

GOVERNMENT RELATIONS

From Milliron and Goodman Government Relations, LLC, Harrisburg, PA

**Berks County
Water & Sewer**
ASSOCIATION

April 12, 2020 – Issue 103

Department of Health Provides Update on COVID-19, 1,178 New Positives Bring Statewide Total to 22,833

On April 12, 2020, the Pennsylvania Department of Health confirmed as of 12:00 a.m., April 12, that there are 1,178 additional positive cases of COVID-19, bringing the statewide total to 22,833. All 67 counties in Pennsylvania now have cases of COVID-19. The department also reported 13 new deaths among positive cases, bringing the statewide total to 507. County-specific information and a statewide map are available [here](https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx) <https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx>. All people are either in isolation at home or being treated at the hospital.

“Now more than ever, as we continue to see COVID-19 cases and deaths rise in Pennsylvania, we need Pennsylvanians to take action,” Secretary of Health Dr. Rachel Levine said. “Those actions should be to stay calm, stay home and stay safe. If you must go out, please limit it to as few trips as possible and wear a mask to protect not only yourself, but other people as well. We need all Pennsylvanians to heed these efforts to protect our

vulnerable Pennsylvanians, and our healthcare workers and frontline responders.”

There are 102,057 patients who have tested negative to date. Of the patients who have tested positive to date the age breakdown is as follows:

- Less than 1% are aged 0-4;
- 1% are aged 5-12;
- 2% are aged 13-18;
- Nearly 9% are aged 19-24;
- Nearly 49% are aged 25-49;
- 29% are aged 50-64; and
- 22% are aged 65 or older.

Most of the patients hospitalized are aged 65 or older, and most of the deaths have occurred in patients 65 or older. There have been no pediatric deaths to date. More data is available [here](https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx) <https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx>.

All non-life-sustaining businesses are ordered to be closed and schools are closed statewide indefinitely. Currently the entire state is under a stay-at-home order.

For the latest information for individuals, families, businesses and schools, visit “Responding to COVID-19” at

<https://www.pa.gov/guides/responding-to-covid-19/>.

The Wolf Administration stresses the role Pennsylvanians play in helping to reduce the spread of COVID-19:

- Wash your hands with soap and water for at least 20 seconds or use hand sanitizer if soap and water are not available.
- Cover any coughs or sneezes with your elbow, not your hands.
- Clean surfaces frequently.
- Stay home to avoid spreading COVID-19, especially if you are unwell.

Updated Coronavirus Links: Press Releases, State Lab Photos, Graphics

- **Daily COVID-19 Report**
<https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx>
- **Press releases regarding coronavirus**
<https://www.media.pa.gov/Pages/Health.aspx>
- **Latest information on the coronavirus**
<https://www.health.pa.gov/topics/disease/coronavirus/Pages/Coronavirus.aspx>
- **Photos of the state's lab in Exton**
<https://www.flickr.com/photos/governortomwolf/sets/72157713388961802/>
- **Coronavirus and preparedness graphics** (located at the bottom of the page)
<https://www.health.pa.gov/topics/disease/coronavirus/Pages/Social-Media.aspx>
- **Community preparedness and procedures materials**
<https://www.pacast.com/m?p=17885>
- **Map with the number of COVID-19 cases**
<https://www.google.com/maps/d/embed?mid=1lPPrIltuVkwFtXhoWdWEA4B1DvNmne&ll=>

[41.03302245465488%2C-77.80500120579285&z=8](https://www.puc.pa.gov/41.03302245465488%2C-77.80500120579285&z=8)

All Pennsylvania residents are encouraged to sign up for AlertPA, a text notification system for health, weather, and other important alerts like COVID-19 updates from commonwealth agencies. Residents can sign up online at www.ready.pa.gov/BeInformed/Signup-For-Alerts

Source: PA Department of Health Press Release, 4/12/2020

PUC's April 16th Public Meeting to be Conducted Telephonically

In response to the ongoing threat to public health posed by the COVID-19 virus, the Pennsylvania Public Utility Commission (PUC) announced that its next public meeting - on Thursday, April 16 - will be conducted telephonically.

