

# Exhibit 1

# ZAMANSKY LLC

**Attorneys at Law**  
50 Broadway - 32nd Floor  
New York, New York 10004  
Telephone (212) 742-1414  
Facsimile (212) 742-1177  
E-Mail: [jake@zamansky.com](mailto:jake@zamansky.com)  
Website: [www.zamansky.com](http://www.zamansky.com)

Zamansky LLC, located in the financial district of lower Manhattan, is a boutique securities litigation firm founded in March 1998. The firm specializes in representing aggrieved investors and employees who have been harmed by financial fraud and misconduct. The firm's practice focuses on investor securities class action, ERISA litigation, employment litigation and securities arbitration. The firm has four experienced partners, two associate attorneys, and several other supporting staff employees.

## **The Firm's Practice**

The firm has extensive experience litigating complex issues in investor and employee class action lawsuits. Recently, as lead counsel, the firm has won large settlements for investors in two fund cases, including \$13.5 million for investors in Citigroup's CSO hedge fund, and \$14.75 million for investors in the Millennium Global hedge fund. The firm was also one of the lead attorneys in the Facebook IPO class action against the Nasdaq Stock Market which settled for \$26.5 million, and the Citigroup Securities class action by employees which settled for \$8.5 million.

Zamansky also recently won settlements in ERISA cases for employees of large public companies. In an ERISA action, on behalf of Avon Products employees who invested in company stock for losses suffered from misrepresentations associated with violations and compliance with the Foreign Corrupt Practices Act, Zamansky won a settlement of \$6.25 million. In another ERISA action, on behalf of J.C. Penney employees who invested in company stock for losses due to a misrepresentation over the new "fair and square" pricing strategy, Zamansky won a settlement of \$4.5 million.

Zamansky was most recently appointed to the Executive Committee in *In re: Wells Fargo ERISA 401(k) Litigation*, No. 0:16-cv-03405-PJS-BRT (D. Minn). Additionally, Zamansky has served, or is currently serving, as lead, co-lead, or sole counsel in class actions under ERISA for employees of the following public companies against the fiduciaries of their 401(k) contribution plans:

- American Express Company
- Avon Products Inc.
- Edison International Inc.
- Eaton Corporation Plc
- Hewlett Packard & Co.
- International Business Machines Corporation
- JPMorgan Chase & Co.
- L-3 Communications Corporation
- Sanofi-Aventis U.S. LLC
- Walt Disney Company
- Whole Foods Market Inc.

Zamansky LLC also has extensive experience litigating financial and investment claims. Zamansky has experience litigating claim against the largest investment banks and Wall Street brokerage firms regulated within the Financial Services Industry.

Zamansky LLC also has substantial experience litigating investor claims involving various investment products in lawsuits and securities arbitrations, including CDOs, CLOs, asset-backed securities, stocks, bonds, options, mutual funds, private equity and hedge funds, variable and fixed annuities contracts, auction rate securities, structured products, leveraged and inverse exchange-traded funds, employee stock options, futures, swaps, restricted stock, and credit default swaps.

### **Jacob Zamansky, Principal**

Mr. Zamansky, who has 30 years of litigation experience, is a leading authority on securities class action law and litigation, and securities arbitration law. He supervises and oversees all of the firms' securities and ERISA class action litigation and securities arbitration matters.

Mr. Zamansky is a former litigator at Skadden, Arps, Slate, Meagher and Flom LLP and a former prosecutor with the Federal Trade Commission. He is a graduate of Temple University and Law School and has a Master's of Law degree from Georgetown University School of Law. He is admitted to practice in New York State and Federal Courts, including the Southern District of New York and Eastern District of New York.

Mr. Zamansky has been at the forefront of efforts to “clean up” Wall Street. In 2001, he successfully sued former Merrill Lynch analyst Henry Blodget on behalf of a New York pediatrician who was misled by Blodget’s stock research and analyst reports. The case’s successful resolution was the catalyst for New York Attorney General Elliot Spitzer to investigate the conflicts of interest on Wall Street and resulted in the well-reported \$1.4 billion Global Stock Analyst Settlement, which included many of the biggest firms on Wall Street.

