RECEIVED
SUPREME COURT
STATE OF WASHINGTON
Jul 07, 2014, 4:22 pm
BY RONALD R. CARPENTER
CLERK

Supreme Court No. 90465-1

RECEIVED BY E-MAIL

Court of Appeals Division One
No. 69929-6-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

In the Matter of the Testamentary Trust of

GIUSEPPE DESIMONE,

Deceased,
Appellant/Cross Respondent,

DALE COLLINS, a married man

Petitioner

v.

BNY MELLON, N.A., JOSEPH R. DESIMONE and RICHARD L. DESIMONE, JR., in their capacities as co-Trustees of the TESTAMENTARY TRUST OF GIUSEPPE DESIMONE, BENJAMIN DANIELI, as Personal Representative of the Estate of Jacqueline Danieli, KAREN DANIELI, LIZA TAYLOR, and MARIA DANIELI, Beneficiaries,

Respondents/Cross Appellants.

ANSWER TO PETITION FOR REVIEW of RESPONDENT/CROSS-APPELLANTS BENJAMIN DANIELI, as Personal Representative of the Estate of Jacqueline Danieli, KAREN DANIELI, LIZA TAYLOR and MARIA DANIELI

FILED
JUL - 8 2014
CLERK OF THE SUPREME COURT
STATE OF WASHINGTON

ORIGINAL

Deborah J. Phillips, WSBA No. 8540
DJPhillips@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Attorneys for Benjamin Danieli, as Personal Representative of the Estate of Jacqueline Danieli, Karen Danieli, Liza Taylor and Maria Danieli

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page

State Cases

TABLE OF AUTHORITIES
(continued)

Page

State Statutes

Rules

I. COURT OF APPEALS DECISION

Following more than a century of precedent, the Court of Appeals correctly upheld the trial court ruling that the beneficiaries of this trust, created by Giuseppe Desimone's 1943 will and effective as of 1946 when he passed away, are limited to his five children named in the will and to their "issue", that is children, grandchildren, great-grandchildren and great-great grandchildren "born in lawful wedlock". The 2012 claim of Dale Collins, who was born in 1949, raised by his mother and her husband as their son, and remained a stranger to the Desimone family for sixty years, was correctly denied. He is not the "issue" of Giuseppe Desimone and his effort to now become a beneficiary of this trust is contrary to the terms of this trust and Washington law.

II. ISSUES PRESENTED FOR REVIEW

1. **Should this Court accept review of an unpublished decision that correctly applied uncontroverted legal standards applicable to the administration of a testamentary trust?**

2. **Should this Court accept review of an unpublished decision that is consistent with Supreme Court precedent and not in conflict with Court of Appeals decisions?**

3. **Should this Court accept review of a case that does not involve an issue of substantial public interest?**

III. STATEMENT OF THE CASE

A. Giuseppe Desimone's Trust and His Intent

The Court of Appeals correctly commenced its analysis by examining the trust terms to discern Giuseppe Desimone's intent. His use of the technical legal term "issue", the fact that the will was drafted by a lawyer presumably familiar with the legal definition of the term issue in 1943 when the will was drafted, and consideration of the law in effect in 1946 when this trust came into existence, all caused the Court of Appeals to conclude that "issue" in this trust is confined to those children "born in lawful wedlock". There is no issue of public interest compelling this Court's review of this well-reasoned decision applying long-settled Washington law.

The Court appropriately rejected Collins' contention that *In re Trusts of Sollid,* 32 Wn. App. 349, 647 P.2d 1033 (1982) provides a

foundation to dramatically transform Washington law and for all trusts to now apply the law in effect whenever a beneficiary determination is made rather than applying the law in effect when a trust becomes effective. Collins efforts to create a conflict between that Court of Appeals decision and other cases such as *Estate of Cook,* 40 Wn. App. 326, 698 P.2d 1076 (1985) and *Estate of Haviland,* 177 Wn. 2d. 68, 301 P.3d 31 (2013) are unpersuasive. There is no conflict and no reason for this Court to accept review here.