The PUC public meeting will begin at 10 a.m. on April 16, and members of the public, the media and others can begin accessing the telephone conference call starting at 9:45 a.m. that day. Interested parties can listen to the meeting by calling 1-888-917-8050, and then entering passcode 9570961#.

The Commission welcomes the public to join the telephonic meeting, stressing that it will follow the Commission's customary public meeting protocol with only Commissioners and the PUC's Secretary permitted to speak on agenda items. A final agenda for the public meeting will be published on the Commission **website** http://www.puc.pa.gov/about_puc/public_meeting_calendar.aspx on Wednesday, April 15.

Under the unique circumstances presented by the COVID-19 pandemic, conducting public meetings and other routine Commission business telephonically – to help minimize non-essential personal social contact – is consistent with the Governor's Proclamation of Disaster Emergency and the requirements of the Public Utility Code.

The Pennsylvania Public Utility Commission balances the needs of consumers and utilities; ensures safe and reliable utility service at reasonable rates; protects the public interest; educates consumers to make independent and informed utility choices; furthers economic development; and fosters new technologies and competitive markets in an environmentally sound manner.

For recent news releases and video of select Commission proceedings or more information about the PUC, visit our **website** at <http://www.puc.pa.gov/>. Follow the PUC on Twitter – @PA_PUC for all things utility. “Like” Pennsylvania Public Utility Commission on Facebook for easy access to information on utility issues.

Source: PUC Press Release, 4/10/2020

Citizens Advisory Council Virtual Meeting

In accordance with Governor Tom Wolf's emergency disaster declaration and based on advice from the Department of Health regarding the mitigation of the spread of the novel Coronavirus (COVID-19), the Citizens Advisory Council (Council) meeting scheduled for 10 a.m. on Tuesday, April 21, 2020, will be held as a virtual meeting. Individuals who wish to join the meeting may do so remotely. Information will be provided on the Council's webpage.

Questions concerning the April meeting can be directed to Keith Salador at ksalador@pa.gov or (717) 787-8171. The agenda and meeting materials, as well as information on how to join the meeting, will be available through the Public Participation tab on the Department of Environmental Protection's (Department) web site at www.dep.pa.gov (select "Public Participation," then "Citizens Advisory Council"). Prior to each meeting, individuals are encouraged to visit the Council's webpage to confirm meeting date, time and location.

Source: Pennsylvania Bulletin, 4/11/2020
<http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol50/50-15/525.html>

Independent Fiscal Office Projects \$2.7 Billion to \$3.9 Billion Reduction in Revenues Over Current, Next Fiscal Year

On April 8, the Independent Fiscal Office issued a special report projecting a **\$2.7 billion to \$3.9 billion reduction in state revenues in the current and FY 2020-21** combined under two different scenarios of how long the COVID-19 shutdown will remain in effect -- a six-week closure ending April 27 and a 10-week closure ending May 25.

More specifically, the IFO projects a **decline in revenues for each scenario:**

- **Corporate Net Income Tax** of \$517 million and \$754 million
- **Sales Tax revenue** decline by \$46 million and \$366 million
- **Personal Income Tax** revenue declines by \$803 million and \$997 million
- **Total General revenue** declines by \$1.4 billion and \$2.2 billion

Both estimates **exclude** a potential gain of \$400 million to \$500 million from federal stimulus.

The FY 2019-20 total revenue numbers under both scenarios are projected to be \$32.383 billion and \$31.872 billion. The IFO had been projecting total revenue of \$35.518 billion in February.

The enacted FY 2019-20 budget totals \$33.9 billion, but as noted there are an estimated \$800 million to \$1.4 billion in supplemental appropriations needed to pay for actual expenses.

The FY 2020-21 total revenue numbers under both scenarios are projected to be \$37.754 billion and \$36.989 billion.

Both scenarios assume 1.1 million workers -- excluding self-employed that receive unemployment compensation -- are impacted by business closures increasing unemployment to 8.7 percent and employment contracts by 264,000 jobs.

In the six-week scenario, it is assumed one-half of those 1.1 million workers return to work after the six-week closure and the other half remain unemployed through June. A similar pattern would occur in the 10-week scenario only lasting longer.

