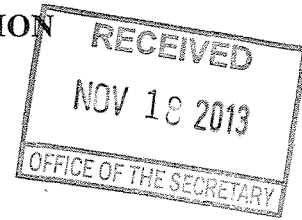


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

DONALD J. ANTHONY, JR.,
FRANK H. CHIAPPONE,
RICHARD D. FELDMANN,
WILLIAM P. GAMELLO,
ANDREW G. GUZZETTI
WILLIAM F. LEX,
THOMAS E. LIVINGSTON,
BRIAN T. MAYER,
PHILIP S. RABINOVICH, and
RYAN C. ROGERS,

Respondents.

ANSWER WITH
AFFIRMATIVE DEFENSES

ADMINISTRATIVE PROCEEDING
FILE NO.: 3-15514

Hon. Cameron Elliot, ALJ

Pursuant to Rule 220 of the Security and Exchange Commission's (the "Commission") Rules of Practice, Respondent, Frank Chiappone ("Respondent Chiappone"), by and through his attorneys, Tuczinski, Cavalier & Gilchrist, P.C., hereby sets forth as follows as and for his Answer with Affirmative Defenses to the Commission's Order Instituting Administrative and Cease-And-Desist Proceedings pursuant to Section 8A of the Securities Act of 1933, Sections 15(b) and 21C of the Securities Exchange Act of 1934, Section 203(f) of the Investment Advisors Act of 1940, and Section 9(b) of the Investment Company Act of 1940 and Notice of Hearing, dated September 23, 2013 (hereinafter "the OIP").

GENERAL RESPONSES AND OBJECTIONS

Certain paragraphs of the OIP lack sufficient facts and information specific to Respondent Chiappone to allow him either to admit or deny the allegations contained in said respective paragraphs, or otherwise adequately respond, and are the subject for a Motion for More Definite Statement filed with this Answer. Respondent Chiappone, furthermore, objects to the group pleading allegations set forth by the Commission inasmuch as Respondent Chiappone cannot prepare an adequate defense against the charges.

Respondent Chiappone responds to the specific allegations of the OIP as follows:

I.

Respondent Chiappone denies the allegations of Section I of the OIP, except admits that the Commission purports to bring this proceeding against him, and the other named Respondents, as described therein.

II.

A. Respondents

1. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 1.
2. Respondent Chiappone admits the allegations of paragraph 2.
3. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 3.
4. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 4.
5. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 5.

6. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 6.
7. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 7.
8. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 8.
9. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 9.
10. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 10.

B. Relevant Entities and Individuals

11. With respect to the allegations set forth in paragraph 11, Respondent Chiappone admits that MS & Co. had its principal office at 99 Pine Street, Albany, New York and maintained branch offices at Clifton Park, New York and King of Prussia, Pennsylvania, and that McGinn Smith & Co. was registered with the Commission as a broker-dealer and as an investment advisor. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 11.
12. With respect to the allegations set forth in paragraph 12, Respondent Chiappone admits that MS Advisors had a principal place of business at 99 Pine Street, Albany, New York and was investment advisor to the Four Funds referred to or known as FIIN, FEIN, TAIN, and FAIN (the "Four Funds"). Respondent Chiappone denies knowledge or information

sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 12.

13. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13.
14. With respect to paragraph 14, Respondent Chiappone admits that McGinn, Smith Capital Holdings Corp. (“MS Capital”) had a principal place of business at 99 Pine Street, Albany, New York, and that MS Capital was the indenture trustee, servicing agent and collateral agent for the Four Funds, and the Trustee for the Trusts created between 2006 and 2009. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 14.
15. With respect to paragraph 15, Respondent Chiappone admits that the Four Funds were limited liability companies, whose sole managing agent was MS Advisors; that MS & Co. served as the placement agent for the Four Funds offerings; that MS Capital acted as the Trustee; and that the Four Funds had offices at 99 Pine Street, Albany, New York. With respect to each and every other allegation set forth in paragraph 15, Respondent Chiappone refers to the PPMs for each of the Four Funds for a complete and accurate statement of their content and terms, and denies knowledge or information sufficient to form a belief as to the truth of such allegations.
16. With respect to paragraph 16, Respondent Chiappone admits that the Trust Offerings were offerings by entities to invest in contracts for burglar alarm service, “triple play” (broadband, cable and telephone) service or luxury cruises; that MS & Co. acted as placement agent; and that MS Capital acted as Trustee for the Trust Offerings. With respect to each and every other allegation set forth in paragraph 16, Respondent Chiappone

refers to the PPMs for the respective Trust Offerings for a complete and accurate statement of their content and terms, and denies knowledge or information sufficient to form a belief as to the truth of such allegations.

17. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17.
18. With respect to paragraph 18, Respondent Chiappone admits that Tim M. McGinn was the chairman, secretary and co-owner of MS & Co. and was CEO of Integrated Alarm Services Group, Inc.; that McGinn was found guilty of multiple counts of mail and wire fraud, securities fraud and filing false tax returns; was sentenced to jail and ordered to pay restitution. Respondent Chiappone but denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 18.
19. With respect to allegations set forth in paragraph 19, Respondent Chiappone admits that David Smith was the president and chief executive officer of MS & Co., was manager of the Four Funds, was the Chief Compliance Officer of MS & Co; that Smith was found guilty of multiple counts of mail and wire fraud, securities fraud and filing false tax returns; and that Smith was sentenced to jail and ordered to pay restitution. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 19.

C. Overview

20. With respect to the allegations set forth in paragraph 20, Respondent Chiappone admits that Anthony, Chiappone, Feldmann, Gamello, Lex, Livingston, Mayer, Rabinovich and Rogers were brokers at MS & Co.; that they sold MS & Co. private placements and that Respondent Guzzetti was a supervisor at MS & Co. Respondent Chiappone denies each

and every other allegation set forth in paragraph 20 that concern and/or pertain to him, and specifically denies the allegations that (a) he willfully violated Section 5(a) and (c) of the Securities Act by offering and selling notes for which no registration statements were in effect; and (b) that he willfully violated Section 17(a) of the Securities Act, Section 10(b) of the Exchange Act or Rule 10b-5 thereunder by knowingly or recklessly or negligently failing to perform reasonable due diligence to form a reasonable bases for his recommendations to customers, or made misrepresentations or omissions in recommending the Four Funds and Trust Offerings. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in said paragraph 20 that concern or pertain to Respondents Anthony, Feldman, Gamello, Lex, Livingston, Mayer, Rabinovich, Rogers and/or Guzzetti.

D. The MS & Co. Offerings

21. With respect to paragraph 21, Respondent Chiappone admits that David Smith and Timothy McGinn created and controlled the Four Funds and Trust Offerings, but denies knowledge and information sufficient to form a belief as to the truth of the allegations that the offerings raised more than \$125 million from more than 750 investors, or that investor losses exceed \$80 million.
22. Respondent Chiappone admits that Smith controlled the issuers, prepared the private placement memoranda (“PPMS”) and set the terms of the offerings, controlled the investor money and made investment decisions, but denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in paragraph 22. Respondent Chiappone respectfully refers to the Four Funds’ offering materials, including

the PPMs, for a complete and accurate statement of their contents and terms, including, but not limited to, descriptions of the three tranches.

23. Paragraph 23 states a legal conclusion as to which no response is required. To the extent (if any) that any further response is required, Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 23.
24. Respondent Chiappone refers to the PPMS for each of the Four Funds for a complete and accurate statement of their contents and terms. Respondent Chiappone admits that he received incentive commissions of 2% of the aggregate principal amount of the notes per year over the term of the notes.
25. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 25. Respondent Chiappone respectfully refers to the PPMs for each of the Four Funds for a complete and accurate statement of their contents and terms.
26. Respondent Chiappone respectfully refers to the PPMs and subscription agreements for each of the Four Funds for a complete and accurate statement of their contents and terms.
27. Respondent Chiappone admits he sold the Four Funds to a limited number of unaccredited investors with the understanding that the Four Funds were offered pursuant to Reg. D. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations that the Four Funds offerings had more than 35 unaccredited investors. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations that other Respondents sold the Four Funds to unaccredited investors.

28. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 28.
29. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations contained in paragraph 29, and respectfully refers to the PPMs for the Four Funds for a complete and accurate statement of their contents, terms and disclosures.
30. Respondent Chiappone admits that McGinn returned to MS & Co. after serving as CEO of IASG; that McGinn created the Trust Offerings and MSTF; and that the Trusts were ostensibly created to fund entities involved in such areas as burglar alarm service, triple play service and luxury cruises. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in said paragraph 30.
31. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the allegations of paragraph 31. Respondent Chiappone refers to the PPMs for the respective Trusts for a complete and accurate statement of their contents and terms.
32. Respondent Chiappone respectfully refers to the Trust PPMs for a complete and accurate statement of conditions and terms thereof. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of each and every allegation set forth therein with regard to any alleged breach of the Rule 506 limitation on unaccredited investors.
33. Respondent Chiappone denies the allegation that the Trust Offerings continued “the egregious misuse of investor funds”. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations as to what Smith and

McGinn did or did not do with the offering proceeds from the Trust offerings or investor funds.

E. The Respondents' Illegal Conduct

34. The allegations of paragraph 34 lack the necessary specificity and factual basis with respect to the individual Respondents and, therefore, Respondent Chiappone cannot admit the allegations of said paragraph and denies the same. Paragraph 34 purports to state legal conclusions as to which no response is required.
35. The allegations set forth in paragraph 35 lack adequate specificity regarding which Respondent allegedly made material misrepresentations or omissions, fail to identify the particular Funds and/or offerings the allegations relate to, fail to state when such alleged material misrepresentations or omissions were made or to whom. The alleged material misrepresentations or omissions were made and, therefore, Respondent Chiappone cannot admit the allegation contained in said paragraph. Respondent Chiappone specifically denies the allegations that he “blindly relied on Smith and McGinn, even in the face of red flags.” Respondent Chiappone denies knowledge or information to form a belief as to the allegations insofar as they concern the other Respondents.
36. The allegations set forth in paragraph 36 fails to identify the relevant time period and lacks specificity and the factual basis with respect to the individual Respondents and, therefore, Respondent Chiappone denies the said allegations. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations insofar as they concern the other Respondents.
37. The allegations set forth in paragraph 37 fail to identify the relevant time periods and lack specificity and the factual basis with respect to the individual Respondents and, therefore,

Respondent Chiappone denies the same. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations insofar as they concern the other Respondents.

38. Respondent Chiappone denies the allegations of paragraph 38, including the allegations in subparagraphs (a) – (d) and in footnote 3, that are directed at him, and specifically denies that he performed “inadequate due diligence prior to recommending the Four Funds to his customer”, or that he was “reckless” in any way, or that there was a complete prohibition on sales to unaccredited investors. Respondent Chiappone refers to the PPMs for the Four Funds for a complete and accurate statement of the contents and terms thereof. Respondent Chiappone further denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38 insofar as they pertain to or concern the other Respondents.
39. Respondent Chiappone denies the allegations of paragraph 39 to the extent that said allegations are directed at him, and specifically denies that he “turned a blind eye” as to how investor funds were being used. Respondent Chiappone further denies knowledge or information sufficient to form a belief as to the truth of the allegations insofar as said allegations are directed at the other Respondents.
40. Respondent Chiappone admits that Smith failed to provide his brokers with specific information about how he invested the offering proceeds, but denies that he should have been prompted to question the property of the Four Funds. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation contained in said paragraph 40.

41. Respondent Chiappone admits only that he did not request an “annual statement of operations consisting of a balance sheet and income statement” before January 2008, but denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation in paragraph 41. Respondent Chiappone refers to the PPMs for a complete and accurate statement of their contents and terms.
42. Respondent Chiappone refers to MS & Co.’s compliance manual for a complete and accurate statement of its contents and terms. Respondent Chiappone admits only he did not ask to review the due diligence files, but denies any “red flags” regarding the Four Funds. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of said allegations in paragraph 42 as they concern the other Respondents.
43. Respondent Chiappone admits, upon information and belief, that the Funds began having difficulty meeting redemption requests, and that Respondent Chiappone was advised that he had to “replace” customers seeking to redeem Four Funds notes with new customers. Respondent Chiappone denies the allegation that he was advised of any Redemption Policy by 2006. Respondent Chiappone further refers to the PPMs for each of the Funds for a complete and accurate statement of the contents and terms thereof.
44. Respondent Chiappone denies the allegation that the “Redemption Policy” was a “red flag” or that he “continued to recommend MS & Co. private placements to [his] customers for several more years.” Respondent Chiappone admits that he did not undertake an “investigation of the offerings.” Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 44 as they concern the other Respondents.

