

The Intersection of Ethics, Competence, and Lawyers' Well-Being

Presenter Biography

- **Janet Van Cuyk, JD, MSW**

Janet Van Cuyk is a lawyer and social worker who joined the Virginia Judges and Lawyers Assistance Program in 2020. She has worked directly with adolescents and adults with mental health concerns and other stressors in a variety of settings and, in a legal capacity, in a law firm and in state government.

Ms. Van Cuyk has an undergraduate degree in Psychology and Sociology from Boston College; a Master in Social Work degree from Virginia Commonwealth University; and her law degree from the University of Virginia.

Brief Description:

This presentation reviews the stress-feedback loop in the brain (when stress becomes distress or chronic stress and how this leads to burnout); how this cycle and other occupational risks in law may impact your professional competency and ethical requirements; and ways to prevent to recognize early warning signs of distress or burnout in yourself and others, and to improve your resilience

Written Materials:

Introduction

A. Objectives

1. Understand the data on substance use and mental health concerns of attorneys
2. Understanding the ethical responsibilities and requirements that intersect with mental health and substance use concerns.
3. Understand what the profession can do to address these problems.

B. Statistics: substance abuse and other mental health issue impact the legal profession at a higher rate than most other professions

1. The Prevalence of Substance Use and Other Mental Health Concerns Among American Attorneys
2. ALM's Mental Health and Substance Abuse Survey (2020)
 - a. 74% said the legal profession has had a negative effect on their mental health over time;
 - b. 56% of respondents said mental health problems and substance abuse are worse in the legal industry than in other industries;
 - c. 41% of respondents said mental health problems and substance abuse are at a crisis level in the legal industry;
 - d. 17.9% of respondents said they have contemplated suicide during their professional legal career;
 - e. 31.2% of respondents said they are depressed;
 - f. 64% of respondents said they have anxiety;
 - g. 10.1% of respondents said they have an alcohol problem; and
 - h. 2.8% of respondents said they have a drug problem.
3. "Stress, Drink, Leave" (2021) study (survey of almost 3,000 lawyers in California and DC)
 - a. Found levels of mental health problems and problematic drinking to be *high among practicing lawyers* generally.
 - b. Found women attorneys have **a higher prevalence and severity** of depression, anxiety, stress, risky and hazardous drinking, and attrition compared to their male counterparts.
 - c. *Overall findings*: 28% of the lawyers reported symptoms of depression; 23% maladaptive stress; 21-36% engage in hazardous drinking
 - d. *More on alcohol*: Over 80% of all the lawyers sampled reported being current drinkers (10% higher than general population); 30% screened positive for high-risk hazardous drinking; only 2% reported being diagnosed with an alcohol use disorder.
 - i. Women attorney findings: 56% engaged in risky drinking behavior; 34% were high-risk or hazardous drinking (c.f., 46% of

- men engaged in risking drinking; 25% were high-risk or hazardous drinkers).
- ii. Note: 34.6% of the women and 29.2% of the men reported that their drinking has increased during the pandemic. Women who reported an increase in drinking were seven times more likely to engage in risky drinking (men were nearly four times more likely).
- iii. Implications: gender disparity; under-diagnosis and treatment
- e. *More on mental health:*
 - i. 5.2% of women had symptoms indicating moderately severe depression, compared with 4.2% of the men.
 - ii. 8.4% of the women and 4.5% of the men had severe anxiety.
 - iii. 37.5% of the women and 30.1% of the men reported high effort-reward imbalances.
- f. *Attrition:* 25% of women contemplated leaving the profession due to mental health concerns, compared with 17% of men (note: a significantly higher proportion of male attorneys were in senior positions).
- g. The study also looked beyond prevalence data; it looks at the predictors of those factors that have been shown to negatively impact the legal profession. Several occupational factors were found to significantly contribute to these problems. Women's responses demonstrated a greater level of effort needed to elicit reward at work when compared with men, significantly higher levels of over-commitment and work-family conflict, and a lower likelihood of promotion.

