

1 PRESTON DuFAUCHARD
California Corporations Commissioner
2 ALAN S. WEINGER
Deputy Commissioner
3 JUDY L. HARTLEY (CA BAR NO. 110628)
Senior Corporations Counsel
4 320 West 4th Street, Ste. 750
Los Angeles, California 90013-2344
5 Telephone: (213) 576-7604 Fax: (213) 576-7181

6 Attorneys for Petitioner

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 COUNTY OF LOS ANGELES

9
10 THE PEOPLE OF THE STATE OF) Case No.: BS129007
CALIFORNIA, BY AND THROUGH THE)
11 CALIFORNIA CORPORATIONS) NOTICE OF APPLICATION AND
COMMISSIONER,) APPLICATION FOR AN ORDER
12) APPOINTING A LIMITED RECEIVER TO
13 Petitioner,) LIQUIDATE AND WIND UP TRUST
14 vs.) ACCOUNT AFFAIRS; MEMORANDUM OF
15 APPLE ESCROW,) POINTS AND AUTHORITIES;
16) DECLARATIONS OF KATHLEEN R.
Respondent.) PARTIN AND PETER A. DAVIDSON
17) Assigned To: Judge Robert H. O'Brien
18)

19 DATE: January 11, 2011
20 TIME: 9:30 a.m.
DEPT: 85

21 Action filed: October 20, 2010

22 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

23 PLEASE TAKE NOTICE THAT on January 11, 2011, at 9:30 a.m. in Department 85 of the
24 Los Angeles County Superior Court, located at 111 N. Hill Street, Los Angeles, California, or as
25 soon thereafter as counsel may be heard, Petitioner, the People of the State of California, by and
26 through the California Corporations Commissioner ("Commissioner" or "Petitioner") will, and
27 hereby does, apply for an Order Appointing a Limited Receiver over the escrow trust property and
28 records of Apple Escrow as more fully described in the Petition filed herewith.

1 This Application is based upon Financial Code section 17636 and other applicable statutes,
2 that Petitioner is entitled to the relief demanded and such relief is necessary to determine the full
3 extent of the trust account claims, to fully identify and locate trust fund claimants, to provide the
4 greatest protection to the escrow customers of Apple Escrow and to properly liquidate and wind up
5 the trust account affairs of Apple Escrow in accord with the provisions of Financial Code sections
6 17635 - 17645 as more particularly described in the Memorandum of Points and Authorities and
7 Declarations filed herewith.

8 This Application is further based upon the Petition, Memorandum of Points and Authorities,
9 the Declarations of Petitioner's special administrator, Kathleen Partin, and the proposed receiver,
10 Peter A. Davidson (and exhibits attached thereto), such further papers as may be filed in support of
11 this Application and the argument of counsel.

12 Dated: October 28, 2010
13 Los Angeles, California

14 PRESTON DuFAUCHARD
15 California Corporations Commissioner

16 By _____
17 JUDY L. HARTLEY
18 Attorney for Petitioner,
19 California Corporations Commissioner
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **1. STATEMENT OF FACTS**

3 Respondent, Apple Escrow (“Apple”), is a California corporation, which had its principal
4 place of business at 13585 Whittier Boulevard, Suite 103, Whittier, California 90605. Apple is an
5 escrow agent licensed by the California Corporations Commissioner ("Commissioner" or
6 "Petitioner"), pursuant to the Escrow Law of the State of California (Section 17000 et seq. of the
7 California Financial Code, hereinafter referred to as the "Escrow Law"). William Campion
8 (“Campion”) is the president and sole shareholder of Apple according to the records of the
9 Department of Corporations (“Department”). At all times relevant herein, Mary Ann Palmer
10 (“Palmer”) was the manager and Veronica Amaya (“Amaya”) was the escrow officer of Apple.
11 (Declaration of Kathleen R. Partin ("Partin"), p. 7, l. 17-27)

12 On or about March 11, 2010, a special examination of the books and records of Apple was
13 commenced by the Commissioner, by and through his staff, after the Department received
14 information on or about March 10, 2010 that a check written against the trust account of Apple had
15 been returned non-sufficient funds. (Partin, p. 7, l. 28 and p. 8, l. 1-5)

