

1 to and throughout the trial of this action. We, therefore, specifically reserve the right at the
2 time of trial to introduce all evidence from any source which may hereinafter be discovered
3 and all testimony from all witnesses whose identities may hereafter be discovered.

4 If any information has unintentionally been omitted from the responses, the
5 responding party reserves the right to amend these responses or apply for relief so as to
6 permit the insertion of the omitted data from these responses.

7 These introductory comments shall apply to each and every response given herein,
8 and shall be incorporated by this reference as though fully set forth in each and every
9 following interrogatory response.

10 **RESPONSES TO FORM INTERROGATORIES**

11 1 **QUESTION:** Personal History. State your full name, current residence address and
12 work address, social security number and any other names you have used, and the dates
13 between which you used each name.

14 **RESPONSE:** Helen Su Irving-Yan. 2810 Domingo Road, Fullerton, CA 92835
15 Work address: 1220 W. Imperial Hwy, La Habra 90631
16 Social security number: can be obtained through counsel.
17 Other names I have used and dates: Helen Su Irving- Birth until date of marriage.

18 2. **QUESTION:** Agreements. Are there any agreements between you and your spouse
19 or domestic partner, made before or during your marriage or domestic partnership or after
20 your separation, that affect the disposition of assets, debts or support in this proceeding?
21 If your answer is yes, for each agreement state the date made and whether is was written
22 or oral, and attach a copy of the agreement or describe its contents.

23 **RESPONSE:** The parties have no Pre- or Post-Marital agreement in place. The parties
24 have discussed temporary arrangements related to custody and support, but these are not
25 yet formalized or made into court orders.

26 3. **QUESTION.** Legal actions. Are you a party or do you anticipate being a party to
27 any legal or administrative proceeding other than this action? If your answer is yes, state
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1 your role and the name, jurisdiction, case number and a brief description of each
2 proceeding.

3 **RESPONSE:** No.

4 4. **QUESTION.** Persons sharing residence. State the name, age, and relationship to
5 you of each person at your present address.

6 **RESPONSE:**

7 Kory Irving Yan: 17 years old. Child

8 Kristi Irving Yan: 14 year old. Child

9 Kurtis Irving Yan: 10 years old. Child

10 Ken Cordero: 46 years old. Significant Other.

11 5. **QUESTION.** Support received for others. State the name, age, address and
12 relationship to you of each person for whom you have provided support during the past 12
13 months and the amount received per month for each.

14 **RESPONSE:** No one.

15 6. **QUESTION.** Support provided others. State the name, age, address and
16 relationship to you of each person for whom you have received support during the past 12
17 months and the amount received per month for each.

18 **RESPONSE:** The demanding party has provided me with financial support for our three
19 children and for myself on a monthly basis over the past 12 months. He provides me with
20 \$3,000 every 2 weeks for our support.

21 My significant other pays for pool maintenance, gardener and minor home repairs.

22 7. **QUESTION.** Current income. List all income you received during the past 12
23 months, its source, the basis for its computation, and the total amount received from each.
24 Attach your last three paycheck stubs.

25 **RESPONSE:**

26 I have two sources of income. At my retail job with TJ Maxx, I made gross income, before
27 taxes, of \$17,213.14 from January 1, 2025 to December 9, 2025. See last 3 paystubs as

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1 well as my last 3 tax returns.

2 At my second job, I mail Amazon packages. My income from this side job fluctuates. In
3 2024, I earned \$1,885.00. Please see attached 1099-NEC.

4 8. **QUESTION.** Other income. During the past three years, have you received cash or
5 other property from any other source not identified in item 7? If so. List the source, the
6 date, and the nature and value of the property.

7 **RESPONSE:** No

8 9. **QUESTION.** Tax returns. Attach copies of all tax returns and tax schedules filed by
9 or for you in any jurisdiction for the past three calendar years.

10 **RESPONSE:** 2022 2023 and 2024 are attached.

11 10. **QUESTION.** Schedule of assets and debts. Complete the Schedule of Assets and
12 Debts (form FL-142) served with these interrogatories.

13 **RESPONSE:** See attached.

14 11. **QUESTION.** Separate property contentions. State the facts that support your
15 contention that an asset or debt is separate property.

16 **RESPONSE:**

17 1. All of my income, earnings, and accumulations/savings from Date of Separation to
18 present.

19 2. E*Trade/Morgan Stanley a/c #9860- contributed to solely with post-separation earnings.

20 3. E*Trade/Morgan Stanley IRA a/c #5139- contributed to solely with post-separation
21 earnings.