4. Pandemic Impact

- a. Alcohol Consumption during the COVID-19 Pandemic: A Cross-Sectional Survey of US Adults, “Almost two-thirds of 2020 participants (60.1%) reported that their drinking had increased compared to before COVID-19. Of those, 45.7% reported that their drinking had increased because of increased stress, 34.4% reported that their drinking had increased because of the increased availability of alcohol, and 30.1% reported that their drinking had increased because of boredom.”
- b. APA survey, “*Stress in America: January 2021 Stress Snapshot*” (2021). The survey found that the average reported stress level during the prior month was 5.6, (on a scale from 1 to 10 where 1 means “little to no stress” and 10 means “a great deal of stress”). This is [higher than stress levels](#) reported in “2020 *Stress in America*” surveys since April. It is therefore no surprise that 84% of adults reported feeling at least one [emotion associated with prolonged stress](#) in the prior two weeks. The most common were feelings of anxiety (47%), sadness (44%) and anger (39%). Additionally, 2 in 3 adults (67%) said the number of issues America is facing is overwhelming to them.

- c. Reports of anxiety and depression rose notably in this year's ALM 2021 Mental Health and Substance Abuse Survey as lawyers and staff feel isolated and overworked.
- d. "Overdue Calls for Help Red Flag for Lawyer Well-Being Advocates." Bloomberg Law (2021). <https://news.bloomberglaw.com/banking-law/overdue-calls-for-help-red-flag-for-lawyer-well-being-advocates>

Legal Competency

A. Competence Elements: The first rule for lawyers

1. Legal knowledge (keep abreast of changes in the law and its practice; continuing study and education);
2. Skill (including benefits and risk associated with relevant technology);
3. Thoroughness;
4. Preparation reasonably necessary; and
5. Mental, emotional, and physical ability reasonably necessary for the representation.

B. Rules of Professional Conduct Preamble and Scope

1. Rules of Professional Conduct, Preamble

- a. *...In all professional functions a lawyer should be competent, prompt and diligent. A lawyer should maintain communication with a client concerning the representation. A lawyer should keep in confidence information relating to representation of a client except so far as disclosure is required or permitted by the Rules of Professional Conduct or other law. ...*
- b. *... Every lawyer is responsible for observance of the Rules of Professional Conduct. A lawyer should also aid in securing their observance by other lawyers. Neglect of these responsibilities compromises the independence of the profession and the public interest which it serves.*
- c. *Lawyers play a vital role in the preservation of society. The fulfillment of this role requires an understanding by lawyers of their relationship to our legal system. The Rules of Professional Conduct, when properly applied, serve to define that relationship. ...*

2. Rules of Professional Conduct, Scope

- a. *... Compliance with the Rules, as with all law in an open society, depends primarily upon understanding and voluntary compliance, secondarily upon reinforcement by peer and public opinion and finally, when necessary, upon enforcement through disciplinary proceedings. The Rules do not, however, exhaust the moral and ethical considerations that should inform a lawyer, for no worthwhile human activity can be completely defined by legal rules. The Rules simply provide a framework for the ethical practice of law. ...*

b.... *Failure to comply with an obligation or prohibition imposed by a Rule is a basis for invoking the disciplinary process. The Rules presuppose that disciplinary assessment of a lawyer's conduct will be made on the basis of the facts and circumstances as they existed at the time of the conduct in question and in recognition of the fact that a lawyer often has to act upon uncertain or incomplete evidence of the situation. Moreover, the Rules presuppose that whether or not discipline should be imposed for a violation, and the severity of a sanction, depend on all the circumstances, such as the willfulness and seriousness of the violation, extenuating factors and whether there have been previous violations. ...*

Ethical Requirements Related to Competency

A. Rule 1.1 Competence

1. *A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.*
2. Comment Maintaining Competence ... [7] *A lawyer's mental, emotional, and physical well-being impacts the lawyer's ability to represent clients and to make responsible choices in the practice of law. Maintaining the mental, emotional, and physical ability necessary for the representation of a client is an important aspect of maintaining competence to practice law. See also Rule 1.16(a)(2). (Note: Comment [7] became effective on October 31, 2018).*

