

**ATTORNEY GRIEVANCE COMMITTEE
SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION, FIRST JUDICIAL DEPARTMENT**

In the Matter of the Complaint of
NORCAL MUSIC & ARTS CENTER
(by Andrew G. Watters, Esq., counsel)
against
JAMES JANG-HOON CHUNG, ESQ.
(OCA Atty. Reg. No. 2846913)
Docket No. 2026.1754

**OMNIBUS ANSWER TO COMPLAINT AND MOTION FOR A DETERMINATION
OF INCAPACITY AND SUSPENSION PURSUANT TO 22 NYCRR 1240.14(b)**

TO THE ATTORNEY GRIEVANCE COMMITTEE FOR THE FIRST JUDICIAL
DEPARTMENT AND TO THIS COURT:

PART ONE: ANSWER TO COMPLAINT

Respondent James Jang-Hoon Chung ("Respondent"), by his own hand and appearing pro se, respectfully and humbly submits the following Answer to the Complaint of Norcal Music & Arts Center, submitted by Andrew G. Watters, Esq. on or about April 26, 2026, and states as follows:

I. PRELIMINARY STATEMENT AND APOLOGY

Respondent begins by offering the Committee his sincere apology. Respondent recognizes that the Committee, and the process this Complaint sets in motion, deserve a prompt and complete response, and Respondent is genuinely sorry for any inconvenience or delay this matter has caused the Committee's work. Respondent does not offer the circumstances below as an excuse, but as an honest account of a period that has been, without exaggeration, the most difficult of Respondent's life.

Respondent also respectfully notes, as relevant context for the Committee, that this is the first time in his career that he has faced attorney disciplinary action of any kind. What follows is, at its core, an honest confusion between being "registered" and being "reinstated" — two different

things that Respondent did not, at the time, appreciate were different — not a pattern of disregard for his professional obligations.

1. Respondent's mother passed away during the pendency of this matter following a period of serious illness. Respondent was at her side in South Korea in her final weeks, and the grief of that loss has not been easy to carry while also attending to this matter.
2. During this same period, Respondent experienced significant personal and family upheaval, including a marital separation. In June 2026, a domestic-related report was made against Respondent that resulted in a temporary separation from his two young children for approximately two months. Respondent states that this matter was subsequently investigated by the Incheon Metropolitan Police Agency and resulted in a determination of no fault as to Respondent. Respondent references this only to convey, honestly, the cumulative personal toll of this period, and not as a matter otherwise before this Committee.
3. While in South Korea, Respondent was the victim of a physical assault occurring on August 31, 2026 — the same date the Committee's then-extended answer deadline fell due. Respondent was diagnosed on September 2, 2026 with a head contusion, with a course of treatment running through September 15, 2026, per the medical report annexed hereto as Exhibit A. Respondent states that this injury carries particular medical significance given a prior history of two cerebrovascular incidents (strokes), and that he has experienced a re-emergence of stroke-related symptoms since the assault. Respondent has been hospitalized in connection with this and remains in considerable physical and mental distress.
4. Respondent is genuinely grateful to the Committee for the accommodations already extended to him: an initial extension of the answer period to August 31, 2026, and a further extension — granted after the assault described above — to September 10, 2026. Respondent does not take these accommodations lightly and is doing everything in his power, notwithstanding his current condition, to meet the Committee halfway by submitting this Answer within that further extended period.
5. Respondent respectfully renews his request that the Committee consider a brief further accommodation, if one becomes necessary, while he continues to recover. Respondent is not asking the Committee to overlook anything material to this matter — only for the basic understanding that a person can be doing his sincere best under circumstances that would strain anyone, and Respondent asks the Committee's patience and grace on that basis.

II. RESPONDENT'S DISCIPLINARY AND REINSTATEMENT STATUS

Respondent wants to be entirely direct with the Committee at the outset of this section: the error described below was Respondent's own, and Respondent takes full responsibility for it.

Respondent's suspension was never the result of any misconduct — it was solely a matter of unpaid registration fees — and when Respondent saw that his registration showed as current, he simply, mistakenly, believed that was the end of the matter. It was not, and Respondent should have known better than to assume so. Respondent explains the sequence below not to minimize the error, but so the Committee has the complete and honest picture.

6. Respondent was admitted to practice law in the State of New York on March 15, 1997, in the First Judicial Department.
7. Respondent's suspension arose from noncompliance with attorney registration requirements under Judiciary Law § 468-a, not from any finding of misconduct.
8. On March 2, 2026, Respondent submitted full payment of all outstanding biennial registration fees. The Office of Court Administration's receipt of that date reflects Respondent's registration status as "Suspended, currently registered."
9. On March 30, 2026, Respondent filed a Notice of Motion and supporting affirmation with this Court seeking an Order of Reinstatement, returnable April 13, 2026.
10. Respondent candidly acknowledges that, upon receiving confirmation that his registration was current as of early March 2026, he mistakenly believed that payment of the outstanding fee had cured his suspension, and that the pending motion for reinstatement was a remaining formality rather than a precondition to resuming practice. Respondent recognizes, on reflection and in hindsight, that this belief was incorrect: reinstatement required, and required, an Order of this Court, which was not entered until May 2, 2026.
11. Respondent states that this misunderstanding was honest and was not a knowing or willful decision to practice while under suspension. Respondent did not personally provide legal services to any client, draft any correspondence asserting legal claims on behalf of a client, or engage in the practice of law in any traditional sense during the period between March 2, 2026 and May 2, 2026.
12. Respondent acknowledges that, beginning on or about early March 2026 and prior to the entry of the Order of Reinstatement, he participated in setting up the website for Pro Veritas Law LLP (proveritaslaw.com), and that this website displayed Respondent's name and a New York business address during that period. Respondent did so under the mistaken belief described above, and takes responsibility for that error.

13. Respondent further acknowledges that, on February 27, 2026 — also prior to the entry of the Order of Reinstatement — he personally signed an Application to Register a Limited Liability Partnership (Form LLP-1) for Pro Veritas Law LLP, filed with the California Secretary of State (Filing No. 202026064003), identifying himself as "Managing Partner" and designating "the practice of law" as the LLP's business. Respondent states that this act, like the website referenced above, was taken under the same mistaken belief that payment of his outstanding New York registration fee had cured his suspension. Respondent recognizes that signing this filing was a more direct and formal act than the website alone, and does not minimize its significance.

III. THE NORCAL MUSIC & ARTS CENTER DEMAND LETTERS

14. Respondent had no role in drafting, reviewing, or authorizing the demand letters sent to Norcal Music & Arts Center ("NCMAC") dated April 5, 2026 and April 23, 2026 (Ref. PV-2026-00378-VK69).
15. During the period in question, day-to-day operations of Pro Veritas Law LLP, including the NCMAC matter, were overseen by John H. Oh, Esq., of the Law Offices of John H. Oh & Associates, P.C., of 4221 Wilshire Blvd., Suite 333, Los Angeles, CA 90010, an affiliate of Pro Veritas Law LLP. Mr. Oh is admitted to practice in California under California State Bar No. 180111, registered under his Korean given name, Hyun Oh.
16. Annexed hereto as Exhibit B is a true and correct copy of an email from John H. Oh, Esq. to Respondent dated March 16, 2026, confirming that the draft demand letter for NCMAC was "reviewed and signed off" by Mr. Oh based on the evidence reports referenced therein.
17. Respondent denies personal authorship, review, or approval of the NCMAC demand letters and denies personal knowledge of their contents prior to the filing of the instant Complaint.

IV. RESPONSE TO CHARACTERIZATION OF THE FIRM'S PRACTICES

18. Respondent denies that the demand letters at issue were the product of fraudulent, dishonest, or criminal conduct, and denies that the firm's practices constitute wire fraud or any other criminal act.
19. Respondent states that the demand letters were generated based on technical evidence collected regarding the subject website's data-collection and accessibility practices, and that a licensed attorney (Mr. Oh) reviewed the letters before transmission. The underlying evidence package prepared in connection with the NCMAC matter, including visit-confirmation

records, technical collection data, and a reconciliation section identifying discrepancies between the demand correspondence and the underlying evidence, is annexed hereto as Exhibit H.

20. Respondent acknowledges that a subsequent Technical Findings Report prepared in this matter identified certain respects in which earlier correspondence required clarification or correction, including the characterization of the statutory basis for a claim under the Video Privacy Protection Act. Respondent states that such self-identified corrections reflect an ongoing, good-faith review process rather than an intent to mislead, and that counsel for NCMAC was provided with this report.

V. CALIFORNIA REGISTRATION OF PRO VERITAS LAW LLP

21. On February 27, 2026, an Application to Register a Limited Liability Partnership (Form LLP-1) for Pro Veritas Law LLP was filed with and accepted by the California Secretary of State, bearing Filing No. 202026064003. Respondent states that Pro Veritas Law LLP is accordingly a registered limited liability partnership in the State of California as of that date. (See Exhibit F.)

VI. CURRENT STATUS OF OPERATIONS

22. In light of the pendency of this Complaint and Respondent's ongoing recovery from the injuries described in Section I above, Pro Veritas Law LLP has suspended further demand-letter and client-solicitation activity pending resolution of this matter.

VII. CONCLUSION

23. Respondent respectfully submits that the conduct at issue reflects, at most, a good-faith misunderstanding regarding the effect of his registration status on his suspension — promptly followed by a properly filed and granted motion for reinstatement — rather than any intentional practice while suspended, and that the substantive allegations regarding the NCMAC demand letters are properly attributable to the supervising attorney responsible for that matter.
24. Respondent has practiced law in New York since 1997 and has never before been the subject of disciplinary proceedings of any kind. Respondent asks the Committee to weigh that history, together with the personal and medical circumstances described in Section I, in assessing the honest mistake at the heart of this matter.

25. Respondent requests that the Committee consider this Answer, together with the accompanying exhibits and the mitigating circumstances described herein, and respectfully requests dismissal of the Complaint or such other relief as the Committee deems appropriate.

