

VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

BOARD OF RETIREMENT

DISABILITY MEETING

JANUARY 9, 2017

MINUTES

DIRECTORS Tracy Towner, Chair, Alternate Safety Employee Member
PRESENT: William W. Wilson, Vice Chair, Public Member
Peter C. Foy, Public Member
Mike Sedell, Public Member
Robert Bianchi, Alternate Public Member
Arthur E. Goulet, Retiree Member
Will Hoag, Alternate Retiree Member
Chris Johnston, Safety Employee Member

DIRECTORS Steven Hintz, Treasurer-Tax Collector
ABSENT: Deanna McCormick, General Employee Member
Craig Winter, General Employee Member

STAFF Linda Webb, Retirement Administrator
PRESENT: Lori Nemiroff, Assistant County Counsel
Dan Gallagher, Chief Investment Officer
Julie Stallings, Chief Operations Officer
Karen Scanlan, Accounting Manager I
Donna Edwards, Retirement Benefits Specialist
Stephanie Berkley, Retirement Benefits Specialist
Chris Ayala, Program Assistant

PLACE: Ventura County Employees' Retirement Association
Second Floor Boardroom
1190 South Victoria Avenue
Ventura, CA 93003

TIME: 9:00 a.m.

ITEM:

I. CALL TO ORDER

Chair Towner called the Disability Meeting of January 9, 2017, to order at 9:03 a.m.

II. APPROVAL OF AGENDA

MOTION: Approve.

Moved by Wilson, seconded by Bianchi.

Vote: Motion carried

Yes: Bianchi, Goulet, Hoag, Johnston, Wilson, Towner

No: -

Absent: Foy, McCormick, Hintz, Sedell, Winter

III. APPROVAL OF MINUTES

A. Disability/Business Meeting of December 12, 2016.

MOTION: Approve.

Moved by Bianchi, seconded by Johnston.

Vote: Motion carried

Yes: Bianchi, Goulet, Hoag, Johnston, Wilson, Towner

No: -

Absent: Foy, McCormick, Hintz, Sedell, Winter

IV. RECEIVE AND FILE PENDING DISABILITY APPLICATION STATUS REPORT

MOTION: Receive and File.

Moved by Johnston, seconded by Wilson.

Vote: Motion carried

Yes: Bianchi, Goulet, Hoag, Johnston, Wilson, Towner

No: -

Absent: Foy, McCormick, Hintz, Sedell, Winter

V. APPLICATIONS FOR DISABILITY RETIREMENT

- A. Application for Service-Connected Disability Retirement, John E. Barbic;
Case No. 16-025.
1. Application for Service-Connected Disability Retirement.
 2. Medical Analysis and Recommendation by County of Ventura, Risk Management, to grant Application for Service-Connected Disability Retirement and supporting documentation.
 3. Hearing Notice, dated December 29, 2016.

Paul Hilbun was present on behalf of County of Ventura Risk Management. The applicant, John E. Barbic was also present.

Both parties declined to make a statement.

Trustee Goulet commented, that although he believed the applicant should be granted a service-connected disability retirement, he said the process was not quite right. Trustee Goulet said that Dr. Ghilarducci did not state that he is familiar with the duties of a Deputy Sheriff, nor does he state that the applicant is unable to perform those duties.

Trustee Foy arrived at 9:06 a.m.

After discussion by the Board, the following motion was made:

MOTION: Approve.

Moved by Bianchi, seconded by Wilson.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Wilson, Towner

No: -

Abstain: Goulet

Absent: McCormick, Hintz, Sedell, Winter

Trustee Goulet said that he abstained because the medical records were incomplete and unclear on the applicant's ability to perform his job duties.

Both parties agreed to waive preparation of findings of fact and conclusions of law.

- B. Application for Service-Connected Disability Retirement, Gregory Teran Jr.;
Case No. 16-010.

1. Application for Service-Connected Disability Retirement.
2. Medical Analysis and Recommendation by County of Ventura, Risk Management, to grant Application for Service-Connected Disability Retirement and supporting documentation.
3. Hearing Notice, dated December 29, 2016.

