

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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JOSEPH FARAH,  
c/o 2020 Pennsylvania Avenue, N.W.  
#351  
Washington, D.C. 20006

JEROME CORSI,  
c/o 2020 Pennsylvania Avenue, N.W.  
#351  
Washington, D.C. 20006

WORLDNETDAILY.COM  
c/o 2020 Pennsylvania Avenue, N.W.  
#351  
Washington, D.C. 20006

And WND BOOKS,  
c/o 2020 Pennsylvania Avenue, N.W.  
#351  
Washington, D.C. 20006

Plaintiffs,

vs.

ESQUIRE MAGAZINE, INC.,  
300 West 57<sup>th</sup> Floor  
New York, New York 10019

HEARST COMMUNICATIONS INC.,  
300 West 57<sup>th</sup> Street  
New York, New York 10019

and MARK WARREN,  
c/o 300 West 57<sup>th</sup> Street  
New York, New York 10019

Defendants.

**JURY  
ACTION**

Case: 1:11-cv-01179  
Assigned To : Collyer, Rosemary M.  
Assign. Date : 6/28/2011  
Description: General Civil

CIVIL ACTION NO. \_\_\_\_\_

**COMPLAINT**

Plaintiffs, Joseph Farah, Jerome Corsi, WorldNetDaily.com, and WND Books bring this complaint against Defendants Esquire Magazine, the Hearst Communications Inc. and Mark Warren and allege as follows:

**Jurisdiction and Parties**

1. This is a case and controversy between citizens of different states, the causes of action exceed \$75,000 in damages and is based upon violation of federal statutes as well as the common law. This case and controversy arose in the District of Columbia and elsewhere.
2. Plaintiff Joseph Farah is at all times material hereto the Editor and Chief Executive Officer of WorldNetDaily.com, a news and commentary Internet publication which competes nationally and internationally with Defendant Esquire Magazine. Mr. Farah at all material times resides in Virginia. WND Books is a wholly owned subsidiary of WorldNetDaily.com.
3. Plaintiff Jerome Corsi is a world renowned author of several New York Times bestsellers and at all material times resides in New Jersey. He is the author of the newly released book by WND Books, "Where's the Birth Certificate? The Case that Barack Obama is Not Eligible to be President."
4. Plaintiff WorldNetDaily.com, as set forth in paragraph 2, at all material times is incorporated in Delaware and is the parent/holding company of WND Books and does business in the District of Columbia, nationally and internationally.
5. Defendant, Esquire Magazine Inc. ("Esquire"), is a print and Internet publication that competes with Plaintiff WorldNetDaily and is incorporated

in New York, and does business nationally and internationally, and in particular in the District of Columbia.

6. Defendant, The Hearst Communications Inc. ("Hearst"), is a multi-media conglomerate which publishes Esquire, and is incorporated in California, is the parent/holding company of Esquire and does business nationally and internationally, and in particular in the District of Columbia.
7. Defendant Mark Warren is the Executive Editor for Esquire for both its print and Internet publications. Mr. Warren resides in the District of Columbia.

#### **THE FACTS**

8. Plaintiffs Farah, Corsi, WorldNetDaily.com and WND Books ("collectively WorldNetDaily") have at all material times covered the controversy concerning whether or not President Barack Hussein Obama is a natural-born American citizen eligible to be President of the United States.
9. In this regard, WND Books has recently published a book by Plaintiff Corsi entitled "Where's the Birth Certificate? The Case that Barack Obama is not Eligible to be President," which bears on President Barack Obama's eligibility to have been elected and continue to serve as President of the United States.
10. About 25 percent of the American people believe that because President Barack Obama waited many years to release what he now claims is his birth certificate, as well as other factors, that the newly released birth

certificate is fraudulent and that he is not eligible to be President of the United States.

11. President Barack Hussein Obama, wanting to try to eliminate this issue among voters and the American populace, recently released what many people, including Plaintiff Corsi, have reason to believe is a fraudulent birth certificate purporting to show that he was born in Hawaii.
12. Specifically, just as Plaintiff's book was released, Defendants, each and every one of them, caused to be published and did publish at a minimum on the Internet, nationally and internationally, and specifically in the District of Columbia, an article entitled "Breaking: Jerome Corsi's Birther Book Pulled from Shelves?," about Plaintiffs' book. This article published on or about 10 am on May 18, 2011, set forth false and misleading facts about the Plaintiffs' book and stated in pertinent part: "In a stunning development one day after the release of 'Where's the Birth Certificate? The Case that Barack Hussein Obama is Not Eligible to be President,' by Dr. Jerome Corsi, World Net Daily Editor and Chief Executive Officer Joseph Farah has announced plans to recall and pulp the entire 200,000 first printing run of the book, as well as announcing an offer to refund the purchase price to anyone who has already bought either a hard copy or electronic download of the book. In an exclusive interview, a reflective Farah, who wrote the book's foreword and also published Corsi's earlier best selling work, 'Unfit for Command: Swift Boat Veterans Speak out Against John Kerry' and 'Capricorn One: NASA, JFK, and the Great "Moon