**PART TWO: NOTICE OF MOTION AND AFFIRMATION FOR A DETERMINATION
OF
INCAPACITY AND SUSPENSION PURSUANT TO 22 NYCRR 1240.14(b)**

PLEASE TAKE NOTICE that, upon the annexed Affirmation of James Jang-Hoon Chung, Esq. ("Respondent"), and the exhibits annexed thereto, Respondent will move this Court, at a term thereof to be held at the Appellate Division Courthouse, First Judicial Department, for an Order, pursuant to 22 NYCRR 1240.14(b):

1. Determining that Respondent is currently incapacitated from practicing law by reason of a medical condition, as described in the annexed Affirmation and supporting medical documentation;
2. Suspending Respondent from the practice of law in the State of New York, effective immediately, for an indefinite period and until further order of this Court;
3. Staying any further investigation or disciplinary proceedings arising from the Complaint of Norcal Music & Arts Center, Docket No. 2026.1754, during the period of Respondent's incapacity, pursuant to 22 NYCRR 1240.14(b) and 1240.17; and
4. Granting such other and further relief as this Court deems just and proper.

AFFIRMATION IN SUPPORT

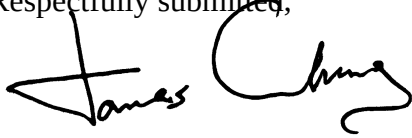
James Jang-Hoon Chung, Esq., affirms under penalty of perjury as follows:

1. I am the Respondent referenced above and in Part One of this filing, my Answer to the Complaint of Norcal Music & Arts Center, Docket No. 2026.1754. I submit this Affirmation in support of my motion for a determination of incapacity and suspension pursuant to 22 NYCRR 1240.14(b).
2. As described more fully in my Answer, I was the victim of a physical assault in South Korea on August 31, 2026, resulting in a diagnosed head contusion and a re-emergence of symptoms related to a prior history of two cerebrovascular incidents (strokes). The medical report documenting this injury is annexed as Exhibit A to my Answer and is incorporated herein by reference.

3. Since the assault, I have continued to experience significant physical and neurological symptoms that, together with the advice of my treating physicians, lead me to conclude that I am not presently capable of practicing law.
4. I intend to remain in South Korea for an extended convalescence period of approximately the next several years in order to focus fully on my medical recovery, without the obligations attendant to active practice.
5. I make this application voluntarily and with a full understanding of its consequences: that I will be suspended from the practice of law for an indefinite period; that I may not practice law in New York in any capacity during that period; and that I will be required to apply affirmatively for reinstatement, and to demonstrate that my incapacity has been removed and that I am fit to resume the practice of law, pursuant to 22 NYCRR 1240.16 and 1240.17, before I may resume practice.
6. I request that the Committee's investigation and any further proceedings on the pending Complaint be stayed during the period of my incapacity, consistent with the relief granted in comparable applications, including *Matter of Dumas*, 235 A.D.3d 41 (1st Dept 2025), in which this Court granted a respondent's own motion for a determination of incapacity, immediate suspension, and a stay of the Attorney Grievance Committee's investigation on materially similar grounds.
7. I do not seek, through this motion, to avoid answering the Complaint — Part One of this filing is my full Answer — but rather to ensure that any further proceedings, including any hearing or additional investigation the Committee may deem necessary, are held in abeyance until I am medically able to participate in them meaningfully and to defend myself adequately.
8. I respectfully submit that this relief serves the interests of the Committee, this Court, and myself alike: it protects the public by confirming I will not practice law while incapacitated, it avoids proceeding against a respondent who is not presently able to fully participate in his own defense, and it provides a clear, self-initiated path back to active status once I have recovered.

WHEREFORE, Respondent respectfully requests that the Committee accept the foregoing Answer to the Complaint, and that this Court grant the relief requested in the foregoing Notice of Motion for a determination of incapacity and suspension pursuant to 22 NYCRR 1240.14(b).

Respectfully submitted,



James Jang-Hoon Chung, Esq.
OCA Atty. Reg. No. 2846913
Central Park Apt 202-1103
Yeonsu-Gu, Incheon, South Korea
310-220-5562
proveritasllp@gmail.com
Dated: September 8, 2026

EXHIBIT LIST

Exhibit A — Medical report documenting injuries from assault in South Korea

Exhibit B — Email from John H. Oh, Esq. to Respondent, dated March 16, 2026

Exhibit C — OCA Attorney Registration Receipt, dated March 2, 2026

Exhibit D — Notice of Motion for Reinstatement, filed March 30, 2026

Exhibit E — Order of Reinstatement, dated May 2, 2026

Exhibit F — Filed LLP-1 Application to Register a Limited Liability Partnership, Pro Veritas Law LLP, California Secretary of State Filing No. 202026064003, filed February 27, 2026

Exhibit G — Technical Findings Report, ncmac.net, dated July 28, 2026

Exhibit H — Plaintiff Evidence Package, ncmac.net, prepared by IdentifiedVerified LLC, dated May 11, 2026

EXHIBIT A

Medical Report

Injury diagnosis dated September 2, 2026 (Korean original),
documenting head contusion from assault of August 31, 2026.



■ 의료법 시행규칙 (별지 제5호의3서식) <개정 2019. 9. 27>

상 해 진 단 서

등록번호	00049493
연 번 호	2026-4-1

환자의 성명	정재일스장후	환자의 주민등록번호	691121-5100278
환자의 주소	호텔거주 (미국호텔) (전화번호 : 010-8856-1105)		
병명 ☒ 임상적 추정 ☐ 최종진단	(주상병) 두부 좌상 (부상병)	질병분류기호 S000	
발병 또는 상해 연월일	2026년 08월 31일	진단 연월일	2026년 09월 02일
상해의 원인 또는 추정되는 상해의 원인	상대방이 주먹으로 머리를 때렸다. (이상 환자 진술)		
상해 부위와 정도	두부 : 좌상		
입원의 필요 여부	불필요		
외과적 수술 여부	불필요		
합병증의 발생 가능 여부	가능		
통상활동의 가능 여부	가능		
식사의 가능 여부	가능		
상해에 대한 소견	두부 다발성 입출 소견을 보임.		
치료기간	2026년 09월 02일 부터	2026년 09월 15일 까지	(진단일부터 14 일간)
치료 내용 및 향후 치료에 대한 소견	약물치료 및 안정가료를 요하며, 증상의 지속시 후후 정밀검사를 요함.		
입원·퇴원 연월일	입원일:	부터	퇴원일: 까지
비 고	.		

「의료법」 제17조 및 같은 법 시행규칙 제22조에 따라 위와 같이 진단합니다.

2026년 09월 02일

의료기관 명칭: 으뜸병원
주소: 경기도 성남시 분당구 성남동 4169 메트로컨빌딩 3,4층



☒ 의사 ☐ 치과 의사 ☐ 한 의사 면허번호 제 63385 호
성명: 강덕수 (서명: )

작성방법

1. 환자의 인적사항은 진찰한 의사, 치과 의사 또는 한의사가 주민등록증, 기간 안료 전 여권, 운전면허증, 공무원증, 국립공립대학 학생증, 군무원증, 건강보험증, 외국인등록증 등 국가공인 신분증(환자가 미성년자인 경우에는 주민등록등본·초본, 학생증 등으로 대체 가능합니다)과 대조하여 확인하고 서명 또는 날인합니다.
2. "병명"란에는 "임상적 추정"과 "최종진단" 중 적절하여 1)에 √ 표시를 하고, 질병명은 한글로 적되 영어로 적을 경우에는 한글을 함께 적으며, 질병분류기호도 함께 적습니다.

EXHIBIT A (Translation)

Medical Report -- English Translation

English translation of Exhibit A, prepared for the Committee's
convenience.

EXHIBIT A -- ENGLISH TRANSLATION

INJURY DIAGNOSIS CERTIFICATE (translated from Korean)

Registration No.: 00049493 Serial No.: 2026-4-1

Patient Name: James Jang-Hoon Chung (Jung) Patient Resident Registration No.: 691121-5100278

Patient Address: Hotel residence (U.S. hotel) Phone: 010-8856-1105

Diagnosis: (Principal injury -- Clinical impression checked) Head contusion (left side) Disease classification code: S000

Date of injury/onset: August 31, 2026 Date of diagnosis: September 2, 2026

Cause of injury (as stated by patient): "The other party struck my head with his fist (per patient's own statement)."

Site and degree of injury: Head -- contusion

Need for hospitalization: Not required Need for surgery: Not required

Possibility of complications: Possible Capacity for ordinary activity: Capable

Capacity to eat: Capable

Clinical findings: Multiple areas of tenderness observed on the head.

Treatment period: September 2, 2026 through September 15, 2026 (14 days from date of diagnosis)

Treatment content and future treatment plan: Medication and rest are required; further precision examination is required if symptoms persist.

Issued pursuant to Article 17 of the Medical Service Act and the corresponding Enforcement Regulations.

Date of issuance: September 2, 2026

Issuing institution: Ottumdeoi Hospital

Address: 4169 Metrocan Building, 3rd-4th Floor, Seongnam-dong, Gyeonggi-do

Physician license No. 63385 Physician name: Kim Deok-su (signature/seal on file)

-- Translator's Note --

This is a plain-language English translation of the Korean-language injury diagnosis certificate provided as Exhibit A, prepared to assist the Committee's review. The Korean original remains the controlling document. Certain administrative boilerplate text at the bottom of the original form (instructions to the preparing physician regarding identity verification) has been omitted as non-substantive.

EXHIBIT B

Email from John H. Oh, Esq.

Email dated March 16, 2026, confirming review and approval of the
NCMAC demand letter.

From: **John Oh** <john@johnohlaw.com>

Date: Mon, March 16, 2026 at
10:02 AM

Subject: NCMAC Demand Letter

To: James <jameessicon@gmail.com>

The draft demand letter for NorCal Music & Arts Center is reviewed and signed off based on the evidence reports.

--

John H. Oh

Law Offices of John H. Oh &
Associates, P.C.

[4221 Wilshire Blvd., Suite 333](#)
[Los Angeles, CA 90010](#)

tel: (323) 456-4406

fax: (323) 456-4410

EXHIBIT C

OCA Attorney Registration Receipt

New York Office of Court Administration receipt, dated March 2, 2026,
showing registration status "Suspended, currently registered."



NEW YORK STATE
Unified Court System
OFFICE OF COURT ADMINISTRATION
ATTORNEY REGISTRATION UNIT

RECEIPT

Page 1 of 2

Attorney Registration #: 2846913 Batch #: Online Process Date: 03/02/2026 Receipt #: 645788
Name: JAMES JANG-HOON CHUNG

Biennial Period(s): 2019-2020, 2021-2022, 2023-2024, 2025-2026

This will acknowledge receipt of your 2019-2020, 2021-2022, 2023-2024, 2025-2026 registration as an attorney and receipt of the \$1500 fee.

