

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

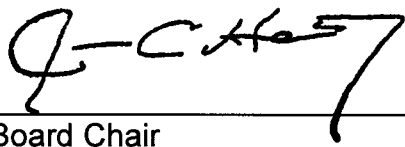
OFFICE OF DISCIPLINARY COUNSEL	:	No. 77 DB 2020
Petitioner	:	
	:	
v.	:	Attorney Registration No. 86875
	:	
WILLIAM CRAIG PENGLASE	:	
Respondent	:	(Bucks County)

ORDER

AND NOW, this 5th day of June, 2020, in accordance with Rule 215(g), Pa.R.D.E., the three-member Panel of the Disciplinary Board having reviewed and approved the Joint Petition in Support of Discipline on Consent filed in the above captioned matter; it is

ORDERED that the said WILLIAM CRAIG PENGLASE be subjected to a **PUBLIC REPRIMAND** by the Disciplinary Board of the Supreme Court of Pennsylvania as provided in Rule 204(a) and Rule 205(c)(9) of the Pennsylvania Rules of Disciplinary Enforcement.

BY THE BOARD:


Board Chair

TRUE COPY FROM RECORD

Attest:



Marcee D. Sloan
Board Prothonotary
The Disciplinary Board of the
Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	No. 77	DB 2020
Petitioner	:		
v.	:		
	:	Attorney Reg. No. 86875	
WILLIAM CRAIG PENGLASE,	:		
Respondent	:	(Bucks County)	

**JOINT PETITION IN SUPPORT
OF DISCIPLINE ON CONSENT
PURSUANT TO Pa.R.D.E. 215(d)**

Petitioner, the Office of Disciplinary Counsel (hereinafter, “ODC”) by Thomas J. Farrell, Chief Disciplinary Counsel, and Harold E. Ciampoli, Jr., Disciplinary Counsel and William Craig Penglase, Esquire (hereinafter “Respondent”), through his attorneys, Marc Robert Steinberg, Esquire and William J. Honig, Esquire, respectfully petition the Disciplinary Board in support of discipline on consent, pursuant to Pennsylvania Rule of Disciplinary Enforcement (“Pa.R.D.E.”) 215(d), and in support thereof state:

1. ODC, whose principal office is situated at Office of Chief Disciplinary Counsel, Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, Pennsylvania 17106, is invested, pursuant to Pa.R.D.E. 207, with the power and duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of the aforesaid Enforcement Rules.

FILED

05/27/2020

**The Disciplinary Board of the
Supreme Court of Pennsylvania**

2. Respondent was born on July 13, 1974, and was admitted to practice law in the Commonwealth on April 17, 2001. His registered public address is Penglase & Benson, Inc., 18 N. Main Street, Suite 100, Doylestown, Pennsylvania 18901. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.

SPECIFIC FACTUAL ALLEGATIONS ADMITTED

3. On July 14, 2017, Sean Kratz was arrested in connection with the deaths of Dean Finocchiaro, Thomas Meo and Mark Sturgis.

4. The disappearance of the three young men, and subsequent discovery of their bodies murdered, burnt and buried on a Bucks County farm, was the subject of extensive media reporting throughout the Philadelphia region.

5. Cosmo DiNardo, the son of the wealthy owners of the farm, was the first person to be arrested and charged.

6. Mr. Kratz, Mr. DiNardo's cousin, was arrested shortly thereafter.

7. Respondent was appointed on August 9, 2017 to represent Mr. Kratz throughout the *Commonwealth of Pennsylvania v. Kratz* matter, in the Court of Common Pleas of Bucks County.

8. Niels Eriksen, Esquire was appointed Respondent's co-counsel and handled the death-penalty aspect of Mr. Kratz's case.

9. On November 27, 2017, an information was filed against Mr. Kratz charging him with first degree criminal homicide and related charges

10. On April 16, 2018, Mr. Eriksen met with District Attorney Matt Weintraub and

came to a general agreement that Mr. Kratz would plead guilty to one count of 3rd degree murder.

11. Mr. Eriksen communicated the general terms to Respondent and it was agreed that Respondent would handle the client acceptance and further conditions of the agreement.

12. After several discussions, a plea agreement was reached on April 23, 2018 between Respondent and First Assistant District Attorney Gregg Shore wherein the Commonwealth agreed to recommend a sentence of 59-118 years of incarceration for a plea to 3rd degree murder and related offenses.

