



Blake La Pierre <blakelapierre@gmail.com>

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## LaPierre | Correspondence

40 messages

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**Marisa Slifka** <marisa@zamaniassociates.com>

Mon, Jan 29, 2018 at 1:53 PM

To: blakelapierre@gmail.com

Cc: Sogand Zamani <szamani@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Dear Mr. LaPierre,

Please see the attached correspondence from Amanda Sow of today's date.

Best,  
Marisa

--

Marisa Slifka

Paralegal

Zamani & Associates PLLC

T: 202.510.9112 | F: 202.510.9152

[www.zamaniassociates.com](http://www.zamaniassociates.com)



ZAMANI & ASSOCIATES PLLC

**\* Adoption \* Assisted Reproductive Technology \***

**\*Custody/Divorce \* Mediation \* Collaborative \***

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**Letter to Mr. LaPierre (012918).pdf**

112K

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**Blake La Pierre** <blakelapierre@gmail.com>

Mon, Jan 29, 2018 at 7:41 PM

To: Marisa Slifka <marisa@zamaniassociates.com>

Cc: Sogand Zamani <szamani@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Marisa and Amanda,

Kim and I have not separated.

Please send me any and all recordings, transcripts, communications, notes, or other work products related to your association with Kim.

Please also record all future conversations with or about Kim and provide them to me at your earliest opportunity.

Thank you.

Blake La Pierre

Kim,

These attorneys appear to have given you bad advice.

Please talk to me directly or seek out the advice of someone else.

I miss you and love you!!

Blake

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Wed, Jan 31, 2018 at 9:30 PM

To: Marisa Slifka <marisa@zamaniassociates.com>

Cc: Sogand Zamani <szamani@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Hi Marisa and Amanda,

When should I expect to receive the materials I requested?

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 4:03 PM

To: Marisa Slifka <marisa@zamaniassociates.com>

Cc: Sogand Zamani <szamani@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Marisa, Amanda, Sogrand, and Kim,

This is a follow-up communication to my phone call with Marisa minutes ago.

Please explain the nature of your delay in responding to my requests. Please also explain why Marisa is not empowered to respond to the requests and only seems to be able to "transmit" messages from you (Amanda and Sogrand) to me.

Thank you.

Blake La Pierre

[Quoted text hidden]

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**Sogand Zamani** <szamani@zamaniassociates.com>

Thu, Feb 1, 2018 at 4:33 PM

To: Blake La Pierre <blakelapierre@gmail.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>

Dear Mr. LaPierre,

Please do let me know if you have retained counsel so that I may speak with your counsel directly. By retaining counsel, you will gain advice as to both the law and process options available to you. I do not represent you and cannot give you legal advice. As I made clear in my initial communication, I represent your wife and our communications with her are privileged. You are not entitled to any information pertaining to those conversations. Because our office does not work on your behalf, we also cannot take instruction from you. Further, as stated in her signature line, Marisa is a paralegal/legal assistant and not an attorney.

I ask that you take the time to provide the documents we are seeking to try to provide stability during separation and find a way to reach a mutually agreed settlement. Please advise if you do not intend to work cooperatively to divide assets equitably.

Thank you,  
Sogand

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 4:37 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>

Sogrand,

Please check your privilege.

Again, Kim and I do not have a 'separation'. If you continue to insist that we do, I will be filing a complaint with DC BAR and any other authority I deem appropriate.

I am entitled to all communications, strategies, work products, and other. Please transmit them to me immediately.

Thank you.

**Blake La Pierre**

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 4:45 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>

Sogrand,

In your only communication to me you said:

>As I made clear in my initial communication, I represent your wife and our communications with her are privileged.

To what are you referring?

[Quoted text hidden]

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**Sogand Zamani** <szamani@zamaniassociates.com>

Thu, Feb 1, 2018 at 4:49 PM

To: Marisa Slifka <marisa@zamaniassociates.com>

Cc: blakelapierre@gmail.com, Amanda Sow <asow@zamaniassociates.com>

I am referring to this emailed from the firm.

Sogand Zamani

**Zamani & Associates PLLC**

2121 K Street, NW, Suite 900

Washington, DC 20037

[www.zamaniassociates.com](http://www.zamaniassociates.com)

T: (202) 510-9112

F: (202) 510-9152

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<Letter to Mr. LaPierre (012918).pdf>

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 5:16 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Sogrand,

The email I am responding to right now is only the second email and communication I have received from you.

The pdf Letter you are referring to was transmitted to me by Marisa and claims to be from Amanda.

Please repair all of your false claims or I will be filing a complaint with DC BAR and any other authority I deem appropriate.

Please also arrange for me to access all of Kim's accounts.

Thank you.