22 4. Gifted jewelry and other gifts in my possession/gifted to me.

23 5. Credit card points she has amassed post-Date of Separation.

24 6. Bank of America Visa a/c #0634.

25 Please see Schedule of assets and debts attached hereto.

26 12. **QUESTION.** Property valuations. During the past 12 months, have you received
27 written offers to purchase or had written appraisals of any of the assets listed on your

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1 completed Schedule of Assets and Debts? If your answer is yes, identify the document.

2 **RESPONSE:** Yes, we have had 3 of our 4 pieces of joint real estate, located in California,
3 valued. The documents are the Appraisal Reports prepared by John Rydell, for the
4 Domingo, Sterns, and Spring Hill homes. We are waiting on the 4th appraisal report for the
5 Brea property from Rod Heffington.

6 I am not aware of any valuations done on real property in Nevada.

7 13. **QUESTION.** Property held by others. Is there any property held by any third party in
8 which you have any interest or over which you have any control? If your answer is yes,
9 indicate whether the property is shown on the Schedule of Assets and Debts completed by
10 you. If it is no, describe and identify each such asset, state its present value and the basis
11 for your valuation and identify the person holding the asset.

12 **RESPONSE:** None other than the savings accounts for the kids.

13 14. **QUESTION.** Retirement and other benefits. Do you have an interest in any
14 disability, retirement, profit-sharing or deferred compensation? If your answer is yes,
15 identify each plan and provide the name, address and telephone number of the
16 administrator and custodian of records.

17 **RESPONSE:**

18 E*Trade/Morgan Stanley IRA a/c #5139 (HIY)

19 E*Trade/Morgan Stanley IRA a/c #1017 (KY)

20 Capital Group/American Funds Kanex 401(K) Plan

21 Guideline/Load Karma 401(K) Plan (KY)

22 Capital Group/American Funds Kanex 401(K) Plan

23 Please see attached Schedule of Assets and Debts for additional information and potential
24 account numbers.

25 There may be other such accounts that have not yet been disclosed to me by the
26 demanding party.

27 Discovery is continuing and the demanding party presently owes me outstanding

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1 documents and further responses to discovery demands I have issued. Thus, I reserve my
2 right to augment and update this response in the future, when I have received full
3 information from the demanding party.

4 15. **QUESTION.** Claims of reimbursement. Do you claim the legal right to be
5 reimbursed for any expenditures of your separate or community property? If your answer is
6 yes, state all supporting facts.

7 **RESPONSE:** Yes. The community property commercial real estate located at 1405
8 Pioneer street in Brea that was sold in or about October of 2021. Demanding party has
9 used some of it to pay down community debts, taxes, and has put it to other uses, but he
10 has not accounted for the entirety of the sales proceeds. I am entitled to reimbursement for
11 50% of all unaccounted-for proceeds from the sale of the 1405 Pioneer Street building.
12 Demanding party has a fiduciary and legal duty to account for his uses of community funds
13 post-separation.

14 Discovery is continuing and the demanding party presently owes me outstanding
15 documents and further responses to discovery demands I have issued. Thus, I reserve my
16 right to augment and update this response in the future, when I have received full
17 information from the demanding party.

18 16. **QUESTION.** Credits. Have you claimed reimbursement credits for payments of
19 community debts since the date of separation? If your answer is yes, identify the source of
20 payment, the creditor, the date paid, and the amount paid. State whether you have added
21 to the debt since separation.

22 **RESPONSE:** Not to responding party's knowledge at this time.

23 17. **QUESTION.** Insurance. Identify each health, life, automobile and disability
24 insurance policy or plan that you now own or that covers you, your children, or your assets.
25 State the policy type, policy number and name of the company. Identify the agent and give
26 the address.

27 **RESPONSE:** The demanding party handles all insurance for both parties in this case. I
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1 respectfully refer demanding party to his own records.

2 18. **QUESTION.** Health. Is there any physical or emotional condition that limits your
3 ability to work? If your answer is yes, state each fact on which you base your answer.

4 **RESPONSE:** No.

5 19. **QUESTION.** Children's needs. Do you contend that any of your children have any
6 special needs? If so, identify the child with the need, the reason for the need, it's costs and
7 its expected duration.

8 **RESPONSE:**

9 Kory has an IEP at school and he receives services from the school for a learning
10 disability.

11 Kurtis has serious asthma. From time to time I need to go and pick him up from
12 school because his asthma flares up, so the school calls me to come get him.

13 20. **QUESTION.** Attorney fees. State the total amount of attorney fees and costs
14 incurred by you in this proceeding, the amount paid, and the source of the money paid.
15 Describe the billing arrangements.