Paul Hilbun was present on behalf of County of Ventura Risk Management. The applicant, Gregory Teran Jr. was also present.

Mr. Hilbun stated that he wanted to point out to the Board that there are two parts to this application. First, the Board would have to find Mr. Teran permanently incapacitated for the performance of his usual job and secondly, approve the alternative job.

Trustee Goulet commented that there is a procedural problem. Trustee Goulet said the Board should find him incapacitated first, then VCERA will notify the applicant's agency employer and finally the agency should inform the applicant of an appropriate job available. Mr. Hilbun replied that the process has never been done that way. Mr. Hilbun said that a county agency usually contacts the disability applicant regarding available jobs, while their application is pending, which is more expedient.

Trustee Sedell arrived at 9:07 a.m.

After discussion by the Board, the following motion was made:

MOTION: Approve.

Moved by Bianchi, seconded by Johnston.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

MOTION: Approve the Alternate Employment Position.

Moved by Goulet, seconded by Johnston.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

Both parties agreed to waive preparation of findings of fact and conclusions of law.

- C. Application for Service-Connected Disability Retirement, Karen M. Hoffstadt; Case No. 14-009.
1. Application for Non-Service Connected Disability Retirement.
 2. Medical Analysis and Recommendation by County of Ventura, Risk Management, to grant Application for Non-Service Connected Disability Retirement and supporting documentation, including request to amend the Application to Non-service Connected Disability, by Karen Hoffstadt, dated March 8, 2016.
 3. Hearing Notice, dated December 29, 2016.

Carol Kempner was present on behalf of County of Ventura Risk Management. The applicant, Karen M. Hoffstadt was also present.

Both parties declined to make a statement.

MOTION: Approve.

Moved by Johnston, seconded by Bianchi.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

Both parties agreed to waive preparation of findings of fact and conclusions of law.

- D. Application for Service-Connected and Non-Service Connected Disability Retirement, Carol Kilbey; Case No. 12-045.
1. Proposed Summary of Evidence, Findings of Fact and Conclusion and Recommendation, dated November 17, 2016, by Louis M. Zigman, Hearing Officer.

2. Letter from B. Derek Straatsma, Attorney for County of Ventura-Risk Management, stating they do not object to the proposed Recommendations of Hearing Officer, Lou Zigman.
3. Hearing Notice, dated December 8, 2016.

B. Derek Straatsma, Attorney was present on behalf of County of Ventura Risk Management. Lilian Meredith, Attorney for Carol Kilbey was also present.

Both parties declined to make a statement.

Ms. Nemiroff stated that there was an issue in this case with the effective date because the Hearing Officer's report was unclear. Ms. Nemiroff said that typically the effective date is the date the application is filed, except where the Board finds that a delay in filing was due an inability to ascertain permanency. It appears from the Hearing Officer's discussion that he did find that the applicant delayed the filing because she did not know that she was permanent. However, in the Hearing Officer's recommendation conclusion on the effective date, is not that clear. The Hearing Officer stated the effective date of the disability shall be in accordance with the standard and applicable date consistent under the statute based on the date of her permanent incapacity and her application. Ms. Nemiroff said that the Board could either interpret the Hearing Officer's report as saying that the applicant delayed her filing until she knew she was permanent, in which case the filing date would be deemed to be the day after the applicant last received compensation, or the Board could send it back to the Hearing Officer for clarification of the effective date.

Trustee Goulet said the Hearing Officer stated that the applicant's doctor found she was permanently disabled in November of 2012.

Ms. Nemiroff said that is why the Board could interpret from the decision that she delayed in filing until she knew she was permanently disabled. Ms. Nemiroff stated she saw this as a fair interpretation and did not believe it was necessary to send the case back, as long as both parties were in agreement on that interpretation. If the parties were not in agreement, the Board would have to send it back for clarification.

Trustee Towner commented that the report also said that the application was timely filed.

Ms. Nemiroff responded that this was a separate issue addressed in the report, and that an application is timely if filed within 4 months of separation from service or if the applicant can show she was continuously incapacitated from the last day of work until she files; the hearing officer made the second finding.