B. The Desimone Family

In November 1943, Giuseppe Desimone executed his Will which resonates with his love for his native Italy, the Catholic Church and his family. He passed away a mere three years later and in 1946 his testamentary trust came into existence.[1] To each of his five children who visited his birthplace outside Naples, Italy, he left $10,000. For twenty years after his death, his South Park church, Church of Our Lady of the Lourdes, was to receive $250 to defray all or part of the cost of an annual fiesta. He left the same bequest to The Church of Passo Melabella Azalomo in the Italian town where he and his wife, Assunta, were born. Finally, he directed that his half of the real estate he and Assunta had

[1] His estate was administered in King County, Washington under King County Cause No. 95961, and the Order Approving Final Account and Decree of Distribution was entered December 30, 1949. CP 260 - 288.

acquired together should be held in trust and remain in the trust through generations. He specifically provided, "I have chosen the land which I own carefully, and wish it to be retained . . . This is also true of my shares of stock in the Pike Place Public Markets, Inc." CP 46. Following his death, Giuseppe Desimone's Trust and his wife Assunta then co-owned all their community property assets and she and their two oldest sons, as trustees, managed the family assets together. Assunta long outlived her husband, passing away in the 1980's at the age of 100.[2] In her 1974 Will, she too left her assets in trust for the benefit of her family and limited her beneficiaries to "lawful" descendants. CP 234 - 259.

Mondo Desimone, one of Giuseppe and Assunta's sons, died in 1996, sixteen years before this claim was filed.[3] Mondo's only child, his daughter, Jacqueline Danieli, then became a trust beneficiary; she passed away in 2012 shortly after this claim was filed. Her six daughters now are trust beneficiaries as the issue of Giuseppe Desimone, his son, Mondo Desimone, and Mondo's only child, Jacqueline Danieli.

---

[2] Her 1974 will was admitted to probate and administered in King County, Washington under King County Cause No. 86-4-00088-4. CP 231, 234.

[3] Collins never filed a paternity action and any claim would be time barred. This issue was not decided by the trial court or the Court of Appeals as it was not necessary for their resolution of the case and review has not been sought on this issue. *Court of Appeals opinion, p. 3.*

C. Dale Collins

On April 13, 1949, Dale Collins was born in Kodiak, Alaska to Josephine Collins. She was then married to Orville Collins, he was listed on the birth certificate as Dale Collins' father, and Orville Collins raised Dale Collins as his son. CP 31, 64. Mr. and Mrs. Collins remained married until 1971. Dale Collins continued his relationship with Orville Collins, whom he viewed as his father, throughout his life. CP 31.

In 2001, when Dale Collins was in his 50's, Orville Collins told him he was not his biological father and possibly not the father of Dale's brothers. Two years later Orville and Dale Collins confirmed by DNA testing that Dale was not Orville's biological son. CP 31 - 32. Dale Collins waited another five years to talk to his mother about his parentage, and at that time she acknowledged Orville Collins was not his biological father. Dale Collins claims that sometime in 2007 he then determined that a "tall, well-dressed man" who worked at a flower stall in the Pike Place Market in 1948 was his biological father. CP 32. Collins claims that man is Mondo Desimone, one of Giuseppe Desimone's sons.

Collins then waited another five years to file this claim, seeking to be declared a beneficiary of Giuseppe Desimone's Trust and claiming a right to receive two-thirds of what had been Mondo Desimone's share of

this trust.[4] In addition to on-going distributions from the trust, Collins also would claw back distributions made to Jacqueline Danieli since her father passed away, as he claims he should receive "sufficient retrospective distributions" for his purported share of the trust distributions dating back to Mondo Desimone's death in 1996. CP 7 - 8.

