

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND NOTICE OF DECISION

Town of Shelburne – Telecommunications Review Board

Meeting Dates: February 13, 2020; August 13, 2020; September 10, 2020; November 12, 2020;
December 17, 2020

#TEL20-01

Address: 4450 Dorset Street

Applicant: Zachary M. Manganello

Applicant’s Counsel: Brian Sullivan, Esq.

Applicant’s Consultant: Louis Hodgetts, PE

REQUEST

The applicant proposes to erect two amateur radio towers on a residential lot located at 4450 Dorset Street.

SUMMARY

The TRB approves this application with certain conditions detailed below, cognizant of federal law on this issue which partially preempts the Town of Shelburne’s Ordinance for Towers and Telecommunication Facilities. It is up to the Selectboard to amend the Ordinance to comply with the federal framework. While the TRB is well aware of and agrees with the priorities Shelburne places on its rural areas, it was required to comply with federal regulations while considering this decision.

TELECOMMUNICATIONS REVIEW BOARD AUTHORITY

The Town of Shelburne (“Town”) adopted an Ordinance for Towers and Telecommunication Facilities (“Ordinance”) which became effective July 10, 2001. Through the Ordinance, the Town Selectboard established a Telecommunications Review Board (“TRB”) charged with reviewing all applications for towers and telecommunications facilities. When making certain amendments to the original Ordinance in 2014, the Selectboard appointed the Shelburne Planning Commission as the TRB.

REVIEW STANDARD

The FCC has regulatory supervision of amateur radio and regulates amateur radio service under 47 C.F.R § 97.15, which codifies two FCC rulings: FCC Memorandum Opinion and Order PRB-1 and Order RM-8763. These rules have a limited preemptive effect over local regulations, including the Ordinance. In interpreting these FCC rulings, both the FCC and the federal courts have determined local regulations must: 1) reasonably accommodate amateur communications; 2) be the minimum practicable in order to accomplish the zoning authority’s legitimate purposes; and 3) may not altogether preclude amateur communications.

The Ordinance does not address amateur radio towers taller than 35 feet, and does not comply with 47 C.F.R § 97.15. Nevertheless, the TRB can use the Ordinance as a guideline even in the face of the federal preemption. Wherever possible, the TRB here follows the federal regulations where the Ordinance does not comply or is not appropriate.

PROCEDURAL SUMMARY

1. Zachary M. Manganello (“Applicant”) filed an application with the TRB on January 8, 2020, seeking approval of a proposal for two amateur radio towers with mast antennas.
2. The Town published a notice in the Shelburne News on January 23, 2020 indicating the public hearing would occur on February 13, 2020 before the TRB.
3. A copy of the notice was posted more than 15 days prior to the hearing at the Shelburne municipal office complex, the Shelburne Post Office, and the Pierson Library.
4. The Town sent the notice by regular mail to adjoining property owners Richard & Amy Guidice, Kevin & Nicola Hawko, Luke & Jennifer Hoenigsberg, Brian & Jeanne Irwin, Maureen O’Brien, Erik Coker, and John & Cathy O’Brien.
5. The TRB first considered the application at a public hearing on February 13, 2020. Evidence and testimony were received from: Applicant, the TRB’s technical expert James Stitt, the TRB’s aesthetic expert Michael Buscher, Applicant’s representative Louis Hodgetts, neighbors, and others.
6. The TRB continued the hearing to March 26, 2020. Due to the COVID-19 pandemic, however, the hearing scheduled for March 26, 2020 never took place, and was postponed to a later date, to be determined.
7. In the intervening weeks and months, the TRB exercised its authority as a quasi-judicial body and deliberated.
8. The TRB issued a Recess Order on May 22, 2020 in which it requested additional information related to aesthetics from the Applicant, and required Applicant to perform a balloon test.
9. The TRB issued a Recess Order on June 17, 2020 clarifying requests from the May 22, 2020 Recess Order regarding photo simulations and balloon tests.
10. On June 22, 2020, Applicant performed a balloon test.
11. The TRB issued a Recess Order on June 26, 2020 regarding a public hearing to be held in late July or early August to hear testimony and evidence relating to the balloon test.
12. On July 23, 2020, a public hearing notice for the August 13, 2020 hearing was published in the Shelburne News to address disruptions caused by the COVID-19 pandemic.
13. The notice of the public hearing was posted more than fifteen days prior to the August 13, 2020 hearing in the Shelburne municipal office complex, the Shelburne Post Office, and the Pierson Library.
14. A legal notice was published in the Shelburne News on June 23, 2020 citing a public hearing to take place on August 13, 2020.
15. The notice was sent by regular mail to adjoiners Richard & Amy Guidice, Kevin & Nicola Hawko, Luke & Jennifer Hoenigsberg, Brian & Jeanne Irwin, Maureen O’Brien, Erik Coker, and John & Cathy O’Brien.
16. On August 13, 2020, the TRB held a hearing conducted remotely using the Zoom online platform regarding the efficacy of the balloon test.

