



**COMMUNITY DEVELOPMENT SERVICES
PLANNING AND BUILDING DEPARTMENT
LONG RANGE PLANNING**

INTEROFFICE MEMORANDUM

Date: March 14, 2018
To: Honorable Board of Supervisors
From: C.J. Freeland *CJF*
Housing, Community and Economic Development
Subject: Mobile Home Park Space Rent Stabilization

As a result of concerns recently expressed by constituents residing in area mobile home parks, the Chief Administrative Office requested County Counsel and the Planning and Building Department to explore the issues surrounding mobile home park rent stabilization ordinances (RSO). On January 17, 2018, the County met with four constituents representing three mobile home parks: Crestview Mobile Home Park in Placerville, Diamond Springs Mobile Home Park in Diamond Springs, and Greenstone Estates Mobile Home Park in Shingle Springs. The representatives expressed concerns regarding unregulated, and what they fear could be excessive space rent increases, that could have the potential to economically displace mobile home park residents, some of whom may be seniors and/or disabled on limited incomes.

The concerns expressed by the mobile home park residents raised questions regarding the law related to rent stabilization ordinances that provide for rent control in mobile home parks, the legal requirements or limitations, the procedure to implement such an ordinance, the positive or negative aspects of adopting such an ordinance and possible alternatives.

It is the intent of this memo to provide a general overview of the main issues surrounding the potential consideration of a rent stabilization ordinance. Whether the identified issues are relevant to El Dorado County is unknown at this time because the County does not have current data on mobile home space availability, existing space rents, comparable and alternative rents, historic rent increases, what is included in rent, affordability, demographics, park amenities, or the condition of existing mobile home parks, including park infrastructure, etc. This type of data is needed in order to put any discussion regarding rent stabilization into context.

The Unique Predicament of Mobile Home Owners in Mobile Home Parks

State regulation of mobile home parks occurred as a result of the recognition that mobile home owners are in a unique situation due to the fact that they own the home (the physical building) but they rent the space that the home sits on. This circumstance makes mobile home owners vulnerable to being economically displaced by unreasonable requirements or unreasonable space rent increases because, despite their name, mobile homes are not that mobile. The cost to move a mobile home is substantial, there is significant risk of damage to the home during the move, and there may not be available space in another suitable location. As a result, mobile homes are rarely moved once placed in a park; if residents move they sell their home in place.

Though the state has addressed a wide variety of issues related to mobile home parks, residency and ownership, the state has left it up to the discretion of each local jurisdiction to determine whether a rent stabilization ordinance is needed and/or desired. Even though the mobile home park residents may be in an unequal bargaining position in relation to the park owners, any consideration of a rent stabilization ordinance must also acknowledge the park owner's property rights and the park owner's ability to make a fair return on their investment. Rent stabilization is obviously an emotional and frequently contentious and litigious issue. Any consideration of such an ordinance will require a thoughtful and delicate balancing of competing interests because all stakeholders have legitimate and understandable concerns.

Mobile Home Park Laws and Regulations¹

The California Department of Housing and Community Development (HCD) is the licensing agency for mobile home parks throughout the state. HCD currently maintains a list of 84 mobile home and RV parks in El Dorado County. Of those listed, 57 are mobile home parks located throughout the county that provide 2,980 mobile home spaces, including 586 spaces in the cities of Placerville and South Lake Tahoe. Any potential rent stabilization ordinance adopted by the County would only apply to mobile home parks in the unincorporated area of the county.

As noted previously, mobile home residency and parks are heavily regulated by state law. However, state law does not regulate the amount of rent that can be charged to a homeowner to lease a space in a mobile home park.

California law governing mobile home parks is entitled "Mobilehome Parks Act" and may be found in Division 13, Part 2.1 of the California Health and Safety Code, commencing with

¹ Information provided by the California Department of Housing and Community Development at <http://www.hcd.ca.gov/manufactured-mobile-home/mobile-home-parks/laws-and-regulations.shtml>

Section 18200. California law governing Special Occupancy Parks² is entitled "Special Occupancy Parks Act" and may be found in Division 13, Part 2.3 of the California Health and Safety Code, commencing with Section 18860. These laws are essentially building codes for mobile homes and mobile home parks. They establish requirements for permits, fees, and responsibilities of park operators and enforcement agencies, including HCD, and require HCD to develop and enforce both the regulations and the laws.

The rights and obligations of mobile home park owners, tenants and management may be found in the "Mobilehome Residency Law" (MRL), (California Civil Code Section 798 et seq.)³. The MRL is extensive and addresses, among other things, specific notice requirements for rent adjustments, rental agreement requirements and restrictions, park rules and regulations, fees and charges, utilities, exemptions from rent control, homeowner communications and meetings, homeowner meetings with management, termination of tenancy, transfer of mobile home or mobile home parks, enforcement, and rights of residents in resident owned subdivisions, cooperatives and condominium parks. Most of the provisions of the MRL were enacted piecemeal over a number of years and eventually codified under Chapter 2.5 of the Civil Code in 1978. Since 1978, a number of sections have been amended and others added to the Code.