45. Because this paragraph lacks adequate specificity regarding the time period, the customers who allegedly rolled over or reinvested in the Four Funds, or how many customers Respondent Chiappone allegedly had roll over or reinvest in the Four Fund notes at maturity, Respondent Chiappone cannot admit the allegations of the paragraph and, therefore, denies the same. Respondent Chiappone further and specifically denies that he sought redemption for “current customers even knowing that the redemption would not be paid for with investment returns.” Respondent Chiappone denies knowledge or information sufficient to form a belief as to the allegations of said paragraph 45 insofar as they pertain to and/or concern the other Respondents.
46. Respondent Chiappone admits only that on or about January 8, 2008 Smith and McGinn held a meeting with the brokers, including Respondent Chiappone, to discuss the status of the Four Funds. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of each and every other allegation set forth in paragraph 46 and, therefore, denies the same.
47. Respondent Chiappone admits only that he did not request an investigation into the Four Funds or ongoing Trust Offerings after the January 2008 meeting, but denies that there were “red flags” that should have prompted him to conduct a “searching inquiry regarding any MS & Co. private placement.” Respondent Chiappone further denies that he recommended Trust Offerings to his customers based on insufficient due diligence. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations regarding how much money the offerings and Trusts raised after January 2008 or insofar as said allegations pertain to and/or are directed at the other Respondents.

48. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 48.
49. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 49.
50. With respect to the allegations in paragraph 50, Respondent Chiappone admits only that he recommended the Benchmark offering, but denies any inappropriateness in having done so. Respondent Chiappone further denies that any “red flags” were raised by the Benchmark PPM, or that he should be skeptical of Benchmark’s ability to meet the promised interest payments. Respondent Chiappone refers to the Benchmark PPM for a complete and accurate statement of the terms and conditions thereof.
51. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations regarding Firstline Securities, Inc., the related Trust Offering, or McGinn’s knowledge and involvement in the Firstline litigation and/or bankruptcy. Respondent Chiappone admits only that he was unaware of the Firstline bankruptcy filing until McGinn disclosed that information in September 2009, and that, upon information and belief, he sold Firstline to only two customers after the bankruptcy filing in January 2008, but that both of such sales were made before Respondent Chiappone was aware of the Firstline bankruptcy. Respondent Chiappone denies that there were any “red flags” raised with respect to the second Firstline Trust Offering prior to September 2009 that should have or would have caused him to conduct “due diligence” in response thereto. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations as they concern or related to the other Respondents.

F. Sales and Commissions

52. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 52.
53. Respondent Chiappone admits only that he sold Four Fund Offerings and Trust Offerings and that he earned commissions thereon. Respondent Chiappone denies knowledge and information sufficient to form a belief as to the truth of the specific dollar amounts set forth in paragraph 53 because Respondent Chiappone's commission run statements, which is his only source of information, do not indicate what product sold, only how much commission was earned in any given month.
54. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 54.
55. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 55.
56. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 56.
57. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 57.
58. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 58.
59. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 59.
60. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 60.

G. Guzzetti Failed to Reasonably Supervise

61. Respondent Chiappone admits the allegations of paragraph 61, except denies knowledge and information sufficient to form a belief as to the truth of the relevant time period in which Guzzetti was the Managing Director of the MS & Co. Private Client Group.
62. Respondent Chiappone admits the allegations of paragraph 62, except denies knowledge and information sufficient to form belief as to the truth of the commissions earned by Respondent Guzzetti.
63. Respondent Chiappone admits that Guzzetti sent out emails summarizing MS & Co. products available for sale to customers, but denies that the allegations completely and accurately reflect the contents of the partially quoted email.
64. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 64, but admits that Respondent Guzzetti instructed the brokers, including Respondent Chiappone, to find replacement tickets.
65. Paragraph 65 purports to state legal conclusions as to which no response is required, except denies that Respondent Chiappone committed any violations.