Blake La Pierre

[Quoted text hidden]

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**Sogand Zamani** <szamani@zamaniassociates.com>

Thu, Feb 1, 2018 at 5:29 PM

To: Blake La Pierre <blakelapierre@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Dear Mr. LaPierre,

I can see that our discussions will not be productive over email. When you decide to participate in the dialogue with our firm please do let me know.

Thank you,  
Sogand

Sogand Zamani  
**Zamani & Associates PLLC**  
2121 K Street, NW, Suite 900  
Washington, DC 20037  
[www.zamaniassociates.com](http://www.zamaniassociates.com)  
T: (202) 510-9112  
F: (202) 510-9152

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 5:48 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Sogrand,

You and your firm are making false claims.

Please arrange for me to access all systems of Zamani & Associates PLLC.

Please standby for the transmission of further information.

Thank you.

Blake La Pierre

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Thu, Feb 1, 2018 at 7:32 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Sogrand, Marisa, and Amanda,

Please prepare to take immediate action against:

- 1) Denise Lunden ("Denise"),  
last known to me to reside in Connecticut and to be doing business in Rocky Hill, Connecticut
- 2) James "Jim" Lunden ("Jim"),  
last known to me to reside in Connecticut and to be doing business in Rocky Hill, Connecticut
- 3) VeraCore Software Solutions, Inc ("VeraCore/SMA"),  
previously known as Software Marketing Associates, Inc. and also known as SMA
- 4) United States of America ("USA"),  
as represented by Department of Labor, Employee Benefits Security Administration ("DOL" and "EBSA")

Please see the attached archive for relevant information on actions to be taken against the above named entities. You may also access the archive at the following URL: <https://www.dropbox.com/s/n77ocrcj4b7itc0/SMAComplaint.zip?dl=0>

You may also access a fully working rendering of the above archive, including working hyperlinks to renderings of evidentiary documents, at the following URL: <https://blakelapierre.github.io/SMAComplaint/Complaint.html>

Please contact me by email if you need further direction.

Please initiate immediate action against the above named entities to secure all funds needed by you to execute all actions against the above named entities.

Please immediately wire \$50,000.00 USD to the following account in advance of awards and possible settlements against the above named entities for my ongoing expenses:

Connex Credit Union  
Blake La Pierre  
Account #: 2493400  
ABA Routing #: 211178200

Please notify me of all your activities in this matter.

I will be coming by your office soon so that you can make copies of additional hard-copy documents in this matter. The number of pages of documents is on the order of five-hundred (500) pages, and possibly more. Please be prepared to copy the documents in my presence. If you have a preferred date and time for me to come, please make it known to me as quickly as possible.

Thank you.

Blake La Pierre

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 **SMAComplaint.zip**  
11874K

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**Blake La Pierre** <blakelapierre@gmail.com>

Fri, Feb 2, 2018 at 7:12 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Amanda, Sogrand, and Marisa,

If you do not repair, or notify me of your intention to repair, within three (3) days, the following items, I will be filing complaints with DC BAR. If I have to file any complaints, you will receive an invoice, payable immediately, for my time spent. My current rate (subject to change) is \$3,000.00USD per day.

#### Item 1 - False Claim

On January 29, 2018 I received a PDF "Correspondence" via email from Marisa Slifka claiming to be from Amanda Sow. In the first line of the correspondence it was falsely claimed that Kim and I have a separation.

#### Item 2 - False Communication

On February 1, 2018 I received my first email communication from Sogrand Zamani. In that email, Sogrand claimed that the PDF I received from Marisa Slifka was actually from her.

#### Item 3 - Failure to Produce Material Artifacts

On January 29, 2018 I requested "any and all recordings, transcripts, communications, notes, or other work products related to your association with Kim". I have not received any of the requested items, nor have I received any communication indicating that I will receive the requested items, despite followup communications.

Thank you.

Blake La Pierre

Kim,

These "attorneys" do not appear to be competent. They are engaged in serious misconduct. Please find someone else to advise/represent you (I don't know if these people actually do represent you, but they have sent me emails claiming they do). Unless something changes very quickly, I think you should stop all payments to them, refuse to make any further payments to them, and request immediate, full refunds from them.

I love you and miss you very much!

Blake

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Mon, Feb 5, 2018 at 4:42 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Hi Marisa, Amand, and Sogand,

I just spoke to Marisa by phone. She did not know if I would be receiving a response to my communications from any of you by today. Please immediately review my prior communications as I will be writing and filing complaints if I do not receive an appropriate response by today.

I also informed Marisa that I will be arriving at your office in about forty (40) hours (9 AM) so that you can make copies of the documents I previously told you about. Our primary retirement account and its statements are defective and an equitable agreement will not be reached until the underlying issues are resolved.

Thank you.