HCD does not have authority to enforce Civil Code provisions; therefore, MRL statutes are enforced through the courts. For example, a mobile home park owner must utilize an unlawful detainer procedure (eviction procedure) in a court to evict a homeowner for non-payment of rent or failure to abide by reasonable park rules. By the same token, a mobile home owner must bring legal action, in court, to enforce a notice or other MRL requirement, or obtain an injunction, if the management will not otherwise abide by the MRL.

Mobile home parks are not subject to the Costa-Hawkins Rental Housing Act, a law passed by the California Legislature and signed by the Governor in 1995. This law allows apartment owners in rent control communities to establish initial rental rates when there is a change in occupancy at a dwelling unit – a policy known as "vacancy decontrol." Vacancy decontrol means that a landlord may charge any amount of rent for a unit that is under rent control following a legal vacancy. Current state law prohibits any locality in California from imposing rent control on single family homes and other units like condominiums or townhomes that were built after 1995.

² Health and Safety Code Section 18862.43 defines a Special Occupancy Park as a recreational vehicle park, temporary recreational vehicle park, incidental camping area, or tent camp.

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=18862.43.

³ Mobilehome Residency Law: <http://www.hcd.ca.gov/manufactured-mobile-home/mobile-home-ombudsman/docs/MRL.pdf> . Courtesy of the California Senate Select Committee on Manufactured Home Communities.

Rent Stabilization Ordinances

There are approximately 482 incorporated cities⁴ and 58 counties in California. According to the Mobile Home Park Homeowners Association⁵ (MHPHOA), approximately 92 cities (19 percent) and eight counties (13 percent) in California have some type of rent control or rent stabilization ordinance (RCOs/RSOs). A majority of these ordinances were initiated between the early 1980's and late 1990's. RCOs/RSOs limit allowable space rent increases both in amount and frequency, and some limit the initial space rent that can be charged following a vacancy.

RCO and RSO laws are known primarily for favoring tenant's rights, because these laws help stabilize rent levels. Typically, park owners do not favor rent control laws because it can greatly limit returns on their investment property. Some cities and counties have included vacancy decontrol regulations into their RCO/RSO to protect landlords. Vacancy decontrol regulations set space rent at market or near market rate levels following a legal vacancy and regulates the raising of rent thereafter. In some cases, vacancy decontrol provides guidelines as to how much higher the new rent can exceed the previous rent on the unit (for example, 10 percent), which takes effect when a new tenant signs the lease.

Just as the needs of each jurisdiction are unique, the provisions in each RSO will vary concerning the limits on annual space rent increases, full or partial vacancy controls or decontrols, fair rate of return determinations, and administrative fees imposed.

Although rent control ordinances have withstood legal challenge, litigation is still prevalent in this area because the concept of a "fair return" or a constitutional minimum rate of return does not lend itself to a precise definition. Existing ordinances utilize varying formulas for allowable rent increases and varying methodologies for determining a fair rate of return for the park owner. Litigation arises either as a facial challenge to the ordinance or as an as-applied challenge which is frequently related to situations in which owners seek rent increases above the normally allowable increase under the ordinance (fair return petition process).

RSOs do not apply to mobile home owners who have signed a lease greater than 12 months duration (Civil Code Section 798.17) or to newly constructed spaces initially held out for rent after January 1, 1990. With certain specified exceptions, the mobile home space is also exempt if it is not a principal residence of the homeowner and the homeowner has not rented the mobile home to another party (Civil Code Section 798.21).

Even though cities and counties have the authority to enact mobile home park rent stabilization ordinances, public entities must show that a legitimate government purpose exists to adopt such

⁴ League of California Cities (as of 2011) <http://www.cacities.org/Resources/Learn-About-Cities>

⁵ Mobile Home Park Homeowners Association web site: <https://mhphoa.com/ca/rso/>

an ordinance. Most public entities that have adopted mobile home park RSOs conducted detailed surveys of both mobile home owners and park owners in order to obtain factual information to support adoption of the ordinance. Just as all mobile home parks are not created equal, RSOs must be fashioned to balance the limits on rent increases with the increasing costs of park utilities, infrastructure, amenities and maintenance.

Recent Case Studies

Alameda County and Humboldt County have recently amended or adopted rent stabilization ordinances. The case studies discussed below provide examples of a County-initiated and a voter-initiated RSO program.

In March 2017 the Alameda County Board of Supervisors amended their 1990 Mobile Home Park Rent Stabilization Ordinance⁶ for the first time to, among other things, reduce the annual allowable space rent increase from five percent (5%) to a flat four percent (4%) and to provide full vacancy decontrol that allows park owners to charge a new space rent of any amount for a mobile home space whenever a lawful space vacancy occurs. The staff report to the Alameda Board that accompanied the item stated that the motion being presented (to adopt the revisions) “was the culmination of two years of public process, including stakeholder meetings, public meetings and discussions with District staff and related parties.”

