

FILED  
U.S. DISTRICT COURT  
DISTRICT OF COLORADO

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF COLORADO**

2014 NOV 21 PM 4:27

Civil Action No. \_\_\_\_\_  
(To be supplied by the court)

JEFFREY P. COLWELL  
CLERK

BY \_\_\_\_\_ DEP. CLK

Ihor Volodymyr Figlus, Plaintiff,

v.

United States Department of State,

~~Office of Children's Issues~~,

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_, Defendant(s).

(List each named defendant on a separate line.)

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**COMPLAINT**

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**PARTIES**

- 1. Plaintiff Ihor Volodymyr Figlus is a citizen of United States of America  
who presently resides at the following address:  
9775 West 36<sup>th</sup> Avenue, Wheat Ridge, Colorado 80033
- 2. Defendant United States Department of State is a citizen of \_\_\_\_\_  
who live(s) at or is/are located at the following address:  
\_\_\_\_\_
- 3. Defendant \_\_\_\_\_ is a citizen of \_\_\_\_\_  
who live(s) at or is/are located at the following address:  
\_\_\_\_\_

(Attach a separate page, if necessary, to list additional parties.)

**JURISDICTION**

- 4. Jurisdiction is asserted pursuant to following statutory authorities:  
U.S. GOVERNMENT AS DEFENDANT

- 5. Briefly state the background of your case:

My wife, Natalie Jaresko, (a natural-born US citizen), who is living in Ukraine with my children, Christina Maria Figlus (DOB May 7, 1998, in Chicago, Illinois) and Daria Stefania Figlus (DOB May 10, 2004, in Barrington, Illinois), is restricting and preventing my access to them. Therefore, I registered the children with the Passport Alert Program at the United States Department of State. Daria's US passport expired on May 27, 2014, and I am not agreeing to its renewal. To be clear, I have informed the Office of Children's Issues, which has jurisdiction in this situation, that I agree to the issuance of a limited validity passport for direct return to the USA. In addition, due to the threat of escalation of open warfare between Ukraine and Russia, I have expressed my desire for my children to return to the USA for their safety, as a number of expats in Ukraine have done already.

Although I attempted to conduct a divorce in Colorado, where I reside, in January, 2011, my petition was denied based on a misstatement by my original attorney in the matter. Although my wife agreed to mediation at that time, she broke off that mediation and returned to Ukraine with my children. She has not allowed my children to visit me since that time and she has rejected numerous attempts at mediation of the divorce conflict.

My wife, who is living in Ukraine on the basis of a visa that is sponsored by the US Government (she is the President of the Western NIS Enterprise Fund, a grantee of the United States Agency for International Development), proceeded to divorce me in Ukraine and obtained physical custody of the children there. However, the Ukrainian courts do not automatically set visitation schedules and do not have a mechanism for ordering visitation schedules when the subjects are not citizens of Ukraine.

In the time since January, 2011, whenever I have traveled to Ukraine to see my children, I have been given very limited access to them (no more than a few hours a week), always supervised and in the presence of bodyguards (one of whom attempted to incite me to violence). Although my wife agreed to provide and encourage communications with my daughters, the reality is that I do not have access to them (telephone numbers provided turned out to be false), and, at present, I have had communications with them only twice this year and have not heard from them in five months. The last time I traveled to Ukraine, in June of this year, my requests for time with my children were ignored and I only had an opportunity to see them at three year-end school functions to which parents were invited.

Christina's, my elder daughter's, passport was due to expire on February 13, 2013. In advance of that, my wife contacted me (through attorneys) with the stated intent of settling our divorce. The attorneys met and decided that the first step would be to agree on a parenting/visitation schedule. Assuming that this was sincere, readily agreed to the renewal of Christina's passport and provided the first proposal for this. However, that proposal has been ignored and a response was never given even though many reminders were sent.

Due to the fact that Ukraine is their habitual residence, that Ukraine is not a full signatory to the Hague Convention on children, and that I do not have a venue for divorce in the USA, I have no option to obtain US orders for visitation with my children. My wife has made numerous trips to the USA with my children (when both of them had valid US passports) but never informed me of their trips and offered me an opportunity to see and spend time with them. In each case, I only learned of their visit after the fact.