Both scenarios assume certain economic projections that have net profits falling by 10 to 15 percent and corporate profits decline by 15 to 25 percent

As a point of comparison, the IFO said during the 2009 tax year, net profits declined by 9.5 percent. Corporate profits declined by 9.5 percent in 2007, by 11.3 percent in 2008 and 14.3 percent in 2009.

The report also includes an estimate of how much Pennsylvania will receive from federal and state stimulus measures adopted so far under the six-week and 10-week scenarios:

- **Rebates/Cash Payments** - \$10.4 billion \$10.4 billion
- **UC Paid by State Government** - \$4.5 billion \$6.0 billion
- **UC Paid by Federal Government** - \$10.1 billion \$11.7 billion
- **Various Business Tax Cuts** - \$4.3 billion \$4.3 billion
- **Forgivable Small Business Loans** - \$12.5 billion \$12.5 billion
- **Federal Grants to State Government** - \$4.6 billion \$4.6 billion

- **Federal Grants to Local Government** - \$3.4 billion \$3.4 billion
- **Total** - \$49.8 billion \$52.8 billion

Click here for a **copy of the report**
<http://www.ifo.state.pa.us/download.cfm?file=Resources/Documents/Revenue-Update-2020-04.pdf>.

The next scheduled update of state revenue estimates is now set for May 20.

Source: PA Environmental Digest Blog, April 8, 2020

House Republicans Begin Path to Pandemic Recovery

At a time when Pennsylvanians are making enormous sacrifices in their day-to-day lives, the Pennsylvania House of Representatives took the first steps toward finding solutions to the growing list of professional and economic impacts from the COVID-19 virus.

The House passed **Senate Bill 327**
<https://www.legis.state.pa.us/cfdocs/billInfo/billInfo.cfm?sYear=2019&sInd=0&body=s&type=b&bn=327> with language that will establish the COVID-19 Cost and Recovery Task Force. The interbranch bipartisan group will be assigned to track and manage the crisis while also developing long-term recovery plans for the Commonwealth.

"Pennsylvanians in all corners of the Commonwealth are suffering from the effects of COVID-19, and from the mitigation procedures designed to slow the spread of the virus," House Majority Leader Bryan Cutler (R-Lancaster) said. "However, that suffering should not be the only story. The task force will ensure input and data is coming from all areas of state government, helping find solutions and a pathway to recovery as efficiently and safely as possible."

The bill also would establish the COVID-19 debt cost reduction review, which would direct all state agencies responsible for any level of borrowing to examine existing debts and determine if refinancing

with current interest rates would be in the best interest of taxpayers.

"There is nothing to celebrate about this virus; however, one positive result is substantially reduced borrowing costs. We should re-examine all state debts and potentially save tens of millions of dollars. That savings could be used to help people and programs that will face monumental challenges as we work to recover from this crisis," Cutler said.

The final piece of the bill establishes the COVID-19 emergency regulation suspension and waiver reporting requirement, which requires the governor to provide the General Assembly with written and official notice any time his administration changes, suspends or waives existing state law in response to the pandemic.

"The state Constitution is very clear - it is the job of the General Assembly to make laws. If the governor changes any of those laws, he must provide official notice. This pandemic is no different," Cutler added.

"Our members have serious concerns with the haphazard manner with which the Wolf administration has attempted to handle the business waiver process," Cutler said. "We have little confidence in the administration's ability to recognize the long-term impacts of the decisions that have already been made. House Republicans are working on a plan to find the right balance between economic health and public health. A bill providing a path for businesses that follow federal safety recommendations to return to work was amended in the House Appropriations Committee and could face floor consideration when the House returns to session.

"Millions of Pennsylvanians are following social distancing, wearing masks and following other guidelines to try and slow the spread of the virus as much as possible. They also see a light at the end of the tunnel," Cutler added. "Democrats today voted in unison against working together, against helping the state recover and against saving tax dollars in a year where we will face the largest financial challenge in a generation.

"House Republicans flatly reject the idea that we must choose between either protecting public health

or safeguarding our economy. We believe we can help both and we must do so to ensure we have a healthy and prosperous Commonwealth."

NOTE: Senate Bill 327 was referred to the Senate Rules Committee.

