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**Minutes of the Board of Agriculture  
January 28, 2025**

A video recording of this meeting can be found online by visiting this website:  
<https://hdoa.hawaii.gov/meetings-reports/>

CALL TO ORDER – The meeting of the Board of Agriculture was called to order on January 28, 2025, at 9:07 am by Board of Agriculture Chairperson, Sharon Hurd. The meeting was conducted virtually via Zoom and in-person from:

*State of Hawaii, Department of Agriculture  
Plant Quarantine Branch  
1849 Auiki Street*

Members Present In-Person:

Sharon Hurd, Chairperson, Board of Agriculture

Members Virtually Present: Roll call/alone

- Dr. Parwinder Grewal, Dean CTAHR, Ex-Officio Member
- Dane Wicker, DBEDT, Ex-Officio Member
- Diane Ley, Hawaii Member
- Nathaniel Oswald, Maui County Member
- Fred Cowell, Kauai Member
- Randy Cabral, Member-at-Large
- En Young, Member-at-Large (left at 9:57 am)
- James Gomes, Member-at-Large

Excused:

Ryan Kanaka'ole, DLNR, Ex-Officio Member

Deputy Attorney General Present In-Person:

DAG Jennifer Waihee-Polk

Others Present In-Person:

- Dean Matsukawa, Hawaii Department of Agriculture (HDOA)/Chairperson's Office
- Marci Clingan, HDOA/Chairperson's Office
- Jason Azus-Richardson, HDOA/IT
- Scott Nishimoto, HDOA/Pesticides
- Greg Takeshima, HDOA/Pesticides

- 1 Jonathan Ho, HDOA/PQ
- 2 Christopher Kishimoto, HDOA/PQ
- 3 Jessica Ann Miura, HDOA/PQ
- 4 Stephen DeLuz, Ernest DeLuz Ranch
- 5 Lilia Kapunia, Ti Leaf Group
- 6 Charles Stevens, SC Ranch
- 7 Nicole Galase, Hawaii Cattlemen's Council

8

9 Others Virtually Present:<sup>1</sup>

- 10 HDOA IT
- 11 Parwinder Grewal# CTAHR Dean (Carol Oshiro (CTAHR))
- 12 Kauai Coffee Orchard
- 13 Andrea Kawabata
- 14 Klayton Kubo
- 15 Cathy Goeggel
- 16 Brandi Ah Yo
- 17 Katie Propp
- 18 Hyatt Rep (1374731)
- 19 Emily Severson
- 20 Kauai Coffee Orchard
- 21 Andrea Kawabata
- 22 melvin kunitake
- 23 Steve Sarro
- 24 HDOAPIO
- 25 Cathy Goeggel
- 26 Klayton Kubo
- 27 Chris Kishimoto
- 28 Brandi Ah Yo
- 29 J
- 30 R
- 31 jerome.k.yasuhara
- 32 Georgette Freitas

33

34

35

36 II. APPROVAL OF MINUTES FROM 11/26/24 MEETING

37

38 Motion to Approve: Gomes/Grewal

39

40 Vote: Approved; unanimously

41

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<sup>1</sup> The identification of the public members is based on their sign-in name but are not verified.

1 III. INTRODUCTIONS

2

3 IV. COMMUNICATIONS FROM DIVISIONS AND ADMINISTRATION

4

5 A. AGRICULTURAL RESOURCE MANAGEMENT DIVISION

6

- 7 1. Request for Acceptance of Annual Lease Rent as Determined by  
8 Independent Appraisal for Rent Re-openings for Various Lots Located  
9 Statewide; TMK Nos.: (1) 4-1-009:266, (2) 1-1-003:028, (2) 2-7-008:015,  
10 (2) 5-2-004:123, (4) 1-9-001:011, (4) 2-8-022:006

11

12 Brandi Ah-Yo, Property Manager, presented testimony as submitted.

13

14 Motion to Approve: Gomes/Cabral

15

16 Discussion:

17

18 Member Gomes asked how long these leases have been in effect.

19

20 Ms. Ah-Yo said she will need to look up this information and provide it to the board.

21

22 Member Gomes asked if the appraised value is per acre or the total?

23

24 Ms. Ah-Yo said it's the annual lease.

25

26 Member Gomes said there is a deposition diversified agriculture for just 1.8 acres. He  
27 asked how we'd calculate that.