**FIRST CLAIM FOR RELIEF  
AND SUPPORTING FACTUAL ALLEGATIONS**

(Please number your paragraphs and attach any necessary additional pages.)

1. I REQUEST THAT THE COURT ISSUE A PRELIMINARY INJUNCTION TO PREVENT THE UNITED STATES DEPARTMENT OF STATE FROM ISSUING A FULL TRAVEL PASSPORT TO MY MINOR CHILD, DARIA STEFANIA FIGLUS.
2. IF THE UNITED STATES DEPARTMENT OF STATE ISSUES THIS PASSPORT, MY CHILD AND I WILL SUFFER IRREPARABLE DAMAGE BECAUSE POSSESSION OF THIS PASSPORT WILL ALLOW MY WIFE TO REMAIN IN A FOREIGN COUNTRY WHERE SHE IS ABLE TO DENY THE CHILD'S ACCESS TO HER FATHER AND THE FATHER'S ACCESS TO THE CHILD WITH IMPUNITY, AND TO TRAVEL WITH THE CHILD AT WILL WITHOUT INFORMING THE FATHER OF THE CHILD'S WHEREABOUTS OR WELLBEING.
3. THE ONLY DAMAGE CAUSED BY THIS INJUNCTION WOULD BE THAT MY CHILD IS LIMITED FROM TRAVELING TO FOREIGN COUNTRIES, WHICH PALES IN COMPARISON THE IRREPERABLE HARM SUFFERED BY THE CHILD AND HER PARENT DUE TO THEIR PRESENT AND CONTINUED SEPARATION.
4. THIS INJUNCTION, IF ISSUED, IS NOT ONLY **NOT ADVERSE** TO THE PUBLIC INTEREST, BUT WOULD SUPPORT THE UNITED STATES OF AMERICA'S CONSTITUTIONALLY MANDATED CIVIL RIGHTS OF A CHILD AND A PARENT AGAINST RULINGS OBTAINED IN A FOREIGN COUNTRY WHOSE JUDICIAL SYSTEM IS WIDELY RECOGNIZED BY THE GOVERNMENT OF THE UNITED STATES OF AMERICA AS BEING DEFICIENT AND CORRUPT. IT WOULD ALSO SUPPORT THE NOTION OF DUE PROCESS AS SET FORTH IN THE CONSTITUION OF THE UNITED STATES OF AMERICA.
5. BASED ON ANALYSIS AND OPINION OF AN EXPERIENCED ATTORNEY IN UKRAINE, THE RULING UPON WHICH THE UNITED STATES DEPARTMENT OF STATE BASES ITS DECISION TO ISSUE A PASSPORT TO A MINOR CHILD IS DEFICIENT AND ERRONEOUS; THAT THE RULING WAS OBTAINED IN ABSENTIA WITHOUT NOTIFICATION OF THE OPPOSING PARTY; THAT THE LAWS APPLIED REFER ONLY TO THE REGULATIONS GOVERNING CITIZENS OF UKRAINE AND NOT CITIZENS OF FOREIGN COUNTRIES; THAT THE COURT IN UKRAINE WAS NEVER INFORMED THAT THE MINOR CHILD WAS NOT A CITIZEN OF UKRAINE AND WAS, IN FACT, A CITIZEN OF THE UNITED STATES OF AMERICA AND THE RULING WOULD APPLY ONLY TO UKRAINIAN AUTHORITIES REGARDING UKRAINIAN CITIZENS.

