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From: Eric Sanders [REDACTED]
Sent: Friday, May 29, 2026 18:21
To: 'IAB@NYPD.org.'
Cc: Shatorra Foster [REDACTED]
Subject: SUPPLEMENTAL COMPLAINT TO THE NYPD OFFICE OF EQUITY AND INCLUSION AND INTERNAL AFFAIRS BUREAU
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SUPPLEMENTAL COMPLAINT TO THE NYPD OFFICE OF EQUITY AND INCLUSION AND INTERNAL AFFAIRS BUREAU

Re: Police Officer Shatorra J. Foster, Tax Registry No. 966063
Subject Officer: Trevlyn O. Headley, formerly Lieutenant / Sergeant, Tax Registry No. 945808
Related IAB Log No.: 2024-26542
Related Case No.: (G51) PW-2024-19
Related Department Advocate Case No.: C-030622
Related Civil Action: Headley v. City of New York, et al., Index No. 155228/2025, Supreme Court, New York County

To the Office of Equity and Inclusion and Internal Affairs Bureau:

Please accept this supplemental complaint on behalf of Police Commissioner Shatorra J. Foster.

Respondent submits this supplemental complaint after further review of Internal Case Management System materials concerning IAB Log No. 2024-26542, Case No. (G51) PW-2024-19. Those materials concern the Department's prosecutorial-wall handling of the Headley/Foster matter, including the Group 25 criminal-side referral, the use of prior Redhead materials, the negative Instagram audit, the Attendance App analysis, the 311/Cloudflare/Pinger theory, District Attorney / Police Accountability Unit communications, C-1 classification, signed Charges and Specifications, and the Department's Information-and-Intelligence closing.

This supplemental complaint does not withdraw, narrow, or replace respondent's prior allegations. Respondent continues to allege that Trevlyn O. Headley sexually assaulted her inside an NYPD Headquarters dormitory room on March 14, 2024; groomed respondent through workplace access and Department resources; misused Department computer systems; retaliated against respondent; misused confidential Department information; manipulated witnesses; and used IAB and disciplinary channels to manufacture or influence a case against respondent. Respondent further maintains that the Department failed to meaningfully investigate Headley before accepting, developing, and prosecuting a Headley-driven disciplinary narrative against respondent.

The newly reviewed prosecutorial-wall file strengthens those allegations. The file shows that the Department did not merely collect evidence. It built a criminal-side structure around Headley as victim

and respondent as subject, used prior-history material to support a stalking narrative, relied on inferential electronic evidence, actively conferred with prosecutorial authorities, converted Information-and-Intelligence entries into disciplinary substantiation language, and continued forward without meaningfully integrating the evidence undermining Headley's credibility, motive, and role.

I. THE PROSECUTORIAL-WALL STRUCTURE CRIMINALIZED RESPONDENT FROM THE OUTSET

The file identifies IAB Log No. 2024-26542, Case No. (G51) PW-2024-19, as a prosecutorial-wall matter. The top allegation is listed as "Crime (Not Domestic) – Aggravated Harassment." The file places the matter within Group 51 – Sexual Assault Investigations Unit and identifies the folder type as "Prosecutorial Wall." Headley is listed as the victim. Respondent is listed as the subject. The file also states that the log was to be assessed as a prosecutorial-wall case to Group 25.

That structure was not neutral. It did not frame the investigation as a competing-claims matter involving sexual misconduct, retaliation, witness manipulation, Department-system misuse, confidential-information abuse, and harassment. It placed respondent into a criminalized subject posture while preserving Headley as victim.

That framing became the architecture of the investigation. The later worksheets, evidence consolidation, prior-history review, digital analysis, DA communications, and disciplinary conversion all developed from that starting point. The Department treated the case as one in which respondent had to be linked to stalking, aggravated harassment, false reporting, computer misuse, and Department-phone misuse. The file does not show an equivalent inquiry into whether Headley manufactured, provoked, influenced, or exploited the allegations to conceal her own misconduct.

OEI and IAB must investigate who approved the prosecutorial-wall structure, who decided to route the matter to Group 25, who accepted Headley's victim posture, and why respondent's sexual-assault and retaliation allegations were not integrated into the same core investigative frame.