Blake La Pierre

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Mon, Feb 5, 2018 at 4:53 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Marisa, Amanda, and Sogand,

Please have all materials I have requested ready for me to take possession of when I arrive at your office.

Thank you.

Blake La Pierre

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**Sogand Zamani** <szamani@zamaniassociates.com>

Mon, Feb 5, 2018 at 4:57 PM

To: Blake La Pierre <blakelapierre@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Dear Mr. LaPierre,

Please do not come to our office. We do not represent you and your insistence in several regards over email is alarming. I suggest you retain counsel to gain an understanding of this process as soon as possible.

I am happy to set up a call today at 5:30 pm or tomorrow at 4 pm regarding settlement only.

Thank you,  
Sogand

Sogand Zamani  
**Zamani & Associates PLLC**  
2121 K Street, NW, Suite 900  
Washington, DC 20037  
[www.zamaniassociates.com](http://www.zamaniassociates.com)  
T: (202) 510-9112  
F: (202) 510-9152

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**Sogand Zamani** <szamani@zamaniassociates.com>

Mon, Feb 5, 2018 at 5:00 PM

To: Blake La Pierre <blakelapierre@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Dear Mr. LaPierre,

You are welcome to scan in, mail or drop off the documents we have requested.

Thank you,

Sogand

Sogand Zamani  
**Zamani & Associates PLLC**  
2121 K Street, NW, Suite 900  
Washington, DC 20037  
[www.zamaniassociates.com](http://www.zamaniassociates.com)  
T: (202) 510-9112  
F: (202) 510-9152

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Mon, Feb 5, 2018 at 5:32 PM

To: Sogand Zamani <szamani@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Sogand,

Please stop removing Kim from these emails.

If you do not wish to receive the documents I have or provide the documents, I suggest you retain your own counsel. Please send me their contact information so that I can speak to them directly.

As you requested, I will not be bringing you documents at this time.

Will you be responding today about the three items I have identified as misconduct?

>We do not represent you and your insistence in several regards over email is alarming.

I have never insisted that you represent me. This appears to be another false claim from you.

You are severely impact my working time and I am not happy about it at all.

Please do better.

Blake La Pierre

[Quoted text hidden]

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**Blake La Pierre** <blakelapierre@gmail.com>

Fri, Feb 9, 2018 at 4:32 AM

To: Sogand Zamani <szamani@zamaniassociates.com>, Amanda Sow <asow@zamaniassociates.com>

Cc: Marisa Slifka <marisa@zamaniassociates.com>, Kim <lapierre.kimberly@gmail.com>, Rick La Pierre <rlapierre2@gmail.com>

Sogand and Amanda,

Please review the following three (3) draft complaints to the District of Columbia Court of Appeals. If you would like to make any correction, please make it now. I will be transmitting these complaints to the court soon.

Also, after reviewing some of your communications I found other false statements of material facts. Please correct them as soon as possible or I will be filing further complaints.

ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML  
- FALSE CLAIM / STATEMENT OF MATERIAL FACT TO A THIRD PERSON

DISTRICT OF COLUMBIA  
COURT OF APPEALS

THE BOARD ON PROFESSIONAL RESPONSIBILITY  
OFFICE OF DISCIPLINARY COUNSEL

515 Fifth Street, N.W.  
Building A, Room 117  
Washington, District of Columbia 20001

To protect the public and the courts from unethical conduct by Members of the District of Columbia Bar,

the Office of Disciplinary Counsel shall,

pursuant to Rule XI of the District of Columbia Court of Appeals Rules Governing the Bar,

investigate the following Complaint of Ethical Misconduct against District of Columbia Bar Member(s):

Amanda Sow, Esq.  
ZAMANI & ASSOCIATES PLLC

Member ID: 980724

Known Address

-----  
2121 K STREET, N.W. | SUITE 900  
WASHINGTON, DISTRICT OF COLUMBIA 20037

and/or

Sogand Zamani, Esq.  
ZAMANI & ASSOCIATES PLLC

Member ID: 473270

Known Address

-----  
2121 K STREET, N.W. | SUITE 900  
WASHINGTON, DISTRICT OF COLUMBIA 20037

Statements of Fact

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1. [Bar Resources / Legal Ethics / Amended Rules / Rules of Professional Conduct: Rule 4.1--Truthfulness in Statements to Others]

Rules of Professional Conduct: Rule 4.1--Truthfulness in Statements to Others

In the course of representing a client, a lawyer shall not knowingly:



(a) Make a false statement of material fact or law to a third person;  
or

(b) Fail to disclose a material fact to a third person when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client, unless disclosure is prohibited by Rule 1.6.

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2. On January 29, 2018, I received a communication from Amanda Sow, Esq. and/or Sogand Zamani, Esq. (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) via electronic mail from Marisa Slifka.