6. On October 9, 2014, the Office of Children's Issues (OCI) at the United States Department of State (USDOS) tried to inform me that a "person applying for Daria's passport has presented sufficient evidence to establish sole authority under U.S. law to apply for the child's passport". The notice stated that I was to respond with evidence to the contrary by November 7, the passport would be issued. \* However, since I was camping in a remote area, I did not receive this notice until I returned to my home on October 14. I immediately responded by contacting the OCI by telephone and learned that they had received a foreign court ruling and determined that it was sufficient to issue a full passport to my daughter, Daria Stafania Figlus (DOB May 10, 2004, in Barrington, Illinois), without my consent. As I had no knowledge of such a ruling, I requested full copies of the documents in this issue. \* ATTACHMENT 3 (2 PG)
7. The OCI responded on Friday, October, 17, with some information referencing the specific Ukrainian court ruling by court name and case number, but no documents. On Monday, November 19, informing them that, since I was in the USA, I had no way to access that ruling, that a copy had not been sent to me, and that I was unaware that such a ruling had been issued. I requested a copy of that ruling and also requested an extension of time in this matter. I also informed the OCI that since there is no agreement between the USA and Ukraine on the validity of their respective court rulings, any Ukrainian court ruling is not valid in the USA.
8. On October 22, the OCI explained to me that, in order to receive copies of the documents in this case, I would have to apply to the Passport Services of the USDOS. When I contact Passport Services, I was informed that the processing of such a request could take up to 12 weeks. Upon my complaint about this procedure to the OCI, Rush Marburg, Branch Chief, informed me that he would expedite the matter and would extend the deadline for me to provide evidence as to why the passport should not be issued without my consent to November 21, 2014. \* ATTACHMENT 4 (1 PG)
9. On November 11, I received a package via US Mail of old passport applications for my daughter and a letter stating that Passport Services does not have copies of any documents regarding any current application. I informed Rush Marburg of the OCI of this fact and once again requested copies of the documentation in this matter from the OCI.
10. On November 12, I received a copy of the Ukrainian ruling from the OCI via email with the statement "This is all we have". However, the attached scanned document contained only a copy of the original Ukrainian-language ruling, and, even though it was clearly visible that an official English translation of the ruling was an integral part of that document (the document was clearly sewn together and a portion of the English was visible on the last page of the scan of the last page), that translation was not included.
11. I immediately responded to the OCI about this omission and also requested the text of the decision accepting the Ukrainian ruling as sufficient evidence to establish the mother's sole authority under U.S. law to issue a passport for my daughter.

12. On November 13, Rush Marburg transmitted the English translation of the Ukrainian ruling to me.\*In a telephone conversation on Friday, November 14, Rush Marburg told that he could not release the OCI's full documentation and that the OCI's legal team would speak only with my attorney, provided I submitted a Privacy Act Waiver. I sent Mr. Marburg an email requesting the PAW form, which he then sent to me along with a statement reiterating the November 21 deadline. \*ATTACHMENT 1 (5 PGS)
13. On November 17, I sent a translated analysis/opinion by my Ukrainian attorney, \* Volodymyr Osinchuk, in which he detailed a number of deficiencies in the Ukrainian ruling, to the OCI, but have received no response to it. Osinchuk verbally emphasized his incredulity that a US Government institution would accept a Ukrainian court decision which was clearly based on laws governing citizens of Ukraine (and my daughter does not have Ukrainian citizenship) as an "order" to issue a passport. Osinchuk pointed out in his analysis that the Ukrainian ruling was made in absentia because Jaresko misled the court about my place of residence even though in other, unrelated actions, she supplied the courts in Ukraine with my correct current residence address in Colorado. \* ATTACHMENT 2 (2 PGS)
14. On November 18, I submitted a completed copy of the PAW to the OCI. Rush Marburg informed me by email on November 19, that the PAW had been transmitted to the OCI's legal team and that they would contact my attorney, Sam Stoorman. However, as of this time, they have made no attempt to contact him.
15. During the past few days, I have requested the OCI to extend the deadline, and informed them that Osinchuk is filing an appeal of the Ukrainian ruling, but they have not responded to that request.
16. Due in large part to the delays by the OCI, it is impossible for me to obtain orders, either in Ukrainian or US courts, which would cancel or supersede the Ukrainian ruling that the OCI is relying on for its decision.
17. Therefore, I am requesting that the court order the United States Department of State to refrain from issuing a full travel passport to my daughter, Daria Stefania Figlus, until such time as the process of obtaining orders superseding the original Ukrainian court order can be obtained.

**SECOND CLAIM FOR RELIEF**

**AND SUPPORTING FACTUAL ALLEGATIONS**

(Please number your paragraphs and attach any necessary additional pages.)

**THIRD CLAIM FOR RELIEF  
AND SUPPORTING FACTUAL ALLEGATIONS**  
(Please number your paragraphs and attach any necessary additional pages.)



## REQUEST FOR RELIEF

Plaintiff requests the following relief:

I REQUEST THAT THE COURT ISSUE A PRELIMINARY INJUNCTION TO PREVENT THE UNITED STATES DEPARTMENT OF STATE FROM ISSUING A FULL TRAVEL PASSPORT TO MY MINOR CHILD, DARIA STEFANIA FIGLUS.

