can work together to prevent further damage to God's church and the loss of many souls.

Regards,

Barry

Barry Black

Nelson Madden Black LLP

475 Park Avenue South, Suite 2800

New York, NY 10016

[www.NelsonMaddenBlack.com](http://www.NelsonMaddenBlack.com)

212-382-4300 main

212-382-4303 direct

212-382-4319 fax

CONFIDENTIALITY NOTICE: This email is privileged and confidential. It is for the sole use of its intended recipient(s), and unauthorized use or disclosure is expressly prohibited. If you are not the addressee or believe that you have received this email in error or without authorization, please notify the sender immediately and delete it from your system.

[Quoted text hidden]



---

## Fount Church

---

**Lewis P. Trippett** [REDACTED]

Wed, Dec 3, 2025 at 2:48 PM

To: Barry Black [REDACTED]

Cc: Joseph Ruta [REDACTED], Lane Paulsen [REDACTED]

Barry,

I don't want to continue a tit for tat email exchange. My plea was for your cooperation, which did not occur after the October 22<sup>nd</sup> meeting. There was no five point plan agreed to by the advisors at the zoom meeting. That was something that apparently was generated thereafter and we were excluded from that discussion. The advisors, those that remain anyway, are not legal representatives of the church as you are fully aware. Our client does have legal status within the church. Your actions give every indication that you are attempting to do an "end run" around our client rather than engage in good faith negotiations. All I am asking is that you engage in open, good faith negotiations.

Also, it is important that you clarify who you represent and who is paying you? That is something which, as I'm sure you know, has to be disclosed to members of a church. Who is the law firm that has been retained and who authorized payment for that? Again, these are not confidential matters to members of the church.

Lewis

Lewis P. Trippett, Esq.

Higgins & Trippett LLP

1120 Avenue of the Americas

Fourth Floors

New York, New York 10036

Tel.: (212) 840-8334

Fax: (212) 840-8336

[www.higginstrippett.com](http://www.higginstrippett.com)

**PLEASE NOTE: NEW EMAIL ADDRESS** [REDACTED]

PLEASE TAKE NOTICE: This is a confidential communication from the law offices of Higgins & Trippett LLP, 1120 Avenue of the Americas, Fourth Floor, New York, New York 10036, (212) 840-8334. The information contained in this e-mail and any attachments is privileged, confidential, and protected from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this communication is strictly



---

## Fount NYC Church

3 messages

---

Joseph Ruta [REDACTED]

Wed, Dec 3, 2025 at 5:40 PM

To: Barry Black [REDACTED]

Cc: "Lewis P. Trippett" [REDACTED], Lane Paulsen [REDACTED]

Barry,

Your email response to Lewis has so many inaccuracies that I am forced to reply. First, Lewis and my client each informed me of what was agreed to at the October 22, 2025, meeting, and it is consistent with what Lewis outlined in his email. Second, neither my client nor Pastor Chris Bennett was ever a part of developing the five-point plan. Moreover, my client never received a copy of the plan until it was sent to him via email on November 17th by Pastor Josh. That email from Pastor Josh was only sent after my client was compelled to issue a second 194 Notice by the members of Fount NYC to the trustees. My client sent the 194 notice only after receiving email resignations from each spiritual advisor of the church. Third, my client was informed via email by Josh Kelsey on November 19, 2025, wanted to place the matter into Christian mediation. I then called you on November 20, 2025, to ask if you were still representing Josh Kelsey, and if you were aware of the mediation request. You stated that you were not aware of the mediation request. My client then spoke with Dan Lian and Michael Strickland on November 21, 2025, agreeing to participate in mediation. My client then received an email later that day from Trevor Buhr, Esq. to participate in mediation. That very same day, I called Trevor Buhr, Esq., to state that my client was interested in participating in the mediation. Despite the agreement by everyone to participate in mediation, you directed Pastor Josh to announce a membership meeting to take place on December 1, 2025.

As such, the only person(s) responsible for the mediation not moving forward, as well as the hasty membership meeting, is either you or your client. Your statement in your email, "Indeed, it is my understanding that, as acknowledged by Joe, there was supposed to be a mediation, but your client withdrew and instead got together another 'petition'," is not accurate. My client never withdrew from mediation; rather, your client moved forward with his own plan.

I have known Lewis Trippett for more than 30 years. I got him involved in this matter because of his integrity and wisdom. I have never in all those years witnessed Lewis making a misstatement about a factual matter.