28

29 Ms. Ah-Yo said she is not the appraiser, but she can check with Ted to get that  
30 information.

31

32 Member Ley asked if there are any insights into whether the decreasing rents for our  
33 producers are being driven by market prices in the area or specific guidance that has  
34 been given to the appraiser.

35

36 Ms. Ah-Yo said no, it's just by the market.

37

38 Vote: Approved; Unanimously

39

40

- 41 2. Request Approval for Conversion of Revocable Permit No. S-7732 to a  
42 New General Lease for G&C Freitas Ranch, Inc. (FKA: George Freitas

1 Dairy, Inc.); TMK: (3) 5-5-007:011, Portion of Government Lands of  
2 Hualua, North Kohala, Island of Hawai'i  
3

4 Brandi Ah-Yo, Property Manager, presented testimony as submitted.  
5

6 Motion to Approve: Gomes/Ley  
7

8 Discussion:

9 Member Cabral asked if this conversion is open to 65 years lease or is it limited to 35?  
10

11 Ms. Ah-Yo said it's up to the board and lessee if they want a longer lease term from the  
12 start.  
13

14 Member Cabral asked if the lessees are informed that they could get a longer lease?  
15

16 Ms. Ah-Yo said yes, that's an option but in this case, she said she did not have that  
17 conversation with the lessee.  
18

19 Member Gomes asked what improvements need to be completed on this parcel of  
20 property?  
21

22 Ms. Ah-Yo said they want to do more cross-fencing. She added that there are some  
23 clearing of the land of invasive trees and some irrigation that they may want to bring to  
24 the property as well.  
25

26 Member Gomes asked if they've been asking for a while to convert this to month to  
27 month?  
28

29 Ms. Ah-Yo said it's been a process to get the documentation in. She said they've been  
30 working with them within the last couple of years.  
31

32 Member Gomes said he'd like to know if these people would want to know if they would  
33 want a 65-year lease instead of 35-years.  
34

35 Georgette Freitas from GNC Freitas Ranch was called forward. She said yes, she would  
36 like a 65-year lease. She said she is familiar with the terrain and the different seasons.  
37 She added that they've been trying to obtain a long-term lease for this property for a few  
38 years now.  
39

40 Ms. Ah-Yo confirmed that Georgette is a lessee.  
41

1 Member Young said he would like lessees to have access to the fullest extent of the  
2 law. He said it would be good for them to look at a higher level on the kind of landscape  
3 of what revocable permits are out there and what is still pending.

4  
5 Member Gomes retracted his motion.

6  
7 Motion to approve a 65-year lease instead of a 35-year lease: Cabral/Gomes

8  
9 Vote: Approved; Unanimously

- 10  
11  
12 3. Request for Approval for the Transfer of Public Lands from the  
13 Department of Land and Natural Resources to the Department of  
14 Agriculture, Pursuant to Act 90, SLH 2003, Codified as Chapter 166E,  
15 Hawaii Revised Statutes; TMK Nos.: (3) 4-3-010:008, (3) 4-3-010:002, (3)  
16 4-2-008:002, and (3) 4-1-006:007 Island of Hawai'i

17  
18 Brandi Ah-Yo, Property Manager, presented testimony as submitted.

19  
20 Motion to Approve: Gomes/Ley

21  
22 Discussion:

23 Clayton Kubo said he wants to be sure that agricultural lands throughout the State of  
24 Hawaii do not get used for rubbish dumps or other unintended purposes.

25  
26 Nicole Galase, Managing Director for the Hawaii Cattlemen's Council, said she is in  
27 strong support of this agenda item. She said since 2003, they've been waiting to get  
28 these ag lands transferred from DLNR so the ag lands are kept in ag production. These  
29 leases are in ag production, and they've all made improvements to the land and have  
30 had multiple generations on the land as well. She added that they need to be under  
31 DOA to be sure they can continue to steward the land in these ways.

32  
33 Steven DeLuz, owner of Ernest DeLuz Ranch, said they are a 4-generation family  
34 ranch. He said in 2005, they lost 21,000 acres to conservation and he has only 5,000  
35 acres left from DLNR. He said he cannot afford to lose any more land. He appreciates  
36 this request going through.

37  
38 Member Cabral asked if these 4 leases were already approved for transfer by DLNR.