Complaint: FALSE CLAIM / STATEMENT OF MATERIAL FACT TO A THIRD PERSON  
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Amanda Sow, Esq. and/or Sogand Zamani, Esq. (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) claimed in the first sentence of their first communication to me that I have a "separation" with "Ms. La Pierre" (Kimberly La Pierre):

"We have been retained to represent Ms. La Pierre in connection with your separation."

No legal separation exists between myself and Kimberly La Pierre.

<see included image of false claim / statement>

The Undersigned hereby certifies to the Office of Disciplinary Counsel that the statements in the foregoing Complaint are true and correct to the best of my knowledge.

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Blake La Pierre

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ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML  
- FALSE COMMUNICATION & APPARENT FALSE STATEMENT OF MATERIAL FACT TO A THIRD PERSON

DISTRICT OF COLUMBIA  
COURT OF APPEALS

THE BOARD ON PROFESSIONAL RESPONSIBILITY  
OFFICE OF DISCIPLINARY COUNSEL

515 Fifth Street, N.W.  
Building A, Room 117  
Washington, District of Columbia 20001

To protect the public and the courts from unethical conduct by Members of the District of Columbia Bar,

the Office of Disciplinary Counsel shall,

pursuant to Rule XI of the District of Columbia Court of Appeals Rules Governing the Bar,

investigate the following Complaint of Ethical Misconduct against District of Columbia Bar Member(s):

Sogand Zamani, Esq.  
ZAMANI & ASSOCIATES PLLC

Member ID: 473270

Known Address

-----  
2121 K STREET, N.W. | SUITE 900  
WASHINGTON, DISTRICT OF COLUMBIA 20037

Statements of Fact

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1. [Bar Resources / Legal Ethics / Amended Rules / Rules of Professional Conduct: Rule 4.1--Truthfulness in Statements to Others]

Rules of Professional Conduct: Rule 4.1--Truthfulness in Statements to Others

In the course of representing a client, a lawyer shall not knowingly:

(a) Make a false statement of material fact or law to a third person;  
or

(b) Fail to disclose a material fact to a third person when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client, unless disclosure is prohibited by Rule 1.6.

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2. On February 1, 2018, I received what I believed to be my first ever communication from Sogand Zamani, Esq.

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3. Sogand Zamani, Esq.'s communication (see Fact 2.) stated, among other statements:

"As I made clear in my initial communication, I represent your wife and our communications with her are privileged."

Complaint: FALSE COMMUNICATION & APPARENT FALSE STATEMENT OF MATERIAL FACT TO A THIRD PERSON

In Sogand Zamani, Esq.'s communication (see Fact 2.) they claimed that a communication to me on January 29, 2018 (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML), signed by Amanda Sow, Esq., and sent by electronic mail from Marisa Slifka, was actually from herself (Sogand Zamani, Esq.).

Additionally, in no prior communication that I have received was it ever claimed, or "made clear", that Sogand Zamani, Esq.'s, nor any other person's communications with Kimberly La Pierre are "privileged" (see Fact 3.).

<see included image of false communication & apparent false statement>

The Undersigned hereby certifies to the Office of Disciplinary Counsel that the statements in the foregoing Complaint are true and correct to the best of my knowledge.

Blake La Pierre

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ZAMANI & ASSOCIATES PLLC - COMPLAINT 3 : BML  
- FAILURE TO PRODUCE MATERIAL ARTIFACTS

DISTRICT OF COLUMBIA  
COURT OF APPEALS

THE BOARD ON PROFESSIONAL RESPONSIBILITY  
OFFICE OF DISCIPLINARY COUNSEL

515 Fifth Street, N.W.  
Building A, Room 117  
Washington, District of Columbia 20001

To protect the public and the courts from unethical conduct by Members of the District of Columbia Bar,  
the Office of Disciplinary Counsel shall,  
pursuant to Rule XI of the District of Columbia Court of Appeals Rules Governing the Bar,  
investigate the following Complaint of Ethical Misconduct against District of Columbia Bar Member(s):

Sogand Zamani, Esq.  
ZAMANI & ASSOCIATES PLLC

Member ID: 473270

Known Address

-----  
2121 K STREET, N.W. | SUITE 900  
WASHINGTON, DISTRICT OF COLUMBIA 20037

Statements of Fact

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1. [Bar Resources / Legal Ethics / Amended Rules / Rules of Professional Conduct: Rule 3.4--Fairness to Opposing Party and Counsel]

Rules of Professional Conduct: Rule 3.4--Fairness to Opposing Party and Counsel

A lawyer shall not:

(a) Obstruct another party's access to evidence or alter, destroy, or conceal evidence, or counsel or assist another person to do so, if the lawyer reasonably should know that the evidence is or may be the subject of discovery or subpoena in any pending or imminent proceeding. Unless prohibited by law, a lawyer may receive physical evidence of any kind from the client or from another person. If the evidence received by the lawyer belongs to anyone other than the client, the lawyer shall make a good-faith effort to preserve it and to return it to the owner, subject to Rule 1.6;

