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November 1, 2024

John M. Nolan
Chair, Member Selection Committee
c/o American College of Real Estate Lawyers
220 N Market Street, Suite 100
Frederick, MD 21701
By E-Mail Only - c/o jaburgess@acrel.org

**Re: Seconding Letter to Nomination of Xenia Garofalo for
Membership**

Dear Mr. Nolan:

It is with great pleasure that I second the nomination of Xenia Garofalo for membership in the American College of Real Estate Lawyers made by Allison Prince.

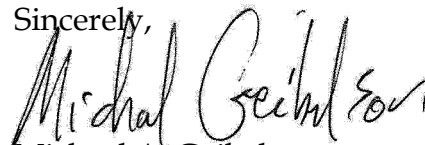
While I have not worked with Xenia on a legal matter, I did coordinate the session she presented at the Chicago conference a few years ago when we needed a panelist to step in to discuss complicated tax issues. Through that work, I found her to not only be professional in her interactions with me and the other panelists, but also to be exceptional in her dedication to meeting deadlines and complying with her obligations as a speaker more generally. More importantly, the content she provided was also quite good despite its complexity and niche subject matter. She was able to both distill ideas from statutory authority on tax issues to make it interesting for the membership, but also to present it in an understandable and accessible way. On a personal level, she is a pleasure to work with and exudes the civility and professionalism in her discussions of substantive and non-substantive matters that is sought after to continuously develop collegiality among our Fellows. Based upon these interactions, I am pleased to second her nomination to the College.

I have received and reviewed the Proposal for Membership submitted by Allison Prince and certify that Xenia Garofalo satisfies the criteria for selection to the College as set forth in Section 4 of the Guidelines for Regular Member Selection. In my opinion and to my knowledge, the Nominee satisfies

ACREL's Statement of Professionalism and exemplifies the standards of professional integrity and civility as provided in the Guidelines. I am not (a) in the same firm, business entity, faculty or other organization as the Nominee, (b) related by birth or marriage to the Nominee, or (c) a current Governor or member of the Member Selection Committee of the College. Except as disclosed below, neither the nominee nor his/her employer regularly employs or retains me or my law firm or employer, and my business relationship, if any, with the nominee is as follows: NONE.

Should you wish to discuss Xenia's qualifications further, please don't hesitate to reach out.

Sincerely,



Michael A. Geibelson