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May 21, 2012

Lee Deschamps, Esq.
Deschamps & Kortemeier Law Offices P.C.
P.O. Box 389
Socorro, NM 87801-0389

Socorro Electric Cooperative, Inc.

Dear Mr. Deschamps:

We represent Socorro Electric Cooperative, Inc. ("SEC"). We have been instructed by your client, Charles Wagner, to contact you directly regarding SEC's demand that Mr. Wagner and his agents return every audio tape recording made at times the SEC Board was in an executive session, including any times when the Board was receiving legal advice from Mr. Francish, SEC's counsel at the time.

As you likely know, these tapes were secretly made without the knowledge or consent of those attending the meeting, in breach of Mr. Wagner's duties to SEC. Mr. Wagner's conduct has disrupted the operations of SEC. SEC has instructed Mr. Wagner to identify the dates of each Board or committee meeting during which he recorded the proceedings and has demanded that he return to the SEC all of those tapes, including any copies or excerpts thereof. SEC also instructed Mr. Wagner to identify by name and address each person or entity to whom he provided the tapes, including the originals, copies, or excerpts of the tapes.

We hereby demand that you provide SEC with an accounting of each and every tape recording in your possession, custody or control that Mr. Wagner provided to you along with the dates of such meeting and that you return, no later than ten days from the date of this letter, all such tapes, together with any copies or excerpts thereof.

If you have any questions, please let us know.

Very truly yours,

WIGGINS, WILLIAMS & WIGGINS A Professional Corporation

Lorna M. Wiggins

LMW:cag cc: Darin Foster, Esq.