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2. [Bar Resources / Legal Ethics / Amended Rules / Rules of Professional Conduct: Rule 1.6--Confidentiality of Information]

Rules of Professional Conduct: Rule 1.6--Confidentiality of Information

(a) Except when permitted under paragraph (c), (d), or (e), a lawyer shall not knowingly:

(1) reveal a confidence or secret of the lawyer's client;

(2) use a confidence or secret of the lawyer's client to the disadvantage of the client;

(3) use a confidence or secret of the lawyer's client for the advantage of the lawyer or of a third person.

(b) "Confidence" refers to information protected by the attorney-client privilege under applicable law, and "secret" refers to other information gained in the professional relationship that the client has requested be held inviolate, or the disclosure of which would be embarrassing, or would be likely to be detrimental, to the client.

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3. On January 29, 2018, I requested (via electronic mail to Amanda Sow, Esq., Sogand Zamani, Esq., Marisa Slifka, and Kimberly La Pierre) "any and all recordings, transcripts, communications, notes, or other work products related to your association with Kim".

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4. As of 03:54 AM, February 9, 2018, I have not received any of the materials I requested.

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5. On January 29, 2018, I received a communication from Amanda Sow, Esq. and/or Sogand Zamani, Esq. (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML && ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) that stated:

"Therefore, if Ms. LaPierre [sic] is blocked from accessing the small prtion of marital assets needed to meet reasonable expenses during your separation, we will have no choice but to seek court intervention."

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6. On January 29, 2018, I received a communication from Amanda Sow, Esq. and/or Sogand Zamani, Esq. (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML && ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) that stated:

"If we do not receive a response, we will assume you are not interested in settlement and will proceed accordingly."

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7. On February 1, 2018, I received a communication from Sogand Zamani, Esq. that stated, among other statements:

"As I made clear in my initial communication, I represent your wife and our communications with her are privileged."

Complaint: FAILURE TO PRODUCE MATERIAL ARTIFACTS  
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In Amanda Sow, Esq.'s and/or Sogand Zamani, Esq.'s communication (see Facts 5. and 6.) (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML & ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) threatened to take legal action against me (see Fact 5.).

They did not explain what they meant by "proceed accordingly" (see Fact 6.).

Amanda Sow, Esq. and/or Sogand Zamani, Esq. are obstructing my access to evidence despite having reasonably should have know that materials I requested would be evidence, subject to discovery and/or subpoena, in whatever pending or imminent proceeding they had planned.

Further, Amanda Sow, Esq. and/or Sogand Zamani, Esq., nor any other person has claimed any applicable law under which the materials I requested are "privileged" (see Fact 7.) or "protected by the attorney-client privilege".

Further, Amanda Sow, Esq. and/or Sogand Zamani, Esq. (see ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML & ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML) sought an "equitable" settlement. In an equitable settlement, there is no information gained by Amanda Sow, Esq. and/or Sogand Zamani, Esq. of which its disclosure would be embarrassing or detrimental to their client. In fact, disclosure of all information is required to achieve an equitable settlement.

<see included image of false communication & apparent false statement>

The Undersigned hereby certifies to the Office of Disciplinary Counsel that the statements in the foregoing Complaint are true and correct to the best of my knowledge.

\_\_\_\_\_  
Blake La Pierre

[Quoted text hidden]

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**Sogand Zamani** <szamani@zamaniassociates.com>

Fri, Feb 9, 2018 at 9:40 AM

To: Blake La Pierre <blakelapierre@gmail.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Rick La Pierre <rlapierre2@gmail.com>

Dear Mr. LaPierre,

If you persist in making baseless allegations and do so in a filing, please know that we will of course take all appropriate action and seek attorneys fees from you for the absolute waste of time that would ensue. I suggest that you speak to an attorney as soon as possible.

Regards,  
Sogand

Sogand Zamani  
**Zamani & Associates PLLC**  
2121 K Street, NW, Suite 900  
Washington, DC 20037  
[www.zamaniassociates.com](http://www.zamaniassociates.com)  
T: (202) 510-9112  
F: (202) 510-9152

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>

Fri, Feb 9, 2018 at 2:50 PM

To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sogand,

What is baseless about my complaints?

You appear to have made another false statement.