16 **RESPONSE:** Objection to the extent that this question calls for attorney client privileged
17 information, and/or documentation shielded from production under the Attorney Work
18 Product Doctrine. Such documentation and other related information is thus private, and
19 confidential.

20 Subject to and without limiting this objection, responding party responds as follows:
21 \$132,179.37 of attorneys fees. These funds have been paid from my earnings, and put on
22 credit cards which I have paid toward, and demanding party has also contributed as well.
23 My mother loaned me the original \$8,000 retainer.

24 21. **QUESTION.** Gifts. List any gifts you have made without the consent of your spouse
25 or domestic partner in the past 24 months, their values, and the recipients.

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1 **RESPONSE:** None other than birthday and Christmas gifts to our children.

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3 Dated: 12/23/2025

THE LAW OFFICE OF LAUREN MULLEE

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By: Lauren Mullee
Lauren Mullee
Attorney for Petitioner, Helen Su Irving-Yan

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THIS FORM SHOULD NOT BE FILED WITH THE COURT

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Lauren Mullee One Park Plaza, Suite 600 Irvine, CA 92614	TELEPHONE NO.: 949-570-0701
ATTORNEY FOR (Name): Helen Su Irving-Yan	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange	
PETITIONER: Helen Su Irving-Yan RESPONDENT: Kelvin Yan	
SCHEDULE OF ASSETS AND DEBTS <input checked="" type="checkbox"/> Petitioner's <input type="checkbox"/> Respondent's	CASE NUMBER: 21D003196

— INSTRUCTIONS —

List all your known community and separate assets or debts. Include assets even if they are in the possession of another person, including your spouse. If you contend an asset or debt is separate, put P (for Petitioner) or R (for Respondent) in the first column (separate property) to indicate to whom you contend it belongs.

All values should be as of the date of signing the declaration unless you specify a different valuation date with the description. For additional space, use a continuation sheet numbered to show which item is being continued.

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
1.	REAL ESTATE <i>(Give street addresses and attach copies of deeds with legal descriptions and latest lender's statement.)</i> 2810 Domingo Road, Fullerton, CA (HELOC) 578 S. Brea Blvd, Brea, CA 2984 E. Stearns St., Brea, CA 1405 Pioneer St., Brea, CA (SOLD Oct 2021 - sales proceeds/disposition unknown) 7702 Spring Hill St., Chino, CA 3726 S. Las Vegas Blvd #310, Las Vegas, NV 89158 3726 S. Brea - unknown (listed on R's 15c SAD attach) Unknown potential interest in property in China. CP contribution believed to be approx \$350,000		9/12/2013 8/6/2020 7/14/2021 4/15/13 2/14/2007 11/8/2021 unknown unknown	\$ 1,700,000 Appraisal TBD 1,650,000 880,000 338,000 unknown unknown	\$ 0 0 50,000 unknown unknown
	2. HOUSEHOLD FURNITURE, FURNISHINGS, APPLIANCES <i>(Identify.)</i> Misc.	P			
	3. JEWELRY, ANTIQUES, ART, COIN COLLECTIONS, etc. <i>(Identify.)</i> Misc.	P			

ITEM NO.	ASSETS DESCRIPTION	SEP. PROP	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
4. VEHICLES, BOATS, TRAILERS <i>(Describe and attach copy of title document.)</i> BMW 740 LI - sold (sales proceeds/disposition unknown) BMW X5 (lease expires August 2022) (currently use by R and rented out) BMW X7 (Respondent is currently renting this out) Porsche (new purchase, in Respondent's possession) Tesla Model 3 (purchased by Respondent, currently used by Petitioner) Tesla Model S (in Respondent's possession) Tesla Model Y (in Respondent's possession)				\$	\$
5. SAVINGS ACCOUNTS <i>(Account name, account number, bank, and branch. Attach copy of latest statement.)</i> Porsche Cayenne - sold (sales proceeds/disposition unknown) Bank of America x0542 (joint account) (DOS: \$92.20)			1/19/2006	5,000.29	@11/19/25
*additional accounts in Respondent's name - unknown 6. CHECKING ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i> Bank of America x4781 (joint account) (DOS: \$766.32) Morgan Stanley x6304 Chase Bank x5537	P		1994 Post-DOS	8,899.77 1.26 21,825.28	@11/19/25 @11/19/2025
additional accounts in Respondent's name - unknown 7. CREDIT UNION, OTHER DEPOSIT ACCOUNTS <i>(Account name and number, bank, and branch. Attach copy of latest statement.)</i> Merrill College Savings Plan (Kristy Yan) x68H51 (DOS: \$unk) Merrill College Savings Plan (Kory Yan) x68H52 (DOS: \$unk)* Merrill College Savings Plan (Kurtis Yan) unk (DOS: \$unk)*			unknown unknown unknown	41,025.41 39,575.91 unknown	@10/29/21 @10/29/21
*Documents in Respondent's possession. 8. CASH <i>(Give location.)</i> 9. TAX REFUND					
10. LIFE INSURANCE WITH CASH SURRENDER OR LOAN VALUE <i>(Attach copy of declaration page for each policy.)</i> Allianz Life Insurance x7425 (cash value as of 6/2020) insuring Respondent			Dur Mar	35,273	@6/20/20
*additional accounts in Respondent's name - unknown					