B. Rule 1.3 Diligence

1. (a) *A lawyer shall act with reasonable diligence and promptness in representing a client.*
2. (b) *A lawyer shall not intentionally fail to carry out a contract of employment entered into with a client for professional services, but may withdraw as permitted under Rule 1.16.*
3. Comment
 - a.[3] Perhaps no professional shortcoming is more widely resented than procrastination. A client's interests often can be adversely affected by the passage of time or the change of conditions; in extreme instances, as when a lawyer overlooks a statute of limitations, the client's legal position may be destroyed. Even when the client's interests are not affected in substance, however, unreasonable delay can cause a client needless anxiety and undermine confidence in the lawyer's trustworthiness.
 - b.[5] A lawyer should plan for client protection in the event of the lawyer's death, disability, impairment, or incapacity. The plan should be in writing and should designate a responsible attorney capable of making, and who has agreed to make, arrangements for the protection of client interests in

the event of the lawyer's death, impairment, or incapacity. (Note: Comment [5] became effective on February 2, 2006).

C. Rule 1.4 Communication

(a) *A lawyer shall keep a client reasonably informed about the status of a matter and promptly comply with reasonable requests for information.*

D. Rule 1.6 Confidentiality of Information

1. (c) *A lawyer shall promptly reveal: ... (2) information concerning the misconduct of another attorney to the appropriate professional authority under Rule 8.3. When the information necessary to report the misconduct is protected under this Rule, the attorney, after consultation, must obtain client consent. Consultation should include full disclosure of all reasonably foreseeable consequences of both disclosure and non-disclosure to the client.*

2. Comment Attorney Misconduct

a.[13] Self-regulation of the legal profession occasionally places attorneys in awkward positions with respect to their obligations to clients and to the profession. Paragraph (c)(2) requires an attorney who has information indicating that another attorney has violated the Rules of Professional Conduct, learned during the course of representing a client and protected as a confidence or secret under Rule 1.6, to request the permission of the client to disclose the information necessary to report the misconduct to disciplinary authorities. In requesting consent, the attorney must inform the client of all reasonably foreseeable consequences of both disclosure and non-disclosure.

b.[14] Although paragraph (c)(2) requires that authorized disclosure be made promptly, a lawyer does not violate this Rule by delaying in reporting attorney misconduct for the minimum period of time necessary to protect a client's interests. For example, a lawyer might choose to postpone reporting attorney misconduct until the end of litigation when reporting during litigation might harm the client's interests.

E. Rule 1.16

1. (a) *... a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if: ... (2) the lawyer's physical or mental condition materially impairs the lawyer's ability to represent the client;*

2. Comment

a.[1] A lawyer should not accept or continue representation in a matter unless it can be performed competently, promptly, without improper conflict of interest and to completion.

F. Rule 5.1 Responsibilities of Partners and Supervisory Lawyers

1. (a) *A partner in a law firm, or a lawyer who individually or together with other lawyers possesses managerial authority, shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that all lawyers in the firm conform to the Rules of Professional Conduct.*
2. (b) *A lawyer having direct supervisory authority over another lawyer shall make reasonable efforts to ensure that the other lawyer conforms to the Rules of Professional Conduct.*
3. (c) *A lawyer shall be responsible for another lawyer's violation of the Rules of Professional Conduct if: ... (2) the lawyer is a partner or has managerial authority in the law firm in which the other lawyer practices, or has direct supervisory authority over the other lawyer, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.*
4. Comment
 - a.[5] ... Appropriate remedial action by a partner would depend on the immediacy of the partner's involvement and the seriousness of the misconduct. The supervisor is required to intervene to prevent avoidable consequences of misconduct if the supervisor knows that the misconduct occurred. Thus, if a supervising lawyer knows that a subordinate misrepresented a matter to an opposing party in negotiation, the supervisor as well as the subordinate has a duty to correct the resulting misapprehension.
 - b.[6] Professional misconduct by a lawyer under supervision could reveal a violation of paragraph (b) on the part of the supervisory lawyer even though it does not entail a violation of paragraph (c) because there was no direction, ratification or knowledge of the violation.
 - c.[7] Apart from this Rule and Rule 8.4(a), a lawyer does not have disciplinary liability for the conduct of a partner, associate or subordinate. Whether a lawyer may be liable civilly or criminally for another lawyer's conduct is a question of law beyond the scope of these Rules.