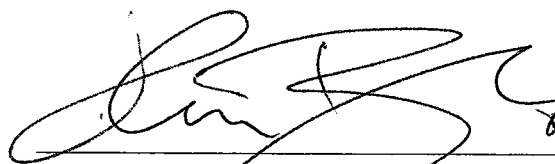
IF THE UNITED STATES DEPARTMENT OF STATE ISSUES THIS PASSPORT, MY CHILD AND I WILL SUFFER IRREPARABLE DAMAGE BECAUSE POSSESSION OF THIS PASSPORT WILL ALLOW MY WIFE TO REMAIN IN A FOREIGN COUNTRY WHERE SHE IS ABLE TO DENY THE CHILD'S ACCESS TO HER FATHER AND THE FATHER'S ACCESS TO THE CHILD WITH IMPUNITY, AND TO TRAVEL WITH THE CHILD AT WILL WITHOUT INFORMING THE FATHER OF THE CHILD'S WHEREABOUTS OR WELLBEING.

THE ONLY DAMAGE CAUSED BY THIS INJUNCTION WOULD BE THAT MY CHILD IS LIMITED FROM TRAVELING TO FOREIGN COUNTRIES, WHICH PALES IN COMPARISON THE IRREPERABLE HARM SUFFERED BY THE CHILD AND HER PARENT DUE TO THEIR PRESENT AND CONTINUED SEPARATION.

THIS INJUNCTION, IF ISSUED, IS NOT ONLY **NOT ADVERSE** TO THE PUBLIC INTEREST, BUT WOULD SUPPORT THE UNITED STATES OF AMERICA'S CONSTITUTIONALLY MANDATED CIVIL RIGHTS OF A CHILD AND A PARENT AGAINST RULINGS OBTAINED IN A FOREIGN COUNTRY WHOSE JUDICIAL SYSTEM IS WIDELY RECOGNIZED BY THE GOVERNMENT OF THE UNITED STATES OF AMERICA AS BEING DEFICIENT AND CORRUPT. IT WOULD ALSO SUPPORT THE NOTION OF DUE PROCESS AS SET FORTH IN THE CONSTITUION OF THE UNITED STATES OF AMERICA.

BASED ON ANALYSIS AND OPINION OF AN EXPERIENCED ATTORNEY IN UKRAINE, THE RULING UPON WHICH THE UNITED STATES DEPARTMENT OF STATE BASES ITS DECISION TO ISSUE A PASSPORT TO A MINOR CHILD IS DEFICIENT AND ERRONEOUS; THAT THE RULING WAS OBTAINED IN ABSENTIA WITHOUT NOTIFICATION OF THE OPPOSING PARTY; THAT THE LAWS APPLIED REFER ONLY TO THE REGULATIONS GOVERNING CITIZENS OF UKRAINE AND NOT CITIZENS OF FOREIGN COUNTRIES; THAT THE COURT IN UKRAINE WAS NEVER INFORMED THAT THE MINOR CHILD WAS NOT A CITIZEN OF UKRAINE AND WAS, IN FACT, A CITIZEN OF THE UNITED STATES OF AMERICA AND THE RULING WOULD APPLY ONLY TO UKRAINIAN AUTHORITIES REGARDING UKRAINIAN CITIZENS.

Date: November 21, 2014



(Plaintiff's Original Signature)

9775 West 36<sup>th</sup> Avenue

(Street Address)

Wheat Ridge, Colorado, 80033

(City, State, ZIP)

(720) 938-7464

(Telephone Number)

COPY

Case No. 369/6085/14-II  
Proceeding No. 2/369/2707/14

**JUDGMENT BY DEFAULT  
IN THE NAME OF UKRAINE**

On September 11, 2014 the Kyievo-Sviatoshynskiy District Court in Kyiv Region consisting of:  
presiding judge: A.Ya. Volchko  
secretary: N.M. Tkachuk  
having considered the civil action of Natalie Ann JARESKO against Ihor Volodymyr FIGLUS in open court in the city of Kyiv for provision of a permit for the issue of children's travel/exit documents,

**ESTABLISHED:**

In June 2014 the Plaintiff filed the aforementioned claim and substantiated it by the fact that she had been in a registered marriage with the Defendant from August 01, 1989. From their marriage the Plaintiff and the Defendant have two children: Christina Maria FIGLUS born in 1998, and Daria Stefania FIGLUS born in 2004.