Source: Rep. Cutler Press Release, 4/7/2020

Senate Approves Martin Bill Providing COVID-19 Emergency Measures for Local Governments

On April 7, 2020, the Senate approved a bill sponsored by Senator Scott Martin (R-13) that includes emergency measures to help local governments respond to the COVID-19 public health emergency.

Senate Bill 841

<https://www.legis.state.pa.us/cfdocs/billInfo/billInfo.cfm?sYear=2019&sInd=0&body=s&type=b&bn=841> would take a number of steps to ensure local governments can continue to operate during the coronavirus pandemic. The bill would:

- Allow local governments to provide greater flexibility on property tax deadlines.
- **Permit local governments to conduct remote meetings.**
- Give notaries emergency authorization to notarize documents remotely through the use of communications technology.

Under the bill, local governments would be authorized to extend deadlines for property tax discount rates to any date up until August 31. The legislation would also allow local governments to waive any fee or penalty for late payments of property taxes if paid in full by the end of the year. The provisions give local taxing bodies more flexibility to help local taxpayers who are struggling financially due to the COVID-19 crisis.

Senate Bill 841 also extends the ability of notaries to conduct business remotely in order to meet the needs of local governments and

individuals. A notary public would still be required to confirm an individual's identity and reasonably identify records, and an audio/visual recording of the notarial act and all related interactions would be required.

The legislation would allow members of local governments to participate in meetings and conduct other business remotely during the governor's disaster declaration. Additional requirements are included to ensure transparency of remote meetings, including provisions for public notice and posting minutes.

Additional time would also be allowed for businesses to contribute to educational scholarship programs in order to earn tax credits.

In addition to providing emergency provisions for local governments, the bill also reauthorizes the Pennsylvania Health Care Cost Containment Council, which is responsible for collecting and analyzing data about the cost and quality of health care in the state and making recommendations to reduce the cost of care.

The panel would be responsible for preparing a report on the effect of the COVID-19 disaster emergency on healthcare facilities, including expenses and lost revenue during the crisis to determine additional financial assistance.

NOTE: Senate Bill 841 was referred to the House Rules Committee

Source: Senator Martin Press Release, 4/7/2020

Mihalek Introduces Legislation to Allow Car Dealerships to Open During COVID-19 Crisis

Rep. Natalie Mihalek (R-Allegheny/Washington) has introduced legislation that would require the Department of Community and Economic Development to issue a waiver allowing all car dealerships to open while respecting the

recommended Centers for Disease Control and Prevention guidelines.

To help mitigate the spread of COVID-19, Gov. Tom Wolf ordered many Pennsylvania businesses to shut down, including car dealerships.

After speaking with a nurse in her district who needed to replace her car to make it to Pittsburgh to treat COVID-19 patients and after talking with dealers all around the Commonwealth who are happy to accommodate their customers and employees with the strictest safety precautions, Mihalek felt it was necessary to introduce the legislation.

“I believe that an undue burden has been placed on our consumers, on our dealers, and on the 50,000-plus workers from the industry who are now without jobs,” said Mihalek. “This is why I introduced House Bill 2388.”

Since she introduced her legislation, Mihalek’s bill has already received overwhelming bipartisan support.

“I know one of our primary functions as a government is to keep our citizens safe from harm. There has to be a balance between the preservation of public health and absolute economic devastation,” continued Mihalek. “Our surrounding states have found a way to keep these sales moving with zero human interaction, and I think we can do that here too. We can do this smartly for our businesses and we can do this safely for our consumers.”

To learn more about **House Bill 2388** <https://www.legis.state.pa.us/cfdocs/billInfo/billInfo.cfm?sYear=2019&sInd=0&body=H&type=B&bn=2388>. A **sponsor summary** can be found at <https://www.legis.state.pa.us/cfdocs/Legis/CSM/showMemoPublic.cfm?chamber=H&SPick=20190&osponId=31500>.

NOTE: The House State Government Committee is scheduled to meet on Monday, April 13, 2020 OFF THE FLOOR in Room 140 Main Capitol to consider House Bill 2388.

Source: Rep. Natalie Mihalek Press Release,
4/9/2020

DEP Issues New Guidance on Inspections, Permit Enforcement, Waivers of Permit, Regulatory Provisions during COVID-19 Pandemic

The Department of Environmental Protection posted new guidance on its website

<https://www.dep.pa.gov/Pages/AlertDetails.aspx> outlining a series of actions it is taking during the COVID-19 pandemic related to inspections, permits enforcement and considering enforcement waivers.