IV. ARGUMENT WHY REVIEW SHOULD NOT BE ACCEPTED

A. The Court of Appeals' decision correctly applied uncontroverted legal standards.

The decision of the Court of Appeals is consistent with decisions of this Court and Collins' *Petition for Review* does not contend otherwise. Review under RAP 13.4(b)(1) is not warranted. The Court of Appeals decision analyzed the claim based upon the uncontroverted approach that calls for the court to ascertain the intent of testator. A testator's intentions are determined as of the time the will is written, here 1943. *E.g. Estate of Mell,* 105 Wn.2d. 518, 524, 716 P.2d. 836 (1986); *In re Estate of Bergau,* 103 Wn.2d 431, 436, 693 P.2d 703 (1985); *In re Estate of Robinson,* 46 Wn.2d 298, 693 P.2d 703 (1955). The date of the testator's death, here 1946, governs the laws of succession. *E.g. Pitzer v. Union Bank of California,* 141 Wn.2d 539, 546, 9 P.3d 805 (2000). Within his will, Giuseppe Desimone's desire to provide for his children, all named in the

[4] Under Giuseppe Desimone's trust, male issue receive a full share and female issue a half-share.

will, and to have them own, manage and maintain the property he and his wife Assunta had acquired, is clear. His intent to limit his trust to his children and their issue is apparent within the structure of the trust, with co-ownership of assets by the trust and his wife, with his oldest two sons named as trustees to be succeeded by the oldest two sons in each generation, and with beneficiaries receiving only income, as opposed to any outright ownership interest in the trust assets. CP 42 - 43.

Again following uncontroverted Washington law, the court presumed that in the drafting of his will, Giuseppe Desimone was familiar with Washington law as was his attorney. [5] The term "issue" is a technical term in estate planning, and one that courts presume should be given its legal meaning. In the 1940's, when the will was executed and the trust came into existence, "issue" was defined by statute as it had been in Washington since territorial days. Rem. Rev. Stat. § 1354, for intestate matters, provided, "[t]he word 'issue,' as used in this chapter, includes all the ***lawful*** lineal descendants of the ancestor." [6] *Court of Appeals decision, p. 7 (emphasis in original).* This remained Washington law until 2005

[5] Mr. Shefelman was a prominent Seattle attorney who served as President of the Washington State Bar Association from 1937 - 1938. http://www.kcba.org/aboutkcba/pastpresdents.aspx; http://digital.lib.washington.edu/findingaids/view?docId=ShefelmanHaroldS2219.xml;brand=defaul

[6] A child not "born in wedlock" could inherit through his father if his parents later married, if the father acknowledged paternity or if the father "adopted him into the family." *In re Estate of Baker*, 49 Wn. 2d 609, 304 P.2d 1051 (1956); Rem. Rev. Stat. § 1345.

(not 1975 as Collins contends.)[7] Washington courts have articulated that the definitions in the laws of intestacy are applicable to testate matters. *E.g. Estate of Price,* 75 Wn.2d 884, 866 - 90, 454 P.2d 411 (1969); *In re Estate of Mell,* 105 Wn.2d 578, 716 P.2d 836 (1986); *Estate of Wright,* 147 Wn. App. 674, 684, 196 P.3d 1075 (2008) ("where there is room for construction in a testamentary instrument that meaning will be adopted which favors those who would inherit under the laws of intestacy."; ". . . wills are to be construed consistently with the intestacy statutes"); *In re Trusts of Sollid, supra,* 32 Wn. App. 349, 357 ("There is no reason to believe that "issue" as used in the statute of descent and distribution has a different meaning when used in a will or trust."). The Court of Appeals correctly rejected Collins' contention that dicta in *Bowles v. Denny,* 155 Wash. 535, 285 Pac. 422 (1930) supports a contrary result. *Court of Appeals opinion, pp. 9 - 10.*

[7] In 1965, there were amendments to the probate code. RCW 11.02.005(4) provided, ""Issue" includes all the lawful lineal descendants of the ancestor, all lawfully adopted children and all illegitimates as specific in RCW 11.04.081." RCW 11.04.081 continued Washington's historical approach, providing that a an illegitimate child would inherit from his mother just as a legitimate child would. The statute continued, "When the parents of an illegitimate child shall marry subsequent to his birth, or the father shall acknowledge said child in writing, such child shall be deemed to have been made the legitimate child of both of the parents for purposes of interest succession." *Laws 1965, Ch. 145, Sec. 11.04.081.* In 1975, further amendments were made and RCW 11.04.081 now provides, "for the purpose of inheritance to, through, and from any child the effects and treatment of the parent-child relationship shall not depend upon whether or not the partners have been married." *Laws of 1975-76, 2d Ex. S, Ch. 42, Sec. 24.* It was not until 2005 that the legislature rewrote the definition of "issue" the read, ""Issue" means all the lineal descendants of an individual." *Laws 2005, ch. 97, § 1.*

This decision is consistent with well-established principals of trust interpretation and administration. The trial court correctly rejected this claim, the Court of Appeals correctly rejected this claim and there is nothing presented here to warrant this Court's further review.