Lewis, Lane, and I all have the same perspective on the foregoing. We all understand that you need to properly represent your clients, who, to be clear, are Josh and Georgie Kelsey, not the church. However, the manner in which you are doing so is jeopardizing the respect of three individuals whose confidence I believe you value.

Despite these concerns, we still all want to see this matter amicably resolved. I am hopeful that the public commitments made at the membership meeting will be honored.

1. You providing me with proposed bylaws
2. Fount NYC sanctioning the forensic audit to be done by CapinCrouse side by side with the firm you hired (we would like to know who they are), and then cross-comparing the results
3. Mediation with an agreed-upon mediator

If we cannot agree on a slate of trustees, bylaws, and the amount to be repaid by Pastor Josh, this can all be worked out at the mediation.

Best,

**Joseph A. Ruta | Partner**

Ruta Soulios & Stratis LLP

NY: 104 W. 27th Street, 11th Floor, New York, NY 10001

NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059

T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.



---

**Barry Black** [REDACTED]

To: Joseph Ruta [REDACTED]

Cc: "Lewis P. Trippett" [REDACTED]

[REDACTED], Lane Paulsen [REDACTED]

Wed, Dec 3, 2025 at 6:04 PM

[REDACTED], Eden Chua

Joe,

I'm now on a train, which I made with moments to spare.

I'm simply not going to respond to your recitation below, other than to say I disagree with it in its entirety.

That said, the next steps going forward are not dictated by you or by me. For once, can you stop with your ominous emails and try to pick up the phone and work COLLABORATIVELY and RESPECTFULLY. Fully orchestrated public showdowns are not my style, nor are accusatory emails.

"Two are better than one, for they bring good return for their labor." Ecclesiastes 4:9.

I'm available, as I told you 15 minute ago, to speak tomorrow. Let me know what time works with you.

Barry

Sent from my iPhone

On Dec 3, 2025, at 5:40 PM, Joseph Ruta [REDACTED] wrote:

[Quoted text hidden]

---

**2 attachments**

---

**Joseph Ruta** [REDACTED] Wed, Dec 3, 2025 at 6:49 PM  
To: Barry Black [REDACTED]  
Cc: "Lewis P. Trippett" [REDACTED], Lane Paulsen [REDACTED], Eden Chua [REDACTED]  
[REDACTED]

Barry,


I am glad you made your train. Tomorrow is an impossible day for me since I have back-to-back meetings all day and then our firm's Christmas party. Please let me know if you are available for a discussion on Friday at 2:30 pm.

I believe it would be extremely helpful if you could send me proposed bylaws for my review before our call. If you prefer that we send you proposed bylaws, I am glad to do so.

Best,

**Joseph A. Ruta | Partner**  
Ruta Soulios & Stratis LLP  
NY: 104 W. 27th Street, 11th Floor, New York, NY 10001  
NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059  
T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.

**From:** Eden Chua [REDACTED]   
**Subject:** Re: Working together and next steps forward  
**Date:** December 12, 2025 at 7:44 PM  
**To:** Joseph Ruta [REDACTED]  
**Cc:** Barry Black [REDACTED]



Hi Joe,

Thanks for your email. Hope you had a good week too!

Will reply with greater detail after the weekend.

Best,  
Eden

---

**From:** Joseph Ruta [REDACTED]  
**Sent:** Friday, December 12, 2025 5:38:40 PM  
**To:** Eden Chua [REDACTED]  
**Cc:** Barry Black [REDACTED]  
**Subject:** Re: Working together and next steps forward

Hi Eden,

I hope you had a good week. Please let me know when I can expect the proposed draft bylaws.

Thank you,

**Joseph A. Ruta | Partner**  
Ruta Soulios & Stratis LLP  
NY: 104 W. 27th Street, 11th Floor, New York, NY 10001  
NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059  
T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.

On Dec 8, 2025, at 8:29 PM, Eden Chua [REDACTED] wrote:

Dear Joe,

We appreciate our calls and are encouraged that you join in our desire

to focus on what's best for the church.

As discussed, here are our goals:

1. We will send you draft bylaws, after consultation with the church's spiritual advisors, to assure that the bylaws reflect the church's theology, Christian values, and Christ-centered mission.
2. We propose open-ended voting. The church leadership will propose its own slate, while anyone else is free to introduce alternative slates or candidates. *All* candidates will get equal time and platform at the meeting—i.e., the church leadership's slate will enjoy no preferential treatment.