Name:
First: JAMES
Middle: JANG-HOON
Last: CHUNG

DOB: XX/XX/1989
SSN: XXX-XX-8227

AN EXPLANATION OF WHY SOCIAL SECURITY NUMBERS ARE
REQUIRED AS PART OF THIS APPLICATION MAY BE FOUND AT:
<http://www2.nycourts.gov/attorneyregistration/index.shtml>

Admission Data:
Year Admitted: 1997
Judicial Dept. of Admission: 1

eSignature Verification Date: 03/02/2026
eCheck Account Ending In: 0764
Registration Fee Transaction #: 020326C1A-C8815FDF-328D-485C-8B54-FAF3E7389CC9
Authorization Code: 754246
Non-Refundable Service Fee: \$1.00
Next Registration: Nov 2027
Registration Status:
Suspended, currently registered

PERSONAL INFORMATION:

The Rules of the Chief Administrator require that this office be notified of any changes in the BELOW information within 30 days of any such change. If changes are required: 1) Go to www.nycourts.gov and Attorney Online Services 2) Make desired changes 3) Print a corrected receipt.

Law School: CHICAGO LAW SCHOOL

Business Address:
Pro Veritas Law LLP
500 Greenwich St Rm 202
New York, NY 10013-1354

Business County: New York
Business Phone: (310) 220-5562
e-mail (optional): Jamesicon@gmail.com
Note: If provided, the e-mail address will be made public.

Home Address: (Note: The Home Address is public information ONLY if no business is provided.)
34 Sea Cove Dr
Rancho Palos Verdes, CA 90275-5830

Home County:

ADDRESS: P.O. BOX 2806 CHURCH STREET STATION NEW YORK, NY 10008
PHONE: (212) 426-2800 • EMAIL: NYATTY@NYCOURTS.GOV • WEBSITE: www.nycourts.gov

Page 1 of 2



NEW YORK STATE
Unified Court System
OFFICE OF COURT ADMINISTRATION
ATTORNEY REGISTRATION UNIT

RECEIPT

Page 2 of 2

Attorney Registration #: 2846913 Batch #: Online Process Date: 03/02/2026 Receipt #: 645788
Name: JAMES JANG-HOON CHUNG

Biennial Period(s): 2019-2020, 2021-2022, 2023-2024, 2025-2026

OTHER REPORTS & CERTIFICATIONS:

Please review the BELOW information on this receipt for accuracy. If changes are required: 1) Circle the item 2) Enter the correct information directly on the receipt 3) SIGN and date the receipt 4) Return via email as a PDF to ATTYREG@NYCOURTS.GOV

Mandatory Continuing Legal Education (22 NYCRR §1580):

2019-2020 Certified as Exempt
2021-2022 Certified as Exempt
2023-2024 Certified as Exempt
2025-2026 Certified as Exempt

Compliance With Child Support Obligations (Gen. Oblig. L. §3-503):
No obligation

Report of Pro Bono Hours Part 1209 (Rule 6.1):
Pro Bono Signature: Yes

Affirmation Of Compliance With Part 1200 (Rule 1.15):
Affirmation Signature:



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ADMISSION TO PRACTICE LAW IN OTHER JURISDICTIONS AND DISCIPLINE REPORT

Only Admitted in NY: Yes

X RegisterComplete.pdf

PERSONAL INFORMATION:

The Rules of the Chief Administrator require that this office be notified of any changes in the **BELOW** information within 30 days of any such change. If changes are required: 1) Go to www.nycourts.gov and Attorney Online Services 2) Make desired changes 3) Print a corrected receipt.

Law School: CHICAGO LAW SCHOOL

Business Address:

Pro Veritas Law LLP
500 Greenwich St Rm 202
New York, NY 10013-1354

Business County: New York

Business Phone: (310) 220-5562

e-mail (optional): Jamesicon@gmail.com

Note: If provided, the e-mail address will be made public.

Home Address: (Note: The Home Address is public information ONLY if no business is provided.)

34 Sea Cove Dr
Rancho Palos Verdes, CA 90275-5830

Home County:

ADDRESS: P.O. BOX 288 CHURCH STREET STATION NEW YORK, NY 10008
PHONE: (212) 426-2800 • EMAIL: NYCTTY@NYCOURTS.GOV • WEBSITE: www.nycourts.gov

Page 1 of 2



NEW YORK STATE
Unified Court System

OFFICE OF COURT ADMINISTRATION
ATTORNEY REGISTRATION UNIT

RECEIPT

Page 2 of 2

Attorney Registration #: 2848913

Batch #: Online

Process Date: 03/02/2026

Receipt #: 645788

Name: JAMES JANG-HOON CHUNG

Biennial Period(s): 2019-2020, 2021-2022, 2023-2024, 2025-2026

OTHER REPORTS & CERTIFICATIONS:

Please review the **BELOW** information on this receipt for accuracy. If changes are required: 1) Circle the item 2) Enter the correct information directly on the receipt 3) SIGN and date the receipt 4) Return via email as a PDF to ATTYREG@NYCOURTS.GOV

Mandatory Continuing Legal Education (22 NYCRR §1506):

2019-2020 Certified as Exempt

2021-2022 Certified as Exempt

2023-2024 Certified as Exempt

2025-2026 Certified as Exempt

Compliance With Child Support Obligations (Gen. Oblig. L. §3-503):

No obligation

Report of Pro Bono Services Part 1206 (Rule 6.1):

Pro Bono Signature: Yes

Affirmation Of Compliance With Part 1206 (Rule 1.15):

Affirmation Signature: Yes

ADMISSION TO PRACTICE LAW IN OTHER JURISDICTIONS AND DISCIPLINE REPORT

Only Admitted in NY: Yes

Ever the subject of discipline in any jurisdiction where admitted, other than NY: No

Signature:

Date: 3/2/26



Drive



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EXHIBIT D

Notice of Motion for Reinstatement

Filed March 30, 2026, seeking an Order of Reinstatement, returnable
April 13, 2026.

**SUPREME COURT OF THE STATE OF NEW YORK APPELLATE DIVISION, FIRST
JUDICIAL DEPARTMENT**

In the Matter of Attorneys Who Are In
Violation of Judiciary Law Section 468-a:

NOTICE OF MOTION

Attorney Grievance Committee **FOR REINSTATEMENT** for the First Judicial Department,

Respondent,

JAMES JANG-HOON CHUNG
Admitted on March 15, 1997, at a
Term of the Appellate Division,
First Department, (OCA Atty. Reg. No. 2846913),

Petitioner.

PLEASE TAKE NOTICE, that upon the annexed affirmation of James Jang-Hoon Chung, affirmed on the 30th day of March, 2026, the undersigned will move this Court at a term thereof to be held at the Appellate Division Courthouse, located at 27 Madison Avenue, New York, New York 10010, on the thirteenth day of April, 2026, at 10:00 A.M., for an Order of Reinstatement from the suspension of movant from the practice of law for violation of Judiciary Law Section 468-a, and for such other and further relief as may be just and proper.

DATED: Rancho Palos Verdes, California
March 30, 2026

Yours,



James Jang-Hoon Chung
34 Sea Cove Dr
Rancho Palos Verdes, CA 90275-5830
(310) 220-5562
Jamessicon@gmail.com

TO: Attorney Grievance Committee
Supreme Court, Appellate Division
First Judicial Department 180 Maiden Lane, FL 17, New York, New York 10038
AD1-AGC@nycourts.gov Attn: 468-a Reinstatements Clerk

EXHIBIT E

Order of Reinstatement

Order of Reinstatement dated May 2, 2026.

NOT INCLUDED: this document was not provided at the time this package was assembled and must be obtained and inserted here before filing.

EXHIBIT F

Filed LLP-1 Application

California Secretary of State Filing No. 202026064003, filed February 27, 2026, for Pro Veritas Law LLP.

LLP-1**Application to Register a
Limited Liability Partnership (LLP)**

To register an LLP in California, fill out this form, and submit for filing along with:

- A \$70 filing fee, and
- If the LLP is formed in another state or country, a certificate of good standing, issued within the last six (6) months by the agency where the LLP is formed.
- A separate, non-refundable \$15 service fee also must be included, if you drop off the completed form.

Attach extra pages if you need to include any other matters.

Important! LLPs in California may have to pay a minimum \$800 yearly tax to the California Franchise Tax Board. For more information, go to <https://www.ftb.ca.gov>.

FILED**Secretary of State
State of California**

202026064003

Filing Number

02/27/2026

Filing Date

This Space For Office Use Only

For questions about this form, go to: www.sos.ca.gov/business/be/filing-tips.

Name to be used for this LLP in California**① PRO VERITAS LAW LLP**

Proposed LLP Name

The name must end with: "Registered Limited Liability Partnership," "Limited Liability Partnership," "LLP," "R.L.L.P.," or "RLLP."

Place of Formation**②** The LLP is registering as a (check only one box):

- a. ☒ California registered LLP formed under the laws of California.
b. ☐ Foreign LLP formed under the laws of _____

List the state or country where the foreign LLP is formed.

LLP Addresses**③ a.** 3275 Wilshire Blvd, Suite 305 Los Angeles CA 90010
Street Address of Principal Office City (no abbreviations) State Zip**b.** _____
Mailing Address of Principal Office, if different from 3a City (no abbreviations) State Zip

Service of Process (List a California resident or an active 1505 corporation in California that agrees to be your agent to accept service of process in case the LLP is sued. You may list any adult who lives in California. You may **not** list an LLP as your agent.)

④ a. Yunja Chung

Agent's Name

b. 3275 Wilshire Blvd, Ste 205 Los Angeles CA 90010
Agent's Street Address (if agent is not a corporation) City (no abbreviations) State Zip**Type of Business****⑤** The business in which the LLP is engaged is (check only one box):

- ☐ The practice of Architecture ☐ The practice of Engineering ☐ The practice of Land Surveying
☒ The practice of Law ☐ The practice of Public Accountancy
☐ Related to: _____

List the name of the LLP to which your LLP is related, exactly as it appears on the records of the California Secretary of State. A related LLP is a California registered LLP that practices public accountancy or law, or is a foreign LLP.

Read and sign below: This form must be signed by one or more authorized partners, or if registering a foreign LLP, by a person with authority to do so under the laws of the state or country where the foreign LLP is formed. If you need more space, attach extra pages that are 1-sided and on standard letter-sized paper (8 1/2" x 11"). All attachments are part of this registration.