17. At the August 13, 2020 hearing, Applicant provided a revised design for the two towers, and Applicant and Applicant's representative Louis Hodgetts, Town's aesthetic expert Michael Buscher, neighbors and others provided testimony and evidence.
18. The TRB continued the August 13, 2020 hearing until September 10, 2020, and again until November 12, 2020.
19. The TRB issued a Recess Order on September 2, 2020 stating the Applicant did not need to refile his Application as a result of the design changes, and requesting updated application materials, including photo simulations and balloon tests.
20. On October 4, 2020, Applicant performed a second balloon test.
21. At the November 12, 2020 hearing, conducted remotely using the Zoom online platform, the Applicant and his expert presented materials related to the revised proposal, the TRB heard testimony from the Town's aesthetics consultant Michael Buscher, and received comments from neighbors and others.
22. The hearing was continued to December 17, 2020.
23. At the December 17, 2020 hearing, also conducted remotely using the Zoom online platform, the TRB heard evidence and testimony from neighbors living near the proposed project, from the applicant and his representatives, and brief comments from the Town's aesthetics consultant, Michael Buscher. There being no further comments or questions, the TRB closed the hearing.
24. Counsel for the applicant and counsel for the neighbors submitted summations approximately two weeks following the close of the hearing.

RECORD

Evidence:

The TRB admitted the following items admitted into the record for this matter :

- Telecommunication Facilities Application form, with responses, received January 8, 2020;
- Narrative Accompanying Application for Amateur Radio Installation, received January 8, 2020;
- Discussion of Town of Shelburne Ordinance for Towers and Telecommunications Facilities, received January 8, 2020;
- Supplemental Information for an Amateur Radio Facility Application, filed under the Town of Shelburne Ordinance for Towers and Telecommunications Facilities, received January 8, 2020;
- Enclosure 1: Satellite view of 4450 Dorset Street showing screening vegetation, received January 8, 2020;
- Enclosure 2: Site Plan of 4450 Dorset Street property with structure locations, received January 8, 2020 (includes plans prepared by Dubois & King Inc: Overall Site Plan Sheet C-1, Detail Site Plan Sheet C-2, and Tower Elevations Sheet C-3, all dated 9-6-19);
- Enclosure 3: FCC Extra Class Amateur Radio License, K1ZK, Zachary M. Manganello, received January 8, 2020;
- Enclosure 4: Proof of life membership, National Association for Amateur Radio, received January 8, 2020;