13. After meeting with Mr. Kratz and his mother, Respondent communicated to Mr. Shore that Mr. Kratz had accepted the terms of the offer and wanted to proceed the next day with an interview under the terms of the agreement.

14. On April 25, 2018, Respondent and Mr. Kratz participated in a recorded police interview at the Bucks County Detective's office. This was a requirement of the plea agreement and included a waiver of rights pursuant to Pennsylvania Rule of Evidence 410.

15. Mr. Kratz gave a videotaped statement in which he detailed his involvement in the homicides including admitting to shooting Mr. Finocchiaro in the back of the head.

16. Mr. Kratz was scheduled to formally enter into the negotiated guilty plea on May 16, 2018.

17. On April 26, 2018, the District Attorney's office provided Mr. Eriksen a CD containing the video of Mr. Kratz's April 25, 2018 confession.

18. On May 10, 2018, Respondent:

- a) requested, and received from Mr. Eriksen, the April 25, 2018 CD;
- b) conducted an interview with reporter Deanna Durante at NBC 10 News in

which he discussed the pending guilty plea agreement of Mr. Kratz and provided her recorded video interviews of Mr. Kratz and Mr. DiNardo.

19. Respondent talked to and provided the interviews to Ms. Durante without Mr. Kratz's explicit permission, knowledge or consent but Respondent believed he had Mr. Kratz's tacit consent and approval for meeting with Ms. Durante.

20. On the morning of May 16, 2018, Mr. DiNardo entered his guilty plea, knowing at the time that Mr. Kratz had signed a plea agreement.

21. On May 16, 2018, at some time prior to his scheduled guilty plea, Mr. Kratz communicated to Mr. Eriksen and Respondent that he did not wish to plead guilty and wanted to proceed to trial.

22. In late afternoon, after it was clear that Mr. Kratz did not wish to plead guilty, Mr. Eriksen observed Respondent texting on his phone in the courtroom.

23. Mr. Eriksen questioned what was happening, and Respondent advised him that Respondent was contacting NBC 10 so that they didn't release a video interview that Respondent made with NBC 10 discussing the Kratz guilty plea deal.

24. On May 16, 2018, at 4:30 p.m., NBC 10 broadcasted the interviews of Mr. Kratz and Mr. DiNardo that Respondent had provided to Ms. Durante.

25. The broadcasted interview included a portion wherein Mr. Kratz admitted to shooting one of the victims in the head.

26. Additionally, NBC 10 aired audio relating to numerous statements Mr. DiNardo made.

27. Fox 29 also aired a story that broadcasted the interviews of Mr. Kratz and Mr. DiNardo.

28. The tapes Respondent provided NBC 10 were also posted on its website.

29. At around 5:00 p.m. on May 16, 2018, while still in the courtroom, Mr. Eriksen was approached by a newspaper reporter who solicited his comments regarding the tapes currently being played on NBC 10.

30. Since Respondent had not informed Mr. Eriksen of Respondent's contact with Ms. Durante, he was unaware what the reporter was talking about; this was the first time Mr. Eriksen learned that the tapes had been released to the media.

31. After talking to the reporter, Mr. Eriksen immediately contacted Respondent and inquired about the tapes being broadcasted on NBC10.

32. Respondent initially told Mr. Eriksen that there was a rumor that people in Philadelphia were passing around an email with the tapes attached to them.

33. Later in the evening of May 16th, Respondent admitted to Mr. Shore and to Mr. Eriksen that it was Respondent who had released the tapes to the media.

34. On May 17, 2018 Respondent:

- a) attended a meeting with Mr. Eriksen, Mr. Shore, and Administrative Criminal Judge Wallace H. Bateman in Judge Bateman's chambers where Respondent apologized for releasing the tapes to the media and agreed that a conflict of interest existed necessitating his removal as counsel for Mr. Kratz;
- b) went to the Bucks County Prison and met with Mr. Kratz about Respondent's imminent removal from Mr. Kratz's case; and
- c) prepared a petition alleging, *inter alia* that "[a] potential conflict of interest now exists between the Defendant and Penglase, such that continued representation of the Defendant by Penglase neither serves the best interest of

the Defendant nor the interest of Justice” and that “[t]he Defendant, as indicated by his signature below, is in agreement that a potential conflict of interest now exists with Penglase and that he further wishes alternate counsel to be appointed by the Court.”