Sign here

James Jang-Hoon Chung

Print your name here

Managing Partner

Your business title

Make check/money order payable to: **Secretary of State**

Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and payment of a \$5 certification fee.

EXHIBIT G

Technical Findings Report

Technical Findings Report, ncmac.net, dated July 28, 2026.

Technical Findings Report

ncmac.net

Norcal Music & Arts Center · Reference PV-2026-00378-VK69

Field	Detail
Subject website	ncmac.net
Operator	Norcal Music & Arts Center, Sunnyvale, California
Reference	PV-2026-00378-VK69
Prepared for	Norcal Music & Arts Center
Delivered to	Andrew G. Watters, Esq., Watters & Jacobs LLP, as counsel
Observation period	February 26, 2026 – July 28, 2026
Observations conducted	36
Report date	July 28, 2026
Issued by	Pro Veritas Law LLP

Purpose. This report sets out the technical findings observed on ncmac.net, the method by which they were collected, and the record of observation. It is provided so that the operator and its counsel can review the underlying evidence directly and verify it independently. Every finding is accompanied by the raw data supporting it.

This document is a confidential settlement communication within the meaning of Federal Rule of Evidence 408 and California Evidence Code §§ 1152 and 1154.

Summary of Findings

ncmac.net was first observed on February 26, 2026 and most recently on July 28, 2026. Across that period the site was observed 36 times. The findings described in this report were present on the first observation, on the dates of each item of correspondence, and on the most recent observation.

Stage	Date	Event
First observation	Feb 26, 2026	Findings recorded across tracking, accessibility, and video.
First correspondence	Apr 5, 2026	Advisory notice sent to info@ncmac.net.
Second correspondence	Apr 23, 2026	Formal notice sent; delivery confirmed.
Reply received	Apr 23, 2026	Correspondence received from Watters & Jacobs LLP.
Most recent observation	Jul 28, 2026	Findings unchanged. No remediation observed.

1. What was first detected

On the first observation the site transmitted information about the visit to a third party before the visitor had any opportunity to respond to the consent banner displayed on the page. Barriers to access for users of assistive technology were recorded on the same visit, along with video content on a page carrying that transmission. Each of these is documented in the exhibits that follow.

2. Specification of the findings

Finding	What was observed
Transmission before consent	A page-view beacon was dispatched to Google Analytics 535 milliseconds after the page began loading — before the consent banner shown on the page could be acted upon. The transmission carried the page address, the page title, the screen resolution, the browser language, a client identifier, a session identifier, and the visitor's IP address. The receiving server accepted it (HTTP 204). Five further requests to Google infrastructure were script file downloads; these are reported for completeness and are not treated as transmissions of visitor data.
Cookies before consent	Four cookies were written to the visiting device 1.3 seconds after page load, before any consent interaction. All four are first-party cookies associated with the site's hosting platform.
Accessibility barriers	Twenty-six barriers arising from nine distinct defect types were recorded on the April 23 observation, measured against WCAG 2.1 Level AA. Six were classified critical and thirteen serious. The most recent evaluation, on July 28, recorded twenty-five.
Video content	Two HTML5 video elements were present on a page carrying the transmission described above.
On the consent banner	
The consent banner on ncmac.net was evaluated and found to operate correctly by every measure applied. It offers an explicit decline option, requires a single click either to accept or to reject, uses no pre-checked boxes, and scored zero out of ten on the dark-pattern scale — the best available result. No	

Finding	What was observed
	criticism of the banner's design is made or implied anywhere in this report. The finding concerns timing alone: the transmission described above occurred before the banner could be acted upon, which is a matter of the order in which the page's scripts execute rather than of how the banner itself is built.

3. Current status

A full observation was conducted on July 28, 2026. It records the same transmission pattern present at first observation: one page-view beacon dispatched to Google Analytics before consent, together with script file downloads. Twenty-five accessibility barriers remain. Both video elements remain. The consent banner is unchanged. No change consistent with remediation has been observed on any measure at any point in the observation period.

Item	Status as of July 28, 2026
Transmission before consent	Present — unchanged since February 26, 2026
Cookies before consent	Present
Accessibility barriers	25 (7 critical, 11 serious, 6 moderate, 1 minor)
Video elements	Present — 2
Consent banner	Unchanged

Method of Collection

The site was observed using compliance scanning technology that opens the page in a standard Chromium browser under instrumentation. Each observation was conducted from a clean browser session with no prior cookies, cache, local storage, or browsing history — reproducing the experience of a first-time visitor.

During each observation the technology did not log in, did not click any element, did not dismiss or accept the consent banner, and did not supply any information to the site. Network traffic was recorded through the Chrome DevTools Protocol beginning before the first page-load event, so that requests dispatched during page initialisation are captured in full.

Instrumentation

Component	Detail
Browser engine	Chromium, headless, driven by Puppeteer
Session state	Clean context — no cookies, cache, or local storage
Network capture	Chrome DevTools Protocol, from before first page-load event
Accessibility engine	axe-core 4.9.1, evaluated against WCAG 2.1 Level AA
Consent banner detection	13 recognised consent management platforms
Hashing	SHA-256 (FIPS 180-4)

Findings are recorded as observed. No observation was re-run and no record was altered in preparing this report.

Independent verification

The findings in this report do not depend on accepting any characterisation offered here. The transmission described in Exhibit A can be reproduced by any party: open ncmac.net in a browser with developer tools recording network activity, filter for requests to google-analytics.com, and observe the request dispatched during page load prior to any interaction with the consent banner. The accessibility findings can be reproduced by running axe-core, an open-source engine, against the same page. The SHA-256 values in Exhibit F allow the reproduced files to be checked against the files described here.

Exhibit A — Transmission Before Consent

One request carrying information about the visit was dispatched to a third party during page load. It was sent 535 milliseconds after the page began loading and returned HTTP 204, indicating the receiving server accepted it.

Attribute	Value
Recipient	www.google-analytics.com
Endpoint	/g/collect
Method	GET
Response	204 — accepted
Dispatched before consent interaction	Yes
Elapsed from page load	535 ms
Observation	April 23, 2026, 19:39:23 UTC

The request address is reproduced below in full, followed by a decoding of every parameter it carried. Nothing has been omitted from the decoding.

```
https://www.google-analytics.com/g/collect?v=2&tid=G-FCKZVBXPBV&gcs=G100&npa=1&cid=1139602403.1776973159&sid=1776973159&sr=800x600&ul=en-us&pscdl=denied&dl=https%3A%2F%2Fncmac.net%2F&dt=Top%20Music%20Lessons%20and%20Music%20School%20in%20Sunnyvale%20CA&en=page_view&_fv=1&_ss=1&tfd=535
```

Parameter	Value	Meaning
tid	G-FCKZVBXPBV	Google Analytics property receiving the data
cid	1139602403.1776973159	Client identifier assigned to the visitor
sid	1776973159	Session identifier
dl	https://ncmac.net/	Address of the page opened
dt	Top Music Lessons and Music School in Sunnyvale CA	Title of the page opened
en	page_view	Event type reported
sr	800x600	Screen resolution of the device
ul	en-us	Browser language setting
_fv	1	Marked as first visit
_ss	1	Marked as session start
tfd	535	Milliseconds from page load to dispatch
gcs	G100	Consent signal — ad and analytics storage denied
npa	1	Non-personalised advertising requested
pscdl	denied	Persistent cookie storage denied

Parameter	Value	Meaning
v	2	Measurement protocol version
— <i>implicit</i> —	IP address	Carried by the HTTP request itself
The consent-state parameters are stated plainly Three parameters above — gcs=G100, npa=1 and pscdl=denied — indicate that Google Consent Mode was configured on the site and was signalling that the visitor had not granted consent. Consistent with that, no _ga cookie was written (Exhibit B). Pro Veritas Law LLP records this without qualification: it reflects a deliberate configuration choice by the operator or its platform, and it means no persistent advertising identifier was created and no personalised advertising data was transmitted. The finding stated in this report is limited accordingly, and concerns the fact that the page address, page title, screen resolution, browser language, session identifier and IP address were transmitted to a third party before the visitor could respond to the consent banner.		

A-2 Script file downloads

Five further requests to Google infrastructure were recorded before consent. These download JavaScript files and do not themselves carry information about the visitor. They are listed for completeness and are not treated as transmissions of visitor data in this report.

Provider	Script address	Status
Google Analytics	googletagmanager.com/gtag/js?id=G-FCKZVBXPBV	200
Google Analytics	googletagmanager.com/gtm.js?id=GTM-WK8G63R7	200
Google Analytics	googletagmanager.com/gtag/js?id=G-FCKZVBXPBV&cx=c	200
Google Analytics	googletagmanager.com/gtm.js?id=GTM-WK8G63R7	200
Google Analytics	googletagmanager.com/gtag/js?id=G-FCKZVBXPBV&cx=c	200

No tracking provider other than Google Analytics was recorded on ncmac.net at any point in the observation period. No advertising network, social media pixel, or data broker endpoint was observed.

Exhibit B — Cookies Written Before Consent

Four cookies were written to the visiting device 1.3 seconds after page load, before any consent interaction. All four are first-party cookies set on the site's own domain and associated with its hosting platform.

Cookie	Domain	Classification	Expiry	Value as recorded
_scc_session	.ncmac.net	Functional	20 min	pc=1&C_TOUCH=2026-04-24T03:43:02
_tccl_visitor	.ncmac.net	Unclassified	1 year	d544d222-72c1-4d1d-a9c9-3ecb...
_tccl_visit	.ncmac.net	Unclassified	30 min	d544d222-72c1-4d1d-a9c9-3ecb...
dps_site_id	ncmac.net	Unclassified	Session	us-west-2

All four are set with the Secure attribute and, where applicable, SameSite=None. None was classified as an advertising cookie, and no third-party cookie was written. No _ga cookie was written, which is consistent with the consent signal recorded in Exhibit A. Of the four, only _tccl_visitor carries an identifier persisting beyond the session.

Exhibit C — Accessibility Barriers

The page was evaluated using axe-core 4.9.1 against WCAG 2.1 Level AA. Twenty-six barriers were recorded on the April 23, 2026 observation, arising from nine distinct defect types. Barriers are grouped below by defect type, since a single underlying defect frequently produces multiple recorded instances.