II. THE GROUP 25 ASSIGNMENT AND CUTTER TRIAGE REQUIRE CONFLICT REVIEW

The file shows that the matter was assigned to Group 25. The triage entry states that Group 25 was assigned to investigate the criminal side of the case, while SIU handled the administrative side. The listed initial investigative steps included transferring SIU worksheets, reinterviewing the complainant, and conferring with the District Attorney.

Lieutenant Commander Daniel S. Cutter appears as the reporting officer, reviewing supervisor, and endorser on the triage entry. He approved the Group 25 criminal-side posture.

That is material. Respondent's counsel is already suing Cutter in *Salvatore J. Greco v. The City of New York, et al.*, EDNY 22-cv-5109, and deposed Cutter on April 30, 2025. Cutter is a named defendant in a pending federal civil-rights action involving allegations concerning IAB investigative and disciplinary authority. His role in this prosecutorial-wall matter raises conflict, bias, appearance-of-impropriety, and retaliatory-use-of-process concerns.

Respondent retained undersigned counsel on June 17, 2025. That date is material to the conflict and notice analysis.

By the time respondent retained counsel, the Department had already developed the prosecutorial-wall file through Group 25, with Cutter appearing in the criminal-side structure as reporting officer, reviewing supervisor, and endorser. The conflict issue, however, did not end with the prior creation of the file. Once respondent retained undersigned counsel, the Department's continued reliance on Cutter-connected materials became a separate and ongoing problem.

At that point, respondent was represented by counsel who was actively suing Cutter in federal court and had personally deposed Cutter on April 30, 2025. The Department therefore had an obligation to identify and address whether its continued use of the Cutter-connected prosecutorial-wall file created a conflict, appearance of bias, retaliatory-use-of-process concern, or disclosure issue.

OEI and IAB must investigate not only how Cutter became involved in IAB Log No. 2024-26542 / Case No. (G51) PW-2024-19, but what the Department did after June 17, 2025, when respondent appeared through counsel. The Department must identify whether IAB, DAO, Legal Bureau, OEI/OEEO, Group 25, Group 51, Group 1, or Deputy Commissioner-Trials personnel knew that respondent's counsel was already suing Cutter; whether that relationship was disclosed internally; whether any conflict, screening, recusal, or reassignment analysis occurred; and whether the Department continued to rely on Cutter-connected investigative materials without disclosing the issue to respondent or the disciplinary tribunal.

The Department cannot avoid the conflict issue by arguing that Cutter's initial role preceded counsel's retention. The relevant question is what the Department did once the conflict became apparent and the prosecution continued. If the Department continued to rely on a Group 25 prosecutorial-wall file connected to an IAB official being sued by respondent's counsel, without disclosure, screening, or reassessment, that failure becomes part of the broader investigative contamination and cover-up that OEI and IAB must investigate.

III. THE PRIOR REDHEAD MATTER WAS USED TO BUILD A PATTERN NARRATIVE

The file contains a worksheet titled "Prior Similar Case M-2019-2316." The investigator reviewed a prior matter involving respondent and Police Officer Precious Redhead. The worksheet states that Foster and Redhead dated briefly in the Police Academy, broke up but remained cordial, and that Redhead and persons connected to her later received harassing text messages from approximately five phone numbers. The worksheet further states that Redhead asked the sender whether they would be satisfied if she killed herself, that Redhead was modified, that respondent ran Redhead's license plate 327 times, that respondent explained she was concerned Redhead might harm herself by jumping from a bridge, that respondent denied being the stalker, that the stalker was not caught, and that respondent was found guilty of computer misuse.

This entry is critical because the Department used the prior Redhead matter to support a repeat-pattern theory against respondent. The file did not merely preserve the prior matter for background. It imported the prior history into the Headley investigation in a manner that reinforced the current "stalker" narrative.

The problem is not that prior history can never be reviewed. The problem is selective use. The Department used Redhead's history against respondent while failing to give equal investigative weight to Headley's later alleged conduct toward Redhead. Respondent has alleged that Headley confronted Redhead, questioned her about respondent, discussed Redhead's internal disciplinary history, claimed knowledge of Redhead's modification status, referenced mental-health-related information, and disclosed or referenced an active IAB matter involving Headley and respondent.