From our side, we highlighted again that a mediation would facilitate resolution and provide clarity (avoid he-said-she-said). However, if we can mutually agree, then mediation would be obviated.

Regarding the meeting to elect board members, we understand that subject to your client's approval, we agree on January 11 as the date. This is in light of how January 11 is a Sunday, and will ensure greater participation and involvement of the congregation in the voting – in contrast to the prior date of January 12. We also do not have a venue large enough and in adherence with fire safety code regulations to accommodate the number of people anticipated to attend the church meeting on January 12.

We look forward to working together with you on behalf of the church members.

Eden Chua  
Nelson Madden Black LLP  
475 Park Avenue South, Suite 2800  
New York, NY 10016

[www.NelsonMaddenBlack.com](http://www.NelsonMaddenBlack.com)

[212-382-4300](tel:212-382-4300) main

[212-382-4319](tel:212-382-4319) fax

CONFIDENTIALITY NOTICE: This email is privileged and confidential. It is for the sole use of its intended recipient(s), and unauthorized use or disclosure is expressly prohibited. If you are not the addressee or believe that you have received this email in error or without authorization, please notify the sender immediately and delete it from your system.



---

## Fount Church NYC - Bylaws

---

Joseph Ruta [REDACTED]

Wed, Dec 17, 2025 at 4:41 PM

To: Barry Black [REDACTED]

Cc: Eden Chua [REDACTED], Lane Paulsen [REDACTED], "Lewis P. Trippett"

Hi Barry,

I am following up on my previous requests and my voicemail this morning regarding receiving proposed bylaws from you.

The Fount NYC meeting took place on December 1, 2025. It is now December 17th, and I still do not have proposed bylaws to review. We are now approaching Christmas week, in which I will not be working at all.

I am seriously concerned that there will not be enough time to do what we promised this congregation on December 1, to work together to present mutually acceptable bylaws, etc.

Please advise,

Best,

**Joseph A. Ruta | Partner**

Ruta Soulios & Stratis LLP

NY: 104 W. 27th Street, 11th Floor, New York, NY 10001

NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059

T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.





---

## Fount Church NYC - Bylaws

---

Barry Black [REDACTED]

Thu, Dec 18, 2025 at 1:18 PM

To: Joseph Ruta [REDACTED]

Cc: Eden Chua [REDACTED], Lane Paulsen [REDACTED], "Lewis P. Trippett"

Dear Joe,

Thank you for your email. We are currently working on a draft of the bylaws in close consultation with the church's spiritual leaders, whose input and guidance is necessary for this endeavor. As soon as we have the document back from them, we will send you a draft. Please let me know your thoughts.

Once trustees are elected on January 11, the newly elected board of trustees can give notice to the congregation for a vote to adopt the bylaws.

Best,

Barry Black

Nelson Madden Black LLP

475 Park Avenue South, Suite 2800

New York, NY 10016

[www.NelsonMaddenBlack.com](http://www.NelsonMaddenBlack.com)

212-382-4300 main

212-382-4303 direct

212-382-4319 fax

CONFIDENTIALITY NOTICE: This email is privileged and confidential. It is for the sole use of its intended recipient(s), and unauthorized use or disclosure is expressly prohibited. If you are not the addressee or believe that you have received this email in error or without authorization, please notify the sender immediately and delete it from your system.

---

**From:** Joseph Ruta <[REDACTED]>

**Sent:** Wednesday, December 17, 2025 4:41 PM

**To:** Barry Black [REDACTED]

**Cc:** Eden Chua [REDACTED]

Lane Paulsen [REDACTED]

Lewis P. [REDACTED]

**Subject:** Fount Church NYC - Bylaws

Hi Barry,

I am following up on my previous requests and my voicemail this morning regarding receiving proposed bylaws from you.

The Fount NYC meeting took place on December 1, 2025. It is now December 17th, and I still do not have proposed bylaws to review. We are now approaching Christmas week, in which I will not be working at all.

I am seriously concerned that there will not be enough time to do what we promised this congregation on December 1, to work together to present mutually acceptable bylaws, etc.

Please advise,

Best,

**Joseph A. Ruta | Partner**

Ruta Soulios & Stratis LLP

NY: 104 W. 27th Street, 11th Floor, New York, NY 10001

NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059

T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.