The Plaintiff mentioned that she was living with the Defendant in the territory of Ukraine in the period from 1992 to 2000 and from 2004 to 2010. In 2010 the relationships between the parties got worse and they stopped running their joint household. The Plaintiff filed a claim for divorce, determination of a place of residence for their children, and for the division of their marital property.

On June 17, 2011 the Shevchenkivskiy District Court in Kyiv resolved that the children will live with their mother in a house at the address: 5, Hlynyshe St., Lisnyky Village, Kyiv Region.

On November 25, 2011 the Shevchenkivskiy District Court in Kyiv issued a judgment under which the marriage between the Plaintiff and the Defendant was dissolved.

The Plaintiff stated that the Defendant had not been officially employed and hadn't had his own earnings or income since 2000. Since April 2010 the Defendant has been living separately and has not provided any voluntary support to children as well as any funds for their living. In particular, the Defendant ignores the judgment of the Shevchenkivskiy District Court in Kyiv dated October 26, 2012 regarding payment of support for two minor children. As of the date of this claim the Defendant's child support debt amounted to UAH 9 953.15 (nine thousand nine hundred fifty-three hryvnias 15 kopecs) for the period of 6 months and 26 days.

The Defendant's daughter Daria FIGLUS has been a student of the Pechersk School International since 2007 and is currently a student of this school in 2013/2014 academic year. All study fees were and are paid by the Plaintiff herself without any Defendant's support.

Ukraine has been the country of residence of Daria Stefania FIGLUS for a long time. Life conditions here like schooling, peer relationships, are usual for her. However, like any child Daria needs comprehensive education as well as intellectual and moral development, including visiting the other countries for the purpose of recreation or medical care abroad, if necessary. For any trips abroad she needs a valid child's travel passport.

Daria Stefania FIGLUS has been subjected for regular medical check-up of an ophthalmologist which can be proved by corresponding certificate. There is very likely that soon Daria FIGLUS may need to go outside Ukraine for regular medical examination and preventive treatment.

However, the passport of Daria FIGLUS expired on May 27, 2014 and therefore she is not able to legally travel outside Ukraine. To travel outside Ukraine, she must have a valid child's travel passport. For the issue of such document a child needs statements (permits) from both parents.

The Plaintiff asked the Defendant to send the required documents for Daria's passport reissue for five times, however, he gave no response.

2, 1  
cna

ATTACHMENT 2, PG. 1

Mr. Ihor Figlus,

I believe that the Ukrainian court, in considering this [Jaresko's] petition went beyond their own competence as a result of a breach of substantive law and as a result of the use of unfair procedural rights by the plaintiff (the plaintiff, knowing your actual address, deceived the court and did not provide it in order that you could receive due notice of the court action, which resulted in depriving you of your guaranteed rights of defense).

First of all, it should be noted that the court must rule whether such a matter is actually in the jurisdiction of a Court of Ukraine, since the question is about documents for a child who is a citizen of the USA. In establishing its jurisdiction to consider the dispute, the court refers to art. 410 of the Civil Procedural Code of Ukraine and art. 76 of the Law of Ukraine "On International Private Law".

The fallacy of use of this legal basis is as follows:

- "The Constitution of Ukraine has the highest legal authority. Provisions of the Constitution of Ukraine are provisions of direct applicability" (art. 8 of the Constitution of Ukraine);
- "Courts have jurisdiction over all legal relations that arise in the State" (art. 124 of the Constitution of Ukraine);

The subject of the proceedings was the permission to issue travel documents for children who are citizens of the USA. However, these documents cannot be issued by any institution of the government Ukraine. Therefore, the court in Ukraine does not have jurisdiction to consider the matter because of the restrictions specified in art. 124 of the Constitution of Ukraine.

I draw your attention to the fact that the court, having the objective to give the appearance of the legality of its decision, did not note in the ruling that the children are US citizens. In addition, it referred to the Law of Ukraine "On the Procedure for Exit from Ukraine and Entry to Ukraine of citizens of Ukraine" and other subordinate documents governing the departure abroad of citizens of Ukraine. These documents do not regulate issues of exit from Ukraine of citizens (including children) of other countries. These normative references in the court decision are a gross violation of substantive law because the court applied the law of Ukraine, which it could not apply to this matter.