35. On the evening of May 17, 2018, Mr. Eriksen had a phone conversation with Mr. Kratz’s mother who advised Mr. Eriksen that based on her conversations with her son earlier that day her understanding was that Respondent had only advised Mr. Kratz that he had been removed from the case “because of all the media attention” in the case.

36. On May 18, 2018:

- a) At a meeting with trial Judge Jeffrey L. Finley and Mr. Eriksen, Mr. Shore expressed concern that Respondent had not communicated to Mr. Kratz the exact reason for his removal;
- b) Judge Finley instructed Mr. Eriksen and attorney Keith Williams to meet Respondent at the prison and verify that Respondent communicated to Mr. Kratz that Respondent’s removal was because he released the tapes to the media; and
- c) Respondent met with Mr. Kratz and Mr. Kratz’s court-appointed attorneys at the Bucks County Prison and communicated to Mr. Kratz that Respondent “released the tapes to the media because [he] felt it was important to get [Mr. Kratz’s] side of the story out there, and that has caused a conflict of interest in this case.”

37. By Order dated May 18, 2018, Judge Finley vacated Respondent’s court appointment and appointed Mr. Williams as Mr. Kratz’s replacement conflict counsel. On that

date, Mr. Shore reported the matter to ODC.

38. The release of the tapes had no effect on Mr. Kratz's decision or ability to change his proposed plea from guilty to not guilty on May 16, 2018.

39. Mr. Kratz's April 25, 2018 statement was important to the defense argument that Mr. Kratz was under the influence of, and manipulated by, Mr. DiNardo and significant in effectuating a plea deal for 3rd degree murder and a negotiated sentence of 59-118 years. However, it was devastating from the standpoint of asserting actual innocence at a trial.

40. Following Mr. Kratz's decision to not plead guilty and assert his innocence by proceeding to trial, the release of the tapes clearly impacted his case going forward.

41. Mr. Kratz felt betrayed, resulting in significant trust issues between Mr. Kratz and court-appointed counsel, which made communication and advice difficult between Mr. Kratz and any of his court-appointed attorneys.

42. As a result of not trusting court-appointed attorneys, Mr. Kratz hired private counsel A. Charles Peruto, Jr. on October 29, 2018.

43. The release of the tapes significantly impacted trial strategy going forward after May 16, 2018, and led to numerous complex pre-trial and trial issues in the case that included attempts to suppress the April 25, 2018 statement of Mr. Kratz.

44. The trial was conducted between November 6, 2019 and November 13, 2019 and the jury found Mr. Kratz guilty of all charges.

45. On November 18, 2019, Mr. Kratz was sentenced to life in prison without parole with a consecutive 18-36 years.

46. An appeal to the Superior Court is presently pending.

SPECIFIC RULES OF PROFESSIONAL CONDUCT VIOLATED

47. By his conduct as alleged in Paragraphs 3 through 46 above, Respondent violated the following Rules of Professional Conduct:

- A. RPC 1.1, which states that a lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.;
- B. RPC 1.2(a), which states that a lawyer shall abide by a client's decisions concerning the objectives of representation and, as required by Rule 1.4, shall consult with client as to the means by which they are to be pursued;
- C. RPC 1.4(a)(2), which states that a lawyer shall reasonably consult with the client about the means by which the client's objectives are to be accomplished;
- D. RPC 1.6(a), which states that a lawyer shall not reveal information relating to representation of a client unless the client gives informed consent; and
- E. RPC 3.6(a), which states that a lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably should know will be disseminated by means of public communication and will have a substantial likelihood of materially prejudging an adjudicative proceeding in the matter; and
- F. RPC 8.4(d), which states that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice.

SPECIFIC RECOMMENDATION FOR DISCIPLINE

48. Petitioner and Respondent jointly recommend that the appropriate discipline for Respondent's admitted misconduct is a public reprimand.

49. Respondent hereby consents to that discipline being imposed upon him. Attached to this Petition is Respondent's executed Affidavit required by Rule Pa.R.D.E. 215(d), stating that he consents to the recommended discipline and including the mandatory acknowledgements contained in Rule 215(d)(1) through (4), Pa.R.D.E.

50. In support of Petitioner and Respondent's joint recommendation, it is respectfully submitted that the following mitigating circumstances are present:

- a) Respondent has admitted engaging in misconduct and violating the charged Rules of Professional Conduct;
- b) Respondent has cooperated with Petitioner in connection with this Petition, as evidenced by Respondent's admissions herein and his consent to receiving a public reprimand;
- c) Respondent is remorseful for his misconduct and understands he should be disciplined, as evidenced by his consent to receiving a public reprimand; and
- d) Respondent has practiced law for over nineteen years and has no record of discipline.

