FILED

APR 15 2014

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

VICTOR E. HOBBS, in pro per
24701 Raymond Way Space 91
Lake Forest, CA 92630
Bar # 80191
Home (949)-951-6292
Work/Cell (949)- 813-7792
E-mail vichobbs@pacbell.net

Defendant in pro per

STATE BAR COURT,

STATE OF CALIFORNIA

STATE BAR COURT Plaintiff, vs. VICTOR E. HOBBS, Defendants.	Case No. 13-N-16739-RAH Assigned to Judge's Clerk J. Gonzales Crt. Rm. 'D' ANSWER TO NOTICE OF DISCIPLINARY CHARGES Hearing April 9th 2014 Crt Room 'D' Time: 4:00 p.m.

The defendant Victor E. Hobbs Answers the State BAR Court's Disciplinary Charges.

INTRODUCTION

My present status is my license to Practice Law was suspended for 3 years. The Practice of Law is my second career.

I am a retired Marine Corp Officer and Naval Aviator. I reside with my wife of 56 years Cora Lee Hobbs, and my second Daughter Lindi E. Hobbs, age of 54 years. Lindi is a licensed. driver. Thanksgiving 2012 Lindi had her Thanksgiving at my wife's home. She also had a kidney stone lodge.. the stone did not pass. Lindi has not been driving, due to the prescription pain medication. She has been taking, see Enclosure (1). My wife permitted her driver's license to expire in February 2013. I do all the driving to take each of these ladies to their doctor appointments, Emergency Room visits, Health and Safety Code 5150

kwiktag® 048 621 522

1 **releases, to pick up their prescriptions, take them to do their shopping and pay bills.**

2 **Lindi's right kidney had several kidney stones. This required another visit to the**
3 **Emergency Room in Mission Viejo Hospital. It was there that a blood test revealed. She**
4 **had developed four serious infections. She was hospitalized for nine days. The hospital**
5 **infection doctor took over all of her infections, and her urinary track problems. She now**
6 **has a hole cut into her back and a plastic tube inserted.**

7 **On or about the September 5, 2013 my decade plus old desk top computer started**
8 **acting up. I took it into Staples to tune up the computer for free. I went to the store every**
9 **day to check on the progress of the Tune Up. The Staples's clerk Raj and I got to be**
10 **friendly. The designation of my old computer's Microsoft's Windows had no numbers.**
11 **When I got the computer back from Staples. I took my quarterly report, and mailed two by**
12 **Registered Mail at the post office's counter on September 12, 2013, were the Certified Mail**
13 **- Receipt was date stamped, see Exhibit (2).**

14 **PLEADING**

15 **The Defendant Denies the allegations set forth in Paragraph 2, page 2 on**
16 **information and belief, or inferred anywhere else therein.**

17 **AFFIRMATIVE DEFENSES**

18 **The Defendant asserts that he mailed both copies of the Quarterly Reports, both**
19 **reports were mailed two days after their State Bar due dates. The two Delivery Notices,**
20 **dark pink cards on enclosure (2) show four different dates for two events. These cards were**
21 **sent from the State Bar Court to Victor E. Hobbs, defendant's address. Both cards were**
22 **filled in by an individual. The hand writing was identical.**

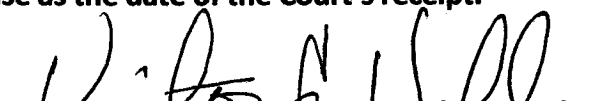
23 **All dates on both dark pink, Delivery Notice. The hand writing is the same on both**
24 **cards and the dates on either card does not comply with the date of September 17, 2013 on**
25 **the State Bar's Pleading. The dates on the pink cards predate the date of September 17,**
26 **2014, on the State Bar's Pleadings**

27

28

All the dates on both cards predated the date asserted in the Pleadings from the State Bar Court. On which the State Bar's Pleading use as the date of the Court's receipt.

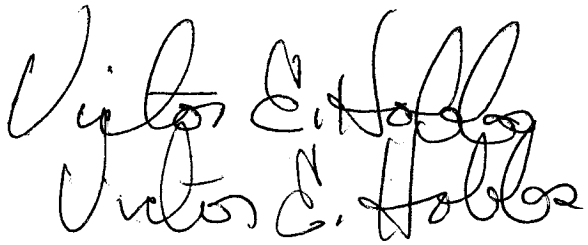
March 16, 2014



Victor E. Hobbs

THE ABOVE IS SUBMITTED UNDER PENALTY OF PERJURY UNDER THE LAWS OF STATE OF CALIFORNIA.