The lawsuit was filed by Jaresko in the Kyiv-Sviatoshynsky District Court of Kyiv region. According to the text of the ruling, the court considered the case using p. 9 of art. 110 of the Civil Procedural Code of Ukraine, which defines the territorial jurisdiction of the court case as follows: "The claims against the defendant, whose registered residence or living place are unknown, are delivered to the location of property of the defendant or to the last known registered place of residence or living place or permanent activity (work)."

In this instance, for the application of p. 9 of art. 110 of the CPC of Ukraine, the court referred to an inquiry to the address and information bureau at the Administration of the Ministry of Internal Affairs of Ukraine on September 5, 2014, that you are not registered as a resident at the village of Lisnyky of the Kyiv-Svyatoshynsky district in Kyiv oblast. The court also referred to a document showing your ownership of a house at the same address.

This means the following:

- a) your address as a defendant in the village of Lisnyky in the Kiev Sviatoshynsky district was noted in the lawsuit by Jaresko. Otherwise, the court could not know about this address;
- b) a document confirming that you own a house at that same address could only have been submitted by Jaresko.

ATTACHMENT 3 Page 1 of 2  
Pg. 1



Ihor Figlus <ifigus@gmail.com>

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## U.S. Passport Application for Daria Figlus

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Prevent, Abduction <PreventAbduction@state.gov>  
To: "IFIGLUS@GMAIL.COM" <IFIGLUS@gmail.com>

Thu, Oct 9, 2014 at 10:07 AM

Dear Mr. Ihor Figlus:

The United States Department of State, Office of Passport Services has received a passport application for Daria. When you enrolled your child into the Children's Passport Issuance Alert Program (CPIAP), we informed you that we would contact you if we received an application for issuance or renewal of a passport for Daria from a domestic passport agency, U.S. Embassy, or a U.S. Consulate. We were recently informed by U.S. Embassy Kyiv that a passport application was executed for Daria by her mother.

You should be aware that it is possible for a passport to be issued to a child under 16 without consent of both parents (or legal guardian), if the applicant can establish that consent of both parents is not required under 22 C.F.R. 51.28. A court order providing the applicant parent or guardian with sole custody of the child, or a court order specifically authorizing the applicant parent or guardian to travel with the child, for example, would allow the Department to issue a passport without the consent of another parent or guardian.

At this time, it appears that the person applying for Daria's passport has presented sufficient evidence to establish sole authority under U.S. law to apply for the child's passport.

Therefore, unless you are able to present evidence that the person applying for a passport for Daria does not have sole authority under U.S. law to do so, it may not be possible to prevent passport issuance to Daria at this point in time. Such evidence may include a court order from a court of competent jurisdiction granting you custodial rights over the child.

Please respond to our office as soon as possible. If we have received no further information from you by close of business **November 7, 2014**, we will issue a passport to Daria. You may send information by e-mail to [PreventAbduction@state.gov](mailto:PreventAbduction@state.gov) or by fax to 202-485-6222.

If you have any questions, please do not hesitate to contact our office at 202-485-6335. Our office hours are Monday through Friday, 9am to 5pm Eastern Standard Time.

ATTACHMENT 4



Ihor Figlus <ifiglus@gmail.com>

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## U.S. Passport Application for Daria Figlus

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Prevent, Abduction <PreventAbduction@state.gov>  
To: "IFIGLUS@GMAIL.COM" <IFIGLUS@gmail.com>

Fri, Oct 24, 2014 at 12:59 PM

Dear Mr. Figlus:

Per your conversation with Mr. Rush Marburg, please provide additional documentation by November 21, 2014. Please send updates and/or information by e-mail to [PreventAbduction@state.gov](mailto:PreventAbduction@state.gov) or by fax to 202-485-6222.

If you have any questions, please do not hesitate to contact our office.

Sincerely,

**Prevention Branch**

Office of Children's Issues

U.S. Department of State

Email: [PreventAbduction@state.gov](mailto:PreventAbduction@state.gov)

Phone: (888) 407-4747

Fax: (202) 485-6222

Website: [travel.state.gov](http://travel.state.gov)

RP

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