16 The special examination revealed that commencing in or about April 2008, and continuing
17 through at least March 9, 2010, Apple, by and through Palmer and Amaya, made unauthorized
18 disbursements of trust funds to Apple to pay the operating expenses of Apple and to repay personal
19 loans of Palmer totaling \$63,808.49 in violation of Financial Code section 17414(a)(1) and
20 California Code of Regulations, title 10, sections 1738 and 1738.2. (Partin, p. 8, l. 5-12)

21 The special examination further revealed that the unauthorized disbursements described
22 above, along with other trust account issues, had caused a shortage of at least \$67,385.36 to exist in
23 the trust account of Apple in violation of California Code of Regulations, title 10, section 1738.1.
24 The Commissioner made several demands on Apple to cure the trust account shortage. However,
25 Apple failed to cure the shortage and continues in its failure to cure the shortage. (Partin, p. 8, l. 13-
26 17)

27 The special examination also disclosed that Apple had not reconciled its trust account since
28 May 31, 2008 in violation of Financial Code section 17404 and California Code of Regulations, title

1 10, section 1732.2. (Partin, p. 8, l. 18-20)

2 On or about April 20, 2010, the Commissioner learned that Comerica Bank had determined
3 to sever its relationship with Apple, and on April 16, 2010 issued cashier's check number
4 200003744 in the amount of \$248,369.12 to Apple Escrow and delivered the cashiers' check to
5 Apple on April 16, 2010 via messenger. As of April 20, 2010, at or about 11:00 a.m., the cashier's
6 check had not been presented to Comerica bank for payment. (Partin, p. 8, l. 21-25)

7 Based upon the findings of the special examination, the Commissioner determined that Apple
8 was conducting its business in such an unsafe, injurious and unauthorized manner so as to render
9 further operations hazardous to the public and to its customers, and that as a result thereof, Apple
10 was unable to meet the demands of persons beneficially interested in the escrow trust account. .
11 (Partin, p. 8, l. 26-28 and p. 9, l. 1)

12 To protect the public and the customers of Apple from such practices, the Commissioner on
13 April 20, 2010, issued an Order to Discontinue Escrow Activities Pursuant to Financial Code Section
14 17415 to Apple along with a Demand For and Order Taking Possession of the Property and Business
15 pursuant to Financial Code Section 17621 and an Order Appointing Conservator pursuant to
16 Financial Code Section 17630. These Orders were personally served on Apple on April 21, 2010.
17 (Partin, p. 8, l. 2-9)

18 Pursuant to the Order Appointing Conservator, Peter A. Davidson of the Law Firm of Ervin
19 Cohen & Jessup LLP ("Conservator") took possession of the property, business and assets of Apple
20 on April 21, 2010. The Conservator remains in possession of the trust account, which has
21 \$18,655.39 on deposit, and the banking and escrow records of Apple to the extent such records of
22 Apple has been identified. (Partin, p. 9, l. 10-13 and Declaration of Peter A. Davidson
23 ("Davidson"), p. 11, l. 11-21 and p. 12, l. 18-21)

24 Immediately upon appointment, the Conservator commenced an extensive review of the
25 books and records of Apple. The review was further complicated when numerous escrow parties
26 contacted the Conservator regarding recent funds they had deposited with Apple, which had not been
27 posted to the ledgers by Apple and had been deposited directly into the general account and used for
28 operating expenses. The Conservator's review of the books and records to date discloses that there

1 is a shortage in the trust account of at least \$120,338.59, but possibly as much as \$341,338.59, as
2 further persons have recently come forward complaining of a misappropriated escrow deposit, which
3 involved a missing escrow file. (Davidson, p. 12, l. 16-28 and p. 13, l. 1-6)

4 After appointment, the Conservator was able to recover \$44,545.94 from a certificate of
5 deposit that had been posted by Apple in lieu of a surety bond. As of September 30, 2010, the
6 expenses incurred in the Conservatorship exceeded the recovered CD funds by more than
7 \$17,000.00. (Davidson, p. 12, l. 3-6)