- Enclosure 5: Vermont Radio Amateur Civil Emergency Service credentials, received January 8, 2020;
- Enclosure 6: Proof of casualty and homeowners insurance, received January 8, 2020;
- Enclosure 7: Manufacturer specifications and data for Rohn 45G guyed support structure, received January 8, 2020;
- Enclosure 8: Manufacturer opinion regarding fall radius, received January 8, 2020;
- Enclosure 9: Photographic simulations created by Dubois & King, Inc., received January 8, 2020;
- Enclosure 10: Selected pages from FCC OET Bulletin 65, Supplement B (ed. 97-01), received January 8, 2020;
- Enclosure 11: FCC Memorandum Opinion and Order in PRB-1, received January 8, 2020;
- Enclosure 12: Copy of 47 C.F.R. 97.15(b), received January 8, 2020;
- Enclosure 13: Copy of V.S.A. 2296(b), received January 8, 2020;
- Enclosure 14: Red Cross Support for Amateur Radio Antennas, received January 8, 2020;
- Enclosure 15: The Importance of Amateur Radio in Emergencies, received January 8, 2020;
- Enclosure 16: Typical Emergency Situation, received January 8, 2020;
- Enclosure 17: Presidential Recognition, received January 8, 2020;
- Enclosure 18: ARR:-FEMA Affiliation, received January 8, 2020; and
- Enclosure 19: Showing of Need for Height of an Amateur Radio Antenna Support Structure with Propagation Maps, received January 8, 2020.
- Area and site specific Visibility maps filed at hearing on February 13, 2020.
- Independent technical review of Manganello tower, prepared by JM Stitt and Associates and dated February 11, 2020.
- Response to TRB questions regarding proposal, prepared by JM Stitt and Associates and dated February 24, 2020.
- Draft photographic inventory and independent review of Manganello tower, prepared by TJ Boyle and Associates and received February 13, 2020.
- Response to TRB questions regarding proposal, prepared by TJ Boyle Associates and dated February 24, 2020.
- June 1, 2020 email from Brian Sullivan, Esq., attorney for neighbor group, regarding May 22, 2020 recess order.
- June 5, 2020 letter from Peter Raymond, Esq. attorney for neighbor group, regarding May 22, 2020 recess order, balloon test, and possibility of neighbors engaging their own expert.
- June 23, 2020 email from Brian Sullian, Esq. regarding balloon test.
- August 13, 2020, email from Brian Sullivan, Esq., to Dean Pierce announcing intention to revise proposal to relocate towers and shorten towers, accompanied by revised plans prepared by Dubois & King Inc(Overall Site Plan Sheet C-1, Detail Site Plan Sheet C-2, and Tower Elevations Sheet C-3) dated 8-13-20.
- August 24, 2020 letter from Peter Raymond, Esq. regarding revised application.
- August 24, 2020 Memorandum of Law from Brian Sullivan, Esq. regarding revised application.
- September 8, 2020 email from Brian Sullivan, Esq. regarding September 2, 2020 recess order.

- September 8, 2020 email from Peter Raymond, Esq. regarding September 2, 2020 recess order.
- Materials transmitted October 29, 2020, for TRB hearing on November 12, 2020 and consisting of 1) Updated MPE calculations, 2) Updated propagation analysis, 3) Updated photo simulations depicting towers, antennas, guy wires and above-ground components as proposed in revised application, 4) Results of second balloon test as summarized by Louis Hodgetts, P.E., 5) A copy of the revised permit plans showing the relocated towers and antennas, and 6) A set of Questions and Answers compiled by Mr. Manganello.
- Photos from neighboring properties of view of October 4, 2020 balloon test provided by Peter Raymond, Esq., attorney representing neighbors.
- Quote for telescoping antenna by Aluma Tower Company provided by neighbor Brian Irwin on October 29, 2020.
- Letter from neighbor Luke Hoenigsberg, FAA Airline Transport Pilot, Safety Official, and Standards Captain for the Whitewind Aviation company, regarding FAA requirements for notice pursuant to 14 C.F.R. § 77.9.

No party raised any objection to the admission of any exhibits, and therefore, every exhibit listed above was admitted into evidence. Based on the evidence and exhibits presented at the hearings, the TRB makes the following findings of fact and conclusions of law:

FINDINGS OF FACT

1. Applicant owns a property located at 4450 Dorset Street, Shelburne, Vermont. (Application)
2. Applicant's property is located in the Rural District as described on the Town of Shelburne Map of Zoning Districts on record at the Town of Shelburne.
3. Applicant filed a Town of Shelburne Tower/Telecommunication Facilities Application, including Narrative, Exhibits, and Supplemental Information with the Town on January 8, 2020, for a project described as two amateur radio antenna support structures. Each proposed structure was to consist of a lattice tower supported by guy wires, with horizontally-oriented antennas mounted at 70.5' and 85.4' above ground level ("AGL"). Each tower was to extend to 70' AGL with a mast extending to 84' AGL. (Application)
4. Applicant revised his Application on August 13, 2020 to change the height and location of the towers (together with the January 8, 2020 application, the "Application"). In the revised application, the towers were relocated on the property, Tower #1 was reduced to 36' AGL with a four foot mast for a total height of 40' AGL, to be bracketed to Applicant's home. Tower #2 was reduced to a 50.5' AGL tower with a ten foot mast, for a total height of 60.5' AGL. (Revised Application)
5. Applicant holds Amateur Extra Class License K1ZK from the FCC. (Application)
6. Applicant's stated purposes for the amateur radio towers are public service and emergency communications, international communications, experimentation, and training and education. (Application)
7. Applicant claimed the type and size of the original towers were necessary to achieve his amateur radio objectives. (Application)