ITEM NO.	SEP. PROP.	DATE ACQUIRED	CURRENT GROSS FAIR MARKET VALUE	AMOUNT OF MONEY OWED OR ENCUMBRANCE
<p>11. STOCKS, BONDS, SECURED NOTES, MUTUAL FUNDS <i>(Give certificate number and attach copy of the certificate or copy of latest statement.)</i></p> <p>E*Trade Individual Brokerage x9860 (Helen) (no DOS stmt) E*Trade x3898 (DOS: \$unknown) - docs in R's possession E*Trade x6186 (DOS: \$unknown) - docs in R's possession E*Trade x2605 (DOS: \$unknown) - docs in R's possession E*Trade x1393 (DOS: \$unknown) - docs in R's possession *additional accounts in Respondent's name - unknown</p> <p>12. RETIREMENT AND PENSIONS <i>(Attach copy of latest summary plan documents and latest benefit statement.)</i></p> <p>E*Trade Traditional IRA x5139 (Helen) (no DOS stmt) Capital Group American Funds 401k (Helen) x7222 (DOS: \$9,546.40) Kanex 401k (Respondent) - unknown as to details to Petitioner. E*Trade Brokerage x7505 post DOS *additional accounts in Respondent's name - unknown</p> <p>13. PROFIT - SHARING, ANNUITIES, IRAS, DEFERRED COMPENSATION <i>(Attach copy of latest statement.)</i></p> <p>E*Trade IRA x1047 (DOS: \$unknown) - docs in R's possession E*Trade IRA x9417 (DOS: \$unknown) - docs in R's possession E*Trade Roth IRA x4177 (DOS: \$unknown) - docs in R's possession E*Trade Roth IRA x4308 (DOS: \$unknown) - docs in R's possession E*Trade Roth IRA x4173 (DOS: \$unknown) - docs in R's possession</p> <p>14. ACCOUNTS RECEIVABLE AND UNSECURED NOTES <i>(Attach copy of each.)</i> *unknown to Petitioner</p>	<p>P</p> <p>P</p> <p>P</p>	<p>2/23/2021 unknown unknown unknown unknown</p> <p>2/1/2021 12/21/2018</p> <p>168,288</p> <p>unknown unknown unknown unknown</p>	<p>\$</p> <p>47,775 unknown unknown unknown unknown</p> <p>25,451 77,143.81</p> <p>11,739.18 unknown unknown unknown unknown</p>	<p>\$</p> <p>@ 12/14/25</p> <p>@ 12/14/25 @6/30/25 @ 12/14/25</p> <p>@4/26/22</p>
<p>15. PARTNERSHIPS AND OTHER BUSINESS INTERESTS <i>(Attach copy of most current K-1 form and Schedule C.)</i> See attachment 15 and additional documents provided via electronic mail only</p>				
<p>16. OTHER ASSETS *unknown to Petitioner</p> <p>*additional assets - unknown to Petitioner</p> <p>17. TOTAL ASSETS FROM CONTINUATION SHEET</p>				
<p>18. TOTAL ASSETS</p>			<p>\$</p>	<p>\$</p>

ITEM NO.	DEBTS—SHOW TO WHOM OWED	SEP. PROP.	TOTAL OWING	DATE INCURRED
19. STUDENT LOANS <i>(Give details.)</i>			\$	
20. TAXES <i>(Give details.)</i>				
21. SUPPORT ARREARAGES <i>(Attach copies of orders and statements.)</i>				
22. LOANS—UNSECURED <i>(Give bank name and loan number and attach copy of latest statement.)</i>				
23. CREDIT CARDS <i>(Give creditor's name and address and the account number. Attach copy of latest statement.)</i> TJ Maxx x7964 (DOS owing: \$711.55)			1,420.80	various
Bank of America - Jas xunknown - documents in Respondent's possession			unknown	various
Bank of America - Karam xunknown - documents in Respondent's possession			unknown	various
Bank of America Kelvin xunknown - documents in Respondent's possession			unknown	various
*additional credit cards in Respondent's name - unknown				
24. OTHER DEBTS <i>(Specify.):</i> Loan from Su Chen (deposit for rental or home)- Petitioner recalls Respondent paying back \$100K of the original \$200k loan Personal loan from Petitioner's mother, Su Chen			100,000 8,000	2013
Citi Costco x1418			2,847.84	
Bank of America x0634			10,913.25	
25. TOTAL DEBTS FROM CONTINUATION SHEET				
26. TOTAL DEBTS			\$	