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>

Fri, Feb 9, 2018 at 3:26 PM

To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sogand,

Please review Rule 8.1:

### **Rules of Professional Conduct: Rule 8.1--Bar Admission and Disciplinary Matters**

An applicant for admission to the Bar, or a lawyer in connection with a Bar admission application or in connection with a disciplinary matter, shall not:

- (a) Knowingly make a false statement of fact; or
- (b) Fail to disclose a fact necessary to correct a misapprehension known by the lawyer or applicant to have arisen in the matter, or knowingly fail to respond reasonably to a lawful demand for information from an admissions or disciplinary authority, except that this rule does not require disclosure of information otherwise protected by Rule 1.6.

<https://www.dcbart.org/bar-resources/legal-ethics/amended-rules/rule8-01.cfm>

Thank you.

**Blake La Pierre**

[Quoted text hidden]

---

**Rick La Pierre** <rlapierre2@gmail.com>

Fri, Feb 9, 2018 at 3:33 PM

To: Blake La Pierre <blakelapierre@gmail.com>

Blake,

I would be very careful in how your proceeding with these people!

Shouldn't Kim be on this email?

I would hate to have them get pissed and try to bury you with data and cause you to need to get council and create a mess for you!

It appears your point has been made. I would think about it. Don't let your situation with Kim , run over into this !

Just a thought from my prospective!

Love You!!

Get [Outlook for iOS](#)

---

**From:** Blake La Pierre <blakelapierre@gmail.com>

**Sent:** Friday, February 9, 2018 12:26:59 PM

**To:** Sogand Zamani

**Cc:** Amanda Sow; Marisa Slifka; Dad Cell; Kim

**Subject:** Re: LaPierre | Correspondence

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>

Fri, Feb 9, 2018 at 3:47 PM

To: Rick La Pierre <rlapierre2@gmail.com>

Kim was on the email that I sent.

Sogand seems to take Kim off every email that she sends.

I have no need to have any counsel. Sogand has made numerous violations of the rules of her profession and It's my duty to report them and to let her know what I'm doing.

[Quoted text hidden]

**Rick La Pierre** <rlapierre2@gmail.com>  
To: Blake La Pierre <blakelapierre@gmail.com>

Fri, Feb 9, 2018 at 3:51 PM

Makes sense !  
Just be cautious!

Get [Outlook for iOS](#)

---

**From:** Blake La Pierre <blakelapierre@gmail.com>  
**Sent:** Friday, February 9, 2018 12:47:15 PM  
**To:** Rick La Pierre  
**Subject:** Re: LaPierre | Correspondence

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Sogand Zamani <szamani@zamaniassociates.com>  
Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Fri, Feb 9, 2018 at 11:18 PM

Sogand, Amanda, and/or Marisa,

I have attached `Invoice1` and have also included it below.

If I do not receive your payment by 8:00AM on 2018-02-13 I will appear at your office around 9:00AM on 2018-02-13 to collect payment in the form of cash or a check.

If you would like to pay in another way, please tell me.

I expect that it will take me one (1) or two (2) more days of work to complete and transmit my complaints.

Thank you.

Blake La Pierre

\*\*\*\*\*

Invoice 1

Prepared for:

ZAMANI & ASSOCIATES PLLC  
-Sogand Zamani  
-Amanda Sow

2121 K STREET. N.W. | SUITE 900  
WASHINGTON, DC 20037

Immediately pay:

\$3015.00 US Dollars  
by wire transfer

T0:

Blake La Pierre

Connex Credit Union  
Account #: 2493400

ABA Routing #: 211178200

412 WASHINGTON AVE  
NORTH HAVEN, CT 06473-0000

Phone #: (203) 603-5730

Items

-----

Time Spent

2018-02-09.....1 Day @  
\$3000/day

Public Service -- Draft Complaints of Ethical Misconduct

ZAMANI & ASSOCIATES PLLC - COMPLAINT 1 : BML

- FALSE CLAIM /  
FALSE STATEMENT OF MATERIAL FACT TO A THIRD PERSON

ZAMANI & ASSOCIATES PLLC - COMPLAINT 2 : BML

- FALSE COMMUNICATION &  
APPARENT FALSE STATEMENT OF MATERIAL FACT TO A THIRD PERSON

ZAMANI & ASSOCIATES PLLC - COMPLAINT 3 : BML

- FAILURE TO PRODUCE MATERIAL ARTIFACTS

Wire Fee.....\$15

[Quoted text hidden]

---

 **Invoice1**  
2K

---

**Rick La Pierre** <rlapierre2@gmail.com>  
To: Blake La Pierre <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 10:50 AM

Blake,  
I would not appear at their office They may read this as a possibility threat , and work place violence is something very serious which I know that is not your intention but they may not.  
Question: What is your Real motivation in all that your doing with this attorney?  
I ask out of Love?!?