Inspections/Responding to Complaints

To limit exposure to and spread of the virus, DEP is currently prioritizing field inspections that are critical to public health and safety.

DEP staff is working remotely, and responding to complaints related to issues critical to public health and safety.

DEP will continue to respond in the field to environmental emergencies that present an immediate threat to public health and safety.

To report environmental emergencies, please call 1-800-541-2050.

Conditions related to the COVID-19 pandemic are constantly evolving. DEP is closely monitoring the situation and working to make the best decisions to protect public health and safety and the environment. As conditions of the COVID-19 pandemic evolve, it may become necessary for DEP to make operational changes to compensate.

Permit Holders

Entities operating under a DEP permit that have ceased or suspended operations or construction,

please refer to your permit terms and conditions, as they contain regulatory obligations and details regarding cessation or temporary stoppage of work.

This includes, but is not limited to, Chapter 102 earth disturbance permits and Chapter 105 encroachment permits.

Permittees or operators with questions about specific permit or operating conditions should contact the entities identified on their permit or cover letter.

If a point of contact is not provided in the permit or cover letter, a current **DEP directory can be found here** <https://www.dep.pa.gov/About/Contact/Pages/default.aspx>.

Chapter 102 Erosion & Sedimentation Permit Holders

- **For Life Sustaining Businesses:** Permittees and operators who are considered “life sustaining businesses” as set forth in Governor Tom Wolf’s March 19, 2020, Order may continue to conduct permitted earth disturbance activities to the extent that those earth disturbance activities are in support of the operation of the life sustaining business.

If earth disturbance activities are conducted, the permittee must remain in compliance with all terms and conditions of any applicable permit.

- **For Non-Life Sustaining Businesses:** Permittees and operators who are not considered “life sustaining businesses” as set forth in the Governor’s Order must, pursuant to the Governor’s Order, cease earth disturbance activities.

Per 25 Pa. Code § 102.22 and the terms and conditions of their permit, including any approved plans, permittees ceasing earth disturbance activities must immediately implement temporary or permanent stabilization practices in accordance with approved permit plans and conditions and the stabilization standards outlined in the Erosion and Sediment Control Program Manual.

In recognition of the Governor's directive to implement social distancing, permittees may, upon temporary or permanent stabilization, cease performing weekly Routine Inspections as otherwise required by their permit.

Permittees must continue to conduct other inspections required by their permit, including Post-Storm Event Inspections and Corrective Action Inspections as set forth in their permit.

Required site inspections of permitted activities by permittees are considered critical operational functions and will not be considered to be out of compliance with the Governor's Order.

Permittees and operators are reminded to limit on-site personnel, and in all cases follow social distancing and COVID-19 mitigation guidance provided by the PA Department of Health and CDC.

The cessation of Routine Inspections as set forth herein is not a limitation of, or defense to, liability for injury to private property or invasion of personal rights.

Permittees must continue to comply with all other permit terms and conditions, including, but not limited to, the requirement to take immediate action to restore, repair, or replace the BMP or to provide an alternative method of treatment upon reduction, loss, or failure of any BMP.

County Conservation District Site Inspection Guidance

The following provides a summary of the current guidance from the Department of Environmental Protection (DEP or Department) regarding site inspections by County Conservation Districts who have delegated authority during the COVID-19 public health emergency. Please note that this is subject to change as the situation evolves.

Click here for the **guidance**
<http://files.dep.state.pa.us/AlertsPage/County%20Conservation%20Districts.pdf>.

Storage Tank Inspections/Installations

Please see the following guidance for underground storage tanks inspections and installation during the COVID response: **Tank Inspections and Installations During COVID-19 Response**

<http://files.dep.state.pa.us/EnvironmentalCleanupBrownfields/StorageTanks/StorageTanksPortalFiles/Certified%20Tank%20Handling%20Companies%20and%20Activities.pdf>.

Water & Wastewater Operator Examinations

The following provides a summary of the current guidance from the Department of Environmental Protection and the Operator Certification Board regarding upcoming water and wastewater operator certification exams during the response to the COVID-19 public health emergency. Please note that this is subject to change as the situation evolves.