51. The parties agree that a public reprimand is appropriate.

Respondent has committed misconduct in this case in connection with his underlying representation of Mr. Kratz. Respondent's decision to conduct an interview with the news media and provide the recorded video confession of Mr. Kratz without adequately obtaining Mr. Kratz's informed consent and prior to Mr. Kratz's scheduled guilty plea implicated the Rules of

Professional Conduct pertaining to competence, communication, confidentiality and the administration of justice. At the time of Respondent's interview with Ms. Durante, Respondent believed that the taped confession of Mr. Kratz would not be made public until **after** the guilty plea. However, Respondent now concedes that such belief was imprudent and irresponsible. Respondent did not properly take into consideration the possibility that, as actually occurred, Mr. Kratz would change his mind about pleading guilty; the tapes would be disseminated to the public; and the ultimate result would be the potential that Mr. Kratz's criminal trial proceeding was materially prejudiced. Additionally, although Respondent believed he was acting in Mr. Kratz's best interest, prior to meeting with the media and providing a reporter with his client's taped confession it was incumbent upon Respondent to **specifically** consult with Mr. Kratz and obtain Mr. Kratz's informed consent regarding Respondent's plan to have Mr. Kratz's confession broadcasted to the public simultaneous to Mr. Kratz's formal guilty plea.

Respondent's misconduct also prejudiced the proper administration of justice in a matter with significant personal and public effect. The release of the tapes had no effect on Mr. Kratz's decision¹ or ability to change his proposed plea from guilty to not guilty on May 16, 2018. However, although Mr. Kratz's April 25, 2018 statement was significant in effectuating a plea deal for 3rd degree murder and a negotiated sentence of 59-118 years, it was devastating from the standpoint of asserting actual innocence at a trial. Following Mr. Kratz's decision to not plead guilty and assert his innocence by proceeding to trial, the release of the tapes certainly impacted his case and trial strategy going forward after May 16, 2018. It led to numerous complex pre-trial and trial issues in the case that included attempts to suppress the April 25, 2018 statement of Mr. Kratz.

¹ The decision having been made prior to the release of the tapes to the public.

After review of prior Pennsylvania disciplinary cases, the parties have been unable to find a case with similar factual circumstances to Respondent's matter. However, the recent decision by the Supreme Court in the case of *Office of Disciplinary Counsel v. Cynthia A. Baldwin*, No. 151 DB 2017(2020) supports the imposition of a public reprimand in this matter.

In *Baldwin*, the Court directed that Baldwin be subject to a public reprimand. Similar to Respondent's case, *Baldwin* involved a high profile case subject to intense public scrutiny and concerned the breach of Rules of Professional Conduct pertaining to competency, client confidences and proper administration of justice. Baldwin failed in her responsibilities to three clients by undertaking their representations in a grand jury proceeding implicating criminal law in which she had no prior experience and without consulting with experienced counsel to guide or advise her. She failed to prepare herself or her clients for their grand jury testimony and failed to conduct any proper investigation into potential conflicts of interests between her clients before accepting the multiple representations. In her grand jury testimony, she impermissibly revealed many client confidences, which in turn led to criminal charges being filed against her clients. The Court found that Baldwin's unblemished disciplinary record in over twenty years was offset by her lack of remorse for her actions.

In this case the parties agree that a suspension of Respondent's law license is not warranted. Similar to Baldwin, Respondent doesn't pose a danger to the public or profession because his misconduct in this case was aberrational and very unlikely to re-occur. Respondent's misconduct does not reflect dishonesty in the practice of law and he has had an unblemished disciplinary record in over nineteen years of practice. Unlike Baldwin, Respondent has expressed

remorse and acceptance of his wrongdoing as evidenced by his entering into this consent petition.

In connection with ODC's investigation, Respondent has received the support of a number of well-respected members of the legal community, including the District Attorney of Bucks County, Matthew Weintraub, Deputy District Attorney Mary Kate Kohler, Deputy District Attorney Jennifer Schorn, Hilltown Township Police Detective Lewis R. Bell, Louis R. Busicio, Esquire, John J. Fiorvanti, Esquire, President of the Bucks County Bar Association, Daniel M. Kean, Esquire and retired Bucks County Deputy Sheriff John T. Milory.