8. James Stitt, the Town's technical expert, stated the height of the original towers proposed by the Applicant were necessary to perform the functions the applicant proposed. He added that the original towers in the Application were a compromise from what the Applicant may need and that a single tower would not meet Applicant's needs. (Written testimony of Stitt)
9. Towers meet all applicable Federal Communications Commission (FCC) regulations regarding licensing and the Office of Engineering and Technology Bulletin 65 guidelines regarding exposure to radio frequency radiation. (Written testimony of Stitt)
10. Applicant's tower fall radius is within the Applicant's property boundaries, which is within the industry's acceptable guidelines. (Verbal testimony of Applicant's engineer)
11. Collapsible or telescopic towers within the scope of amateur radio hobby usage typically do not support the large antenna loads contemplated by the Applicant and are not as sturdy because they do not utilize guy wires. (Written testimony of Stitt)
12. Neighbors objected to the height and location of the towers. (Verbal and written testimony of neighbors)
13. Michael Buscher, the Town's aesthetics expert, testified there would be intermittent visibility of the towers in the original application from Dorset Street and Barstow Road. He recommended trying to understand the best spot on the property in terms of visibility to mitigate the towers. (Verbal testimony of Buscher)
14. On August 13, 2020, Applicant reduced the tower height and revised the tower locations to address aesthetic concerns of neighbors and community members. (Verbal testimony of Applicant)
15. As part of the revised plan, the applicant also proposed a wire antenna strung between the two towers. (Updated plans dated 8-13-2020)
16. Applicant stated the revised project will result in a reduction in flexibility and performance. (Verbal testimony of Applicant)
17. Updated propagation studies indicated Applicant's amateur radio goals will be further compromised with the revised towers. (Application)
18. The TRB determined the revisions to the Application did not require a new application. (Recess Order of September 2, 2020)
19. The largest antenna facial surface area of Tower #1 is less than 15 square feet and Tower #1 will not extend more than 12 feet above the 28 foot portion of the building to which the mast is attached. (Application)
20. Applicant submitted an application for the towers to the Federal Aviation Administration, and the filing was assigned Aeronautical Study Number (ASN) 2020-ANE-6056-OE and 2020-ANE-6057-OE. (Application)
21. The Applicant has not yet received approval from the FAA for the project. (Verbal testimony of Applicant)
22. Applicant offered to provide screening landscaping for the neighboring properties during the hearings. (Verbal testimony of Applicant)
23. Neighbors objected to the revised towers and expressed a desire for towers under 35 feet or retractable towers. (Verbal testimony)
24. Towers under 35 feet are not subject to the Ordinance. (Ordinance)
25. Applicant plans to use the towers on an ongoing basis for data collection and would not expect to lower a retractable tower. He also expressed concerns about the ability to retract a tower in winter ice and snow conditions. (Verbal testimony of Applicant.)

26. The safety features Applicant proposes include ground rods and bonding and low radio frequency exposure. (Application)
27. Applicant is not able to use existing tower/facility sites either with or without the use of repeaters or similar technology. (Application)
28. There are no existing towers adjacent to Applicant's property and therefore efforts have not been made to locate new towers adjacent to existing towers. (Application)
29. The project will not require access roads or additional above-ground utilities. (Application)
30. The project does not include an equipment shelter and the towers cannot be climbed easily, so there is no plan for a fence. "No trespassing" signs will be posted on the towers. (Application)
31. The towers will have a galvanized finish. (Application)
32. The project will not contain any commercial advertising. (Application)
33. The project will not have any external lighting. (Application)
34. The project will not generate any appreciable noise. (Application)
35. Neither antenna support structure exceeds 200 feet and notice to the FAA under 14 C.F.R. § 77.9(a) is not required. Neither structure qualifies as an obstruction to air navigation under 14 C.F.R. § 77.17(a). Applicant has applied to the FAA for a determination that the project complies with FAA regulations. (Application, Revised Application, Verbal Testimony)
36. Applicant's towers are not located on a hillside or ridgeline. (Application)
37. The towers are located far enough from property boundaries that, should they fall, they would remain on the Applicant's property. (Application)
38. Applicant will transmit from a maximum of two antennas at any time with a maximum aggregate power input of 3,000 Watts. (Application)
39. Radio frequency exposure will be within FCC limits. (Application and October 29, 2020 Updated MPE calculations)
40. While the towers will be visible from adjacent parcels, the revised tower locations are sited where they will minimize the visual impact compared to the original locations. (Verbal testimony of Applicant)
41. The tower locations in the revised application take advantage of existing vegetation to help screen the lower tower and lower portions of the taller tower. (Verbal testimony of Buscher)
42. The revised lower tower blends in with the surrounding vegetation, landscaping, and other development in the area. (Verbal testimony of Buscher)
43. The revised higher tower is still visible but the new location helps mitigate the tower even during leaf off conditions because the small members of the antennas tend to blend in with the surrounding deciduous trees. (Verbal testimony of Buscher)
44. There is no significant benefit to requiring additional surrounding landscaping on the project but neighbors may benefit from strategically placed landscaping in their yards. (Verbal testimony of Buscher)