8 While the Conservator has filed a Proof of Loss Claim with Escrow Agent's Fidelity
9 Corporation, the fidelity insurer for the independent escrow industry, there remains much additional
10 work that needs to be accomplished before this matter can be concluded, including dealing with and
11 possibly negotiating with Escrow Agent's Fidelity Corporation concerning the Proof of Loss,
12 settling or possibly litigating the Proof of Loss Claim, reviewing escrow files to determine to whom
13 the funds are owed, disbursing any recovered funds, and making arrangements for the maintenance
14 of the escrow files for the required statutory period. (Davidson, p. 13, l. 11-17)

15 On October 19, 2010, in furtherance of limiting the expenses to be incurred in this matter, the
16 Commissioner amended the conservatorship order to return possession of Apple to Campion and/or
17 Palmer except for the escrow agent's license, the remaining trust funds, and the banking and escrow
18 records. (Partin, p. 10, l. 5-8)

19 **2. THIS PETITION FOR APPOINTMENT OF A RECEIVER IS AUTHORIZED**
20 **UNDER CODE OF CIVIL PROCEDURE SECTION 564 AND FINANCIAL CODE**
21 **SECTION 17336**

22 Code of Civil Procedure section 564 provides in pertinent part as follows:

23 A receiver may be appointed, in the manner provided in this chapter,
24 by the court in which an action or proceeding is pending in any case in
25 which such court is empowered by law to appoint a receiver . . .

26 Financial Code section 17636 provides for the appointment of a receiver for an escrow agent
27 as follows:

28 Whenever the commissioner has taken possession of the property and
business of a licensee he may petition the superior court for the appointment
of a receiver to liquidate the affairs of the licensee.

1 This is a proper case for petitioning the court for a receiver over Apple as Petitioner has
2 taken possession of the property and business of Apple, and retains such possession as it relates to its
3 trust account affairs.

4 **3. PETITIONER HAS FULFILLED ALL THE STATUTORY REQUIREMENTS FOR**
5 **THE APPOINTMENT OF A RECEIVER**

6 Based upon the findings of the special examination; i.e., that Apple had made unauthorized
7 disbursements from the trust account and had a trust account shortage, Petitioner determined that
8 Apple was conducting its business in such an unsafe, injurious and unauthorized manner so as to
9 render further operations hazardous to the public and to its customers, and that as a result thereof,
10 Apple was unable to meet the demands of persons beneficially interested in the escrow trust account.
11 To protect the public and the customers of Apple from such practices, Petitioner, on April 20, 2010,
12 issued an Order to Discontinue Escrow Activities Pursuant to Financial Code Section 17415 to
13 Apple along with a Demand For and Order Taking Possession of the Property and Business pursuant
14 to Financial Code Section 17621 and an Order Appointing Conservator pursuant to Financial Code
15 Section 17630. These Orders were personally served on Apple on April 21, 2010. (Partin, p. 8, l.
16 26-28 and p. 9, l. 1-9)

17 As set forth in Section 2 above, Financial Code section 17636 establishes taking possession
18 of the property and business of the licensee as the only prerequisite to a petition for appointment of a
19 receiver to liquidate the affairs of a licensee. This taking occurred on April 21, 2010. (Partin, p. 9, l.
20 2-13) Pursuant to Financial Code section 17622, Apple had ten (10) days after the taking to apply
21 to the superior court for an order to enjoin further proceedings by Petitioner. The ten days provided
22 by Financial Code section 17622 has expired, and there has been no action commenced by Apple to
23 contest the actions of Petitioner described above. (Partin, p. 9, l. 8-9) Thus, Petitioner has met the
24 statutory requirements for seeking the appointment of a receiver.

25 **4. A RECEIVERSHIP IS NECESSARY TO PROTECT APPLE'S CUSTOMERS AND**
26 **TO ADEQUATELY DISPOSE OF APPLE'S TRUST AFFAIRS**

27 The special examination of Apple's books and records along with the follow up conducted by
28 the Conservator revealed a trust account shortage of at least \$120,838.59, but possibly as high as