B. There is No Conflict With Prior Courts of Appeals Decisions

Collins posits that review should be accepted based on claimed conflicts between the Court of Appeals decision in this matter and the 1982 decision of *In re Trust of Sollid,* 32 Wn. App. 349, 358, 647 P.2d 1033 (1982) and the 1985 decision of *Estate of Cook,* 40 Wn. App. 326, 698 P.2d 1076 (1985). A review of each case, other case law and the facts here demonstrate that there is no conflict and nothing to warrant this Court's review.

1. *In re Trusts of Sollid*

The trust document in *In re Trusts of Sollid* included this specific language

> (T)he said term shall include their heirs or successors in interest as provided in this trust agreement as and when such heirs or successors in interest may acquire the rights of either or any of said beneficiairies.

32 Wn. App. 349, 358, 47 P.2d 1033 (1982) (emphasis added). Thus the court's determination to apply the law in effect in 1980, when the trust was being terminated and assets distributed, and include adopted children

of the testator's son, is consistent with the testator's stated intent. There is no such statement in Giuseppe Desimone's Will, and the terms in Giuseppe Desimone's trust express his intent to confine his trust beneficiaries within his five children and their families.[8] And unlike *In re Trusts of Sollid,* there is no single point in time when beneficiaries in Giuseppe Desimone's trust are determined. Rather, the initial beneficiaries were determined in 1946, when Giuseppe Desimone passed away; his then living children became beneficiaries, including Mondo Desimone. When he died in 1996, the trustees determined that his daughter Jacqueline Danieli would succeed to her father's interest. And in 2012, when Jacqueline Danieli passed away, the trustees determined that her six daughters would succeed to their mother's interest. This determination of beneficiaries will continue to occur with the end of each generation within each family line, until the last grandchild alive when Giuseppe Desimone died passes away and the trust then terminates.

The *Sollid* court's decision also discusses legislative changes related to the creation of a new family by adoption. That is not the case here, where Collins was a stranger to the Desimone family throughout Mondo Desimone's lifetime and throughout virtually all of his daughter

[8] Giuseppe Desimone's wife, Assunta, executed her last will in 1974, and there and in her codicils similarly limited her beneficiaries to "lawful descendants", lawful children", and "lawful lineal descendants". Collins is clearly excluded by her estate planning. CP 103 - 116; CP 117 - 120.

Jacqueline Danieli's lifetime. Among the issues noted by the court in *Sollid* was that adopted families are created by affirmative acts of love, understanding and mutual recognition of reciprocal duties and bonds. A decade later, Division III of the Court of Appeals itself distinguished the holding in *In re Trusts of Sollid* and rejected the claim of an adoptee. Collins fails to note that decision, *Rhay v. Johnson,* 73 Wn. App. 98, 867 P.2d 669 (1994). Division III endorsed again the voluntary creation of family and the parent-child relationship and held there is no "hard and fast rule" to be applied when issues arise involving adopted children as potential beneficiaries to trusts established decades before ascertainment of the identity of beneficiaries. 73 Wn. App. at 106.

Collins also relies on Delaware cases but to no avail. In 1973, the Delaware court in *Haskell v. Wilmington Trust Co.,* 304 A.2d 53 (Del. 1973), held that the laws of intestacy at the time of ascertainment would control absent a contrary intent in the trust instrument. Collins fails to note that the response of the Delaware legislature was to overturn that result. *Annan v. Wilmington Trust Co.,* 559 A.2d 1289, 1292 n.2 (Del. 1989). Thus the holding in *Annan v. Wilmington Trust Co.,* 559 A.2d 1289 (Del. 1989) is itself limited by Delaware law. Del. Code Ann. Tit. 12, § 213. Applying *Annan v. Wilmington Trust Co.* and Delaware law to this case would require that the law in effect in 1946, when Giuseppe

Desimone's trust became irrevocable, be applied, not what Collins contends.