Landing" Cover-Up,' said that after much serious reflection, he could not go forward with the project. 'I believe with all my heart that Barack Obama is destroying this country, and I will continue to stand against his administration at every turn, but in light of recent events, this book has become problematic, and contains what I now believe to be factual inaccuracies,' he said this morning. 'I cannot in good conscience publish it and expect anyone to believe it.' When asked if he had any plans to publish a corrected version of the book, he said cryptically, 'There is no book.'

Farah declined to comment on his discussions of the matter with Corsi. A source at WND, who requested that his name be withheld, said that Farah was 'rip shit' when on April 27, President Obama took the extraordinary step of personally releasing his 'long-form' birth certificate, thus resolving the matter of Obama's legitimacy for 'anybody with a brain.' 'He called upon Corsi and really tore him a new one,' says the source. 'I mean, we'll do anything to hurt Obama, and erase his memory, but we don't want to look like fucking idiots, you know? Look, at the end of the day, bullshit is bullshit.' Corsi, who graduated from Harvard and is a professional journalist, could not be reached for comment."

13. Immediately following the Esquire and Warren publication, news organizations, readers of WorldNetDaily, purchasers and distributors of WND Books and others began contacting Plaintiff Farah for confirmation of the story and comment. In addition, consumers began requesting refunds

and book supporters began attacking Farah and Corsi. Book stores also began pulling the book from their shelves, or not offering it for sale at all.

14. Only when Plaintiff Farah on behalf of himself and the other Plaintiffs issued a statement saying that he was exploring legal options against Esquire and Warren did they purport to issue a disclaimer. However, this so-called disclaimer was as false, misleading and legally actionable as the initial story that was published by the Defendants. Adding "insult to injury," it represented later that day on the Internet, nationally and internationally, including the District of Columbia, the following false, misleading and disparaging information: "... for those who didn't figure it out yet, and the many on Twitter for whom it took a while: We committed satire this morning to point out the problems with selling and marketing a book that has had its core premise and reason to exist gutted by the news cycle, several weeks in advance of publication. Are its author and publisher chastened? Well no. They double down, and accuse the President of the United States of perpetrating a fraud on the world by having released a forged birth certificate. Not because this claim is in any way based on reality, but to hold their terribly gullible audience captive to their lies, and to sell books. This is despicable, and deserves only ridicule. That's why we committed satire in the matter of the Corsi book. Hell, even the president has a sense of humor about it all. Some more serious reporting from us on this whole "birther" phenomenon here, here, and here."

15. The so-called disclaimer of Defendants Warren and Esquire was not a disclaimer at all. It was another actionable attack on Plaintiffs and exhibited the malice of Defendants toward the Plaintiffs. This actionable conduct and malice later manifested itself in comments made by Defendants to The Daily Caller, another Internet publication read by a viewing audience interested, among other topics, in the "birther issue." Defendant Warren, on behalf of himself and Esquire, told The Daily Caller that they had "no regrets" in posting the subject stories and that Plaintiff Corsi, and by extension the other Plaintiffs, are an "execrable piece of shit." The Daily Caller published these statements on May 18 and 19, 2011 in the District of Columbia, nationally and internationally.

16. These actionable statements remain on the Internet and have been widely published domestically, in the District of Columbia, and around the world.

17. Contrary to the false, misleading and otherwise actionable statements of Defendants, Plaintiffs never contemplated, much less offered, to pull the book from shelves, refund purchases to consumers and believed at all material times that the contents of the book are accurate and newsworthy. However, the representations of the Defendants, each and every one of them, resulted in books being pulled from the shelves by booksellers, harmed sales and damaged the goodwill and reputation of Plaintiffs among the buying and consuming public, in the District of Columbia and elsewhere. Defendants' stated malicious purpose in harming Plaintiff, through their actions, succeeded as planned.