1 \$341,838.59. (Partin, p. 9, l. 19-22 and Davidson, p. 12, l. 22-28 and p. 13, l. 1-10) The extensive
2 review that has been conducted by the Conservator in order to prepare a tentative trust account
3 reconciliation and thereafter file a Proof of Loss Claim with Escrow Agent's Fidelity Corporation
4 ("EAFC"), the industry's fidelity insurer, has exhausted all monies available to pursue this matter to
5 a conclusion. In order to conclude this matter, the Proof of Loss Claim must be dealt with, which
6 include providing further documentation to EAFC, and possibly negotiating with EAFC concerning
7 the Proof of Loss, settling or possibly litigating the Proof of Loss Claim. Upon receipt of monies
8 from EAFC, whether through settlement or otherwise, the pertinent escrow files must be reviewed to
9 determine to whom the funds are owed, the recovered funds must be disbursed, and arrangements
10 made for maintenance of the escrow files for the required statutory period. (Davidson, p. 13, l. 11-
11 23)

12 Petitioner is unaware that any assets of Apple exist with which to continue to pursue the
13 avenues necessary to wind up the trust account affairs of Apple or bring about any relief to the trust
14 fund claimants. This lack of assets can be best addressed through a receivership as a receivership
15 provides more avenues of funding to pursue the measures necessary to protect the customers of
16 Apple. Through a receivership, the Court is empowered to authorize the payment of expenses
17 incurred on behalf of the estate from existing trust funds. (Partin, p. 10, l. 9-14)

18 Moreover, a receivership would provide a formal claims process which would allow a
19 "flushing out" of the trust liabilities, and by establishing a deadline for claims filing, bring a final
20 resolution to all liabilities. (Partin, p. 10, l. 15-18)

21 In light of the above, Petitioner submits that this Court's appointment of a limited receiver
22 over Apple to properly liquidate its trust account affairs and to provide the greatest protection to
23 Apple's customers is mandated by the current state of affairs surrounding Apple as enumerated
24 above. An emergency exists and the public will suffer irreparable harm unless and until a receiver is
25 appointed over Apple in order to wind up and liquidate its escrow trust affairs. (Partin, p. 10, l. 19-
26 23)

27 **5. CONCLUSION**

28 For the reasons stated herein, and based on the statutory authority quoted, Petitioner

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respectfully requests this Court enter an Order granting the relief requested in the Petition filed
herewith.

Dated: October 28, 2010
Los Angeles, California

Respectfully Submitted,

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
JUDY L. HARTLEY
Attorney for Petitioner,
California Corporations Commissioner

1 Corporation (“EAFC”), the fidelity insurer for the independent escrow industry, that a check written
2 against the Apple trust account had been returned non-sufficient funds. I immediately made a
3 request to the Department’s regulatory staff to commence a special examination of Apple to
4 determine the status of the trust account and whether any shortage existed, and if so, what was the
5 cause. The special examination was commenced on March 11, 2010. I have reviewed the reports
6 prepared by Corporations Examiner Camtu Tran regarding the Department’s findings of the March
7 11, 2010 special examination.

8 6. The special examination revealed that commencing in or about April 2008, and
9 continuing through at least March 9, 2010, Apple, by and through Palmer and Amaya, made
10 unauthorized disbursements of trust funds to Apple to pay the operating expenses of Apple and to
11 repay personal loans of Palmer totaling \$63,808.49 in violation of Financial Code section
12 17414(a)(1) and California Code of Regulations, title 10, sections 1738 and 1738.2.

13 7. The special examination further revealed that the unauthorized disbursements
14 described in paragraph 6 above, along with other trust account issues, had caused a shortage of at
15 least \$67,385.36 to exist in the trust account of Apple in violation of California Code of Regulations,
16 title 10, section 1738.1. The Commissioner made several demands on Apple to cure the trust
17 account shortage. However, Apple failed to cure the shortage and continues in its failure to cure the
18 shortage.

19 8. The special examination also disclosed that Apple had not reconciled its trust account
20 since May 31, 2008 in violation of Financial Code section 17404 and California Code of
21 Regulations, title 10, section 1732.2.

22 9. On or about April 20, 2010, the Commissioner learned that Comerica Bank had
23 determined to sever its relationship with Apple, and on April 16, 2010 issued cashier’s check
24 number 200003744 in the amount of \$248,369.12 to Apple Escrow and delivered the cashier’s check
25 to Apple on April 16, 2010 via messenger. As of April 20, 2010, at or about 11:00 a.m., the
26 cashier’s check had not been presented to Comerica bank for payment.