Respondent's conduct was clearly aberrational as demonstrated by the character letters written in support of him by a number of well-respected members of the legal community, including one from the District Attorney of Bucks County, Matthew Weintraub. Mr. Weintraub has known Respondent for twenty years, and has personally handled case with, and against him. He writes that Respondent is "honest, trustworthy and a zealous, competent advocate for his clients." He goes on to opine, "My long standing relationship with Mr. Penglase makes me believe his actions in this matter were an aberration rather than a pattern." Assistant District Attorney Mary Kate Kohler, who was directly involved in the prosecution of the **Kratz** case, wrote glowingly about Respondent, describing him with phrases like "hard worker," "professional," "formidable" and a "strong advocate." She shares, "One of the many things I admire about the way Mr. Penglase conducts business is that you can always trust his word; when he tells you that he is going to do something , you can take it to the bank. He is not a slick car salesman type of lawyer who you have to worry about doing 'shady' or underhanded things and you don't ever have to worry about him misleading the Court, as he takes his duty of candor to the tribunal very seriously." She closes with the following, "Mr. Penglase's conduct

throughout that case and many others are why he is such a valuable asset to the Defense Bar of Bucks County. He is a skilled, hardworking and upstanding attorney who makes the system run the way it should. I hope to be able to continue trying cases against him because I believe in the system and I think it only works well when talented and ethical people are involved on both sides.” It is important to note again, that Ms. Kohler was one of the lead prosecutors in the **Kratz** case. There are several other well-respected people who have shared their opinions of Respondent. All indicate that this has been a solitary lapse in his character. They describe him as honest, trustworthy, competent, and a zealous advocate in support of his clients. They all make reference to his integrity.

Respondent’s transgressions were significant in this case. But considering the mitigating factors, apparent aberrational nature of the misconduct, and the lack of aggravation, a public reprimand sufficiently serves to protect the public, preserve the integrity of the courts and deter future unethical conduct.

WHEREFORE, Petitioner and Respondent respectfully request that, pursuant to Pennsylvania Rules of Disciplinary Enforcement 215(e), 215(g) and 215(i), a three member panel of the Disciplinary Board review and approve the Joint Petition in Support of Discipline on Consent.

Respectfully submitted,
OFFICE OF DISCIPLINARY COUNSEL
THOMAS J. FARRELL, Esquire
Attorney Registration No. 20955,
Chief Disciplinary Counsel



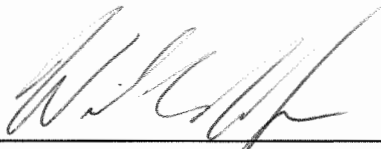
May 26, 2020

DATE

HAROLD E. CIAMPOLI, JR., Esquire

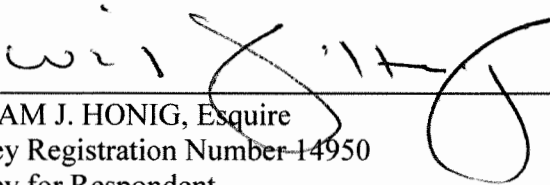
Disciplinary Counsel
Attorney Registration Number 51159
Office of Disciplinary Counsel
820 Adams Avenue, Suite 170,
Trooper, PA 19403
(610) 650-8210

5/21/2020
DATE



WILLIAM CRAIG PENGLASE, Esquire
Attorney Registration Number 86875
Respondent

DATE



WILLIAM J. HONIG, Esquire
Attorney Registration Number 14950
Attorney for Respondent

DATE

MARC ROBERT STEINBERG, Esquire
Attorney Registration Number 17659
Attorney for Respondent

VERIFICATION

The statements contained in the foregoing *Joint Petition In Support of Discipline on Consent Discipline* are true and correct to the best of my knowledge or information and belief and are made subject to the penalties of 18 Pa.C.S.A. §4904, relating to unsworn falsification to authorities.