There is no conflict between the decision here and Division II's decisions and nothing that warrants this Court's review.

2. *Estate of Cook*

Estate of Cook, 40 Wn. App. 326, 698 P.2d 1076 (1985) similarly does not have the broad sweep claimed nor does it support a change in long-standing Washington law or create a conflict warranting this court's review. Collins' portrayal of the case holding is simply off the mark. Miss Cook was born in 1909, and her mother and father, Mr. Cumpston, married in 1911. In 1942 she obtained an Ohio birth certificate, through a "delayed registration process", that identified Mr. Cumpston as her father; her mother and aunt provided affidavits supporting her application. The Washington court accepted that birth certificate as evidence of her status as Mr. Cumpston's daughter, which in turn controlled whether her heirs on her father's side or the more distant heirs on her mother's side inherited her estate. There is no holding in *Estate of Cook* that is applicable here, let alone a conflict with the Court of Appeals decision in interpreting Giuseppe Desimone's trust.[9]

[9]Collins citation to *Estate of Haviland*, 177 Wn. 2d 68, 301 P.3d 31 (2013) as a basis to accept review is also unpersuasive. This is a case, and an argument, of so little

C. This Case Does not Present An Issue of Substantial Public Interest

The primary goal in administering and interpreting a trust is to carry out the trustor's intent. The issue here was decided based upon well settled law, carrying out the estate planning and personal choices Giuseppe Desimone made for his assets, for his wife, and for their children and future generations within their family. The affirmation of those decisions by the trial court and the Court of Appeals were well reasoned.

Giuseppe Desimone's trust is not the proper vehicle to advocate for overturning a century of Washington law and for overturning a plan Giuseppe Desimone (and his wife Assunta) put in place for their family. The social and statutory changes Collins would superimpose on this 1946 trust have been put in place through legislative action over time but they were not the law in Washington in the 1940's. There is no issue of public importance in this family trust that warrants further judicial review.

V. CONCLUSION

This case was resolved based upon well-settled law governing the interpretation of trusts. The purported conflicts between two Court of Appeals decisions dating back to the 1980's do not exist. The sweeping proposition Collins claims from another 1980's Court of Appeals decision

---

persuasive import that he did not include it in his opening brief or his reply brief in the Court of Appeals nor did he ever cite it as additional authority to that court.

does not exist. The trial court and Court of Appeals decisions here correctly decided that Collins is not a beneficiary of Giuseppe Desimone's trust. Review should be denied.

RESPECTFULLY SUBMITTED this 7th day of July, 2014.

PERKINS COIE LLP

By: Deborah J. Phillips

Deborah J. Phillips, WSBA No. 8540
DJPhillips@perkinscoie.com
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000

Attorneys for Benjamin Danieli, as Personal Representative of the Estate of Jacqueline Danieli, Karen Danieli, Liza Taylor and Maria Danieli

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on July 7th, 2014 I caused the foregoing document to be served on the following parties via U.S. mail unless otherwise described below:

Via Email:
Joseph R. Desimone
Richard L. Desimone, Jr.
c/o Karen R. Bertram
Kutscher Hereford Bertram Burkart PLLC
705 Second Avenue, Suite. 800
Seattle, WA 98104-1711

Via Email
BNY Mellon, N.A.
c/o Johanna M. Coolbaugh
James K. Treadwell
Karr Tuttle Campbell
701 Fifth Avenue, Suite 3300
Seattle, WA 98104

Co-Trustees of the Trust Under the Last Will and Testament of Giuseppe Desimone dated November 18, 1943

Via Email
Catherine Ross
PO Box 681
Soap Lake, WA 98851-0681

Via Email
Dale Collins
c/o Hans P. Juhl
Jennifer L. King
Somers Tamblyn King, PLLC
2955 – 80th Avenue SE, Suite 201
Mercer Island, WA 98040

Via Email
Dale Collins
c/o Ann T. Wilson
The Law Offices of Ann T. Wilson
1420 Fifth Avenue, Suite 3000
Seattle, WA 98101