Sent from my iPhone

[Quoted text hidden]

<Invoice1>

---

**Rick La Pierre** <rlapierre2@gmail.com>  
To: Blake La Pierre <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 10:56 AM

They won't let you in the office then you may have to force your way in , which gives them probable cause and it doesn't make sense! They could call police etc,etc.  
I believe this will only make your case weaker in the eyes of a judge if it goes that far with you and Kim.  
Take a breath ask David Higgins get a second or third opinion!!  
Just send complaint...  
What's the 3,000 for a bill?



Sent from my iPhone  
[Quoted text hidden]

<Invoice1>

---

**Blake La Pierre** <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 5:45 PM

To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Amanda, Sogand, Marisa, and Kim,

I do not appreciate people showing up where I live, unannounced, while I am taking a nap, who curses at me when I answer his knocking, "sorry if this fucks up your night dude", and who would not even identify himself.

What is the identity of the person you sent to deliver me paperwork?

Or, did you not send the person who just interrupted me?

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 5:51 PM

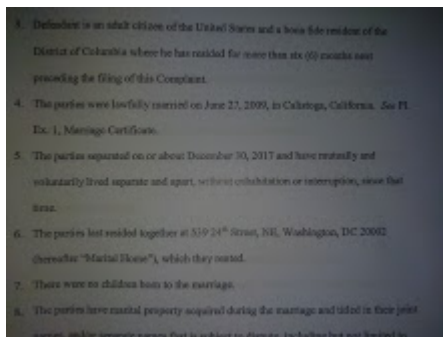
To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

I have already communicated many times that I have not mutually or voluntarily separated from you Kim. Did you read the papers that I was sent?

Sogand and/or Amanda, if you have filed this paperwork with a court, I will be filing a further complaint for making a false statement.

[Quoted text hidden]



IMG\_20180211\_174821.jpg  
2214K

---

**Blake La Pierre** <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 5:58 PM

To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Kim,

You should not have signed this paper and Sogand and/or Amanda should not have let you sign it.

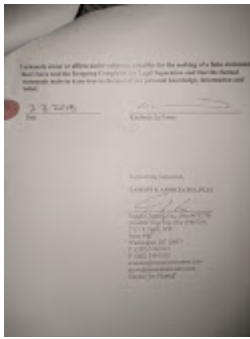
At least one false statement is made in the preceding pages.

I love you and miss you!

[Quoted text hidden]

---

IMG\_20180211\_175450.jpg  
2182K



---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Rick La Pierre <rlapierre2@gmail.com>

Sun, Feb 11, 2018 at 6:07 PM

The \$3000 is for my time spent having to write up and file a complaint. I shouldn't have to do that because attorneys should not be doing the things that these people have done. It is a public service to report attorneys who are unethical. My intention in going to their office will only be to collect the money they owe me if they do not pay earlier.

I don't see what violence has to do with any of this. Do you think they might attack me?

[Quoted text hidden]

---

**Rick La Pierre** <rlapierre2@gmail.com>  
To: Blake La Pierre <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 6:21 PM

No, but I don't want them to say that you are. I'm on your side here. Just want you to consider their perception that's all.

Get [Outlook for iOS](#)

---

**From:** Blake La Pierre <blakelapierre@gmail.com>  
**Sent:** Sunday, February 11, 2018 3:07:56 PM  
**To:** Rick La Pierre  
**Subject:** Re: LaPierre | Correspondence

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Sogand Zamani <szamani@zamaniassociates.com>  
Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sun, Feb 11, 2018 at 6:21 PM

Sogand and Amanda,

Please immediately send me all images your "process server" (only way the person who delivered paperwork that appears to contain Sogand's signature identified himself), or anyone else, took of me, surreptitious or otherwise. I am aware that there is at least one image as the "server" told me he took one (not really sure why he told me after the fact).

Please also send me copies or originals of all documents related to this matter (including previously identified and requested documents).

[Quoted text hidden]

---

**Rick La Pierre** <rlapierre2@gmail.com>  
To: Blake La Pierre <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 6:22 PM

If they don't pay when you go what are you then going to do leave?

Get [Outlook for iOS](#)

---

**From:** Rick La Pierre <rlapierre2@gmail.com>  
**Sent:** Sunday, February 11, 2018 3:21:27 PM  
**To:** Blake La Pierre  
**Subject:** Re: LaPierre | Correspondence

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Rick La Pierre <rlapierre2@gmail.com>

Sun, Feb 11, 2018 at 6:22 PM

No one should have such a perception and I don't know why they would. I have had to take a lot of time out of my work to deal with correcting these people.

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Rick La Pierre <rlapierre2@gmail.com>

Sun, Feb 11, 2018 at 6:23 PM

Yeah.

[Quoted text hidden]

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Sogand Zamani <szamani@zamaniassociates.com>  
Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sun, Feb 11, 2018 at 6:45 PM

Hi Sogand and/or Amanda,

I just called the "T" number in the attached image twice. I received no human answer and my voice messages were cut off twice.

Please confirm that the paper the image was taken of is actually from you.