27. *(Specify number):* 1 _____ pages are attached as continuation sheets.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 12/23/2025

Helen Su Irving-Yan _____
(TYPE OR PRINT NAME)

 _____
(SIGNATURE OF DECLARANT)

SHORT TITLE: — Irving-Yan v. Yan	CASE NUMBER: 21D003196
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ATTACHMENT (Number): 15

(This Attachment may be used with any Judicial Council form.)

Attachment 15 to Petitioner's Schedule of Assets and Debts

1. Sydnee LLC (loan \$150k SBA 30 yr term, AMEX x71005, holds 1405 Pioneer title (SOLD) and 3726 S. Las Vegas Blvd #310, Las Vegas, NV 89158 title)

2. Sydnee Properties LLC (AMEX credit cards x51004, x11004); holds title to 2984 E. Stearns St., Brea , CA.)

3. Sydnee Inc. (holds title to 3726 S. Brea, Brea, CA)

4. Sydnee 578 LLC (loan \$297k SBA 25 yr term, AMEX credit card x51003, BOA checking x7246, holds title to 578 S. Brea, Brea, CA)

5. Kanex Pro Inc

5. Iolo Capital Inc. (Bank of America account x4714)

6. Load Karma (BOA x7266 credit card, BOA checking x8759)

7. Kanex, Inc. (loan \$500k SBA 30 yr term, AMEX x36007)

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF **Orange**

I have read the foregoing PETITIONER'S RESPONSE TO RESPONDENT'S FORM INTERROGATORIES, SET NO 1 and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a _____ of _____

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____ a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on **December 23**, 20**25**, at **Fullerton**, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Helen Irving-Yan
Type or Print Name

Helen Irving-Yan
Signature

**ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)**

Received copy of document described as _____

on _____, 20____.

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY

~~Of~~ am employed in the county of _____, State of California.

I am over the age of 18 and not a party to the within action; my business address is: _____

On _____, 20____, I served the foregoing document described as _____

_____ on _____

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

(BY MAIL) I caused such envelope postage thereon fully prepaid to be placed in the United States mail at _____, California.

Executed on _____, 20____, at _____, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

Executed on _____, 20____, at _____, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 253665 NAME: Lauren Mullee FIRM NAME: The Law Office of Lauren Mullee, A Professional Law Corporation STREET ADDRESS: One Park Plaza, Suite 600 CITY: Irvine STATE: CA ZIP CODE: 92614 TELEPHONE NO.: 949-570-0701 FAX NO.: 949-570-0704 E-MAIL ADDRESS: lauren@laurenmulleelaw.com ATTORNEY FOR (name): Helen Su Irving-Yan	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 341 The City Drive South MAILING ADDRESS: Same CITY AND ZIP CODE: Orange 92868-3205 BRANCH NAME: Lamoreaux Justice Center	CASE NUMBER: 21D003196
PLAINTIFF/PETITIONER: Helen Su Irving-Yan DEFENDANT/RESPONDENT: Kelvin Yan	JUDICIAL OFFICER: Israel Claustro
PROOF OF ELECTRONIC SERVICE	DEPARTMENT: C22

1. I am at least 18 years old.

- a. My residence or business address is (specify):
One Park Plaza, Suite 600
Irvine, CA 92614
- b. My electronic service address is (specify):
katy@laurenmulleelaw.com

2. I electronically served the following documents (exact titles):

Petitioner's Response to Respondent's Form Interrogatories, Family Law, Set No. 1; Tax Returns; Income Statements; completed Schedule of Assets and Debts (FL-142) and accompanying statements.

The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

- a. Name of person served: **Kelvin Yan**
 On behalf of (name or names of parties represented, if person served is an attorney):
Kelvin Yan, In Pro Per
- b. Electronic service address of person served :
kyan@kanex.com
- c. On (date): **December 23, 2025**

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: **December 23, 2025**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Katy M. Flores

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)