A native of Philadelphia, Mr. Zamansky has been a frequent expert commentator on CNBC, CNN, and FOX News and has published opinion pieces in *The Wall Street Journal*, *Financial Times* and *USA Today*. He is regularly quoted and his cases have been chronicled in major financial and news publications including *The New York Times*, *USA Today*, *Washington Post*, *The Wall Street Journal*, *Business Week*, *Fortune* and *Forbes*. He is a frequent lecturer for industry and legal groups around the country. He also writes a blog on financial news that is regularly viewed by regulators and financial reporters at [www.zamansky.blogspot.com](http://www.zamansky.blogspot.com).

Mr. Zamansky and his practice was also prominently featured in *Blood On The Street: The Sensational Inside Story of How Wall Street Analysts Duped A Generation of Investors*, by Charles Gasparino (former Wall Street Journal reporter), published by Free Press in January 2005.

### **Edward H. Glenn Jr., Partner**

Edward H. Glenn Jr. has been with Zamansky LLC since its origination in 1998. His practice involves the firm’s securities and ERISA class actions and representing customers and employees in securities arbitrations before the Financial Industry Regulatory Authority (“FINRA”). He has tried as lead or second chair over 40 investor cases at FINRA, and handled many of the firm’s notable cases including the *Kanjilal* arbitration.

Mr. Glenn is a graduate of Colgate University in 1988, where he received a B.A. in Economics. He is also a graduate of the Syracuse University College of Law in 1993, where he received a J.D. He was a Staff Editor for the *Syracuse Journal of International Law and Commerce*, repeated *Dean’s List* member and Quarterfinalist in the annual *Grossman Mock Trial Contest*.

Mr. Glenn was admitted to the New York State Bar in February 1994. He is also a member of the Bars of the United States District Courts for the Southern and

Eastern Districts of New York and the District Court of Colorado, and has been admitted *pro hac vice* in District Courts in California, Illinois and Texas.

Mr. Glenn passed Level 1 of the Chartered Financial Analyst exam – the premier exam for securities analysts. He was also mentioned in *Blood On The Street: The Sensational Inside Story of How Wall Street Analysts Duped A Generation of Investors*, by Charles Gasparino (former Wall Street Journal reporter), published by Free Press in January 2005.

**Samuel E. Bonderoff, Partner**

Samuel Bonderoff joined Zamansky LLC in 2013. His practice concentrates primarily on the firm's securities and ERISA class actions. He has extensive experience litigating securities fraud and ERISA class action claims, and has experience in all stages of litigation, including multiple bench and jury trials.

Prior to joining the firm, Mr. Bonderoff worked for many years at the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, where he litigated class actions and other complex commercial cases involving securities, ERISA, telecommunications, antitrust, bankruptcy, tax, construction, and intellectual property law. These cases involved clients such as Citigroup, JPMorgan Chase, Deutsche Bank, Morgan Stanley, Credit Suisse, Time Warner, Merck, Unilever, and others in state and federal jurisdictions including New York, California, Georgia, Tennessee, Illinois, and Delaware, as well as the foreign jurisdictions of the United Kingdom and France.

Mr. Bonderoff graduated from Dartmouth College in 1997 and earned his Juris Doctor from New York University School of Law in 2002, where he was an Editor of the Moot Court Board and a two-time winner of the law school's oral advocacy competition. Mr. Bonderoff was admitted to the New York State Bar in 2003. He is also a member of the Bars of the United States District Courts for the Southern and Eastern Districts of New York, and other federal courts.

**August M. Iorio, Partner**

August Iorio joined the firm as an associate in 2011. His practice focuses on FINRA arbitrations, federal securities class actions and group actions, all on behalf of investors.

Mr. Iorio received his B.S. in Finance in 2006 from The Pennsylvania State University, Smeal College of Business, where he was a repeated member of the Dean's List. He received his J.D. in 2011 from Seattle University School of Law.