Those allegations go directly to Headley's access to confidential Department information, misuse of internal information, witness influence, intimidation, and narrative control. The Department cannot fairly use Redhead's prior history to stigmatize respondent while failing to investigate whether Headley later exploited Redhead's history or confidential information to strengthen Headley's narrative.

OEI and IAB must investigate who authorized reliance on M-2019-2316, whether DAO received the prior Redhead material, whether the disciplinary tribunal was informed that the prior matter was being used as pattern evidence, and whether Headley's later alleged conduct toward Redhead was investigated before the Department relied on Redhead's history against respondent.

IV. THE NEGATIVE INSTAGRAM AUDIT SHOWS THE DANGER OF CONCLUSION-DRIVEN REASONING

The file includes an "Instagram Audit (Negative)" worksheet. The investigator made an exigent request to Instagram concerning the username "Must.betold," which had posted under Headley's photograph on the Desi Society Instagram page that Headley falsely made an IAB allegation about people known to the Department. The return came back to an email address, "kimberlysuarez11104@gmail.com." The investigator found no Kimberly Suarez in NYPD records. The date of birth returned as August 24, 2024. The IP address appeared encrypted and returned to Los Angeles. The worksheet further notes that identical posts had been made under other photographs of Headley by different fake usernames.

That is not an identification of respondent. It is a negative or inconclusive result. It shows anonymity, possible fake account information, an unusable date of birth, and an encrypted or obscured IP return.

Despite that, the investigation continued to move toward respondent. This does not mean the Department had no circumstantial evidence. It means the Department absorbed negative or inconclusive evidence into the same preexisting theory instead of treating it as a cautionary limitation on the investigation.

OEI and IAB must determine how negative, inconclusive, anonymized, encrypted, or non-identifying digital returns were treated. They must determine whether investigators documented exculpatory or cautionary value, or whether all uncertainty was simply folded back into the "Foster is the stalker" theory.

V. THE ATTENDANCE APP ANALYSIS IS CIRCUMSTANTIAL AND WAS USED TO SUPPORT A PREDETERMINED THEORY

The file contains an Attendance App worksheet. The investigator wrote that between May and August respondent used the Attendance App 143 times and looked up the Police Commissioner's Office 58 times, approximately 40 percent of her Attendance App use. The worksheet further states that respondent looked at the Police Commissioner's Office on four of seven dates mentioned in an anonymous letter to IAB, with some dates positive, some negative, and one date noting that 1DCO was looking at Headley on Security Desk video.

This entry is another example of circumstantial pattern construction. The Department used access frequency and date comparisons to support the stalking theory. But the analysis does not, by itself, prove authorship of anonymous messages, 311 reports, or criminal intent. It is an inference stacked onto the larger criminalized frame.

The Department also does not appear to have applied the same analytical rigor to Headley's access to Department systems, Headley's substantiated CPR inquiry of respondent, or Headley's alleged knowledge of confidential information concerning Redhead. That disparity is central to respondent's complaint. The Department turned respondent's system use into evidence of stalking, but did not treat Headley's system use and information access as evidence of grooming, retaliation, surveillance, or witness manipulation.

VI. THE "CONSOLIDATION OF EVIDENCE" WORKSHEETS SHOW NARRATIVE CONSTRUCTION

The file includes "Consolidation of Evidence" entries addressing how respondent allegedly committed the conduct and why respondent was allegedly the actor. These entries are the Department's narrative architecture.

The "How" theory appears to consolidate the 311-job allegations, Cloudflare/VPN issues, Department computer history, 311 lookup timing, 1PP security-desk access, and generic account activity. The Department's theory is that anonymous 311 jobs were sent to Headley's home, that the IP/IPv6 information returned to Cloudflare, that Cloudflare obscured location, that respondent's Department computer had visited Cloudflare.com before the first 311 job, and that respondent's system lookups and 1PP access patterns linked her to the conduct.

The "How" theory also relies on a 1PP Security Desk theory involving a photograph of Headley and respondent hugging in the lobby of One Police Plaza. The file suggests that the generic 1DCOffice account viewed relevant camera playback shortly before the photograph was sent and treats that access as evidence connecting respondent to the sender.