MARCH 17, 2014



M E D I C A L E X P E N S E S

HOBBLI1
Patient: HOBBS, LINDI E
RespPty:
24701 RAYMOND WAY SPC 91

LAKE FOREST CA 92630 4725
Birth: 08/29/1959

Pharmacy: TARGET PHARMACY #2163
25601 JERONIMO RD
MISSION VIEJO CA 92691
RPh: ROBINSON, TRACY

Prescriptions: Dates: 01/01/2013 to 03/14/2014

Last Fill / Written	Rx # / Tx #	Drug Name / Drug NDC	RPh	DAW Ref	Aut/Rem/#	Qty	Days	Physician	Price
03/22/2013	4417108	HYDROCO/APAP 5-325M TAB		0		20	5		12.37
03/22/2013	1288544		MDN	0	/0 / 0			Dr. MEULENBERG, NATALIE J	
03/22/2013	6720244	FLUCONAZOLE 150 MG TAB		0		1	1		4.00
03/22/2013	1288539		MDN	0	/0 / 0			Dr. MEULENBERG, NATALIE J	
04/15/2013	4417414	HYDROCO/APAP 5-325 TAB		0		20	5		12.37
04/15/2013	1293853		MDN	0	/0 / 0			Dr. PEDROZA, REBECCA SUE	
05/06/2013	4417662	HYDROCO/APAP 5-325M TAB		0		20	5		12.37
05/06/2013	1298459		PJG	0	/0 / 0			Dr. PATEL, HITESH DAHYABH	
05/06/2013	6724048	CITALOPRAM 40MG TAB		0		30	30		4.00
04/26/2013	1298455		PJG	0	/0 / 0			Dr. PURMANDIA,MAHENDER	
05/06/2013	6724050	MIRTAZAPINE 15 MG TAB		0		30	30		9.92
04/26/2013	1298456		PJG	0	/0 / 0			Dr. PURMANDLA, MAHENDER	
05/20/2013	4417805	HYDROCO/APAP 5-325 TAB		0		20	5		12.37
05/20/2013	1301712		MDN	0	/0 / 0			Dr. PEDROZA, REBECCA SUE	
05/20/2013	6725300	GEMFIBROZIL 600 MG TAB		0		60	30		14.04
05/20/2013	1301701		MDN	2	/1 / 0			Dr. PEDROZA, REBECCA SUE	
05/20/2013	6725305	CIPROFLOXACIN 500MG TAB		0		20	10		4.00
05/20/2013	1301703		MDN	0	/0 / 0			Dr. PEDROZA, REBECCA SUE	
06/12/2013	6725300	GEMFIBROZIL 600 MG TAB		0		60	30		14.04
05/20/2013	1306976		MDN	2	/1 / 1			Dr. PEDROZA, REBECCA SUE	
06/12/2013	6727302	CITALOPRAM 40MG TAB		0		30	30		4.00
05/24/2013	1306977		MDN	0	/0 / 0			Dr. PURMANDLA, MAHENDER R	
06/12/2013	6727303	TRAZODONE 100MG TAB		0		30	30		4.00
05/24/2013	1306978		MDN	0	/0 / 0			Dr. PURMANDLA, MAHENDER R	
08/13/2013	6732474	CITALOPRAM 40MG TAB		0		30	30		4.00
08/13/2013	1320274		BP	0	/0 / 0			Dr. PURMANDLA, MAHENDER R	
08/13/2013	6732475	TRAZODONE 100MG TAB		0		30	30		4.00
08/13/2013	1320275		BP	0	/0 / 0			Dr. PURMANDLA, MAHENDER R	
08/14/2013	6732580	TRAMADOL HCL 50 MG TAB		0		50	12		8.18
08/14/2013	1320508		BP	0	/0 / 0			Dr. WAYT, MARISA	
08/27/2013	6733592	TRAMADOL HCL 50 MG TAB		0		120	30		10.17
08/27/2013	1323382		RHA	2	/0 / 0			Dr. WAYT, MARISA	
08/27/2013	6733593	TERAZOSIN 2 MG CAP		0		60	30		8.00
08/27/2013	1323377		PJG	6	/5 / 0			Dr. WAYT, MARISA	