Severity	Rule	Instances	Barrier
Critical	image-alt	3	Image has no text alternative — not conveyed by a screen reader
Critical	aria-valid-attr-value	3	aria-level="NaN" — invalid heading level sent to assistive technology
Serious	color-contrast	9	Text below AA contrast threshold
Serious	frame-title	2	Embedded frame has no accessible name
Serious	aria-command-name	1	Interactive control has no accessible name
Serious	link-name	1	Link in tab order with no discernible text
Moderate	heading-order	3	Heading levels skip
Moderate	landmark-unique	2	Landmarks cannot be distinguished from one another
Moderate	region	1	Content sits outside any landmark region
Minor	empty-heading	1	Heading element contains no text
TOTAL	9 defect types	26	6 critical · 13 serious · 6 moderate · 1 minor

The nine contrast findings measure ratios of 4.44 and 4.16 against the Level AA minimum of 4.5, and affect the underlined links shown in Exhibit E-3. The three critical aria-valid-attr-value findings all arise from a single heading component emitting aria-level="NaN" on the FAQ section.

Frequency of accessibility evaluation

The accessibility evaluation was performed on five of the 36 observations: February 26, both observations on April 13, April 23, and July 28, 2026. On the remaining observations the evaluation was not performed. Those observations should not be read as recording an absence of barriers, and this report makes no such claim. The most recent evaluation, on July 28, 2026, recorded 25 barriers: 7 critical, 11 serious, 6 moderate, 1 minor.

C-1 Itemised findings

All 26 findings from the April 23, 2026 evaluation, with the element as recorded from the page source.

Framework class attributes have been removed for legibility; no other alteration has been made.

#	Severity	Rule	Element as recorded
1	critical	aria-valid-attr-value	<span role="heading" aria-level="NaN" data-ux="HeadingProduct" data-aid="FAQ_QUESTION_RENDERED_0" da...
2	critical	aria-valid-attr-value	<span role="heading" aria-level="NaN" data-ux="HeadingProduct" data-aid="FAQ_QUESTION_RENDERED_1" da...
3	critical	aria-valid-attr-value	<span role="heading" aria-level="NaN" data-ux="HeadingProduct" data-aid="FAQ_QUESTION_RENDERED_2" da...
4	critical	image-alt	piano</u>
9	serious	color-contrast	<u>guitar</u>
10	serious	color-contrast	<u>violin</u>
11	serious	color-contrast	<u>singing</u>
12	serious	color-contrast	<u>Contact us</u>
13	serious	color-contrast	Norcal Music & Arts Center</...
14	serious	color-contrast	Norman Y. Mineta San ...
15	serious	color-contrast	<span rel="" role="button" aria-haspopup="menu" data-ux="Link" data-aid="CONTACT_HOURS_COLLAPSED_HR_...
16	serious	color-contrast	<a href="https://www.yelp.com/biz/norcal-music-and-arts-center-sunnyvale-3" rel="noopener" target="..."
17	serious	frame-title	<iframe id="iframe-141463" frameborder="0" src="javascript: window.frameElement.getAttribute("s...
18	serious	frame-title	<iframe id="iframe-1141512" frameborder="0" src="javascript: window.frameElement.getAttribute("...
19	serious	link-name	<a rel="nofollow noopener" role="link" aria-haspopup="true" data-ux="Link" target="_blank" data-aid=...
20	moderate	heading-order	<h4 role="heading" aria-level="4" data-ux="ContentHeading" data-aid="ABOUT_HEADLINE_RENDERED0" data-...
21	moderate	heading-order	<h4 role="heading" aria-level="4" data-ux="ContentHeading" data-aid="CONTACT_INTRO_HEADING_REND" dat...
22	moderate	heading-order	<h4 role="heading" aria-level="4" data-ux="Heading" data-aid="FOOTER_COOKIE_TITLE_RENDERED" data-typ...
23	moderate	landmark-unique	<nav data-ux="Block">
24	moderate	landmark-unique	<div data-ux="Widget" role="region" id="7cbb7e0c-6454-4b6a-964b-4fbe353beaa3">

#	Severity	Rule	Element as recorded
25	moderate	region	<div id="be28e70e-601f-40fb-abb1-bdd8723b6829">
26	minor	empty-heading	<h3 role="heading" aria-level="3" data-ux="HeadingMiddle" data-aid="MENU_SECTION_TITLE_0" data-typog...

Exhibit D — Video Content

Two HTML5 video elements were recorded on the page. Both sit on a page carrying the transmission described in Exhibit A.

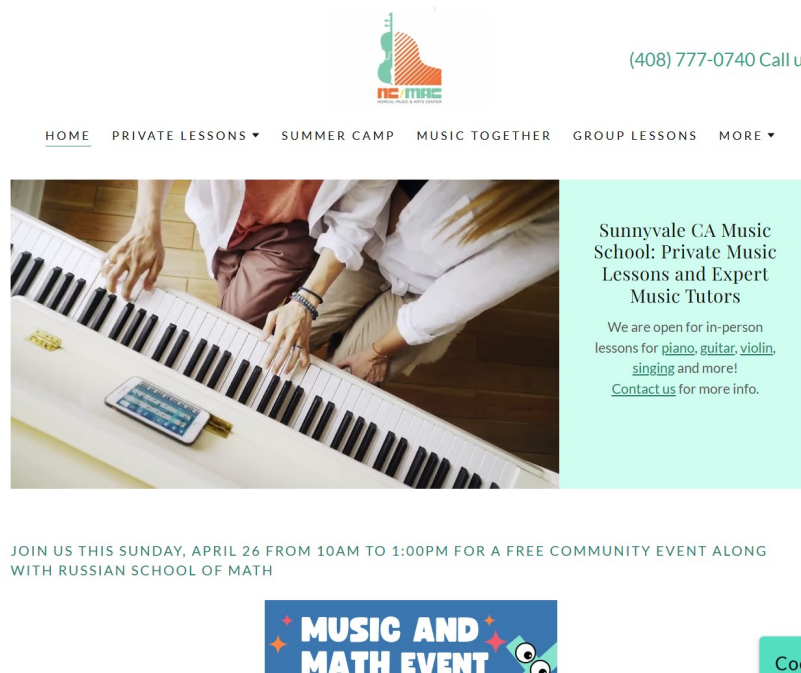
Type	Source	Page carries transmission
html5	<code>websites.godaddy.com/categories/v4/videos/raw/video/jwpDDdJ</code>	Yes
html5	<i>inline — no resolvable source address</i>	Yes

Both resolve to a single video provider. The second element carries no resolvable source address, and this report draws no conclusion from it beyond its presence on the page.

Exhibit E — Visual Record

E-1 Viewport at page load

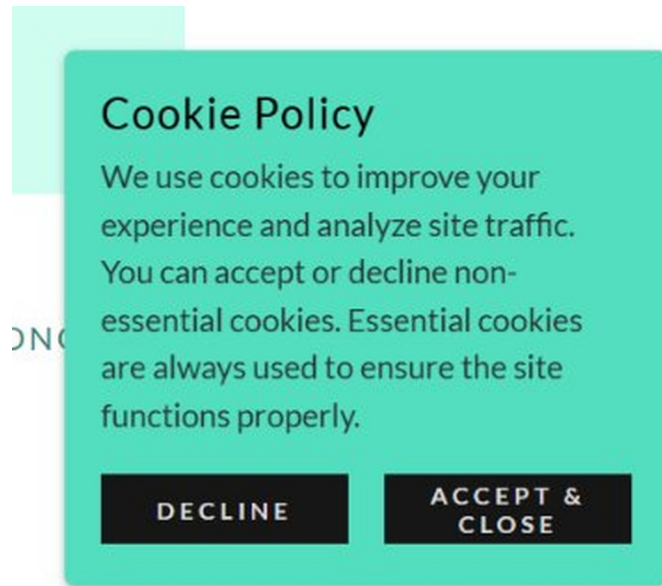
Captured April 23, 2026 at 19:39:19 UTC, 1920 × 1080 viewport. SHA-256 recorded in Exhibit F.



E-1 — ncmac.net as rendered on first load.

E-2 Consent banner

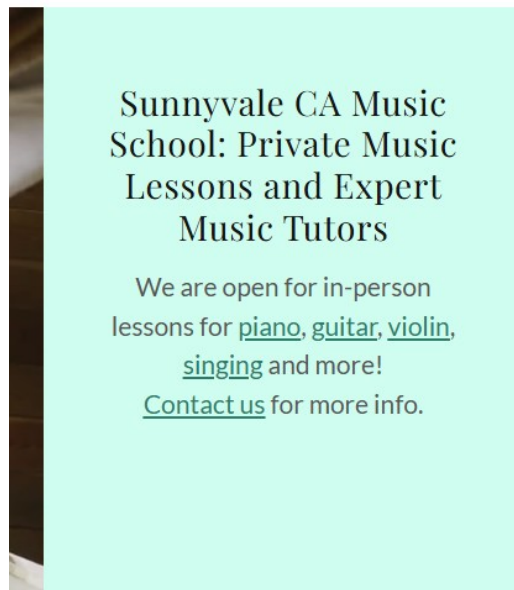
Enlarged from the full-page capture. The banner presents an explicit Decline alongside Accept & Close.



E-2 — Consent banner as displayed.

E-3 Hero panel

The underlined links in this panel are among the elements recorded below the Level AA contrast threshold in Exhibit C.



E-3 — Hero panel containing the "piano", "guitar", "violin" and "singing" links.

E-4 Full page

The complete rendered page, 1557 × 8000 pixels, in four sequential segments.

(408) 777-0740 Call us

[HOME](#) [PRIVATE LESSONS](#) [SUMMER CAMP](#) [MUSIC TOGETHER](#) [GROUP LESSONS](#) [MORE](#)



Sunnyvale CA Music School: Private Music Lessons and Expert Music Tutors

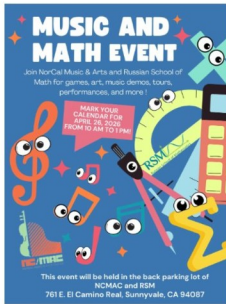
We are open for in-person lessons for [piano, guitar, violin, singing](#) and more! [Contact us](#) for more info.

Cookie Policy

We use cookies to improve your experience and analyze site traffic. You can accept or decline non-essential cookies. Essential cookies are always used to ensure the site functions properly.