H. Violations

66. Respondent Chiappone denies the allegations contained in paragraph 66, and specifically denies that he violated Sections 5(a) and (c) of the Securities Act, willfully or otherwise. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 66 insofar as said allegations concern the other Respondents.
67. Respondent Chiappone denies the allegations contained in paragraph 67, and specifically denies that he violated Section 17(a) of the Securities Act or Section 10(b) of the Exchange

Act or Rule 10(b)-5, willfully or otherwise. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 67 insofar as said allegations concern the other Respondents.

68. Respondent Chiappone denies the allegations contained in paragraph 68 insofar as said allegations concern and/or are directed at Respondent Chiappone, and specifically denies that he committed any violations of Sections 5(a), or 17 of the Securities Act, or Section 10(b) of the Exchange Act or Rule 10(b)-5 thereunder. Respondent Chiappone denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 68 insofar as said allegations concern the other Respondents.

69. With respect to any allegation set forth in Section II of the OIP not expressly admitted herein, Respondent Chiappone hereby denies the same.

III. – IV.

Frank Chiappone submits that this Administrative Proceeding against him is unfounded and baseless in that Respondent Chiappone did not violate any provision of the Securities Laws cited by the Commission. Respondent Chiappone properly discharged his duties in accordance with existing standards and rules established by the Commission. In discharging his duties and obligations, Mr. Chiappone reasonably relied upon McGinn Smith's institutional processes, and other employees and counsel, such as those who worked in McGinn Smith's legal, compliance, sales and trading and accounting departments, to ensure adequate and appropriate legal review and compliance. Mr. Chiappone requests a hearing in this matter.

DEFENSES

Respondent Frank Chiappone asserts the following defenses without assuming the burden of proof or any other burden if such burdens would otherwise be on the Commission:

AS AND FOR A FIRST DEFENSE

The OIP fails to state a claim upon which relief may be granted against Respondent Chiappone.

AS AND FOR A SECOND DEFENSE

The Commissions' claims are barred by the applicable statute of limitations and the doctrine of laches.

AS AND FOR A THIRD DEFENSE

The OIP fails to allege the existence of any material misstatement or omission specifically made by Respondent Chiappone.

AS AND FOR A FOURTH DEFENSE

The Commission claims and requested relief are barred by the doctrine of Fair Notice.

AS AND FOR A FIFTH DEFENSE

The OIP fails to allege that Respondent Chiappone acted with the requisite scienter or mental state that is necessary under the circumstances for him to be held liable.

AS AND FOR A SIXTH DEFENSE

The purported claims against Respondent Chiappone and the allegations upon which they are based are improperly vague, ambiguous and omit essential facts. Furthermore, the Commission has failed to plead alleged willful violations and fraud by Respondent Chiappone with sufficient particularity.

AS AND FOR A SEVENTH DEFENSE

The purported claims against Respondent Chiappone are based on alleged actions, misrepresentations and omissions made by many different McGinn Smith employees, in particular though not limited to David Smith & Tim McGinn, who worked in various aspects of

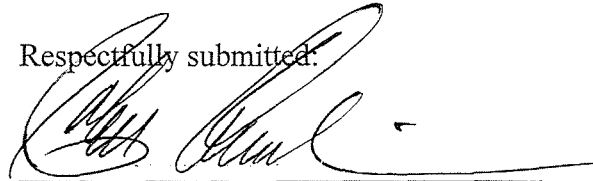
the company, including legal, compliance, sales and trading, and accounting. Respondent Chiappone reasonably and in good faith relied on McGinn Smith's institutional processes to ensure adequate and appropriate legal review, disclosure of material information and compliance insurance, and cannot be held liable for any alleged failings of that process.

PRAYER FOR RELIEF

Based upon the foregoing, Respondent Frank Chiappone respectfully requests that any request for relief or judgment on behalf of the Commission be denied, and that this proceeding be dismissed against Mr. Chiappone in its entirety, with prejudice, together with such other further and different relief as is deemed just and proper.

Dated: November 15, 2013
Albany, New York

Respectfully submitted:



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