Mr. Straatsma asked if the Board was asking the parties if they would stipulate to have the application filing date be considered the effective date. Ms. Nemiroff replied no, the Board needs to decide whether to find the effective date to be the day after the applicant last received regular compensation, or whether to send it back for clarification.

Chair Towner asked if the parties would stipulate to the effective date being the date following the day the applicant last received compensation. Mr. Straatsma replied no, he thought it should be sent back.

Trustee Goulet also said that the Hearing Officer needs to correct the report, where it states the applicant started her employment with the County of Riverside, instead of Ventura.

After discussion by the Board, the following motion was made:

MOTION: To Send the Case Back to the Hearing Officer with Instruction.

Moved by Bianchi, seconded by Johnston.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

E. Application for Service-Connected and Non-Service Connected Disability Retirement, Josie Y. Garcia; Case No. 13-019.

1. Proposed Summary of Evidence, Conclusion of Law and Recommendation, dated December 4, 2015, by Louis Zigman, Hearing Officer.
2. Legal Memorandum by Respondent, County of Ventura/Risk Management, Objecting to Proposed Summary of Evidence, Conclusion of Law and Recommendation of Hearing Officer, Louis M. Zigman, Esq. dated December 10, 2015, by Stephen D. Roberson, Attorney for County of Ventura/Risk Management.
3. Letter from VCERA Board Counsel, Lori Nemiroff, to Hearing Officer Louis M. Zigman, dated April 29, 2016.
4. Supplemental Report received from Hearing Officer Louis M. Zigman, dated August 10, 2016.
5. Legal Memorandum by Respondent, County of Ventura/Risk

Management, Objecting to Supplemental Report of Hearing Officer, Louis M. Zigman, Esq. by Stephen D. Roberson, Attorney for County of Ventura/Risk Management, dated December 13, 2016.

6. Applicant's Brief in Support of Hearing Officer's Finding of Permanent Incapacity and Service Connection, by David G. Schumaker, Attorney for Applicant, dated January 3, 2017.
7. Hearing Notice, dated December 6, 2016.

Steve D. Roberson, Attorney was present on behalf of County of Ventura Risk Management. David G. Schumaker, Attorney for Josie Y. Garcia was also present.

Chair Towner stated that item E.1. needed an edit, as it should read, "Corrected Proposed Summary of Evidence, Conclusion of Law and Recommendation, dated December 4, 2015, by Louis Zigman, Hearing Officer."

After statements from both parties, Chair Towner asked Mr. Schumaker if he believed the recommendation from the Hearing Officer could stand legally and factually. Mr. Schumaker replied yes.

Trustee Goulet commented that the physician should be the one to make the determination that the applicant cannot continue to work. He noted that the Hearing Officer stated in his report that in his career he had never seen an application for disability retirement that did not include a physician's report stating that the applicant is unable to work. Trustee Goulet said the he believed the Board had two options, which were either to review the report or to hold a hearing.

Trustee Wilson asked Ms. Nemiroff if these two options were the only alternatives for the Board, and also if her opinion regarding Mr. Roberson's comment that the Board could not approve the report as it was because it was not legal. Ms. Nemiroff replied that the Board could either send it back to the Hearing Officer for the second time, requesting a summary of evidence and the transcripts and make the determination on the record or could set it for hearing in front of the Board. Ms. Nemiroff also said that the Hearing Officer did not apply the exact legal standard in a couple of areas in the report; however, if the case were to be brought to the Superior Court, the Court would disregard the Hearing Officer's record and apply its own determination.

After discussion by the Board, the following motion was made:

MOTION: Request Applicant's Records Be Forwarded to the Board of Retirement for Review.

Moved by Wilson, seconded by Foy.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

After the vote, Mr. Schumaker asked the Board if they would make another motion to listen to the applicant's testimony of an independent physician, specializing in pain management, as well as a psychiatric physician.

Chair Towner suggested that the Board first review the records from the case.