39  
40 Ms. Ah-Yo said no, they needed to do the due diligence first. The next step would be  
41 DLNR making the determination as to what is going to come over. There have been  
42 some negotiations back and forth and DLNR notified HDOA that they were willing to  
43 transfer parts of these 4 leases.

1  
2 Chairperson said that they were on the portion of the list for “do not transfer”, but  
3 through the advocacy of the Hawaii Cattlemen’s Council, they were reconsidered, and  
4 these 4 leases are now on the table for transfer.  
5 Member Young said there are other agricultural pertinent uses for agricultural land. He  
6 asked if Brandi could line some of those out if there are other existing uses besides just  
7 straight agriculture so that the public can know what is received. He wants to be sure  
8 there are no surprises for the public when land comes over.

9  
10 Ms. Ah-Yo said she does not have a timeline for when this will be back from DLNR. She  
11 said she will notify them today that the board has passed these 4.

12  
13 Vote: Approved; Unanimously

14  
15  
16 B. PLANT INDUSTRY DIVISION

17  
18 Pesticides Branch

- 19  
20 1. Request for: (1) Preliminary approval of the proposed amendments to  
21 Chapter 4-66, Hawaii Administrative Rules necessary to comply with  
22 State Certification Plan updates with the U.S. Environmental Protection  
23 Agency and with Act 220 (2023); and (2) Authorization for the  
24 Chairperson to schedule public hearings and appoint one or more  
25 hearings officers in connection with the proposed amendments to  
26 Chapter 4-66.

27  
28 Greg Takeshima, Pesticides Program Manager, presented testimony as submitted.

29  
30 Motion to Approve: Gomes/Young

31  
32 Discussion:

33  
34 Clayton Kubo said there were too many repeat offenders, and the list was 60-70 pages  
35 with each page containing about 12 repeat offenders. He said he and his family have  
36 been impacted by pesticides drift, fumes and vapors for many years.

37  
38 Member Gomes asked if DOA would consider having these public hearings in the late  
39 afternoons and early evenings so there are more participants. He also asked if there are  
40 enough personnel for this enforcement and if we are still recruiting.

41  
42 Mr. Takeshima said yes, we can take that into consideration. For the staffing capacity,  
43 he said they do have one staff member for the case prep. He added that they are

1 currently in internal recruitment for the second position and that capacity will be coming  
2 on board hopefully within the next month or two.

3  
4 Member Cabral asked if the proposed rule state rules exceed the requirement of CFR or  
5 is it the same?

6  
7 AG Waihee-Polk said we met with EPA and they had requested this language changes  
8 into our rules to match the CFR. EPA always wanted HDOA to provide a copy of the  
9 CFR provisions with the rules so that people could see them, but this would be too  
10 many pages longer than the actual rules. Therefore, links to the CFR were added  
11 instead. The EPA felt that HDOA's rules were not comporting appropriately with the  
12 CFR, and they weren't going to approve HDOA's certification plan without those  
13 changes.

14  
15 Member Cabral asked for clarification on the labeling requirements specifically where it  
16 says that the applicator must be physically present at the site of application.

17  
18 Mr. Takeshima said if the label requires it, the certified applicator does need to be on  
19 site. He said there are labels that allow for non-certified applicators to be immediately  
20 available and that is where they allow certified applicators to not physically be there but  
21 be in contact through phone to provide immediate direction.

22  
23 Member Ley asked when penalties are assessed, who makes the recommendation and  
24 approval?

25  
26 Mr. Takeshima said the case development staff are the ones who make the initial  
27 recommendation for civil penalties. It goes through multiple levels to ensure that it is  
28 appropriate.

29  
30 Member Ley said with respect to the Advisory Committee's review of the proposed rules  
31 in October, there were a significant number of new board members. What were the  
32 concerns about the increase in penalties that might impact the smaller producers?

33  
34 Mr. Takeshima said the discussion and no-votes were all related to the increase in  
35 fines.

36  
37 Scott Nishimoto, Program Compliance Officer, said he wants to add that the Attorney  
38 General reviews the penalties prior to issuance. He also added that these increases in  
39 penalty amounts are the maximum penalty amount. These are maximum penalty  
40 amounts that are capped by violation for the branch. He added that the initial violation  
41 triggers a warning notice that carries no civil penalty. Usually, an initial violation will not  
42 automatically trigger as a penalty. They will need a second violation for the notice of  
43 violation to receive a civil penalty.