CONCLUSIONS OF LAW

Based on the above findings derived from the evidence and testimony offered during the proceeding, the TRB has reached the following conclusions:

1. The FCC has regulatory supervision of amateur radio and regulates amateur radio service through 47 C.F.R § 97.15, which codifies two FCC rulings: FCC Memorandum Opinion and Order PRB-1 and Order RM-8763.
2. These rules have a limited preemptive effect over local regulations, including the Ordinance.
3. Interpreting 47 CFR § 97.15(b)), the FCC and federal courts have determined local regulations must: 1) reasonably accommodate amateur communications; 2) be the minimum practicable to accomplish the zoning authority's legitimate purposes; and 3) may not altogether preclude amateur communications.
4. Pursuant to, Vermont law, "... a municipal ordinance regulating amateur radio antenna or amateur radio antenna support structures shall comply with the requirements of 47 C.F.R. § 97.15(b), as amended from time to time, by allowing for the erection of an amateur radio antenna or an amateur radio antenna support structure at a height and dimension sufficient to accommodate amateur radio service communications." (24 V.S.A. § 2296)
5. As it relates to proposed amateur radio towers over 35 feet tall, the Ordinance is partially federally preempted because it does not reasonably accommodate amateur radio communications.
6. The Ordinance prohibits towers in the Rural District, but exempts amateur radio towers less than 35 feet tall from the Ordinance, thereby effectively allowing only amateur radio towers less than 35 feet tall in the Rural District.
7. This type of blanket denial based on height restriction is preempted on its face because it does not "reasonably accommodate" amateur radio communications.
8. Local ordinances are preempted as applied when they, "do not reasonably accommodate amateur communications through the least restrictive regulation practicable. In making its determination, the local board must consider all relevant factors and explore potential alternatives." *Evans v. Board of County Com'rs of County of Boulder, Colo.*, 994 F.2d 755, 761–62 (C.A.10 (Colo.),1993)
9. The FCC acknowledges local authorities can regulate amateur installations to ensure safety, health, and aesthetics provided the regulations are not so restrictive as to preclude amateur radio communications.
10. The FCC has specifically declined to regulate the height of amateur radio towers, "leaving the specifics of zoning regulation to the local authority, including provisions concerning the height of an amateur antenna. *PRB-1* at 17.
11. In considering an Application for amateur radio towers, the TRB can use the Town's Ordinance as a guideline, but must put aside the Ordinance where it does not comply with Federal Regulations.
12. 47 CFR § 97.1 provides that amateur radio has a fundamental purpose expressed in the following principles: (a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications; (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art; (c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art; (d) Expansion of the existing reservoir within the amateur radio service of trained