VI. OLD BUSINESS

- A. Consider Meeting and Conferring with VCERA Management Employees Concerning Potential Changes to VCERA Management Employees' Resolution Provisions for Leave Redemption
- B. Consider Changes to VCERA Management Employees' Resolution Re: Leave Redemption

VII. CLOSED SESSION

**A. CONFERENCE WITH LABOR NEGOTIATORS,
GOVT. CODE SECTION 54957.6**

Agency Designated Representatives:
Tracy Towner

Unrepresented VCERA Employees:
Retirement Administrator
General Counsel
Chief Investment Officer
Chief Financial Officer
Chief Operations Officer

Chair Towner said he had consulted outside legal counsel on whether the Board was required to meet with employees under the Management Resolution regarding the leave redemption item. Counsel advised that this was not a requirement, and whatever the Board adopted would then be imposed on employees; however, if the Board were to decide to meet and confer with employees, that would require going into a closed session.

After discussion by the Board, the following motion was made:

MOTION: Consider Potential Changes to VCERA Management Employees' Resolution Provisions for Leave Redemption in Open Session.

Moved by Foy, seconded by Wilson.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Sedell, Wilson

No: Johnston, Towner

Absent: McCormick, Hintz, Winter

Chair Towner stated that the Board was provided two legal analyses regarding the 80 hour vacation requirement, one from Nossaman, LLP and one from tax counsel Ice Miller. The review found no legal requirement for employees to take 80 hours of vacation leave prior to redemption, as it is a negotiated item. Chair Towner said that requirement is currently in effect in both the VCERA Management Employees' Resolution and the County of Ventura Management Resolution. Chair Towner said that this requirement would not affect the current employees because of their leave accrual rate, but it would affect new or future employees under the Resolution who accrued at a lower rate. Chair Towner, said that his recommendation would be to not change the requirement.

Mr. Wilson said that he understood that the VCERA Board's intent was to try to mirror the County's policies to the extent possible. Chair Towner said that County had this requirement as well.

Chair Towner stated the next item would be different from the County, and that was the automatic deduction of hours as a measure to facilitate the previously mentioned 80-hour vacation requirement. He said that according to Nossaman, LLP, this automatic deduction does not comply with California law code so he would advise that the Board not include the automatic deduction of up to 80 hours vacation leave in the VCERA Management Resolution.

Trustee Goulet said the Board could pass a provision to automatically deduct the 80 hours of leave and pay the employees for it, which would be compliant with the law. Chair Towner replied that he did not seek legal advice on that specific suggestion, and Counsel was looking only at the legality of the proposed changes as presented.

Trustee Foy asked to hear from County Human Resources Director Shawn Atin, who was present at the meeting. Mr. Atin said that County of Ventura had consulted with specialty tax counsel Steptoe and Johnson, as well as County Counsel and was advised the provision to be legal, and to avoid constructive receipt, the election to redeem had to be irrevocable. Mr. Atin said at the time an employee signs the leave redemption form he or she is agreeing to taking 80 hours of vacation time or to forfeit hours 80 hours, unless there is a hardship that hindered the employee from actually taking 80 hours of vacation.

Trustee Sedell stated that he thinks that legal counsels should discuss the matter to resolve the difference in opinion's to avoid possible future legal action. Trustee Foy suggested possibly tabling the item. Chair Towner said that the Board's counsel could indeed speak with County Counsel. Mr. Atin said that he would help to arrange this.

Chair Towner said the next issue is the irrevocable intent to retire or resign as a condition to redeeming leave hours banked in prior years. Chair Towner said according to Nossaman, LLP, the irrevocable election to retire conflicts with CERL and an irrevocable intent to resign conflicts with labor law. Also, according to Ice Miller tax counsel, given the unenforceability, it would likely not constitute a substantial limitation or restriction over employees' control over the receipt over the prior year's leave. The recommendation is to omit the County of Ventura's exception language of the VCERA Management Employees' Resolution because it contains an unenforceable provision, and to avoid constructive receipt risk for the employees. VCERA employees would not utilize the County's irrevocable election form for this purpose.

Mr. Sedell remarked that the County's legal counsel may not have considered the CERL laws.