**COUNT I - DEFAMATION**

18. Plaintiffs re-allege and re-aver paragraphs 1 through 17 of the complaint as if fully set forth herein.
19. As set forth above, Defendants, jointly and severally, made false and defamatory statements about Plaintiffs, published these statements to third parties, the Defendants' publications were made with malice and at least were negligent, and these statements are actionable as a matter of law irrespective of special harm, but indeed did cause Plaintiffs, each and every one of them, special harm.
20. Plaintiffs sustained and prays for actual and compensatory monetary damages to compensate them for lost business, loss of good will and reputation as a result of Defendants' actions, in an amount in excess of \$10,000,000, and punitive damages in excess of \$20,000,000, plus attorneys fees and costs and such other relief as this court may deem just and proper.

**COUNT II - FALSE LIGHT**

21. Plaintiffs re-aver and re-allege paragraphs 1 through 17 of the complaint as if fully set forth herein.
22. As set forth above, Defendants' misleading and false statements and related actions, which were joint and several, were outrageous and admittedly held Plaintiffs Farah and Corsi up for extreme ridicule in the community where they reside and where their works are viewed and read,



including but not limited to the District of Columbia and throughout the United States and abroad.

23. This severely damaged the Plaintiffs Farah and Corsi.

24. Plaintiffs Farah and Corsi sustained and pray for actual and compensatory damages for business losses and to their good will and reputation in an amount in excess of \$5,000,000, and punitive damages in an amount in excess of \$10,000,000, plus attorneys fees and costs, and such other relief as the court may deem just and proper.

**COUNT III- TORTIOUS INTERFERENCE  
WITH BUSINESS RELATIONS**

25. Plaintiffs re-allege and re-aver paragraphs 1 through 17 of the complaint as if fully set forth herein.

26. Plaintiffs, each and every one of them, and at all material times had a business relationship with distributors and booksellers, such as Borders, Barnes & Noble, Amazon, Tower and others, who sell and distribute their books to the consuming public, including the book at issue in this complaint.

27. Defendants, each and every one of them, and at all material times, have knowledge of these relationships.

28. Defendants, each and every one them, jointly and severally, intentionally interfered with these relationships, causing and/or inducing the abridgment, limitation, breach or termination of these relationships as concerns the sale of the subject book.

29. As a result of Defendants' actions, jointly and severally, Plaintiffs sustained and pray for actual and compensatory damages in an amount in excess of \$10,000,000 and punitive damages in excess of \$ 20,000,000, and attorneys fees and costs and such other relief as this court may deem just and proper.

**COUNT IV - LANHAM ACTION VIOLATIONS UNDER 15 U.S.C. 1125 (a)((1)(A).**

**(B).**

30. Plaintiffs re-allege and re-aver paragraphs 1 through 17 of this complaint as if fully set forth herein.

31. Defendants are commercial competitors of the Plaintiffs generally and with regard to the issue of President Barack Obama's birth certificate and his country of birth.

32. Defendants, each and every one of them, jointly and severally, caused confusion, mistake and deception through their publication of false and misleading information and description of fact which include but are not limited to the accuracy, motives, nature, characteristics, and qualities of the subject book, on their Internet advertising and reporting sites, and as republished by others both domestically and internationally, in the District of Columbia and elsewhere.

33. Defendants' actions, each and every one of them, jointly and severally, damaged Plaintiffs in an amount in excess of \$30,000,000.

34. Plaintiffs pray for damages as calculated under the above statutes, trebled, in an amount, in an amount to be determined by the trier of fact, attorneys fees and costs, and such other relief as this court may deem just and proper.

COUNT V - INVASION OF PRIVACY

35. Plaintiffs re-allege and re-aver paragraphs 1 through 17 of the complaint as if fully set forth herein.
36. Defendants' wholly fabricated, false and misleading quotations attributed to Plaintiffs and use and misuse of Plaintiffs' names, without authorization, were intentional, and with malice, and were calculated and did substantially damage Plaintiffs, each and every one of them, and constitutes the common law tort of invasion of privacy.
37. Defendants acted jointly and severally.
38. Plaintiffs pray for actual and compensatory damages in excess of \$100,000,000, and punitive damages in excess of \$20,000,000, plus attorney's fees and costs and such other relief as this court may deem just and proper.

Plaintiff prays for a trial by jury of all claims so triable.

Respectfully submitted,

  
Larry Klayman, Esq.