That theory requires scrutiny. A generic office account is not the same as a named individual login. A Cloudflare visit is not, standing alone, proof that respondent authored anonymous 311 reports. A 311 lookup is not, standing alone, proof that respondent generated the 311 complaint. The Department may argue these facts are cumulative. Respondent argues that the Department converted cumulative inference into certainty while ignoring the competing Headley contamination.

The "Why" theory is even more problematic. The file uses selected text messages to argue why "the stalker is in actuality Det. Foster." That phrasing is not neutral. It shows that the Department was no longer merely testing competing possibilities. It was selecting and organizing evidence to prove the adopted conclusion.

OEI and IAB must review whether the consolidation worksheets were neutral analyses or conclusion-driven documents designed to support a predetermined Headley-as-victim / Foster-as-stalker theory.

VII. THE PINGER SUBPOENA FINDINGS REQUIRE CAREFUL ATTRIBUTION REVIEW

The file states that the Department uploaded Pinger subpoena findings. It indicates that 27 phone numbers used to message Headley were linked to Pinger and that some numbers had multiple accounts. The file further references device advertising IDs and device tokens obtained from the user's operating system.

This evidence may be relevant, but it is not self-executing. Account linkage, device tokens, advertising IDs, and platform data require careful forensic interpretation. They may show account creation, device

association, application use, or platform-level metadata. They do not automatically prove who physically authored every communication, whether devices were shared, whether accounts were spoofed, whether VPNs or anonymization were used, or whether the communications were influenced by another actor.

The Department's burden was not to collect Pinger records and declare victory. It had to test attribution, context, device control, timing, access, motive, and competing explanations. It also had to investigate whether Headley's own conduct, retaliation, or manipulation affected the communications or reporting sequence.

OEI and IAB must determine whether the Pinger evidence were subjected to competent attribution analysis or merely folded into a conclusion-first theory.

VIII. DISTRICT ATTORNEY / POLICE ACCOUNTABILITY UNIT CONTACTS SHOW ACTIVE CRIMINAL-SIDE DEVELOPMENT

The file includes multiple entries documenting contact with the Manhattan District Attorney's Office and the Police Accountability Unit, including communications with Unit Chief Nicholas Viorst and ADA Tavish DeAtley. The file reflects attempted contacts, phone contacts, in-person meeting scheduling, email exchanges, and an in-person meeting at the Manhattan Police Accountability Unit.

This is important because the prosecutorial-wall file was active. It was not merely a passive repository. Group 25 and/or the assigned investigators were developing the criminal side, transferring worksheets, reinterviewing the complainant, and conferring with prosecutorial authorities.

That means OEI and IAB must determine what information was given to the District Attorney's Office, what information was withheld, whether prosecutors were told about respondent's allegations against Headley, whether prosecutors were told about Headley's substantiated computer misuse involving respondent, whether prosecutors were told about Headley's OEEO-related demotion, and whether prosecutors were told about Headley's alleged sexual assault inside NYPD Headquarters.

If the DA was given the Headley-as-victim / Foster-as-stalker version without the Headley-contamination evidence, then the prosecutorial-wall process itself was compromised.

IX. THE FILE TRACKED HEADLEY AND FOSTER PERSONNEL MATERIALS BUT DID NOT INTEGRATE HEADLEY'S MISCONDUCT

The file contains later personnel-profile and assignment materials, including Foster's personnel profile reports, Headley transfer materials, modified-assignment-related materials, and personnel-order materials.

That shows the Department was tracking employment status and personnel movement while the case remained active. Yet the file does not meaningfully integrate Headley's own OEEO-related discipline, subject-officer status, substantiated CPR misuse, alleged sexual assault, or alleged misconduct involving other female members of the service into the core prosecution theory against respondent.

That omission matters. If the Department could track personnel and assignment materials, it could also investigate and integrate the personnel and disciplinary materials bearing on Headley's credibility and

motive. Instead, the file developed respondent's alleged misconduct in detail while leaving Headley's misconduct outside the center of analysis.

