

ETHICS STATEMENT

By preserving the founding principles of integrity and fairness upon which Epsten Grinnell & Howell, APC was built, we strive to make our law firm an entity that garners the admiration of our employees, clients, business associates and suppliers.

This statement embodies the corporate culture and ethics that define what one can expect in the behavior of our law firm and our employees. It is equally important to us that our clients, business associates and suppliers exhibit a similar set of values.

INTEGRITY

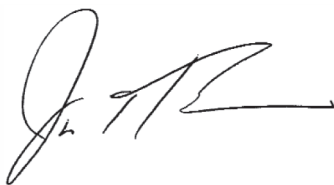
Epsten Grinnell & Howell is dedicated to adhering to the letter and spirit of the laws and regulations that govern us. We strive to have the very best person in every job. We embrace diversity and eschew any form of illegal discrimination or harassment. We will protect all confidential and proprietary information received from clients, suppliers, business associates and employees. Our principles of integrity and fairness extend to all areas of our operation including our billing and accounting practices, the quality of our client services and client satisfaction, employee wages and benefits, and our responsibilities to the community and environment.

RESPONSIBILITY

At Epsten Grinnell & Howell, APC, we hold ourselves accountable to the highest standards of conduct relative to our business activities. It is important to us that we are perceived as being a highly professional organization. To this end, we expect our employees to build and maintain a foundation of trust and respect in all endeavors. Our commitment to provide the best possible legal services ensures that our client's interests always come first.

COMMITMENT

It is important to Epsten Grinnell & Howell, APC that our Ethics Statement not be construed as just "good intentions" but, rather, that it be seen as the words by which the firm actually conducts its business. To this end, our firm's principles, ethics and code of conduct are published in the firm's Employee Policy Manual and are reviewed with all Epsten Grinnell & Howell personnel.



Jon H. Epsten
President and Managing Shareholder