DC Bar No.: 334581

2000 Pennsylvania Avenue NW,

Suite 345

Washington, DC 20006

**CIVIL COVER SHEET**

JS-44  
(Rev. 2/11 DC)

E 11-1179 Amc

<b>I (a) PLAINTIFFS</b> <p align="center" style="font-size: 1.2em;">Farah et. al</p>	<b>DEFENDANTS</b> <p align="center" style="font-size: 1.2em;">Esquire et. al</p>
(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)	COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT (IN U.S. PLAINTIFF CASES ONLY)

1001  
~~Virginia~~  
DC

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) <p style="font-size: 1.2em;">Larry Klayman, Esq. 2000 Pennsylvania Ave. # 345 Washington, D.C. 20006</p>	Case: 1:11-cv-01179 Assigned To : Collyer, Rosemary M. Assign. Date : 6/28/2011 Description: General Civil
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JURY ACTION

<b>II. BASIS OF JURISDICTION</b> (PLACE AN X IN ONE BOX ONLY)	<b>III CITIZENSHIP OF PRINCIPAL PARTIES</b> (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) <b>FOR DIVERSITY CASES ONLY!</b>
<input type="radio"/> 1 U.S. Government Plaintiff	<input type="radio"/> PTF Citizen of this State
<input checked="" type="radio"/> 2 U.S. Government Defendant	<input checked="" type="radio"/> DFT Citizen of Another State
<input checked="" type="radio"/> 3 Federal Question (U.S. Government Not a Party)	<input type="radio"/> PTF Citizen or Subject of a Foreign Country
<input checked="" type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III)	<input type="radio"/> DFT Foreign Nation

**IV. CASE ASSIGNMENT AND NATURE OF SUIT**

(Place a X in one category, A-N, that best represents your cause of action and one in a corresponding Nature of Suit)

<input type="radio"/> <b>A. Antitrust</b>  <input type="checkbox"/> 410 Antitrust	<input type="radio"/> <b>B. Personal Injury/Malpractice</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> <b>C. Administrative Agency Review</b> <input type="checkbox"/> 151 Medicare Act Social Security: <input type="checkbox"/> 861 HIA ((1395m)) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) Other Statutes <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> <b>D. Temporary Restraining Order/Preliminary Injunction</b>  Any nature of suit from any category may be selected for this category of case assignment.  *(If Antitrust, then A governs)*
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**E. General Civil (Other)**      OR       **F. Pro Se General Civil**

<b>Real Property</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property  <b>Personal Property</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<b>Bankruptcy</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>Prisoner Petitions</b> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition  <b>Property Rights</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>Federal Tax Suits</b> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	<b>Forfeiture/Penalty</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 RR & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other  <b>Other Statutes</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 900 Appeal of fee determination under equal access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input checked="" type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)
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3

<input type="radio"/> <b>G. Habeas Corpus/ 2255</b>  <input type="checkbox"/> 530 Habeas Corpus-General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee	<input type="radio"/> <b>H. Employment Discrimination</b>  <input type="checkbox"/> 442 Civil Rights-Employment (criteria: race, gender/sex, national origin, discrimination, disability age, religion, retaliation)  *(If pro se, select this deck)*	<input type="radio"/> <b>I. FOIA/PRIVACY ACT</b>  <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act)  *(If pro se, select this deck)*	<input type="radio"/> <b>J. Student Loan</b>  <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (excluding veterans)
<input type="radio"/> <b>K. Labor/ERISA (non-employment)</b>  <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> <b>L. Other Civil Rights (non-employment)</b>  <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 American w/Disabilities-Employment <input type="checkbox"/> 446 Americans w/Disabilities-Other	<input type="radio"/> <b>M. Contract</b>  <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> <b>N. Three-Judge Court</b>  <input type="checkbox"/> 441 Civil Rights-Voting (if Voting Rights Act)

**V. ORIGIN**

1 Original Proceeding   
 2 Removed from State Court   
 3 Remanded from Appellate Court   
 4 Reinstated or Reopened   
 5 Transferred from another district (specify)   
 6 Multi district Litigation   
 7 Appeal to District Judge from Mag. Judge

**VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)**  
Lanham Act 15 U.S.C. 1125(a)(1)(A), Diversity

**VII. REQUESTED IN COMPLAINT**    CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23     DEMAND \$ 7.20 million USD    Check YES only if demanded in complaint  
**JURY DEMAND:**    YES     NO

**VIII. RELATED CASE(S) IF ANY**    (See instruction)    YES     NO     If yes, please complete related case form

DATE 6/28/11    SIGNATURE OF ATTORNEY OF RECORD 

**INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44**  
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the Cover Sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence Use 11001 to indicate plaintiff is resident of Washington, D C , 88888 if plaintiff is resident of the United States but not of Washington, D C , and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II
- IV. CASE ASSIGNMENT AND NATURE OF SUIT The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of case.
- VI. CAUSE OF ACTION Cite the US Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASES, IF ANY If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form

*M*