X. THE POLICE ACCOUNTABILITY UNIT CLOSURE, C-1 CLASSIFICATION, AND SIGNED CHARGES SHOW THE DISCIPLINARY USE OF THE CRIMINAL-SIDE FILE

The file later records that the Police Accountability Unit investigation closed. The file also reflects that programmatic review was not required, that the matter was classified as C-1, that signed Charges and Specifications were attached, that allegation findings were updated as I&I – PW Case, and that the prosecutorial-wall matter was closed as Information and Intelligence.

That sequence is central. The Department pursued a criminal-side prosecutorial-wall investigation, conferred with prosecutors, classified the matter as criminal, built a circumstantial electronic and prior-history theory, attached signed disciplinary charges, and then closed the prosecutorial-wall matter as I&I.

The Department cannot have it both ways. It cannot use the criminal-wall file to support discipline while shielding the file behind an Information-and-Intelligence posture. It cannot declare the “actual Finding is Substantiated” while also avoiding full scrutiny of the evidence, negative results, generic account issues, attribution problems, prior-history prejudice, and Headley contamination.

OEI and IAB must determine how the prosecutorial-wall file was used by DAO, whether the signed Charges and Specifications were based on this criminal-side file, whether respondent received the full file, whether the disciplinary tribunal received a fair description of the file's status, and whether the I&I closure concealed the Department's reliance on the file as substantiated disciplinary proof.

XI. THE FILE CONFIRMS THE COVER-UP

This file confirms that respondent's concern is not merely that the Department conducted an incomplete investigation. The Department built a criminal-side scaffolding around the Headley narrative.

It used a prosecutorial-wall structure.

It assigned the criminal side to Group 25.

It used Cutter's triage approval despite his adverse litigation posture with respondent's counsel.

It imported the Redhead prior matter to support a pattern theory.

It treated negative Instagram results as insufficient to slow the case.

It used Attendance App analysis as circumstantial proof.

It built “How” and “Why” evidence-consolidation worksheets to prove that respondent was the actor.

It obtained Pinger subpoena materials and folded them into attribution theory.

It worked with the Manhattan District Attorney / Police Accountability Unit.

It classified the matter as C-1.

It attached signed Charges and Specifications.

It closed the case as Information and Intelligence while describing the allegations as actually substantiated.

And through all of that, the file still does not meaningfully confront whether Headley was the sexual abuser, workplace groomer, retaliator, computer misuser, confidential-information abuser, witness influencer, and source of a manufactured disciplinary narrative.

That is the cover-up.

XII. SUPPLEMENTAL INVESTIGATIVE DEMANDS

Respondent demands that OEI and IAB investigate and provide written findings concerning the following:

1. who created, approved, and maintained the prosecutorial-wall designation in IAB Log No. 2024-26542 / Case No. (G51) PW-2024-19;
2. who decided to frame Headley as victim and respondent as subject;
3. who approved the Group 25 criminal-side assignment;
4. why the file states "PW TO G25";
5. Daniel S. Cutter's exact role in the file, including his role as reporting officer, reviewing supervisor, endorser, and triage approver;
6. whether Cutter exercised discretion in the criminal-side classification, Group 25 assignment, worksheet transfer, complainant reinterview, DA conferral, or evidence-consolidation process;
7. whether Cutter's adverse litigation posture with respondent's counsel in Salvatore J. Greco v. The City of New York, et al., EDNY 22-cv-5109, was disclosed, reviewed, screened, or ignored;
8. what the Department did after respondent retained undersigned counsel on June 17, 2025, including whether the Department reassessed its continued reliance on Cutter-connected materials;
9. whether IAB, DAO, Legal Bureau, OEI/OEEO, Group 25, Group 51, Group 1, or Deputy Commissioner-Trials personnel knew after June 17, 2025 that respondent's counsel was suing Cutter and had deposed him on April 30, 2025;
10. whether the Department disclosed Cutter's role and the conflict issue to respondent or the disciplinary tribunal;
11. who authorized use of the prior Redhead matter, M-2019-2316;
12. whether the prior Redhead matter was used to create a prejudicial pattern narrative against respondent;
13. whether the Department investigated Headley's later alleged conduct toward Redhead before using Redhead's history against respondent;
14. whether the Department investigated how Headley allegedly knew Redhead's modification status, disciplinary history, mental-health-related information, or active-IAB information;
15. how the Department treated the negative Instagram audit and whether it was considered exculpatory, cautionary, or inconsistent with the Department's theory;
16. whether the Attendance App analysis was treated as circumstantial only or improperly converted into proof of authorship, intent, or stalking;
17. whether the 1DOffice/security-desk theory relied on a generic login rather than a named user;