Prior to joining the firm, Mr. Iorio worked in the Office of General Counsel at the Boeing Company; as a law clerk in the United States Attorney's Office for the Western District of Washington; representing small businesses at the Community Development and Entrepreneurship Clinic at the Ronald A. Peterson Law Clinic at Seattle University School of Law; and as an intern at the Monroe County District Attorney's Office in Rochester, New York.

### **Jorge Altamirano, Associate**

Jorge Altamirano joined Zamansky LLC in January 2014. He graduated from Loyola University College of Law in 2013 and received his BA from the University of Central Florida in 2009 where he majored in Political Science. Mr. Altamirano's practice is focused on recovering investment losses for brokerage customers stemming from UBS Puerto Rico closed-end bond funds. Mr. Altamirano is admitted to practice law in New York and New Jersey.

### **Justin Sauerwald, Associate**

Justin Sauerwald joined Zamansky LLC in September 2014. He graduated from Nova Southeastern University Shepard Broad College of Law in 2011 and received his BSBA from the University of Florida in 2005 where he majored in Finance. Mr. Sauerwald's practice is focused on the firm's securities and ERISA class action litigation, and recovering investment losses for brokerage customers stemming from UBS Puerto Rico closed-end bond funds. Mr. Sauerwald is admitted to practice law in Florida and New Jersey.

### **Significant Settlements and Verdicts**

- In re Avon Products, Inc. ERISA Litigation, No. 1:14-cv-10083-LGS (S.D.N.Y). As interim co-lead class counsel, Zamansky LLC successfully obtained a settlement of \$6.25 million for Avon Products employees in an ERISA class action over misrepresentations associated with violations of compliance with the Foreign Corrupt Practices Act. Final approval of this settlement is currently pending before the Court.

- In re CSO Hedge Fund Litigation, et al., No. 1:12-cv-07717-GHW (S.D.N.Y.). Zamansky LLC was appointed co-class counsel for investors in a fraud, breach of fiduciary duty and aiding and abetting case against Citigroup Inc. and Citigroup Alternative Investments Inc. for its failed Corporate Special Opportunities Ltd. fund, a distressed debt fund. After successfully defeating a motion to dismiss and discovery, the case recently settled for \$13.5 million.
- In re Facebook, Inc. IPO Securities & Derivative Litigation, No. 1:12-md-02389-RWS (S.D.N.Y.). Zamansky LLC was one of the lead attorneys for the plaintiff class of investors in the negligence class action against the NASDAQ Stock Market for its technical failures during the Facebook initial public offering. After successfully defeating motion to dismiss, the case settled for \$26.5 million.
- Marylebone PCC Limited - Rose 2 Fund v. Millennium Global Investments Ltd., et al., No. 1:12-cv-03835-PAC (S.D.N.Y.). Zamansky LLC was co-lead counsel for hedge fund investors who were victims of a fraudulent net asset valuation inflation conspiracy scheme involving Nigerian and Uruguayan warrants. The case settled for \$14.75 million.
- Peters, et al. v. JinkoSolar Holding Co. Ltd, et al., No. 1:11-cv-07133-JPO (S.D.N.Y.). Zamansky LLC was co-lead counsel for a class of investors against the company and its underwriters for registration statement and financial report misrepresentations and omissions concerning its compliance with environmental standards during its manufacture of solar chips. The Second Circuit Court of Appeals overturned and remanded the district court order dismissing the claims. The case settled for \$5.5 million.
- In re Citigroup, Inc. Securities Litigation—Brecher, et al. v. Citigroup, Inc., et al., No. 1:09-cv-07359-SHS (S.D.N.Y.). Zamansky LLC was co-lead counsel for class of Citigroup employees for losses suffered in their employee restricted FCAP stock and stock option plan as the result of securities fraud. Successfully defeated motion to dismiss and obtained \$8.5 million settlement for investors.
- Grund, et al. v. Principal Financial Group, No. 1:09-cv-08025-RWS (S.D.N.Y.). Zamansky LLC was co-lead counsel for a class of investors against the custodian of plaintiffs’ IRA and pension accounts, the assets of

which were stolen in the James Nicholson/Westgate fraud. Successfully defeated motion to dismiss and obtained \$3.2 million settlement for investors.