EXHIBIT (1)

M E D I C A L E X P E N S E S

HOBBLI1
Patient: HOBBS, LINDI E
RespPty:
24701 RAYMOND WAY SPC 91

LAKE FOREST CA 92630 4725
Birth: 08/29/1959

Pharmacy: TARGET PHARMACY #2163
25601 JERONIMO RD
MISSION VIEJO CA 92691
RPh: ROBINSON, TRACY

Prescriptions: Dates: 01/01/2013 to 03/14/2014

Last Fill / Written	Rx # / Tx #	Drug Name / Drug NDC	RPh	DAW / RefAut/Rem/#	Qty / Physician	Days	Price
08/27/2013	6733600	LEVOTHYROXIN 50MCG TAB		0	90	90	10.00
08/27/2013	1323387		RHA	0 /0 / 0	Dr. WAYT, MARISA		
08/27/2013	6733601	GEMFIBROZIL 600MG TAB		0	60	30	14.04
08/27/2013	1323385		RHA	5 /0 / 0	Dr. WAYT, MARISA		
09/11/2013	6734752	CITALOPRAM 40MG TAB		0	15	15	4.00
09/11/2013	1326645		RHA	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
09/11/2013	6734759	TRAZODONE 100MG TAB		0	15	15	4.00
09/11/2013	1326648		RHA	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
09/24/2013	6733592	TRAMADOL HCL 50 MG TAB		0	120	30	10.17
08/27/2013	1329729		BTN	2 /0 / 1	Dr. WAYT, MARISA		
09/24/2013	6733593	TERAZOSIN 2 MG CAP		0	60	30	8.00
08/27/2013	1329723		BTN	6 /5 / 1	Dr. WAYT, MARISA		
09/24/2013	6733601	GEMFIBROZIL 600 MG TAB		0	60	30	11.99
08/27/2013	1329736		BTN	5 /0 / 1	Dr. WAYT, MARISA		
09/24/2013	6735947	CITALOPRAM 40MG TAB		0	30	30	4.00
09/24/2013	1329728		BTN	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
09/24/2013	6735948	TRAZODONE 100MG TAB		0	30	30	4.00
09/24/2013	1329727		BTN	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
10/11/2013	4419421	HYDROCO/APAP 5-500M TAB		0	50	8	9.17
10/11/2013	1333645		SSR	0 /0 / 0	Dr. WAYT, MARISA		
10/22/2013	4419547	HYDROCO/APAP 5-500M TAB		0	20	10	7.72
10/22/2013	1336027		PJG	0 /0 / 0	Dr. WAYT, MARISA		
10/25/2013	6738825	CIPROFLOXACIN 500MG TAB		0	7	3	4.00
10/25/2013	1336877		YLW	0 /0 / 0	Dr. PRICE, JAMES BLAIR		
10/25/2013	6738826	ONDANSETRON 4MG ODT TAB		0	5	1	7.92
10/25/2013	1336878		YLW	0 /0 / 0	Dr. PRICE, JAMES BLAIR		
10/26/2013	4419589	HYDROCO/APAP 5-325 TAB		0	25	4	13.77
10/25/2013	1336946		BTN	0 /0 / 0	Dr. PRICE, JAMES BLAIR		
10/29/2013	4419619	HYDROCO/APAP 5-325 TAB		0	40	5	17.99
10/29/2013	1337499		PJG	0 /0 / 0	Dr. WAYT, MARISA		
11/04/2013	4419671	HYDROCO/APAP 5-325M TAB		0	30	3	24.99
10/31/2013	1338725		BTN	1 /0 / 0	Dr. WILLIAMS, STEPHEN BEN		
11/06/2013	4419671	HYDROCO/APAP 5-325M TAB		0	30	3	24.99
10/31/2013	1339257		PJG	1 /0 / 1	Dr. WILLIAMS, STEPHEN BEN		