Click here for the **guidance**
<http://files.dep.state.pa.us/AlertsPage/Water%20and%20Wastewater%20Operator%20Certification%20Exam%20Process.pdf>.

Requesting Suspension of Regulation/Permit Condition

In accordance with Gov. Wolf's Proclamation of Disaster Emergency of March 6, 2020 and the Governor's powers pursuant to the Emergency Management Code, 35 Pa.C.S. §7301, the Governor has authority to suspend regulatory obligations and other legal obligations within his jurisdiction where strict compliance will prevent, hinder, or delay necessary action in coping with the COVID-19 emergency.

To request a temporary suspension of regulatory requirements and/or permit conditions, **fill out this form**
<http://files.dep.state.pa.us/AlertsPage/DEP%20Request%20for%20Suspension%20of%20Regulatory%20Requirements.docx> and submit to: RA-EPCOVID19SuspReq@pa.gov.

If you are requesting suspension of a Federal requirement, under only Federal authority, please

contact US EPA Region III and refer to the US EPA March 26, 2020 Memorandum (COVID-19 Implications for EPA’s Enforcement and Compliance Assurance Program) <http://www.paenvironmentdigest.com/newsletter/default.asp?NewsletterArticleID=49528&SubjectID=10>.

To the extent the request relates to a federal program delegated to Pennsylvania, Pennsylvania will review requests submitted in this format.

Permit Review Times Suspended

DEP is suspending the timeframes for providing permit decisions established in the Policy for Implementing the Department of Environmental Protection Permit Review Process and Permit Decision Guarantee due to the office closures related to COVID-19.

Please note that DEP staff will continue to process received permit applications.

However; due to operational conditions, applicants may experience delays receiving decisions.

Applicants may also experience delays in receiving permit decisions where the applications are processed by County Conservation Districts. DEP will provide emergency authorizations for projects that are critical to public health and safety.

Right to Know Law

As of March 16, 2020, the Rachel Carson State Office Building was closed in accordance with Governor Tom Wolf’s guidance on COVID-19 mitigation.

Any requests for public records submitted to DEP on or after March 16, 2020 will be deemed to have been received by the DEP’s open-records officer on the first day of the reopening of the Rachel Carson State Office Building.

Please note that the Pennsylvania Office of Open Records issued a statement indicating that “if an agency is closed on a given day, that day does not count toward the five business days referenced in

Section 901 of the Right-to-Know Law, which governs the time period under which an agency must respond to a request.”

Notice of Legal Actions

For questions about service of process, please contact Joseph Iole at RA-EPOCC@pa.gov or call 814-450-3620.

For more information on this guidance and updates, visit DEP’s **Alert webpage** <https://www.dep.pa.gov/Pages/AlertDetails.aspx>.

Source: PA Environmental Digest, 4/12/2020

PennVEST Board Approves Up to \$450 Million in Financial Aid to PA Hospitals

On April 10, the PA Infrastructure Investment Authority voted to approve a low-interest, short-term loan program to provide up to \$450 million in funding to state hospitals to bridge the gap until federal assistance arrives.

“The federal CARES Act will deliver hundreds of millions of dollars to hospitals, but when that money will arrive is uncertain. The surge in cases is happening now and hospitals need this help now because the virus caseload intensifies each day,” Democratic Leader Rep. Frank Dermody (D-Allegheny), said.

“By making state financing available quickly, hospitals will be able to get doctors and nurses the equipment and supplies they require to handle the surge and save as many lives as possible. This funding is a vital lifesaving tool to help us weather the worst part of the storm,” Rep. Dermody said.

PennVEST

<https://www.pennvest.pa.gov/Pages/default.aspx> was established to provide loans and grants to improve water and wastewater infrastructure throughout the state.

[**Note:** Last week the Wolf Administration took \$30 million from the **Underground Storage Tank Indemnification Fund** <https://ustif.pa.gov/> , an insurance fund to provide coverage for leaks from underground tanks, to help fund medical equipment purchases.]

Source: PA Environmental Digest, 4/12/2020

#####

This newsletter provides general information, not legal advice as to any specific matter. It should not be used as a substitute for appropriate legal advice.