G. Rule 5.3 Responsibilities Regarding Nonlawyer Assistants

1. *With respect to a nonlawyer employed or retained or associated with a lawyer: (c) a lawyer shall be responsible for conduct of such a person that would be a violation of the Rules of Professional Conduct if engaged in by a lawyer if: ... (2) the lawyer is a partner or has managerial authority in the law firm in which the person is employed, or has direct supervisory authority over the person, and knows or should have known of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.*
2. Committee Commentary: The Committee inserted the phrase "or should have known" in Rule 5.3(c)(2) to reflect a negligence standard. The Committee also

deemed it appropriate to add the language in the last sentence of the Comment to cover such recognized and accepted activities as those described.

3. ABA Formal Opinion 03-429: “The firm’s paramount obligation is to take steps to protect the interests of clients. The first step may be to confront the impaired lawyer with the facts of his impairment and insist upon steps to assure that clients are represented appropriately notwithstanding the lawyer’s impairment. Other steps may include forcefully urging the impaired lawyer to accept assistance to prevent future violations or limiting the ability to handle matters or deal with clients” (page 4).

H. Rules 8.3 Reporting Misconduct

1. (a) *A lawyer having reliable information that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to the lawyer’s honesty, trustworthiness or fitness as a lawyer shall inform the appropriate professional authority*
2. (d) *This Rule does not require disclosure of information otherwise protected by Rule 1.6 or information gained by a lawyer or judge who is a member of an approved lawyer’s assistance program, or who is otherwise cooperating in a particular assistance effort, when such information is obtained for the purposes of fulfilling the recognized objectives of the program.*
3. Comment
 - a.[1] Self-regulation of the legal profession requires that members of the profession initiate disciplinary investigation when they know of a violation of the Rules of Professional Conduct. Lawyers have a similar obligation with respect to judicial misconduct. An apparently isolated violation may indicate a pattern of misconduct that only a disciplinary investigation can uncover. Reporting a violation is especially important where the victim is unlikely to discover the offense.
 - b.[4] The duty to report professional misconduct does not apply to a lawyer retained to represent a lawyer or judge whose professional conduct is in question. Such a situation is governed by the rules applicable to the client-lawyer relationship.
 - c.[5] Information about a lawyer's or judge's misconduct or fitness may be received by a lawyer in the course of that lawyer's participation in or cooperation with an approved lawyers or judges assistance program. In that circumstance, providing for the confidentiality of such information encourages lawyers and judges to seek treatment through such program. Conversely, without such confidentiality, lawyers and judges may hesitate to seek assistance from these programs, which may then result in additional harm to their professional careers and additional injury to the welfare of clients and the public. The duty to report, therefore, does not apply to a lawyer who is participating in or cooperating with an approved lawyer assistance program such as the Virginia Bar Association's

Committee on Substance Abuse and who learns of the confidences and secrets of another lawyer who is the object of a particular assistance effort when such information is obtained for the purpose of fulfilling the recognized objectives of the program. Such confidences and secrets are to be protected to the same extent as the confidences and secrets of a lawyer's client in order to promote the purposes of the assistance program. On the other hand, a lawyer who receives such information would nevertheless be required to comply with the Rule 8.3 reporting provisions to report misconduct if the impaired lawyer or judge indicates an intent to engage in illegal activity, for example, the conversion of client funds to personal use.

4. ABA Formal Opinion 03-429:

a. "... if partners in the firm and the supervisory lawyer reasonable believe that the previously impaired attorney has resolved a short-term psychiatric problem that made the lawyer unable to represent clients competently and diligently, there is nothing to report. Similarly if the firm is able to eliminate the risk of future violations of the duties of competence and diligence under the Model Rules through close supervision of the lawyers work, it would not be required to report the lawyer's violation.

However.....

b. "...if, on the other hand, a lawyers mental impairment renders the lawyer unable to represent clients competently, diligently, and otherwise as required by the Model Rules and he nevertheless continues to practice, partners in the firm or the supervising attorney must report the violation" (page 5).

I. Virginia Legal Ethics Opinion 1886

1. Adopted by the Supreme Court of Virginia, December 15, 2016.
2. Addresses the duties of Supervising Lawyers and Partners in a law firm upon discovering a lawyer in the firm may be impaired.
3. Duty to take remedial measures if a supervisor or partner reasonably believes that a lawyer under their supervision may be suffering from a significant impairment that poses a risk to clients or the general public.
4. The anchor for this opinion is Rule 5.1 of the Virginia Rules of Professional Conduct.