MEDICAL EXPENSES

HOBBLI1
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Last Fill / Written	Rx # / Tx #	Drug Name / Drug NDC	RPh	DAW / RefAut/Rem/#	Qty / Physician	Days	Price
11/06/2013	6733601	GEMFIBROZIL 600 MG TAB		0	60	30	14.04
08/27/2013	1339258		PJG	5 /0 / 2	Dr. WAYT, MARISA		
11/06/2013	6739043	TERAZOSIN 5 MG CAP		0	60	60	8.00
10/29/2013	1339287		PJG	6 /6 / 0	Dr. WAYT, MARISA		
11/08/2013	4419740	APAP/CODEINE 300-30 TAB		0	20	2	8.98
11/07/2013	1339940		BTN	0 /0 / 0	Dr. TERTZAKIAN, GARO MIKH		
11/08/2013	6740171	CIPROFLOXACIN 250MG TAB		0	20	10	0.00
11/07/2013	1339933		BTN	0 /0 / 0	Dr. TERTZAKIAN, GARO MIKH		
11/08/2013	6740173	CITALOPRAM 40MG TAB		0	30	30	0.00
10/05/2013	1339938		AWL	1 /1 / 0	Dr. PURMANDLA, MAHENDER R		
11/08/2013	6740181	TRAZODONE 100MG TAB		0	30	30	0.00
11/05/2013	1339954		AWL	1 /1 / 0	Dr. PURMANDLA, MAHENDER		
11/19/2013	4419837	HYDROCO/APAP 5-325M TAB		0	30	3	17.46
11/19/2013	1342315		AWL	0 /0 / 0	Dr. WILLIAMS, STEPHEN BEN		
11/22/2013	4419869	APAP/CODEINE 300-30 TAB		0	30	5	12.09
11/21/2013	1342854		AWL	0 /0 / 0	Dr. TERTZAKIAN, GARO MIKH		
11/22/2013	6741284	CIPROFLOXACIN 250MG TAB		0	20	10	0.00
11/21/2013	1342845		AWL	0 /0 / 0	Dr. TERTZAKIAN, GARO MIKH		
11/26/2013	6741412	HYDROXYZ PAM 50 MG CAP		0	60	15	0.00
11/22/2013	1343795		PJG	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
11/26/2013	6741413	CITALOPRAM 40MG TAB		0	30	30	0.00
11/22/2013	1343762		PJG	0 /0 / 0	Dr. PURMANDLA, MAHENDER R		
12/08/2013	6742390	LEVOTHYROXIN 50MCG TAB			30	30	0.00
12/06/2013	1346207		AWL	0 /1 / 0	Dr. WAYT, MARISA		
12/15/2013	6733592	TRAMADOL HCL 50 MG TAB		0	120	30	16.83
08/27/2013	1347775		PJG	2 /0 / 2	Dr. WAYT, MARISA		
12/15/2013	6733601	GEMFIBROZIL 600 MG TAB		0	60	30	0.00
08/27/2013	1347774		PJG	5 /0 / 3	Dr. WAYT, MARISA		
01/03/2014	4420335	CLONAZEPAM 0.5 MG TAB		0	60	30	12.80
01/03/2014	1351903		SDN	1 /0 / 0	Dr. WAYT, MARISA		
01/03/2014	6744683	CIPROFLOXACIN 500MG TAB		0	28	14	0.00
01/03/2014	1351874		SDN	0 /1 / 0	Dr. WAYT, MARISA		
01/10/2014	6742390	LEVOTHYROXIN 50MCG TAB			30	30	15.99
12/06/2013	1353640		SSR	0 /1 / 1	Dr. WAYT, MARISA		