[Quoted text hidden]



IMG\_20180211\_184216.jpg  
2488K

---

**Blake La Pierre** <blakelapierre@gmail.com>  
To: Sogand Zamani <szamani@zamaniassociates.com>  
Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sun, Feb 11, 2018 at 7:59 PM

I have found another false statement on one of the papers someone gave me today (see attached image).

I have not engaged in any threatening or intimidating behavior against Kim or Sogand or Amanda. To what were you referring?

I am most concerned about Kim's safety more than anyone I know in existence. The insinuation that Kim would be unsafe if I knew her address appears to be based on false assumption.

Kim, I don't know if one of these people have been influencing you to make any particular claims, but these people appear to be giving you very bad advice and counsel. I do not see how they will be attorneys for much longer.

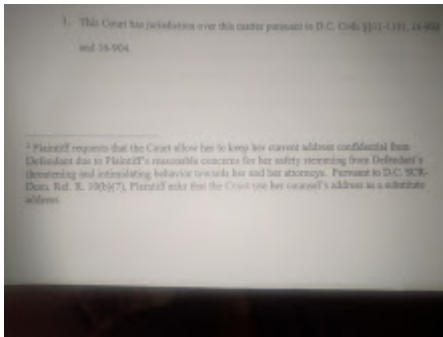
Please, please go talk to some other people.

I love you and miss you so much. Big Kitty is here rolling on the floor...I think she would live to see you and snuggle with you.

[Quoted text hidden]

---

IMG\_20180211\_195000.jpg



2113K

**Blake La Pierre** <blakelapierre@gmail.com>

Sun, Feb 11, 2018 at 9:11 PM

To: Sogand Zamani <szamani@zamaniassociates.com>

Cc: Amanda Sow <asow@zamaniassociates.com>, Marisa Slifka <marisa@zamaniassociates.com>, Dad Cell <rlapierre2@gmail.com>, Kim <lapierre.kimberly@gmail.com>

Sogand and Amanda,

I have begun drafting four (4) additional complaints. I have also made these complaints and other documents available at <https://github.com/blakelapierre/zamani> (see `complaints` folder). If you need help accessing the repository, let me know. You can interact with me via the repository, github, or by email. If you have any corrections to make, please make them now.

Expect to receive a second invoice from me soon.

Here is the text of the new drafts:

\*\*\*

Item 4 - False claim / False statement made to a third person

On February 5, 2018, Sogand Zamani said, via electronic mail, "We do not represent you and your insistence in several regards over email is alarming."

I have never insisted, claimed, insinuated, or done any other thing that should, or could, be construed as a claim or insistence that Sogand Zamani, nor any other person, represents me, let alone, "in several regards".

\*\*\*

Item 5 - False Claim / False statement / False statement made to a third person

On February 9, 2018, Sogand Zamani said to me, via electronic mail, "If you persist in making baseless allegations and do so in a filing, please know that we will of course take all appropriate action and seek attorneys fees from you for the absolute waste of time that would ensue. I suggest that you speak to an attorney as soon as possible. "

I have not made any baseless allegations. Sogand does not even identify one (1) allegation to which they refer. In an immediate follow up communication to Sogand Zamani, I inquired what was baseless about the complaints I had, which I had previously communicated to her.

Sogand Zamani has not responded to my inquiry.

\*\*\*

Item 6 - False Claim / False Statement / False Statement to a Third Person / False Statement in an Apparent Court Filing - 1

On February 11, 2018, I received, by an unidentified individual (they refused to identify themselves, even after my asking them to), papers that purport to be a Complaint filed by Sogand Zamani. The complaint makes at least two false statements (see 2).

False statement 1:

"5. The parties separated on or about December 30, 2017 and have mutually and voluntarily lived separate and apart, without cohabitation or interruption, since that time."

I have not mutually or voluntarily lived separate or apart from Kim. I have previously communicated this to Kim, before the false statement was filed. I have also communicated to Sogand Zamani and Amanda Sow that Kim and I have not separated, despite their initial claim.

\*\*\*

Item 7 - False Claim / False Statement / False Statement to a Third Person / False Statement in an Apparent Court Filing - 2

On February 11, 2018, I received, by an unidentified individual (they refused to identify themselves, even after my asking them to), papers that purport to be a Complaint filed by Sogand Zamani. The complaint makes at least two false statements (see 1).

False statement 2:

"1 Plaintiff requests that the Court allow her to keep her current address confidential from Defendant due to Plaintiff's reasonable concerns for her safety stemming from Defendant's threatening and intimidating behavior towards her and her attorneys."

I have not engaged in threatening or intimidating behavior towards Kim or her attorneys. I don't believe anyone is more concerned for Kim's safety than I am.

\*\*\*

[Quoted text hidden]