May 26, 2020

DATE



HAROLD E. CIAMPOLI, JR., Esquire
Disciplinary Counsel

5-21-2020

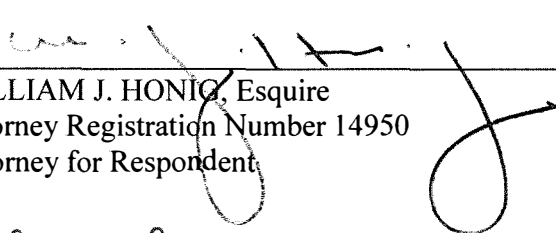
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WILLIAM CRAIG PENCLASE, Esquire
Attorney Registration Number 86875
Respondent

5/21/2020

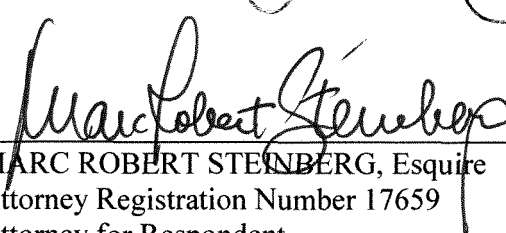
DATE



WILLIAM J. HONIG, Esquire
Attorney Registration Number 14950
Attorney for Respondent

5/27/2020

DATE



MARC ROBERT STEINBERG, Esquire
Attorney Registration Number 17659
Attorney for Respondent

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v.	:		
	:	Attorney Reg. No.	86875
WILLIAM CRAIG PENGLASE,	:		
Respondent	:	(Bucks County)	


CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 204 Pa. Code §89.22 (relating to service by a participant).

Electronic Mail and First Class, as follows:

Marc Robert Steinberg, Esquire
Rubin Glickman Steinberg et al
PO Box 1277
Lansdale, PA 19446-0726
Counsel for Respondent

Dated: May 26, 2020



HAROLD E. CIAMPOLI, JR, Esquire
Disciplinary Counsel
Attorney Registration No. 51159
Office of Disciplinary Counsel
820 Adams Avenue, Suite 170
Trooper, PA 19403
(610) 650- 8210

BEFORE THE DISCIPLINARY BOARD OF THE
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OFFICE OF DISCIPLINARY COUNSEL,	:	No.	DB 2020
Petitioner	:		
v.	:		
	:	Attorney Reg. No.	86875
WILLIAM CRAIG PENGLASE,	:		
Respondent	:	(Bucks County)	

AFFIDAVIT
UNDER RULE 215(d), Pa.R.D.E.

COMMONWEALTH OF PENNSYLVANIA:
COUNTY OF BUCKS:

William Craig Penglase, being duly sworn according to law, deposes and hereby submits this affidavit consenting to the recommendation of a public reprimand in conformity with Pa.R.D.E. 215(d) and further states as follows:

1. He is an attorney admitted in the Commonwealth of Pennsylvania, having been admitted to the bar on or about April 17, 2001.
2. He desires to submit a Joint Petition in Support of Discipline on Consent Pursuant to Pa.R.D.E. 215(d).
3. His consent is freely and voluntarily rendered; he is not being subjected to coercion or duress, and he is fully aware of the implications of submitting this affidavit.
4. He is aware that there is presently pending a proceeding into allegations that he has been guilty of misconduct as set forth in the Joint Petition in Support of Discipline on Consent Pursuant to Pa.R.D.E. 215(d) to which this affidavit is attached.
5. He acknowledges that the material facts set forth in the Joint Petition are true.

6. He submits the within affidavit because he knows that if charges predicated upon the matter under investigation were filed, or continued to be prosecuted in the pending proceeding, he could not successfully defend against them.

7. He acknowledges that he is fully aware of his right to consult and employ counsel to represent him in the instant proceeding. He has retained, consulted and acted upon the advice of counsel, in connection with his decision to execute the within Joint Petition.

It is understood that the statements made herein are subject to the penalties of 18 Pa.C.S.A. §4904 (relating to unsworn falsification to authorities).

Signed this 21 day of May, 2020.

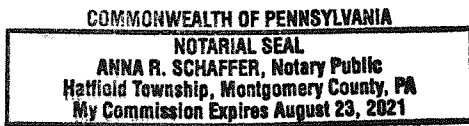


WILLIAM CRAIG PENGLASE, Esquire

Sworn to and subscribed
before me this 21st day
of May, 2020.



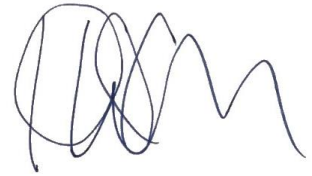
Notary Public



CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Harold E. Ciampoli, Jr.

A handwritten signature in blue ink, consisting of a series of loops and a trailing flourish.

Signature: _____

Name: Harold E. Ciampoli, Jr.

Attorney No. (if applicable): 51159