Mr. Atin commented that the County's legal counsel had reviewed the provision, but suggested the County's and VCERA's legal counsel's discuss this topic as well.

Chair Towner said the next item is the limitations on the number of leave redemptions requests an employee may make in one year. He said the County of Ventura allows its employees to make no more than two requests per year, but because VCERA has only 5 employees, Mr. Atin and the Auditor-Controller suggested that we allow our employees up to 4 requests per year. Mr. Atin said that would be an administrative choice.

Chair Towner stated that he would need a motion to approve funds for VCERA's counsels to meet and discuss these items with the counsels for the County of Ventura.

Trustee Johnston left at 10:07 a.m.

After discussion by the Board, the following motion was made:

MOTION: To Approve the Cost for VCERA's Counsel to Discuss the Leave Redemption Proposals with the Counsel for the County of Ventura Above the Previous Not-to-Exceed Amount of \$25,000

Moved by Sedell, seconded by Foy.

Vote: Motion carried
Yes: Foy, Goulet, Hoag, Sedell, Wilson, Towner
No: Bianchi
Absent: Johnston, McCormick, Hintz, Winter

Trustee Johnston returned at 10:11 a.m.

After discussion by the Board, the following motion was made:

MOTION: Table the Finalization of the Management Resolution until the Disability Meeting of February 6, 2017.

Moved by Sedell, seconded by Bianchi.

Vote: Motion carried
Yes: Bianchi, Goulet, Hoag, Johnston, Sedell, Wilson, Towner
No: -
Absent: McCormick, Hintz, Winter

Chair Towner requested a Break at 10:15 a.m.

The Board returned from break at 10:25 a.m.

VII. NEW BUSINESS

A. Re-Establish Personnel Committee

1. Staff Letter

Ms. Webb stated that it has been 2 years since the establishment of the personnel committee, which was generally for the purpose of facilitating the evaluation Retirement Administrator and other such issues. She said that the Board of Retirement now had a larger burden from a personnel standpoint, given the implementation of AB1291.

Chair Towner asked the Board if there were any volunteers. Trustee Foy replied that he would like to nominate the previous committee members. Trustee Goulet commented that the committee should consider meeting prior to the scheduled Board Meeting, unless there the committee believes there is too much to discuss, then they may want to meet on a different day. Ms. Webb commented that it could be helpful, especially if the committee anticipates a meeting may require a significant amount of time to discuss its items.

After discussion by the Board, the following motion was made:

MOTION: Reappoint the Previous Personnel Committee Members of Trustee Sedell, Trustee Johnston and Trustee Hoag.

Moved by Wilson, seconded by Bianchi.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

- B. Recommendation to Approve Application for Reinstatement to Active Membership Pursuant to GC 31680.4 & 31680.5 – Martin Hernandez

Recommended Action: Approve

1. Staff Letter

Letter from Mr. Hernandez

Offer of Employment

Medical Clearance

Trustee Goulet stated that he and Ms. Nemiroff were in disagreement on whether a retiree could be reinstated back to their previous tier. Trustee Goulet said CERL the CERL provision 31680.5 – Reinstatement; contributions and allowances; contingent operation (a) “Upon reinstatement, pursuant to Section 31680.4, the member’s rate of contributions and retirement allowance upon subsequent retirement shall be determined as if the member were first entering the system.”

Trustee Foy asked if this was a new employee being referenced. Trustee Goulet replied that this provision was specifically for reinstated retirees’. Trustee Goulet stated that PEPR is silent on the issue of reinstated employees’.

Trustee Foy stated that CalPERS does something a little different with their reinstatements. He said that CalPERS allows a retiree to be reinstated to their previous tier, if they request to be reinstated within 6 months. Trustee Foy said that there is precedent, under CalPERS that a retiree can be reinstated to their previous tier.

Trustee Sedell asked if Ms. Nemiroff could give her opinion to the Board. Ms. Nemiroff said that PEPR defines a new employee as “someone who is employed for the first time by any public employer on or after January 1, 2013.” Ms. Nemiroff said that she did not believe that reinstated members would meet

that definition, because they are already a member of our system and thus not becoming a member for the first time under January 1, 2013.