[DECLINE](#) [ACCEPT & CLOSE](#)

JOIN US THIS SUNDAY, APRIL 26 FROM 10AM TO 1:00PM FOR A FREE COMMUNITY EVENT ALONG WITH RUSSIAN SCHOOL OF MATH



MUSIC AND MATH EVENT
Join NorCal Music & Arts and Russian School of Math for games, art, music demos, tours, performances, and more!
MARK YOUR CALENDAR NOW
APRIL 26, 2020
FROM 10 AM TO 1 PM
This event will be held in the back parking lot of NCMAC and RSM
781 E. El Camino Real, Sunnyvale, CA 94087

WELCOME TO NORCAL MUSIC AND ARTS CENTER

Benefits of becoming an NCMAC Student

We offer lessons for [Piano, Guitar, Drums, Voice, Violin, Cello, Flute, Saxophone, Clarinet, Ukulele, Trumpet, Euphonium, Baritone, Tuba, Valve Trombone](#) and [Art classes](#)— in one location. This saves our students time and money, as one family can take multiple instruments on the same day. Our service areas include Sunnyvale, Santa Clara, Cupertino, Mountain View, Palo Alto, Los Altos, Saratoga, Milpitas, Fremont and San Jose. Click here to learn more [Why NCMAC](#) or [Contact us](#) for more info.

Enriching Life Through Music

At NCMAC, we believe that music is a powerful tool in our lives. We believe everyone can become a great musician through learning and passion. We are currently conducting in-person and

E-4.1 — Segment 1 of 4 (top).

online music lessons. You can learn in the comfort of your own home or come to our center. [Contact us](#) to register for lessons.

Tailored Lessons

We provide high-quality private and group music lessons by dedicated teachers who strive to ensure the success of each student. We also offer music theory, ABRSM and CM testing for those looking to dive deep into music. Click here to learn more [Why NCMAC](#) or [Contact us](#) for more info.

All Are Welcome

We welcome everyone from all walks of life and experience levels. So take the first step to experience music like it was always meant to be!

[LEARN MORE](#)

Testimonials

"My 12 year old son have been getting lessons from Mr. Eric/NorCal Music Center for the past six months and on going. Mr. Eric is very knowledgeable and a rockstar teaching my son different ways to play his guitar(Electric and acoustic) and learning more about music notes. My son think he's super cool! Also, the process of initial paper work and billing has been super easy and they're flexible on changes in our agreements at later time. The pricing is in mid range compare to all but your getting quality services. I highly recommend NorCal Music!"

-Tammie V (Los Altos, CA)

Click [here](#) to see more testimonials!

MUSIC ACADEMY IN SUNNYVALE: EXPERT TUTORS AND MUSIC PROGRAM

At our music school in Sunnyvale CA, we offer a comprehensive learning experience for every music student. Our dedicated music tutors provide private music lessons and group lessons, covering various music styles to suit individual preferences. Our curriculum emphasizes music theory, ensuring a solid foundation for all students. Whether you're beginning your musical journey or seeking to enhance your skills, our music classes are designed to meet your needs.

PERSONALIZED MUSIC LESSON IN SUNNYVALE

At our music academy in Sunnyvale, we offer private music lessons tailored to all skill levels. Our experienced music tutors provide personalized instruction, focusing on ear training and performance experience. We also offer preschool music classes to nurture young talent. Our comprehensive music programs and classes are designed to meet diverse learning needs, ensuring a fulfilling musical journey. For those seeking dedicated guidance, our Sunnyvale music tutoring services are available to support your goals.

Master Music Theory with Personalized Ear Training

At our music school in Sunnyvale CA, we offer private music lessons led by expert tutors. Our experienced music instructors specialize in various music styles and provide personalized ear training to enhance your understanding of music theory. With a focus on both theoretical knowledge and practical application, our music teachers guide you through mastering musical instruments. Regular music recitals offer opportunities to showcase your progress and gain performance experience.

Experienced Music Teachers Offering Private Lessons

At our music academy in Sunnyvale CA, we offer private lessons led by experienced music educators. Our comprehensive music programs cater to all skill levels, from preschool music classes to advanced music performance training. Students receive personalized instruction on various musical instruments, enhancing their music education. Regular music recitals provide opportunities to showcase progress and build confidence.

Music Recitals Tailored to All Skill Levels

At our music academy in Sunnyvale CA, we offer music recitals tailored to all skill levels. Our dedicated music teachers provide personalized music instructions, ensuring each music lesson enhances your learning experiences. Whether you're taking piano lessons, exploring [drums instruction](#), or studying another instrument, our music teachers are committed to guiding you through your musical journey. These recitals offer a platform to showcase your progress and gain valuable performance experience.

Expert Music Teacher, Comprehensive Music Program, Quality Music Education

Our music tutors provide personalized guidance to help students excel in their musical journey. With expert tutors leading the way, students receive focused instruction tailored to their needs. Whether you're interested in violin lessons to master string techniques or engaging in group classes to collaborate and grow with others, there's an opportunity for everyone to thrive.

WHY CHOOSE NORCAL MUSIC & ARTS CENTER MUSIC AND ARTS LESSONS

There are many ways in which music and arts can shape your and your children's lives. Here at Norcal Music & Arts Center, we are committed to helping each student realize their potential through personalized music lessons. Our music coaches and instructors have years of teaching experience and work closely with each student at their pace to ensure brilliant results. Our music lessons span across different areas and instruments, including piano lessons, drums lessons, guitar lessons, cello lessons, saxophone lessons, and more. We also have music coaches to help you and your child learn clarinet, flute, ukulele and develop a better singing voice.

Our curriculum is both comprehensive and advanced. Our approach to teaching and learning allows our students to grow at their pace, picking up all of the essential skills and training and directing them in the area that they most love. We offer both physical and online music classes, and we are proud of the effects of our music education on our students.

Music instruction at Norcal Music & Arts Center located in Sunnyvale, CA offers many benefits you and your children can tap into.

Brain Boost

Music lessons at a young age can help boost your kids' brainpower. Music is known to stimulate the brain and has a positive association with academic achievement. Enrolling your child in any of the available music lessons will improve their chances of getting better at math, reading and also enhance their emotional development. Our music lessons here at Norcal Music & Arts Center are structured such that it is more of an important part of your child's education rather than an extracurricular activity.

Art Positively Correlates with Academic Achievement

Have you found your child to be excellent or interested in music and/or arts? You have a better chance of boosting their self-esteem and happiness when you allow them to explore the world of music and arts. If you are worried about their academics, then you'd be amazed to find that music and art classes give your child a better chance of being recognized for academic achievement, and a better chance of excelling in science or math.

Improves Memory

Much of music lessons rely on memory. Our music lessons, located in Sunnyvale CA, are structured to exercise students' memory, which boosts their performance in academic and non-academic activities. With our thorough, in-depth, and personalized music and art lessons, you can improve your child's memory, boost their self-confidence, and also equip them with the skills needed to set up an amazing life in their adult years.

At Norcal Music & Arts Center, we aim to enhance each student in all areas, including their creativity, self-confidence, awareness, etc. We serve students across Sunnyvale, Santa Clara, Cupertino, Mountain View, Palo Alto, Los Altos, Saratoga, Milpitas, Fremont, and San Jose.

FREQUENTLY ASKED QUESTIONS

Please reach us at info@ncmac.net if you cannot find an answer to your question.

- What is a good age to start? ▾
- Do you offer online music lessons ▾
- How much practice time is required? ▾

CONNECT WITH US



Top Rated Music School in Sunnyvale, California

Norcal Music & Arts Center is located at 761 E El Camino Real, Sunnyvale, CA. From Norman Y Mineta San Jose International Airport (SJC) get on US-101 N from Airport Blvd and Airport Pkwy and continue on US-101 N to Reed Ave. Then, continue on Reed Ave and take S Wolfe Rd to El Camino Real in Sunnyvale. After that, turn right onto El Camino Real and drive to your destination. Afterwards, turn right twice and turn left twice. Norcal Music & Arts Center will be on your left.

761 East El Camino Real, Sunnyvale, California 94087, United States

Hours

Open today 03:00 pm - 08:30 pm ▾

We are open:
Monday to Friday: 3:00 PM to 8:30PM
Saturday: 9:00 AM to 3:00 PM

For additional questions, you can call us at (408) 777-0740 or find us on [Yelp](#).

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NCMAC IN IMAGES: A PICTORIAL TOUR OF OUR BUSINESS

NCMAC
761 E. EL CAMINO REAL SUNNYVALE CA 94087
(408) 777-0740

Exhibit F — Consent Mechanism and Record of Observation

F-1 Consent mechanism

Measurements taken from the banner shown in Exhibit E-2, unchanged as of the most recent observation.

Measurement	Result
Consent banner present	Yes
Decline option available	Yes
Clicks required to accept	1
Clicks required to reject	1
Pre-checked consent boxes	None
Dark pattern score	0 out of 10 — best available result

F-2 Record of observation

The site was observed 36 times between February 26 and July 28, 2026. The transmission described in Exhibit A was recorded on every observation for which network classification was applied, at both ends of the period and throughout.

Period	Observations	Finding
Feb 26 – Apr 5, 2026	21	One transmission before consent, plus script downloads
Apr 13 – Apr 23, 2026	9	Same pattern
Apr 24 – Jun 8, 2026	10	Routine monitoring
Jul 28, 2026	1	Same pattern — no change observed

F-3 Integrity of the files described in this report

Each file was hashed with SHA-256 (FIPS 180-4) at the moment of collection. Any party holding a copy of these files can confirm they are unaltered by recomputing the hash with freely available tools.

File	SHA-256
Network capture (network.har)	232f260152a26400b77a46b176e73450155ea942035eb5febe09b73adc46aed5
Page source (source.html)	f7c47116ff7a15cb37a328821298d5de60c5d7290355b20120213db42d3ac854
Tracking records (pixels.json)	1fa83639674527aea5a8e600f87511e9c7863e3835c660a6e8401433b0cbe7bc
Accessibility records (violations.json)	945eb91146cdbc5c83639455411004b4353906abf960d50e41d839a90e84364c
Cookie records (cookies.json)	74bed17bdb28ab152081dad47da6de5f0fbd93d1ad352a2919af616eac1b290
Consent records (consent.json)	3db63094bc65bd1f18ce820167d65d0066d2c3153f7b3886faac6032040ac96a
Video records (videos.json)	ba7cdeb4667656d8b4ea5ce07c8c31c68dd572c3b683a5181224d9d5590f3497
Screenshot — full page (Exh. E-4)	2d84145a4ccbbddeb9272cd781e62b7ad631d7c8096bc16f69065edbcfc88d1
Screenshot — viewport (Exh. E-1)	a22309d9af8de4f509adce7aab46d44c8c0192dfc44ad5be58e62aacfee4f6ca

The screenshots reproduced in Exhibit E are the images bearing the final two hashes above. The underlying files are available to counsel on request.