- Lopez Del Valle v. UBS Financial Services Inc. of Puerto Rico, FINRA No. 13-03784 (August 2015). Zamansky LLC was trial counsel for two investors awarded \$3.2 million total compensatory damages, attorneys’ fees and interest for losses in proprietary closed-end bond funds.
- Croce v. UBS Financial Services, Inc., FINRA No. 10-00361 (May 2011). Zamansky LLC was trial counsel for investor awarded rescission of \$2 million purchase of Lehman Brothers Holdings Inc. “100% Principal Protection Notes” in connection with misrepresentation and material omission claims.

### **Other Pending Cases**

- Attia, et al. v. Exxon Mobil Corporation, et al., No. 4:16-cv-03484-VEC (S.D. Tex.). Zamansky LLC was appointed interim class counsel for current and former employees of Exxon in an ERISA class action over losses suffered in the Savings Plan as the result of materially false and misleading public statements with regard to its oil and gas reserves.
- Dodd and Hill v. Strianese and D’Ambrosio, No. 1:16-cv-04930-VEC (S.D.N.Y.). Zamansky LLC was appointed interim class counsel for current and former employees of L-3 Communications Corporation in an ERISA class action over losses suffered in the Savings Plan as the result of a massive accounting fraud.
- In re Disney ERISA Litigation, No. 2:16-CV-2251-PA (JCx) (C.D. Cal.). Zamansky LLC is counsel for plaintiffs Wilson, Gaudette, and the Putative Class in an ERISA class action over misrepresentations in the offering of the Sequoia Fund to Plan participants. This case is currently on appeal in the Ninth Circuit.
- Engel v. Third Avenue Management Company LLC, et al., No. 1:16-cv-01118-PKC (S.D.N.Y.). Zamansky LLC represents a shareholder in the first derivative action filed against the mutual fund trustees for failing to maintain a sufficient liquidity plan and violation of the 25% limit on illiquid assets in the prospectus for the Third Avenue Focused Credit Strategy Fund which had \$1 billion in assets.

- Phan, et al. v. Ivy Investment Management Company, et al., No. 16CV02338 (Kan. Dist. Ct.). Zamansky LLC is sole counsel in this shareholder derivative action against two funds to recover damages resulting from the purchase of private securities in a start-up and potentially criminal company in the field of professional boxing promotion. Zamansky LLC was recently successful in defeating a motion to dismiss.
- Jander and Waksman v. Retirement Plans Committee of IBM, et al., No. 1:15-cv-03781-WHP (S.D.N.Y.). Zamansky LLC was appointed interim lead counsel for employees of IBM in an ERISA class action over misrepresentation relating to \$700 million of losses reported in its Microelectronics business segment.
- Martone v. Robb, et al., No. 1:15-cv-00877-RP (W.D. Tex.). Zamansky LLC is sole counsel for employees of Whole Foods Market in an ERISA class action over losses suffered from misrepresentations associated with its quality controls and consumer regulatory violations for overcharging.
- Houssain v. Chenault, et al., No. 1:15-cv-8184-PGG (S.D.N.Y.). Zamansky LLC is sole counsel for employees of American Express Company in an ERISA class action over losses suffered from misrepresentations associated with the expiration of its co-branding agreement with Costco.
- Wilson v. Edison International Inc., et al., No. 2:15-cv-09139-JAK-PJW (C.D. Cal.). Zamansky LLC is sole counsel for employees of Edison International Inc. in an ERISA class action over misrepresentation relating to a proposed \$3.3 billion settlement of the regulatory investigation by the California Public Utility Commission over its defunct San Onofre Nuclear Generating Station.