- operators, technicians, and electronics experts; (e) Continuation and extension of the amateur's unique ability to enhance international goodwill.
13. Applicant's proposal details his experience with and plans to use the towers for public service and emergency communication, international communication, experimentation, and training and education purposes as specified under 47 CFR § 97.1.
 14. When municipalities review applications for radio towers, the FCC requires that "a reasonable accommodation be made between the two sides." (PRB-1)
 15. A municipality "reasonably accommodates a ham radio operator when it considers his application, holds public hearings, makes factual findings and seeks a compromise. At the same time, the FCC's exhortation that reasonable accommodation be made 'between the two sides' suggests that the applicant, too, must compromise, the more so since its limited preemption doctrine expresses a federal, not individual, interest." *DePolo v. Board of Sup'rs of Tredyffrin Tp.*, 105 F.Supp.3d 484, 496 (E.D.Pa., 2015).
 16. Applicant made a "reasonable accommodation" by reducing the tower height and changing the location of the towers in response to neighbor and community member concerns.
 17. Pursuant to 24 V.S.A. § 2296, "Except to the extent bylaws protect historic landmarks and structures listed on the State or National Register of Historic Places, no permit shall be required for placement of an antenna used to transmit, receive, or transmit and receive communications signals on that property owner's premises if the area of the largest face of the antenna is not more than 15 square feet, and if the antenna and any mast support do not extend more than 12 feet above the roof of that portion of the building to which the mast is attached."
 18. Tower #1 in the revised application does not alone require a permit from the Town of Shelburne under 24 V.S.A. § 2296, but, because Tower #1 is not proposed in isolation and because Tower #1 and Tower #2 will be connected via a wire antenna, the TRB considers it together with Tower #2 as part of the Application.
 19. The height of the proposed towers is necessary to accommodate the Applicant's amateur radio operator communication objectives.
 20. Compared to the original towers, the revised tower heights and locations improve the aesthetics of the project from surrounding vantage points, particularly during leaf on conditions.
 21. The revised project represents a reasonable accommodation between the Applicant and the Town and addresses health, safety, and aesthetic concerns brought up during the hearings.
 22. While the TRB is well aware of and agrees with the priorities Shelburne places on its rural areas, the TRB was required to comply with federal regulations in making its decision.

DECISION AND CONDITIONS

Based upon the findings, and subject to the conditions set forth below, the TRB grants approval to Zachary Manganello's Application in its revised form, subject to the following conditions:

1. Applicant shall submit proof of FAA approval to the Town prior to beginning construction of the project.

2. Tower #2 shall be removed should no resident of 4450 Dorset Street hold an amateur radio license from the Federal Communications Commission for any period longer than one year.
3. The towers shall be removed should they not be used for amateur radio communications by a resident of 4450 Dorset Street for any period longer than one year.
4. Applicant shall submit a copy of his FCC license to the TRB each time it is renewed.
5. The Applicant shall post “No Trespassing” signs on a clearly visible location on each tower.
6. The TRB encourages the Applicant and neighbors to work together to consider establishing screening that could protect views from the neighboring properties.
7. Applicant shall provide a financial surety bond payable to the Town of Shelburne and acceptable to the Board to cover the cost of removal of the telecommunications facility and the remediation of the landscape, should the facility cease to operate. Such bond shall be executed prior to construction of the facility in an amount equal to 150% of the estimated cost of removal and site remediation.
8. No commercial advertising shall be allowed on the towers or antenna.
9. Applicant shall not rent or lease space on the towers.
10. The use shall be conducted in a manner consistent with the Application, presentations, and statements of the Applicant at the hearings, and any change in use which would alter the conditions adopted as part of this permit shall require approval by the TRB.

APPEAL RIGHTS

Any person interested in this decision may appeal this decision to the Chittenden County Superior Court, Civil Division within 30 days of the decision, in writing.

VOTING AND EXECUTION

Dated in Shelburne, Vermont this 17th day of February 2021 for the hearing closed on December 17, 2020.

[continues]

TELECOMMUNICATIONS REVIEW BOARD

Jason Grignon

Signed by: Jason Grignon
Date & Time: 17/02/2021 18:11:52 EST

Jason Grignon
Megan McBride

Signed by: Megan McBride
Date & Time: 17/02/2021 20:06:47 EST

Megan McBride
Stephen Selin

Signed by: Stephen Selin
Date & Time: 17/02/2021 20:23:43 EST

Stephen Selin
Neil Curtis

Signed by: Neil Curtis
Date & Time: 17/02/2021 19:49:29 EST

Neil Curtis
Steve Kendall

Signed by: Steve Kendall
Date & Time: 17/02/2021 19:10:10 EST

Steve Kendall

Signed by: Jean Sirois
Date & Time: 17/02/2021 17:42 CST

Jean Sirois
Jean Sirois
Deb Estabrook

Signed by: Deb Estabrook
Date & Time: 17/02/2021 17:42 EST

Deb Estabrook