Conditions Under Which These Findings Would No Longer Be Present

This section is included so that the operator and its counsel can see precisely what each finding turns on. It describes technical conditions only. Pro Veritas Law LLP does not provide remediation services, does not recommend any vendor, and receives nothing from any party that does.

Finding	Condition under which it would not be recorded
Transmission before consent	The page-view beacon is not dispatched until the visitor has made a selection on the consent banner. This is typically a matter of deferring tag initialisation rather than of changing the banner. The consent signalling already configured on the site (Exhibit A) indicates the necessary framework is in place.
Cookies before consent	No cookie other than one strictly necessary to deliver the page is written before a consent selection is made.
Accessibility — critical	Images carry a text alternative; heading elements emit a valid numeric level in place of <code>aria-level="NaN"</code> .
Accessibility — serious	Text meets or exceeds a 4.5 contrast ratio; embedded frames carry a title; interactive controls and links carry discernible accessible names.
Video content	No third-party transmission occurs on pages hosting video content before a consent selection is made. This follows from the first condition above and requires nothing additional.
A note on the hosting platform Pro Veritas Law LLP notes that ncmac.net is built on a hosted website platform, and that the consent banner, the cookies recorded in Exhibit B, and the heading component producing the <code>aria-level="NaN"</code> finding in Exhibit C all originate in that platform rather than in content authored by the operator. Where a finding is controlled by the platform rather than by the operator, that is a relevant circumstance and Pro Veritas Law LLP is prepared to discuss it.	

Correspondence

All correspondence concerning this matter is directed to Watters & Jacobs LLP as counsel for Norcal Music & Arts Center. Pro Veritas Law LLP conducts correspondence in writing. Enquiries may be addressed to contact@proveritaslaw.com under reference PV-2026-00378-VK69.

Issued by Pro Veritas Law LLP. All observations described in this report were made through lawful, non-intrusive viewing of a publicly accessible website using a standard web browser. No login was performed, no credentials were used, no element of the site was clicked or submitted, and no unauthorised access of any kind occurred. Findings are reported as recorded. This document is a confidential settlement communication within the meaning of Federal Rule of Evidence 408 and California Evidence Code §§ 1152 and 1154, and is provided for the purpose of discussing resolution.

EXHIBIT H

Plaintiff Evidence Package

Prepared by IdentifiedVerified LLC, dated May 11, 2026 -- visit-confirmation records, technical collection data, and reconciliation with prior demand correspondence for ncmac.net.

PLAINTIFF EVIDENCE PACKAGE

Visit Confirmation and Violation Evidence

Subject Domain	ncmac.net
Site Operator	Norcal Music & Arts Center
Address of Record	761 E El Camino Real, Sunnyvale, CA 94087
Matter Reference	PV-2026-00378-VK69
Notices Transmitted	April 5, 2026 (3 plaintiffs) · April 23, 2026 (see § 10)
Response Deadline	May 23, 2026
Evidence Period	February 11, 2026 – May 9, 2026
Prepared By	IdentifiedVerified LLC
Records Source	Digital Privacy Watchdog
Package Date	May 11, 2026

CONFIDENTIAL — ATTORNEY WORK PRODUCT

Prepared in anticipation of litigation. Not for distribution

1. Scope and Purpose

This package documents that five identified individuals personally visited ncmac.net during a period in which that website transmitted visitor data to third-party recipients, and correlates each individual's confirmed visit against contemporaneous technical evidence of those transmissions.

It is organized to answer three questions in sequence:

- Did these individuals visit the site, and how do we know? (Sections 3–6)
- Was the site transmitting visitor data to third parties, and when? (Section 7)
- Do those two periods overlap? (Section 8)

Section 10 sets out four points on which the demand correspondence already transmitted in this matter does not reconcile with the evidence recorded here. Counsel should read that section before relying on the figures in Section 9.

Individuals are identified throughout by pseudonymous serial identifiers. No name, electronic mail address, IP address, user-agent string, or session fingerprint appears anywhere in this package. A key mapping each serial to the underlying member record is maintained separately and is available under an appropriate protective order.

1.1 A Note on the Serial Identifiers

Pseudonymization here protects the individuals from incidental public exposure — it keeps their names out of a document that will circulate during pre-suit correspondence. It is not anonymity. The key exists, it

is retained permanently, and it is discoverable. Counsel should not represent to any party that the individuals cannot be identified.

2. Custodian Declaration

The declaration establishes, in substance:

- That the declarant is the custodian of records for the source system and is familiar with its recordkeeping practices.
- That each record was made at or near the time of the event recorded, by a person with personal knowledge, through an authenticated account.
- That the records were made and kept in the course of a regularly conducted business activity, and that it is the regular practice of the source to make them.
- That the integrity hashes were independently recomputed and matched.
- That the only alteration to the records is the withholding described in Section 1.

For California claims in state court, the governing provisions are Cal. Evid. Code §§ 1271 and 1561. For a federal claim, the declaration should instead conform to Fed. R. Evid. 902(11) so that the records are self-authenticating without live testimony.

3. Plaintiff Cohort

Two written notices were transmitted to the operator of ncmac.net. The first identified three individuals; the second identified those three plus two additional individuals.

Serial	Cohort	Confirmed (UTC)	Stated Frequency	Last Visit
IV-P-MEE7-RTTP	First notice	2026-03-18 09:47:13	once	past 3 months
IV-P-Q8K8-34FV	First notice	2026-03-16 14:22:07	regularly	past 3 months
IV-P-XZTH-MVYK	First notice	2026-03-16 16:05:41	few_times	this month
IV-P-2DPY-9GZV	Second notice	2026-04-11 11:33:52	regularly	this month
IV-P-5QGA-3CPX	Second notice	2026-04-11 11:41:06	frequently	this week

Notice	Date Transmitted	Reference	Plaintiffs Stated
Demand Notice	April 5, 2026, 5:15:04 PM PT	PV-2026-00378-VK69	3
Second Notice	April 23, 2026, 5:02:12 PM PT	PV-2026-00378-VK69	see § 10

Serials are sorted alphabetically within each cohort. The ordering carries no information about the underlying records.

Time zone convention: notice transmission times are stated in Pacific Time, as recorded by the sending system. Visit confirmation timestamps are stated in UTC, as stored. Where sequence matters, convert before comparing — Pacific Daylight Time is UTC−7 for the entire period covered by this package.

4. Visit Confirmation Records

Each record below is reproduced from the source system's visit confirmation table. Withheld fields are marked. The record hash is the value stored at the time of insertion.

4.1 IV-P-MEE7-RTTP

Subject domain	ncmac.net
Confirmed at (UTC)	2026-03-18T09:47:13Z
Stated visit frequency	once
Approximate last visit	past 3 months
Retracted	No
Member name	[WITHHELD]
Electronic mail address	[WITHHELD]
IP address	[WITHHELD]
User-agent string	[WITHHELD]
Session fingerprint	[WITHHELD]
Record hash (SHA-256)	c6c0fb5c54b4c5072db808bf00dc3ca304d7e5f55c99a09cbc23f5fbc592f17f

4.2 IV-P-Q8K8-34FV

Subject domain	ncmac.net
Confirmed at (UTC)	2026-03-16T14:22:07Z
Stated visit frequency	regularly
Approximate last visit	past 3 months
Retracted	No
Member name	[WITHHELD]
Electronic mail address	[WITHHELD]
IP address	[WITHHELD]
User-agent string	[WITHHELD]
Session fingerprint	[WITHHELD]
Record hash (SHA-256)	c5ffa6ab01e4fe8376ccdd62788e54bff9c94f60a8cace1ce0bdd6bf7d63a575

4.3 IV-P-XZTH-MVYK

Subject domain	ncmac.net
Confirmed at (UTC)	2026-03-16T16:05:41Z

Stated visit frequency	few_times
Approximate last visit	this month
Retracted	No
Member name	[WITHHELD]
Electronic mail address	[WITHHELD]
IP address	[WITHHELD]
User-agent string	[WITHHELD]
Session fingerprint	[WITHHELD]
Record hash (SHA-256)	309c401522518dbc1cf340163733e3f49550bb78eae4859921820a5d4d4b709b

4.4 IV-P-2DPY-9GZV

Subject domain	ncmac.net
Confirmed at (UTC)	2026-04-11T11:33:52Z
Stated visit frequency	regularly
Approximate last visit	this month
Retracted	No
Member name	[WITHHELD]
Electronic mail address	[WITHHELD]
IP address	[WITHHELD]
User-agent string	[WITHHELD]
Session fingerprint	[WITHHELD]
Record hash (SHA-256)	a1748298f4a0c4c1796be2c02d6802ddd7c9e09fec4ac57b963456b303f10dbe

4.5 IV-P-5QGA-3CPX

Subject domain	ncmac.net
Confirmed at (UTC)	2026-04-11T11:41:06Z
Stated visit frequency	frequently
Approximate last visit	this week
Retracted	No
Member name	[WITHHELD]
Electronic mail address	[WITHHELD]
IP address	[WITHHELD]
User-agent string	[WITHHELD]

Session fingerprint	[WITHHELD]
Record hash (SHA-256)	d0dcfa7d63c63cf855732562a4e9b025d8eb7c03b1ce2061d32c897293a42509

5. Record Integrity and Verification Procedure

At the moment a visit confirmation is written, the source system computes a SHA-256 digest over the record's identifying fields and stores it alongside the record. Any later modification to those fields produces a different digest. The stored digest therefore functions as a tamper-evident seal.

The digest is computed over the following fields, joined by the pipe character, in this order:

```
serial | domain | confirmed_at | visit_frequency | approximate_last_visit
```

On May 11, 2026, each digest was recomputed from the then-current field values and compared against the stored value. All five matched.

5.1 Independent Verification

Any party in possession of the field values may confirm this without access to the source system. Using the first record as an example, the preimage is:

```
IV-P-MEE7-RTPP|ncmac.net|2026-03-18T09:47:13Z|once|past_3_months
```

and the digest is:

```
c6c0fb5c54b4c5072db808bf00dc3ca304d7e5f55c99a09cbc23f5fbc592f17f
```

This can be reproduced from a command line:

```
printf '%s' "IV-P-MEE7-RTPP|ncmac.net|2026-03-18T09:47:13Z|once|past_3_months" | sha256sum
```

A matching result confirms the record has not been altered since insertion. A mismatch would indicate alteration and should be raised immediately.