---

## Fount Church NYC - Bylaws

---

Joseph Ruta [REDACTED]

Thu, Dec 18, 2025 at 3:52 PM

To: Barry Black [REDACTED]

Cc: Eden Chua [REDACTED], Lane Paulsen [REDACTED], "Lewis P. Trippett"

Hi Barry,

My recollection of the last membership meeting, confirmed by Lane and Lewis, was that everyone was in agreement that new bylaws (that we worked on collaboratively) would be presented to the members for a vote at the next meeting on January 11th. As I mentioned during our last conversation, the spiritual component of the bylaws can be finalized over the next couple of weeks. In the meantime, there is no reason we cannot address and resolve the legal provisions now so that there is no delay. In addition, it was also discussed that the certificate of incorporation needs to be amended to allow for the increased number of trustees, which should also be voted on at the January 11th meeting.

As promised at the December 1st meeting, please provide a copy of the report from the law firm/accounting firm that you retained in this matter concerning the expenditures in question.

Lastly, please provide an update regarding the engagement of CapinCrouse to conduct the audit that was agreed to.

You committed to the Fount NYC congregation to work together to resolve this matter. I sincerely hope that you honor that commitment.

Best,

**Joseph A. Ruta | Partner**

Ruta Soulios & Stratis LLP

NY: 104 W. 27th Street, 11th Floor, New York, NY 10001

NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059

T: 212.997.4500 | F: 212.768.0649 | E: [REDACTED]

**DISCLOSURE:** This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.



## Fount Church NYC - Bylaws

Barry Black [REDACTED]

Fri, Dec 19, 2025 at 8:02 PM

To: Joseph Ruta [REDACTED]

Cc: Eden Chua [REDACTED], Lane Paulsen [REDACTED], "Lewis P. Trippett"

Hi, Joe.

Sorry for the delay in responding. [REDACTED]



Contrary to your recollection, there was no agreement at the December 1, 2025, meeting that the bylaws would be voted on at the January 11 meeting--despite the meeting's many lively interactions Nor could this have been decided, because the meeting notice specified a single purpose: to elect trustees. And, as you know, a special meeting is limited to the purpose for which it was noticed.

We look forward to having a Board elected by church members at the January 11 meeting, and thereafter, for the trustees to facilitate the adoption of bylaws.

I should note that that the Church has historically, since its inception, sought scriptural guidance from its spiritual advisors. We are thus working on the bylaws, as a whole, in consultation with the spiritual advisors. In the spirit of camaraderie, we will send you the draft bylaws once the spiritual advisors have had the time to give their input.

Finally, we have engaged a reputable firm to conduct an unbiased audit. We will share the report we mentioned at the December 1 church meeting once it is in context (i.e., once the audit has been completed).

We are committed to working with the Fount NYC congregation moving forward, as we always have been. We hope you join us in keeping in mind the best interests of the congregation.

Bes  
Barry

Sent from my iPhone

On Dec 18, 2025, at 3:53 PM, Joseph Ruta <[REDACTED]> wrote:

Hi Barry,

My recollection of the last membership meeting, confirmed by Lane and Lewis, was that everyone was in agreement that new bylaws (that we worked on collaboratively) would be presented to the members for a vote at the next meeting on January 11th. As I mentioned during our last conversation, the spiritual component of the bylaws can be finalized over the next couple of weeks. In the meantime, there is no reason we cannot address and resolve the legal provisions now so that there is no delay. In addition, it was also discussed that the certificate of incorporation needs to be amended to allow for the increased number of trustees, which should also be voted on at the January 11th meeting.

As promised at the December 1st meeting, please provide a copy of the report from the law firm/accounting firm that you retained in this matter concerning the expenditures in question.

Lastly, please provide an update regarding the engagement of CapinCrouse to conduct the audit that was agreed to.

You committed to the Fount NYC congregation to work together to resolve this matter. I sincerely hope that you honor that commitment.

Best,

**Joseph A. Ruta | Partner**

Ruta Soulios & Stratis LLP

NY: 104 W. 27th Street, 11th Floor, New York, NY 10001

NJ: 101 Town Center Drive, Suite 111, Warren, NJ 07059

T: 212.997.4500 | F: 212.768.0649 | [REDACTED]

DISCLOSURE: This message is being sent by or on behalf of a lawyer; it is intended for the exclusive use of its intended recipient and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you are not the intended recipient or an employee or agent responsible for delivering this message to the intended recipient, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify us immediately by e-mail, discard any paper copies and delete all electronic files of the message. If you are not sure as to whether you are the intended recipient, please respond to the above e-mail address.

<PastedGraphic-3.tiff>

[Quoted text hidden]

---