27 10. Based upon the findings of the special examination, the Commissioner determined
28 that Apple was conducting its business in such an unsafe, injurious and unauthorized manner so as to

1 render further operations hazardous to the public and to its customers, and that as a result thereof,
2 Apple was unable to meet the demands of persons beneficially interested in the escrow trust account.

3 10. To protect the public and the customers of Apple from such practices, the
4 Commissioner on April 20, 2010, issued an Order to Discontinue Escrow Activities Pursuant to
5 Financial Code Section 17415 to Apple along with a Demand For and Order Taking Possession of
6 the Property and Business pursuant to Financial Code Section 17621 and an Order Appointing
7 Conservator pursuant to Financial Code Section 17630. These Orders were personally served on
8 Apple on April 21, 2010. A true and correct copy of these Orders along with the proof of service is
9 attached and incorporated to this Application as Exhibit B. Apple has never contested the
10 Department's actions in taking possession and appointing a conservator over the company.

11 13. Pursuant to the Order Appointing Conservator, Peter A. Davidson of the law firm of
12 Ervin Cohen & Jessup LLP took possession of the business and property of Apple on April 21, 2010.
13 The Conservator remains in possession of the trust account, which has \$18,655.39 on deposit, and
14 the banking and escrow records of Apple to the extent such records of Apple has been identified.

15 14. I have reviewed the progress memorandum prepared by the Conservator.
16 Immediately upon appointment, the Conservator commenced an extensive review of the available
17 books and records of Apple. The review was further complicated when numerous escrow parties
18 contacted the Conservator regarding recent funds they had deposited with Apple, which had not been
19 posted to the ledgers by Apple and had been deposited directly into the general account and used for
20 operating expenses. The Conservator's review of the books and records to date discloses that there
21 is a shortage in the trust account of at least \$120,338.59, but possibly as much as \$341,338.59, as
22 further persons have recently come forward complaining of a misappropriated escrow deposit, which
23 involved a missing escrow file.

24 15. After appointment, the Conservator was able to recover \$44,545.94 from a certificate
25 of deposit that had been posted by Apple in lieu of a surety bond. As of September 30, 2010, the
26 expenses incurred in the Conservatorship exceeded the recovered CD funds by more than
27 \$17,000.00.

28 16. While the Conservator has filed a Proof of Loss Claim with EAFC, there remains

1 much additional work that needs to be accomplished before this matter can be concluded, including
2 dealing with and possibly negotiating with EAFC concerning the Proof of Loss, settling or possibly
3 litigating the Proof of Loss Claim, reviewing escrow files to determine to whom the funds are owed,
4 disbursing any recovered funds, and making arrangements for the maintenance of the escrow files
5 for the required statutory period.

6 17. On October 19, 2010, in furtherance of limiting the expenses to be incurred in this
7 matter, the Commissioner amended the conservatorship order to return possession of Apple to
8 Campion and/or Palmer except for the escrow agent's license, the remaining trust funds, and the
9 banking and escrow records.

10 18. The Department is unaware that any assets of Apple exist with which to continue to
11 pursue the avenues necessary to wind up the trust account affairs of Apple or bring about any relief
12 to the trust fund claimants. This lack of assets can be best addressed through a receivership as a
13 receivership provides more avenues of funding to pursue the measures necessary to protect the
14 customers of Apple. Through a receivership, the Court is empowered to authorize the payment of
15 expenses incurred on behalf of the estate from existing trust funds.

16 19. Additionally, the formal claims process which would occur via a receivership to
17 liquidate and wind up the trust account affairs of Apple would allow a "flushing out" of the trust
18 liabilities, and by establishing a deadline for claims filing, bring a final resolution to all trust
19 liabilities.

20 20. For the reasons stated above, the Commissioner has concluded that it is necessary to
21 place Apple into a limited receivership to properly liquidate its trust account affairs and to provide
22 the greatest protection to Apple's customers. An emergency exists and the public will suffer
23 irreparable harm unless and until a receiver is appointed over Apple in order to wind up and
24 liquidate its escrow trust affairs.

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed this ___ day of October, 2010 at Los Angeles, California.