5.2 Retraction Handling

The source table has no delete pathway. Where an individual withdraws a confirmation, the row is flagged as retracted and preserved; an entry is written to the audit log. Retracted records remain discoverable, and a retraction is itself a fact that may bear on the matter. No record in this package is retracted.

6. Audit Log Extract

The audit log is append-only. Entries are never modified or removed once written. The extract below covers every logged event touching the five records in this package.

Timestamp (UTC)	Serial	Event	Actor
2026-03-16 14:22:07	IV-P-Q8K8-34FV	created	member
2026-03-16 16:05:41	IV-P-XZTH-MVYK	created	member
2026-03-18 09:47:13	IV-P-MEE7-RTPP	created	member

Timestamp (UTC)	Serial	Event	Actor
2026-04-03 15:41:08	(3 records)	admin_view	admin
2026-04-03 15:43:22	(3 records)	exported	admin
2026-04-11 11:33:52	IV-P-2DPY-9GZV	created	member
2026-04-11 11:41:06	IV-P-5QGA-3CPX	created	member
2026-04-21 09:18:50	(5 records)	admin_view	admin
2026-04-21 09:20:14	(5 records)	exported	admin

The two export events correspond to the preparation of the first and second notices. Each precedes its respective transmission date.

7. Website Violation Evidence — ncmac.net

Technical evidence was collected by automated compliance scanning technology using an instrumented headless browser. Each collection captures full-page screenshots, a complete network request log, response headers, cookies set, and the rendered document source. Each archive is hashed and recorded in an append-only chain-of-custody log at the time of collection.

7.1 Classification Method

Third-party requests are separated into two tiers. This distinction matters and should be understood before reading the table below.

- Tier 1 — a request that carries visitor data to a third-party recipient. This is the conduct at issue.
- Tier 2 — a script file loaded from a third-party domain that does not itself carry visitor data.
Recorded for completeness, but not treated as a transmission.

Only Tier 1 findings are relied upon in Section 8. Counting script loads as transmissions is the most common defect in this kind of analysis and is avoided here deliberately.

7.2 Collection History

Collection Date	Tier 1	Tier 2	Accessibility	Context
2026-02-11	1	5	15	Baseline collection
2026-03-15	1	5	15	Scheduled monitoring
2026-04-02	1	5	15	Verification, 3 days before first notice
2026-04-20	1	6	15	After first notice, before second
2026-05-09	1	6	14	After second notice

Tier 1 transmissions were present at all five collections across the evidence period, including the collection taken sixteen days after the second notice. No remediation is observed at any point.

7.3 Tier 1 Recipients

Recipient	Endpoint	Tier	First Seen	Last Seen
Google Analytics	/g/collect	Tier 1	2026-02-11	2026-05-09

7.4 Consent Interface

No consent banner, cookie notice, or interstitial was detected at any collection. Transmissions to all three recipients occurred on initial page load, before any visitor interaction.

8. Temporal Overlap Analysis

This section carries the analytical weight of the package. Everything preceding it establishes two independent facts; this section joins them.

Transmission window	February 11, 2026 through May 9, 2026 — continuous, verified at five separate collections
Confirmation window	March 16, 2026 through April 11, 2026
First notice	April 5, 2026, 5:15:04 PM PT — 3 individuals identified
Second notice	April 23, 2026, 5:02:12 PM PT — 5 individuals identified
Overlap	Complete. Every confirmation falls inside the transmission window.

Each of the five individuals attested to visiting ncmac.net during a period in which the site was, at every point tested, transmitting visitor data to a third-party recipient without a consent interface. The earliest confirmation postdates the first observed transmission by thirty-three days; the latest predates the final observed transmission by twenty-eight days.

The three individuals identified in the first notice each confirmed before that notice was transmitted. The two additional individuals confirmed on April 11, 2026 — after the first notice and twelve days before the second, which is why the second notice identifies five rather than three.

8.1 Limits of This Analysis

Counsel should be clear-eyed about what these records do and do not establish, because opposing counsel will be.

- A confirmation records the date the individual attested, not the date of the visit itself. The stated frequency and approximate-last-visit fields narrow the visit period but do not fix it to a date.
- Technical collection establishes the site's configuration at the moment of collection. Continuity between collections is a reasonable inference from five consistent observations, not a direct one.
- The confirmations are self-reported. Their evidentiary weight rests on the authenticated account, the contemporaneous timestamp, the integrity hash, and the attestation — not on independent corroboration of the visit.

The overlap is nonetheless unusually clean here: the transmission window fully contains the confirmation window at both ends, which forecloses the argument that the confirmations describe a period before the conduct began or after it stopped.

8.2 Persistence After Notice

Two collections postdate written notice to the site operator.

Collection	Days After	Tier 1 Transmissions
April 20, 2026	15 (first notice)	1 — unchanged
May 9, 2026	16 (second notice)	1 — unchanged

The transmissions identified in the first notice were still occurring more than a month later, after two written communications. Whether that bears on willfulness, on the operator's duty to mitigate, or on neither is a question for counsel — but the underlying observation is documented and independently verifiable from the archived collections.

One caveat: the package contains no evidence that either notice was received or read. Persistence after transmission is not the same as persistence after actual knowledge, and delivery records are held separately from this package.

9. Statutory Exposure

The first two columns reproduce the figures asserted in the demand correspondence. The third column shows the calculation that follows from the evidence in this package at five plaintiffs. The columns do not agree; Section 10 explains why.

Statute	Letter A (Apr 5)	Letter B (Apr 23)	As Evidenced (5 plaintiffs)
CIPA § 637.2	\$15,000	\$20,000	\$25,000
VPPA § 2710	\$7,500	\$12,500	\$12,500
Total	\$22,500	\$32,500	\$37,500

The evidenced column is calculated as: per-unit statutory amount $\times$ 1 Tier 1 recipient $\times$ 5 plaintiffs. One Tier 1 recipient — Google Analytics — was observed at every collection across the evidence period.

These are statutory maxima. They are not a demand, a valuation, or a settlement position, and they exclude attorney fees, costs, injunctive relief, and any punitive component. Counsel should perform an independent calculation.

9.1 VPPA Contingency

VPPA applicability turns on whether these individuals qualify as consumers within the meaning of the statute — an issue on which the Supreme Court has granted review in *Salazar v. Paramount Global*. It also

turns on whether a qualifying disclosure to a third party occurred at all. See Section 10.3. The VPPA line should be treated as contingent on both points.

9.2 Unruh Act

Exposure under Civ. Code § 52(a) is not calculated. It accrues per occurrence rather than per violation, and the confirmation records establish that visits occurred without establishing how many. Quantifying it requires either discovery or individual declarations. Note that the Second Notice demands remediation of "ADA/Unruh" violations, though no accessibility violation was identified or quantified in either letter.

10. Reconciliation with Demand Correspondence

Two written notices have been transmitted in this matter. Four figures asserted in that correspondence do not reconcile with the evidence recorded in this package, or with each other. They are set out here so that counsel is not surprised by them, and so that they are addressed on our terms rather than the recipient's.

10.1 CIPA Provider Count — Letter A

Narrative text	Four third-party tracking providers identified
Damages table	Calculated on one provider
Providers named	One — Google Analytics
Evidence	One Tier 1 recipient at every collection

The evidence supports one. The narrative figure of four appears to count script loads rather than data transmissions — the Tier 1 / Tier 2 distinction described in Section 7.1. The damages calculation is correct; the surrounding sentence is not.

10.2 VPPA Instance Count — Letter A

The narrative states two instances of video viewing data disclosure. The damages table calculates on one. As with 10.1, the calculation is the reliable figure.

10.3 VPPA Recipient Characterization

Letter A identifies the VPPA provider as "HTML5 Video." This requires attention before the VPPA claim is pressed further.

An HTML5 video element is a browser feature for playing media. It is not a third party and it is not a recipient of anything. VPPA liability under 18 U.S.C. § 2710 requires a knowing disclosure of personally identifiable information to a third party. A video element on a page is not such a disclosure; a transmission of viewing activity to an outside recipient would be, and the evidence in this package does not currently document one.

As presently supported, the VPPA line accounts for \$12,500 of the \$32,500 asserted in the Second Notice. Counsel should either identify the actual third-party recipient of video viewing data, or withdraw the VPPA claim.

10.4 Plaintiff Count — Letter B

The Second Notice asserts escalated figures that imply two different plaintiff counts within the same table:

Statute	Asserted	Per Unit	Implied Plaintiffs
CIPA	\$20,000	\$5,000 × 1 provider	4
VPPA	\$12,500	\$2,500 × 1 provider	5

Five individuals had confirmed as of April 11, 2026, twelve days before the Second Notice. The VPPA line is consistent with that; the CIPA line is short by one plaintiff and by \$5,000. This is consistent with a known defect in which the second-notice plaintiff count falls back to four rather than reading the current figure.

The practical consequence is that the Second Notice under-demands on the CIPA line relative to the evidence. That is the less damaging direction of error, but it is an inconsistency visible on the face of the letter, and a recipient who notices it has a reason to question the rest of the arithmetic.

10.5 Recommended Handling

- Resolve 10.3 before any further correspondence. A statutory claim without a factual predicate is the most serious of the four items and the only one that cuts against us rather than merely looking careless.
- Correct the generation defect behind 10.4 before the next notice in any matter, not only this one.
- Treat the damages tables, not the narrative paragraphs, as the operative figures in both letters.
- Expect the recipient to raise 10.1 and 10.2. A clear, unprompted correction costs less than a defended one.

11. Package Manifest

The complete package comprises this document and the accompanying archive. Every file is hashed; the manifest is hashed in turn, and that value appears below.

Component	Files	Description
visit-confirmations/	5	Redacted record exports, JSON
audit-log/	1	Append-only log extract
screenshots/	12	Full-page captures, 4 collections
network-logs/	4	HAR captures, 1 per collection
page-source/	4	Rendered DOM, 1 per collection
chain-of-custody.log	1	Append-only collection record
manifest.json	1	SHA-256 of every file above

Manifest hash (SHA-256):

0d1df7affa7cc1722a9d323ed1c7506c08cc14509ddcab8f69ab21f3aad539a5

Verify with: sha256sum manifest.json

END OF PACKAGE