18. whether the Cloudflare/VPN evidence proved authorship or merely anonymization;
19. whether the 311 evidence proved respondent generated the reports or merely showed later lookups;
20. whether the Pinger subpoena findings were subjected to competent attribution analysis;
21. whether the "Consolidation of Evidence (How)" and "Consolidation of Evidence (Why)" worksheets were neutral analyses or conclusion-driven documents;
22. who approved language stating that "the stalker is in actuality Det. Foster";
23. whether DA/Police Accountability Unit personnel were told about respondent's allegations against Headley;
24. whether DA/Police Accountability Unit personnel were told about Headley's substantiated CPR misuse involving respondent;
25. whether DA/Police Accountability Unit personnel were told about Headley's OEEEO-related demotion or sexual-harassment history;
26. whether DA/Police Accountability Unit personnel were told about respondent's allegation that Headley sexually assaulted her inside an NYPD Headquarters dormitory room;
27. whether the PAU closure affected the Department's decision to proceed disciplinarily;
28. whether the C-1 classification was appropriate after the prosecutorial-wall investigation closed;
29. whether the signed Charges and Specifications were based on the prosecutorial-wall file;
30. whether DAO relied on I&I entries as substantiated disciplinary proof;
31. whether the disciplinary tribunal was informed that the file was closed as I&I while comments described the allegations as actually substantiated;
32. whether programmatic review should have been required given the prosecutorial-wall structure, Group 25 role, conflict issue, sexual-misconduct allegations, and Headley contamination; and
33. whether the Department's continued prosecution of respondent is tainted by prosecutorial-wall misuse, conflict, selective enforcement, retaliation, biased criminalization, or institutional protection of Headley.

XIII. CONCLUSION

Respondent demands an immediate OEI and IAB investigation into the Department's cover-up.

The newly reviewed file shows that the Department built a criminal-side prosecutorial-wall case around Headley's allegations, routed the matter to Group 25, used Cutter's approved triage structure, imported prior Redhead materials, treated negative digital evidence as non-disruptive, developed circumstantial Attendance App, 311, Cloudflare, Pinger, Wi-Fi, and 1PP security theories, conferred with prosecutorial authorities, classified the case as C-1, attached signed Charges and Specifications, and then closed the matter as Information and Intelligence while treating the allegations as actually substantiated.

That is not neutral investigation. It is narrative construction.

The Department did all of this while failing to meaningfully investigate whether Headley sexually assaulted respondent inside NYPD Headquarters, groomed respondent through workplace and Department-system access, misused CPR and confidential information, retaliated against respondent, manipulated Redhead or other witnesses, used IAB to redirect scrutiny, and manufactured or influenced the disciplinary narrative.

Respondent retained undersigned counsel on June 17, 2025. From that date forward, the Department had actual notice that respondent was represented by counsel who was actively litigating against Cutter

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in federal court and had deposed him less than two months earlier. The Department's continued reliance on Cutter-connected prosecutorial-wall materials after that date, without disclosure, conflict review, screening, or reassessment, is part of the investigative contamination OEI and IAB must address.

Respondent demands that OEI and IAB identify who built the criminalized narrative, who approved the prosecutorial-wall structure, who allowed a conflicted Group 25 role, who used the Redhead history, who ignored the negative or inconclusive evidence, who approved conclusion-driven "How" and "Why" worksheets, who converted I&I entries into substantiated disciplinary proof, who withheld Headley-contamination evidence from prosecutors or DAO, who failed to reassess the case after respondent retained counsel, and who allowed the Department to continue prosecuting respondent on a compromised record.

Until that investigation is completed, the Department's prosecution of respondent stands as retaliatory discipline built on a contaminated prosecutorial-wall file, selective enforcement disguised as accountability, and a cover-up of sexual-misconduct evidence inside the NYPD.

Respectfully submitted,

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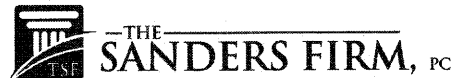
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