1  
2 Chairperson Hurd asked when the penalties will be in effect.

3  
4 Mr. Takeshima said that we'll need to go through the hearing process and, once  
5 approved, we'll go through each county to ensure that we have the appropriate  
6 comments from the public. Amendments will be made based on the comments from the  
7 hearings. We'll also go through the Small Business Review Board. Once the boards  
8 make the secondary approval, it'll go to the Governor's office and Lieutenant Governor's  
9 office. He said this should take us through possibly the 3<sup>rd</sup> or 4<sup>th</sup> quarter of this calendar  
10 year.

11  
12 Chairperson Hurd said the rule changes will not occur at this meeting.

13  
14 Vote: Approved; Unanimously

15  
16  
17 Plant Quarantine Branch

- 18  
19 1. Request to: (1) Allow the Importation of Four (4) African Black-Footed  
20 Penguins, *Spheniscus demersus*, an Animal on the List of Restricted  
21 Animals (Part B), by Permit, for Exhibition, by Hyatt Regency Maui Resort  
22 and Spa; and (2) Update Permit Conditions for the Importation and  
23 Possession of Four (4) African Black-Footed Penguins, *Spheniscus*  
24 *demersus*, an Animal on the List of Restricted Animals (Part B), for  
25 Exhibition, by Hyatt Regency Maui Resort and Spa.

26  
27 Jessica Ann Miura, Acting Land Vertebrate Specialist, presented testimony as  
28 submitted.

29  
30 Motion to Approve: Gomes/Grewal

31  
32 Discussion:

33 Povi Carissa Abney, Wildlife Supervisor at the Hyatt Regency Maui, said we focus on  
34 African penguins because we've been given a unique opportunity to make a difference  
35 in the world. 40 years ago, when the decision was made to house penguins. They were  
36 not an endangered species, and were chosen because they could thrive in our similar  
37 tropical climate, but now that they are in our care. We have a responsibility to the colony  
38 living in Maui, and their declining wild counterparts. Only 1% of the original African  
39 penguin population remains, and at this rate they could be functionally extinct by 2035.  
40 Our team has been certified and maintains all necessary permits to keep and breed.  
41 African penguins, going through these certifications requires a rigorous screening  
42 process that has taken us over 2 years to achieve. These management plans will  
43 ensure responsible breeding practices for generations to come. Because the population



1 of penguins in our care has been geographically isolated for over 40 years, they are  
2 genetically unique and considered extremely valuable. In 1950, the Hawaiian Nene was  
3 all but gone when a biologist named Peter Scott stepped in and saved them from  
4 extinction by bringing them in England. Nobody looks back criticizing this scientist for  
5 helping birds outside of England, because in his words, "extinction is forever".  
6 We have a responsibility to prevent species extinction if it is in our power to do so.  
7 The plight of the endangered African penguin mirrors the struggles of our own native  
8 birds. Extinction is a worldwide issue, and as keepers of an endangered species, we  
9 have a responsibility to help educate the public by sharing our penguin story. We give a  
10 voice to life-threatening issues that endangered birds are facing all around the world.  
11 We strongly believe in introducing our keiki to animals from around the world. We're  
12 inspiring them to dream big and think globally. Birds are an indicator species. The same  
13 loss of resources and habitat that affects them comes back to affect us.  
14 Animal habitats are windows to ecosystems around the world. There are no zoos in  
15 Maui which means many children on the island do not have an opportunity to see  
16 animals that live outside of Hawaii. We need to begin by recognizing the value of animal  
17 care facilities and the role they play in saving species.

18  
19 Katie Propp, Penguins International, spoke on behalf of their positive experiences with  
20 Hyatt Regency Maui Resort and Spa and their African Penguin Program. African  
21 penguins were uplisted this past October to a critically endangered species, and it is  
22 imperative now more than ever to share about their plight with the public through  
23 education programs and with conservation dollars. We've worked directly with Hyatt  
24 Regency Maui Resort and Spa to highlight their African penguins through a  
25 conservation social media competition that went viral, reaching over 600,000 people  
26 across the world, including a feature on BBC showcasing these endangered species  
27 thriving in Hawaii. Through our partnership with Hyatt Regency Maui, we were able to  
28 co-teach virtual education programming to school districts in the U.S.A. that are unable  
29 to connect with penguins at zoos and aquariums, as well as share their African penguin  
30 paintings with the community to bid on during silent auctions with funds going to support  
31 our South African partners at Sam Cobb and Dyer Island Conservation Trust.  
32 If Hyatt Regency Maui is unable to continue their African penguin programming, it would  
33 be a loss of funding to African penguin conservation programs which desperately need  
34 our support as the species continues to dwindle in the wild.