Ms. Nemiroff said that she knew of other retirement systems that view the issue in this way and other systems who do not.

Trustee Wilson stated that the provision mentioned by Trustee Goulet did apply if CERL defines their status as a first time member and he believed that retirees' should be reinstated in the PEPRA tier as a new employee. Trustee Goulet said that his argument is PEPRA is silent on reinstatements.

Chair Towner said that he felt this issue was in a gray area. Trustee Foy said that he thought the Board should reinstate these two retirees into their previous tiers, then the Board could set a new policy for reinstatements going forward, because of the precedent that had already been set. He said the Board should inform the County of Ventura of this issue, because the County might like VCERA to keep reinstating members into their previous tiers, which would remove the gray area.

Trustee Goulet stated that he would not be averse to adopting a policy to comply with CERL that states that if retirees were reinstated within 6 months of their retirement date, they will be placed into their previous tier.

Trustee Sedell said that the Board should approve these two reinstatements and have them placed in their prior tiers, then discuss the issue at a later date, giving the County of Ventura notice of the issue. Trustee Wilson asked if this would set a precedent. Chair Towner replied that a precedent for allowing retirees to be reinstated into their previous tiers has already been set.

Chair Towner said that he would ask Ms. Webb to speak to the County of Ventura regarding this issue. Mr. Atin said that he would take the topic back to Ventura County CEO/HR because he had not consulted with counsel on the issue.

After discussion by the Board, the following motion was made:

MOTION: Approve.

Moved by Sedell, seconded by Foy.

Vote: Motion carried

Yes: Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Abstain: Bianchi

Absent: McCormick, Hintz, Winter

- C. Recommendation to Approve Application for Reinstatement to Active Membership Pursuant to GC 31680.4 & 31680.5 – Paul Grossgold

Recommended Action: Approve

1. Staff Letter
2. Letter from Mr. Grossgold
3. Offer of Employment
4. Medical Clearance

Chair Towner noted a typo in the staff letter, which referenced Mr. Hernandez instead of Grossgold.

MOTION: Approve with correction.

Moved by Goulet, seconded by Johnston.

Vote: Motion carried

Yes: Bianchi, Foy, Goulet, Hoag, Johnston, Sedell, Wilson, Towner

No: -

Absent: McCormick, Hintz, Winter

VIII. INFORMATIONAL

- A. Investment Article: Is it Science or Baloney?
- B. Investment Article: Floods and Deserts: Why the Dream of Secure Pension for Everyone is Still Unattained

IX. PUBLIC COMMENT

None

X. STAFF COMMENT

Ms. Webb said that staff will also be sending the Board members their training summaries for 2016, so that they can review it for any additions, omissions or corrections. Ms. Webb said that staff was reviewing a recent cost estimate for updating the Board Room sound system.

Ms. Webb reminded the Board that Segal would be presenting the new actuarial valuation at the business meeting on the 23rd. Trustee Johnston asked about the plans for an actuarial audit. Ms. Webb replied that staff had begun the process of replicating the data given to Segal.

Trustee Wilson asked if the staff has a feel for the 4th quarter returns, particularly for the bond portfolio. Mr. Gallagher replied that he felt the portfolio did fairly well for the month of December, though it was challenging at the end. Mr. Gallagher said he believed for the calendar year, the envelope could be as high as 8% returns.

XI. BOARD MEMBER COMMENT

Trustee Goulet asked for the status of Vitech's defect remediation and the IRS Model Regulations contract negotiations. Ms. Webb replied that Vitech is working on a time and materials basis, as they would not agree to a block of hours payable at a later time. Ms. Webb said staff had executed the change order as instructed, which would allowed for the remediation of the rest of the main material defects by April of 2017 and additional warranty protections for cyclical processes.

XII. ADJOURNMENT

The meeting was adjourned at 10:46 a.m.

Respectfully submitted,



LINDA WEBB, Retirement Administrator

Approved,



TRACY TOWNER, Chairman