Via Email
Dale Collins
c/o Catherine W. Smith
Smith Goodfriend, P.S.
1619 - 8th Avenue N.
Seattle, WA 98109-3007

Via U.S. Mail
Richard L. Desimone, Jr.
7902 Eastside Drive NE
Browns Point, WA 98422

Via U.S. Mail
Denise Peterman
22 E 13th Avenue
Kennewick, WA 99337

Via U.S. Mail
John Hittman
20134 SE 192nd Street
Renton, WA 98058

Via U.S. Mail
Laura Jensen
3704 SW 110th Street
Seattle, WA 98146

Via U.S. Mail
Richard L. Desimone III
78 Orchard Road North
Tacoma, WA 98406

Via U.S. Mail
John Anthony Desimone
c/o Jane M. Henderson
3306 SW 323rd Street
Federal Way, WA 98023

Via U.S. Mail
Ann Maria Roth
7319 Jones Avenue North
Seattle, WA 98117

Via U.S. Mail
Sarah C. Campbell
PO Box 6713
Ketchikan, AK 99901

Via U.S. Mail
Richard D. Collins
#1 Double Eagle Lane
Ketchikan, AK 99901

Via U.S. Mail
Shelley Caturegli
5522 Atascocita Timbers
North Tumble, TX 77346

Executed in Seattle, Washington, this 7th day of July, 2014.

Legal Secretary

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Monday, July 07, 2014 4:23 PM
To: 'Stokes, Krista (Perkins Coie)'
Cc: Jennifer L. King; Ann T. Wilson; Catherine W. Smith; Phillips, Deborah (Perkins Coie); Douglas C. Lawrence; Michael R. Garner; Johanna Coolbaugh; James K. Treadwell; Dennis H. Walters; Catherine Ross; scartozian@khbblaw.com; kbertram@khbblaw.com; hans@stklawfirm.com; Zea, Christine (Perkins Coie)
Subject: RE: Testamentary Trust of Giuseppe Desimone; Collins v. BNY Mellon, N.A., et al.; | Court of Appeals Division One No. 69929-6-I

Rec'd 7-7-14

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Stokes, Krista (Perkins Coie) [mailto:KStokes@perkinscoie.com]
Sent: Monday, July 07, 2014 4:22 PM
To: OFFICE RECEPTIONIST, CLERK
Cc: Jennifer L. King; Ann T. Wilson; Catherine W. Smith; Phillips, Deborah (Perkins Coie); Douglas C. Lawrence; Michael R. Garner; Johanna Coolbaugh; James K. Treadwell; Dennis H. Walters; Catherine Ross; scartozian@khbblaw.com; kbertram@khbblaw.com; hans@stklawfirm.com; Zea, Christine (Perkins Coie)
Subject: Testamentary Trust of Giuseppe Desimone; Collins v. BNY Mellon, N.A., et al.; | Court of Appeals Division One No. 69929-6-I

Re: In the Matter of the Testamentary Trust of Giuseppe Desimone; Dale Collins v. BNY Mellon, N.A., Joseph R. Desimone and Richard L. Desimone, Jr., in their capacities as Co-Trustees of the Testamentary Trust of Giuseppe Desimone
Washington Supreme Court No.: [Not Yet Assigned]
Court of Appeals Division One No.: 69929-6-I
Filed by: Deborah J. Phillips, Attorney for Benjamin Danieli, as Personal Representative of the Estate of Jacqueline Danieli, Karen Danieli, Liza Taylor and Maria Danieli

Dear Clerk:

Attached please find the following document for filing today with the Supreme Court regarding the above matter:

1. Answer to Petition for Review of Respondent/Cross-Appellants Benjamin Danieli, as Personal Representative of the Estate of Jacqueline Danieli, Karen Danieli, Liza Taylor and Maria Danieli

Thank you,

Krista

Krista M. Stokes | Perkins Coie LLP
LEGAL SECRETARY to David F. Taylor Sean C. Knowles Angela R. Jones
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
☎: 206.359.3871
🖷: 206.359.4871
✉: KStokes@perkinscoie.com

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.