35  
36 Cathy Goeggel, President of Animal Rights Hawaii said they oppose this, and that the  
37 hotel is a hotel and not a zoo. She said we should be showing animals that are  
38 endangered here in Hawaii and not at a hotel or spa which is not an educational facility.  
39 She said there must be other places in the world where these animals can be bred and  
40 improve their chances of survival in the wild.

41  
42 Diane Pure, resident of Maui, said she has been a volunteer with the Lahaina school  
43 system. The students are brought to the Hyatt so they can learn about penguins as well

1 as other animals. The penguins are well cared for and are an education system for the  
2 community of West Maui. They are not just entertainment for the people who visit the  
3 Hyatt. They are crucially important to the children and to the families of West Maui,  
4 especially since this fire. That's what kept a lot of these kids going who were staying at  
5 the Hyatt during that time, and they also took in all their animals. They're very animal,  
6 oriented.

7  
8 Member Gomes said he would like to support this with reservations. He asked if it'd be  
9 better to feature native species at the hotels. He said according to Dr. Allison, due to  
10 climate change and the reduced access to their food, how would it be in the long run for  
11 these penguins? He asked why there was no response from the other two doctors?

12  
13 Ms. Miura said during that time, Dr. Wright was out of state. She said she reached out  
14 and left voice messages on their phones but didn't receive a response until it was a little  
15 too late. Dr. Reid was out of state during that time as well.

16  
17 Member Grewal said he wants to know where these 4 penguins are coming from and  
18 where they are located.

19  
20 Ms. Miura said they are interested in receiving the penguins from Metro Richmond Zoo  
21 located in Virginia.

22  
23 Member Gomes asked if there is anywhere else in the states that has these African  
24 Penguins and are thriving and making a comeback.

25  
26 Ms. Miura said she can only answer for Hawaii and that the Honolulu Zoo also has  
27 Black-Footed penguins. They are also part of the conservation.

28  
29 Povi Carissa Abney, Wildlife Supervisor at the Hyatt Regency Maui, said they source  
30 the food for the penguins, which is capelin from the Atlantic Coast and is a sustainable  
31 stock. She said they work with several different native species organizations including  
32 Maui Seabirds and Maui Forest Birds for education. She said they don't want to house  
33 the penguins for display but to present them as a form of education. Ms. Abney said  
34 Metro Richmond Zoo is one of the most successful African penguin programs in the  
35 world. The curator of the zoo came to Maui and gave approval of their program. She  
36 said they respect all the rules in place and wants to be sure that this is a very safe  
37 procedure.

38  
39 Member Grewal asked what the economic benefit to the hotel is.

40  
41 Ms. Abney said they do not charge for any of their wildlife tours and penguin  
42 presentations.

43

1 Vote: Approved – 8; Reservations (Ley/Gomes)  
2  
3

- 4 2. Request for Review of the Petition From Andrea Kawabata, University of  
5 Hawai'i (UH) College of Tropical Agriculture and Human Resources  
6 (CTAHR), to Initiate Administrative Rule Making and Rule Amendment to  
7 Chapter 4-72, Hawaii Administrative Rules (HAR), to Designate the  
8 Islands of Kaua'i, Moloka'i, and Lāna'i as Coffee Berry Borer  
9 (CBB), *Hypothenemus hampei*, infested areas.  
10

11 Jonathan Ho, Plant Quarantine Branch Manager, presented testimony as submitted.  
12

13 Motion to Approve: Cowell/Gomes  
14

15 Discussion:

16 Bronson Yadao testified on behalf of Kauai Coffee Company. He said they first  
17 discovered CBB in the northernmost portion of their farm. It then spread to all of their  
18 farm in a span of 18 months. He said some of their fields have reached as much as  
19 94% of CBB. Expanding the states designation of infested to Kauai, Lanai, and Molokai  
20 would expedite the exchange of much needed resources, materials and collaboration to  
21 combat both CBB and CLR in the state.  
22