J. Virginia Legal Ethics Opinion 1885 and Rule 5.1

1. Rule 5.1(a): Partners and managers in a law firm have a duty to have in place measures to ensure that lawyers practicing in the firm comply with the RPC.
2. Rule 5.1(b): Supervising attorney must make reasonable efforts to ensure that a lawyer under his/her supervision complies with the RPC.
3. Rule 5.1(c): A supervising attorney will be responsible for the subordinate attorney's violation of the RPC, if the supervising attorney directed or ordered the

specific conduct; or knew of the specific conduct at a time when its consequences could have been prevented or mitigated, but failed to take remedial action.

K. Rule 13-30 Confidentiality of Disciplinary Records and Proceedings

M. Disclosure of Information to Lawyer Assistance Program. If Bar Counsel believes that an Attorney may benefit from the services of a Lawyer Assistance Program, Bar Counsel may make an informal referral to a Lawyer Assistance Program and may share information deemed confidential under this Paragraph as part of that referral. Bar Counsel shall not share information that is protected from disclosure by other state or federal privacy laws. Bar Counsel may, but shall not be required to, notify the subject Attorney of the informal referral or transmission of confidential information to the Lawyer Assistance Program. Unless the subject Attorney has signed a release allowing the Lawyer Assistance Program to share information with Bar Counsel, the Lawyer Assistance Program shall not report information about the subject Attorney to Bar Counsel, and Bar Counsel shall not receive such information from the Lawyer Assistance Program.

Competency and Impairment

A. ABA: Top 10 Necessary Skills

1. Keeping confidentiality.
2. Arriving on time.
3. Honoring commitments.
4. Integrity and trustworthiness.
5. Treating others with courtesy and respect.
6. Listening attentively and respectfully.
7. Responding promptly.
8. Diligence.
9. Having a strong work ethic.
10. Paying attention to detail.

B. Impact of Mental Health and Substance Use Concerns

1. Mental impairment does not lessen a lawyer's obligation to provide clients with competent representation
2. Lawyers who suffer from substance abuse, mental illness, physical illness, and personal problems may have impairment in their ability to provide competent services (they may be undertaking work they do not have the competency to do despite possessing the requisite learning and skill).
3. Depressed, anxious, substance abusing lawyers may struggle with follow through, attention, integrity, trustworthiness, responding promptly, diligence.
4. Sometimes these problems mask their ability to understand their limitations and sometimes sheer economic necessity compels them to undertake matters beyond their competency.

5. There is an interface between these struggles and ethical violations.

C. Examples of Problematic Behaviors (Connected to Lawyer Mental Health or Substance Use Concerns with Potential Ethical Consequences)

1. Practice-based
 - a. Missed deadlines
 - b. Last minute requests for continuances
 - c. Frequent absenteeism
 - d. Sub-par work product
 - e. Lack of communication with clients and/or colleagues
 - f. Failure to advocate for client's interests
 - g. Late for or missed appointments and/or hearings
 - h. Errors in fiscal management
 - i. False representations
2. Attorney signs
 - a. Acting different from prior functioning
 - b. Socially withdrawn
 - c. Procrastination
 - d. Unpredictable and frequent mood swings
 - e. Unwarranted anger or hostility
 - f. Blaming others for personal failings
3. Example:
 - a. Depression: A depressed attorney will typically demonstrate low motivation, low energy, fatigue, and difficulty concentrating. At work, such an attorney may take a long time to learn something new or to respond to client calls or answer mail. They may avoid responding to important emails, mail, or phone calls out of irrational panic or fear. The lawyer may procrastinate and leave a job unfinished for someone else to complete, come into work late, leave early, or not come into the office at all for several days. They may file motions or briefs that omit important details because the attorney could not concentrate and could not remember specific information. Work would be completed late, or not at all, and would contain major mistakes. If the lawyer's supervisor commented on this performance or offered constructive feedback, the depressed attorney is likely to respond with anger and irritability. To this attorney, everything would sound like criticism, resulting in angry responses or blaming others for mistakes. Even if the supervisor would ask the lawyer to redo something or to correct a problem, the lawyer would likely feel overwhelmed and too stressed to manage. This attorney's ability to tolerate stress and cope with the everyday demands of clients, partners, opposing counsel, or judges becomes severely compromised to the point where the lawyer is unable to practice competently.
 - b. Response: considering what must be done when confronted with evidence of a lawyer's apparent mental disorder or substance abuse, it may be helpful for

partners or supervising lawyers to consult with an experienced psychiatrist, psychologist, or other appropriately trained mental health professional.”