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RPh: ROBINSON, TRACY

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Last Fill / Written	Rx # / Tx #	Drug Name / Drug NDC	RPh	DAW / RefAut/Rem/#	Qty / Physician	Days	Price
01/10/2014	6745441	CEPHALEXIN 500 MG CAP		0	40	10	6.00
01/10/2014	1353641		SSR	0 /0 / 0	Dr. MERVIS, ERIC JOSEPH		
01/14/2014	6745781	DOXYCYCL HYC 100MG CAP		0	14	7	0.00
01/14/2014	1354470		BTN	0 /0 / 0	Dr. MERVIS, ERIC JOSEPH		
01/15/2014	6745896	METOCLOPRAM 10 MG TAB		0	24	6	0.00
01/15/2014	1354733		PJG	0 /0 / 0	Dr. KEANY, JAMES EDWARD		
01/17/2014	6746083	CITALOPRAM 40MG TAB		0	30	30	0.00
01/17/2014	1355255		AWL	1 /0 / 0	Dr. PURMANDLA, MAHENDER R		
01/21/2014	6746386	METOCLOPRAM 10 MG TAB			30	15	0.00
01/21/2014	1356053		PJG	0 /0 / 0	Dr. WAYT, MARISA		
01/21/2014	6746387	NITROFURANTN 100MG CAP			20	10	0.00
01/21/2014	1356055		PJG	0 /0 / 0	Dr. WAYT, MARISA		
01/22/2014	4420567	HYDROCO/APAP 5-325 TAB		0	10	1	8.99
01/22/2014	1356489		AWL	0 /0 / 0	Dr. MELLOTT, JOHN		
01/22/2014	6733601	GEMFIBROZIL 600 MG TAB		0	60	30	0.00
08/27/2013	1356484		AWL	5 /0 / 4	Dr. WAYT, MARISA		
02/05/2014	4420335	CLONAZEPAM 0.5 MG TAB		0	60	30	0.00
01/03/2014	1359607		AWL	1 /0 / 1	Dr. WAYT, MARISA		
02/17/2014	2206264	OXYCOD/APAP 5-325MG TAB		0	21	5	0.00
02/16/2014	1362174		PJG	0 /NR / 0	Dr. SHAKEEL, MUHAMMAD AZF		
02/17/2014	6748780	MUPIROCIN 2% OIN		0	22	4	0.00
02/17/2014	1362176		PJG	0 /0 / 0	Dr. SHAKEEL, MUHAMMAD AZF		
02/17/2014	6748781	AMOX/K CLAV 875 MG TAB		0	20	10	0.00
02/17/2014	1362177		PJG	0 /0 / 0	Dr. SHAKEEL, MUHAMMAD AZF		
02/17/2014	6748782	FLUCONAZOLE 200 MG TAB		0	10	10	0.00
02/17/2014	1362179		PJG	0 /0 / 0	Dr. SHAKEEL, MUHAMMAD AZF		
02/26/2014	4420941	HYDROCO/APAP 5-325 TAB		0	30	4	0.00
02/26/2014	1364177		PJG	0 /0 / 0	Dr. MEAGLIA, JAMES P		
02/26/2014	6733601	GEMFIBROZIL 600MG TAB		0	60	30	0.00
08/27/2013	1364246		PJG	5 /0 / 5	Dr. WAYT, MARISA		
02/26/2014	6746083	CITALOPRAM 40MG TAB		0	30	30	0.00
01/17/2014	1364247		PJG	1 /0 / 1	Dr. PURMANDLA, MAHENDER R		
03/05/2014	6750085	CIPROFLOXACIN 500MG TAB			10	5	0.00
03/05/2014	1365593		DJA	0 /0 / 0	Dr. MEAGLIA, JAMES P		

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HOBBLI1
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Prescriptions: Dates: 01/01/2013 to 03/14/2014

Last Fill / Written	Rx # / Tx #	Drug Name / Drug NDC	RPh	DAW / RefAut/Rem/#	Qty / Physician	Days	Price
03/06/2014	4421032	HYDROCO/APAP 5-325 TAB		0	30	4	0.00
03/06/2014	1366016		DJA	0 /0 / 0	Dr. MEAGLIA, JAMES P		

Report Date: 03/14/2014 $443.76

Attested To By: RPh 3/14/14
Registered Pharmacist

United States Postal Service®
Sorry We Missed You! We Re Deliver for You

Today's Date: 9/13/13
Sender's Name: U.S. Court

Item is at:
X Post Office™ (See back)

Available for Pick-up After
Date: 9/14 Time: 8:30A

For Redelivery
Go to usps.com/redelivery
or see reverse

X Letter
— Large envelope, magazine, catalog, etc.
— Parcel
— Restricted Delivery
— Perishable Item
— Other:

For Delivery: *(Enter total number of items delivered by service type.)*
For Notice Left: *(Check applicable item)*
— Express Mail®
— Insured Mail
X Certified Mail™ *(Must claim within 15 days or article will be returned)*
— Return Receipt for Merchandise
— Firm Bill
— Delivery Confirmation™
— Registered Mail™
— Signature Confirmation™

☐ If checked, you or your agent must be present at time of delivery to sign for item.