23 Member Cowell said the degree to which CBB is affecting the islands that are currently  
24 covered by this rule is not yet determined. We are looking for the fastest way forward to  
25 reduce the amount of time it takes to get materials between islands. Whatever's fastest  
26 is what we need to be working toward.  
27

28 Andrea Kawabata said she spoke with growers on different islands and discussed how  
29 extensive CBB was on their island. She said she wanted to take that step forward for  
30 the industry and she does not want to change the rules and repeal it because it is for  
31 the industry to do. By including Kauai, Molokai, and Lanai as CBB infested, it would help  
32 HARC, USDA and anyone else who is trying to distribute their plants statewide without  
33 this one-year quarantine.  
34

35 Mr. Ho said the way the rules are written, the section has a very specific provision that  
36 you need to consult with people prior to the action being taken which has not yet  
37 happened. Once that happens, we can make another submittal and bring it back to the  
38 board and they can then make the designation. That could be a month or two and it  
39 wouldn't be years. To effectuate what Ms. Kawabata has provided, that would be the  
40 regular rulemaking. There is a way for the board to board order to expand the  
41 quarantine designation and that is essentially an administrative function and would not  
42 need to go through rulemaking.  
43

1 Mr. Ho said the recommendation of the branch is to deny the request and direct the  
2 branch to work with the petitioner to use the quarantine expansion process that's in 4-72  
3 and come back before the board so that the Board can decide on the rest of the islands  
4 being infested

5

6 Member Cowell withdrew his motion.

7

8 Motion to deny Ms. Kawabata's petition and to direct the branch to take action –  
9 Cowell/Gomes

10

11 Vote: Approved; Unanimously

12

13

14 V. OLD BUSINESS

15 None

16

17

18 VI. NEW BUSINESS

19

20 1. NON-ACTION ITEM: Invasive Species Action Plan Updates

21

22 Jonathan Ho, Plant Quarantine Branch Manager, presented new business item.

23

24 Discussion:

25 Mr. Ho said we have a systems approach pest management contract for \$800,000 to  
26 UH. For Brown Tree Snake, we are getting 150 traps for statewide distribution. We're  
27 looking for equipment to expend the \$240,000. We have a pest diagnostic Request for  
28 Proposals (RFP) for \$240,000 that closes at the end of the month. There is a \$1.1  
29 million dollar contract for HTM Contractors for the cutting and removal of dead trees on  
30 public land. There was an RFP issued in November 2024 for green waste management  
31 and that will need to be reissued due to the inability to come up with an agreement with  
32 the bidder. The compost reimbursement program for \$400,000 was opened in October  
33 2024 and will be ongoing until May of 2025. \$1.1 million was awarded to Rentokil for  
34 little fire ant (LFA) treatments of residential sites and the contract is being finalized.  
35 There was \$74,355 for coqui frog (coqui) and we have spent \$8,000 on citric acid. We're  
36 going to use the rest of the funds for purchasing citric acid for treatments, particularly on  
37 Oahu and Kauai. The biosecurity facility planning was awarded for approximately  
38 \$400,000 for a design development planning document for a modular containment  
39 facility. We are working on finalizing the contract. There was \$300,000 for RRP and a  
40 \$150,000 went to Kauai County. The City and County of Honolulu declined their  
41 \$150,000 so we're working on a supplemental contract toward the additional \$150,000  
42 to Kauai County. There was about \$360,000 for TLS for UH and there is another RFP  
43 for about \$240,000 for management on Hawaii Island that is going to be closing at the

1 end of the month. The department maintains its coqui, LFA and coconut rhinoceros  
2 beetle responses. Senate Bill (SB) 252 provides the department administrative search  
3 or administrative inspection authority for  
4 things people, passengers, cargo, including now inner-island and creates civil penalties  
5 to manage some of the administrative search issues. SB251 creates a placard program  
6 which is similar to the DOH program. House Bill 427 also changes the name of this  
7 body to the Board of Agriculture and Biosecurity if the bill passes.

8

9

10 Motion to adjourn: Gomes/Cowell

11

12 The meeting was adjourned at 11:08 am

13

14 Respectfully submitted,

15

16

17

18 Marci Clingan

19