- i. Refer to VJLAP
- ii. Consult mental health professionals
- iii. Implement tighter work-supervision controls.

D. Impact of the problem:

1. Human Toll
 - a. Health impacts on the individual
 - b. Damage to families and relationships
 - c. Loss of career and financial problems
 - d. Serious disability or death
2. Work Environment
 - a. Culture and morale
 - b. Direct impact on colleagues
 - c. Reputation/ trust
 - d. Clients and business
3. Productivity
 - a. Individual and Team work product
 - b. Management time
4. Financial
 - a. Human capital
 - b. Unwanted turnover
 - c. Legal, work comp. or disability claims
 - d. Lawsuits/ malpractice

E. Business Case for Taking Action

1. Malpractice avoidance and ethical adherence
2. Firm image and overall customer satisfaction
3. Delivery of quality, effective client service
4. Individual employee performance, development, and retention
5. Collective culture and morale
6. Turnover and healthcare costs.

Role of Legal Profession in Risks and Responses

A. Lawyer Hesitance:

1. Most do not receive treatment services
 - a. MH: 37% yes; 63% no
 - b. Addiction: 7% yes; 93 % no
2. Lawyers are hesitant to seek help for their mental health or substance use problems.
 - a. Concerns about privacy or confidentiality

- b. Not wanting others to find out - Stigma
 - i. Fear of being judged
 - ii. Fear it will harm their professional reputations
 - iii. Fear it would impact their license
- c. Think they can solve the problem themselves
- d. Denial about the existence or severity of the problem

B. Fighting Stigma

1. *Poor mental health is a medical condition; attorneys with mental health challenges can thrive in the profession.*
2. Profession-wide collaboration:
 - a. Change the messaging. There is no shame in mental illness. There is no shame in asking for help. There is no shame in the struggle to wellness.
 - i. Asking for help is the smart thing to do.
 - ii. Acknowledge the issues.
 - b. Educate
 - i. Profession-wide summits for health and wellness
 - ii. Awareness of the impact of obsessing over a desire for perfection.
 - c. Prevent
 - i. Develop strategies for improving well-being
 - ii. Promote health and wellness activities
 - d. Refer
 - i. To VJLAP often and early – prior to, during, or after discipline
 - ii. Early identification is the key and a duty
 - iii. Often, by the time an attorney is referred into a program, they are severely impaired which may negatively impact the outcome.
3. Suggestions for Firms: Assess your firm’s culture, philosophy, and history; define your firm’s goals; evaluate your firm’s policies, protocols, and practices; invest in education, training, guidance, and support; change; track progress. Create a safe environment within your firm for attorneys to feel safe in asking for help.

Resources

- [The Virginia Judges and Lawyers Assistance Program](#)
- [The National Suicide Prevention Line](#). This hotline provides free, confidential support 24/7 to people in distress across the United States. Call 1-800-273-TALK (8255) for support.
- [The SAMHSA Helpline](#). SAMHSA’s National Helpline is a free, confidential information service that provides treatment and support referrals 24/7 to people facing mental illness and addictions. Call 1-800-662-HELP (4357) for support.
- [Crisis Text Line](#). Crisis Text Line provides free, confidential support via text message 24/7 to those in crisis situations. Text HOME to 741741 for support.

- [The Trevor Project](#). The Trevor Project provides free, confidential support 24/7 to LGBTQ youth via a helpline, text and online instant messaging system. Call 1-866-488-7386 for support.
- [The Veterans Crisis Line](#). The Veterans Crisis line provides free, confidential support 24/7 to veterans, all service members and their family and friends in times of need. Call 1-800-273-8255 and press 1 or text 838255 for support.