Article Number(s): 4084

Notice Left Section
Customer Name and Address: Hobbs
24701 Raymond #91

Article Requiring Payment
☐ Postage Due ☐ COD ☐ Customs
Amount Due $

☐ **Final Notice:** Article will be returned to sender on

Delivered By and Date

PS Form **3849,** September 2009 usps.com **Delivery Notice/Reminder/Receipt**

United States Postal Service®
Sorry We Missed You! We Re Deliver for You

Today's Date: 9/14/13
Sender's Name: Haight

Item is at:
X Post Office™ (See back)

Available for Pick-up After
Date: 9/16 Time: 8:30A

For Redelivery
Go to usps.com/redelivery
or see reverse

X Letter
— Large envelope, magazine, catalog, etc.
— Parcel
— Restricted Delivery
— Perishable Item
— Other:

For Delivery: *(Enter total number of items delivered by service type.)*
For Notice Left: *(Check applicable item)*
— Express Mail®
— Insured Mail
X Certified Mail™ *(Must claim within 15 days or article will be returned)*
— Return Receipt for Merchandise
— Firm Bill
— Delivery Confirmation™
— Registered Mail™
— Signature Confirmation™

☐ If checked, you or your agent must be present at time of delivery to sign for item.

Article Number(s): 6212

Notice Left Section
Customer Name and Address: V. Hobbs
24701 Raymond #91

Article Requiring Payment
☐ Postage Due ☐ COD ☐ Customs
Amount Due $

☐ **Final Notice:** Article will be returned to sender on

Delivered By and Date

PS Form **3849,** September 2009 usps.com **Delivery Notice/Reminder/Receipt**

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®
LOS ANGELES CA 90015
OFFICIAL USE

7012 3460 0001 3707 3970

Postage	$ $0.46
Certified Fee	$3.10
Return Receipt Fee (Endorsement Required)	$2.55
Restricted Delivery Fee (Endorsement Required)	$0.00
Total Postage & Fees	$ $6.11

0486
LAKE FOREST, CA 92630
Postmark Here
09/12/2013

Sent To: STATE BAR COURT
Street, Apt. No.; or PO Box No.: 1149 S. HILL ST.
City, State, ZIP+4: L.A. CA. 90015-2299

PS Form 3800, August 2006 See Reverse for Instructions

EXHIBIT

Medical and Dental Clinic
1 Purpose Drive
Lake Forest, CA 92630
Phone: (949) 609-8199
Fax: (949) 609-8787

Date: 03/17/2014

re: Lindi E Hobbs

Date of Birth: 08/29/1959

To whom it may concern:

Ms. Lindi E. Hobbs has been a patient of ours since 8-13-2013. Ms. Hobbs has multiple conditions with the primary one's being kidney stones, resulting renal failure, hydronephrosis and multiple kidney and related infections. As a result, visits to various specialist's, imaging study facitlities, visit's to the emergency room with occasional resulting hospitalizations have occurred since 8-2013.

Lindi has asked me to write this letter as her primary care provider for verification of her conditions and referencing her need for assistance which her father Mr. Hobbs has provided. Mr. Hobbs takes Lindi to her appointments and assists her at home with various needs. If there is any other information we can provide, please do not hesitate to call at 949-609-8199.

Sincerely,

Marisa Wayt MS, PA-C
Physician Assistant

Marisa Wayt

Marisa Wayt PA

EXHIBIT (3)

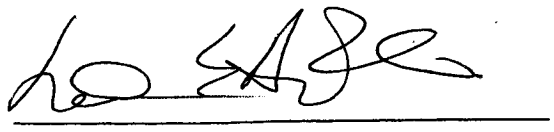
DECLARATION OF SERVICE

I, the undersigned, over the age of eighteen, declare that [ ] I am / [✓] am not a party to the within action, in the City and County of Los Angeles, on 4/15/14, served the following document(s):

Answer to notice of Disciplinary charges

[✓] by personal delivery: Kim Kasreliovich Esq
845 S. Figueroa St.
LA, CA 90017

[ ] other:

I declare under penalty of perjury at Los Angeles, California, on the date shown below, that the foregoing is true and correct.

Dated: 4/05/14