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28 _____
KATHLEEN R. PARTIN

1 5. Over the next few weeks, I fielded telephone calls from parties to escrows concerning
2 missing funds and escrow records. I was also able to recover \$44,545.94 from a certificate of
3 deposit that had been posted by Apple in lieu of a fidelity bond. After I was able to retrieve all the
4 records from Apple's offices, the premises were returned to Palmer.

5 6. At the time of my appointment, \$248,369.12 existed in Apple Escrow's trust account,
6 which was in the form of a cashier's check issued by Comerica Bank to Apple. After consulting
7 with counsel for the Commissioner, \$229,713.73 of those funds earmarked for a specific escrow, and
8 deposited to the trust account subsequent to the cessation of unauthorized disbursements, were
9 transferred to Complete Escrow so that the specific escrow could close. Even that sum was not
10 sufficient to close the sale, but the brokers agreed to delay receiving part of their commissions so the
11 escrow could close. The brokers eventually received an assignment from the seller of the seller's
12 claim to funds that will eventually, hopefully, be distributed to make up for their agreement to
13 reduce their commissions.

14 7. My accountants proceeded over the next few months to attempt to reconcile Apple's
15 books so that a Proof of Loss could be filed with the Escrow Agents Fidelity Corporation, the
16 fidelity insurer for the independent escrow industry. This proved to be very difficult given the lack
17 of certain records maintained by Apple and the fact that a number of escrow files were missing. A
18 number of requests were made to Apple's bank for bank records and cancelled checks, which were
19 eventually received and provided to the accountants.

20 8. A tentative reconciliation was finally prepared, although there are still a number of
21 escrow files that are missing. The reconciliation indicates a loss (trust account shortage) of
22 \$120,338.59. Prior to the completion of the reconciliation, I was contacted by an accountant on
23 behalf of Maria and Valentine Calderon concerning Apple escrows numbers 9595 and 9559. The
24 Calderons asserted that they had deposited \$260,000.00 with Apple and that the funds were
25 misappropriated. I spent significant time exploring the Calderons' claims, including writing and
26 obtaining copies of cancelled checks from Apple's bank. Apple escrow file 9595 is missing or never
27 existed. I was able to determine that \$39,000.00 of the \$260,000.00 deposit was transferred from
28 Apple escrow number 9595 to Apple escrow number 9559 so that Apple escrow number 9559 could

1 close for the benefit of the Calderons. That results in a reduced claim by the Calderons of
2 \$221,000.00. The other transfers of the funds from Apple Escrow number 9595 appeared to have
3 gone either to Apple, to Helen Hinojos, the Calderons' loan broker (and possibly a relative), and
4 \$25,000.00 to the Calderons' son. An investigation into this escrow continues.

5 9. I finalized the Proof of Loss, which was submitted to the Escrow Agents Fidelity
6 Corporation on October 11, 2010. The Proof of Loss Claim seeks recovery of the \$120,838.59
7 shown in my reconciliation of the Apple trust account, and the \$221,000.00 missing from Apple
8 escrow number 9595.

9 10. Additional work needs to be accomplished before this matter can be concluded and
10 includes dealing with and possibly negotiating with the Escrow Agents Fidelity Corporation
11 concerning the Proof of Loss, settling or litigating the Proof of Loss, and obtaining whatever funds
12 can be obtained from the Escrow Agents Fidelity Corporation. I also still need to review the escrow
13 files to determine exactly to whom any funds recovered should be disbursed. Once that
14 determination is made, then the funds have to be disbursed; and arrangements will have to be made
15 to deal with the Apple escrow files which need to be maintained for five years.

16 11. I currently am holding \$22,928.85. Of that sum, \$18,655.39 is trust funds and
17 \$4,273.41 in remaining funds from the certificate of deposit posted by Apple. I am currently owed
18 \$4,153.90 as of September 30, 2010. My field agent is owed \$454.50, and my accountants are owed
19 \$16,763.95 as of August 30, 2010. There are, therefore, insufficient funds in the conservatorship to
20 pay administrative expenses and the conservatorship needs to be transformed into a receivership in
21 order to bring this matter to a conclusion.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed this ____
23 day of October 2010, at Beverly Hills, California.

24 _____
25 PETER A. DAVIDSON
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