In November 2016, Humboldt County voters passed Measure V, adopting an ordinance to regulate rent increases for spaces in their 42 mobile home parks with 10 or more spaces in the unincorporated area of Humboldt County. The Humboldt Board of Supervisors certified the election results on December 13, 2016, incorporating the Mobile Home Rent Stabilization⁷ Ordinance into the County Code. Measure V obligated Humboldt County to administer the ordinance.

The Humboldt Ordinance locked in space rents as of November 1, 2016, allowing future rent increases as follows: annual increases after May 1, 2017, will be based on 100 percent of Consumer Price Index (CPI) for all items for all urban consumers for the San Francisco-Oakland-San Jose area as reported by the Department of Labor, Bureau of Labor Statistics (the CPI for 2018, published January 12, 2018, is 3.2 percent); rent increase upon sale or move in of a new tenant is limited to a maximum 5 percent; rent increases for new capital improvements,

⁶ Alameda County Housing & Community Development Department, Mobile Home Parks web site:

<http://www.acgov.org/cda/hcd/mobilehome/index.htm>

⁷ Humboldt County Mobile Home Rent Stabilization web site: <https://humboldt.gov/2283/Mobile-Home-Rent-Stabilization-Ordinance>

with approval of a majority of the tenants; and, increase due to right of fair return, with proper noticing as determined by a county-appointed hearing officer.

Space Rent

Rent increases under an RSO are often linked to a percent of the increase in the Consumer Price Index and/or set through a hearing process. From 2011 to 2017 the Consumer Price Index (CPI)⁸ for California increased an average of 2.1 percent. The El Dorado County Health and Human Services Agency, through cooperation with the former Board-appointed Mobile Home Task Force, conducted space rent surveys of mobile home parks located in the county in 2002 and 2007. Current data on local space rents is not available to determine if rent increases have significantly exceeded increases in the CPI or other economic indicators.

Affordable Housing

The Housing Element of the El Dorado County General Plan includes provisions for the County to provide for the development and preservation of affordable housing in the unincorporated areas of the county. Affordable housing is defined by the Federal Department of Housing and Urban Development (HUD) standard as having a total housing cost that does not exceed 30 percent of household income. Housing costs that exceed 50 percent of household income is considered overburdened.

Because some seniors live on fixed incomes dictated by Social Security and other retirement benefits, those who do not own their homes are significantly affected by rising housing costs. Also, while some seniors may prefer to live in single-family detached homes, others may desire smaller, more affordable homes with less upkeep, such as condominiums, townhouses, apartments, or mobile homes. As reported in the most recent Housing Element, as of 2007 nearly 87 percent of unincorporated El Dorado County's housing stock was made up of single-family detached homes, leaving only 15 percent of the housing stock for those who choose to or must live in other forms of housing. Recent construction activities have been primarily for single-family detached homes. There has not been significant development of multifamily housing or other alternative forms of housing over the past 10 years.

Three Housing Element Policies specifically address mobile home parks: Policy HO-2.5: The County shall encourage manufactured home subdivisions; Policy HO-3.3: The County shall support efforts to convert mobile home parks where residents lease their spaces to resident ownership of the park; and, Policy HO-3.4: The conversion of mobile home parks to housing that is not affordable to very low-and low-income households shall be discouraged.

⁸ California Department of Industrial Relations, Consumer Price Index, historic data (1914-2017) at: <https://www.dir.ca.gov/OPRL/capriceindex.htm>

As stated earlier, the County does not have current data on space availability, existing space rents, comparable and alternative rents, historic rent increases, what is included in rent, affordability, demographics, park amenities, or the condition of existing mobile home parks, including park infrastructure, etc. The lack of current data for local mobile home park rents and alternatives rents prevent any conclusion that mobile home parks are or are not affordable to those residents.

County Ordinance Proposal

In accordance with Board Policy A-3⁹, Ordinances – New or Amended, new ordinances and ordinance amendments must be presented to the Board for conceptual review and authorization to prepare the draft ordinance or ordinance amendment. There is an exception for minor amendments to existing ordinances that are the result of changes in state or federal laws or regulations, or in the case of urgency ordinances governed by Government Code Section 25120.

The preparation necessary for the Board to consider adoption of a countywide mobile home park rent stabilization ordinance would require a significant commitment of County resources to conduct surveys, analyze data, and conduct public and stakeholder meetings.

The cost of administering an RSO would depend on the program design. Many California jurisdictions have instituted rent review boards, rent administrators, or mobile home park mediation boards to administer their RSO program. The cost to administer a RSO is usually passed along to park owners and residents in the form of an administration fee per space for those protected by the RSO. Other costs associated with hearings and appeals are passed on to the parties bringing the action forward.

Mobile Home Park Conversions

A mobile home park "conversion" usually refers to a change in the ownership structure of the park from a rental park owned by a park operator/investor to a resident owned community. It can also refer to the conversion of a park to a different use where a park ceases to be operated as a mobile or manufactured home park.

The California Civil Code Section 798.56 (MRL) and Government Code Section 65863.7 (Planning and Land Use) establish requirements regarding notification of mobile home park residents when conversion to a different use, closure of a mobile home park, or cessation of use of the land as a mobile home park is proposed.

⁹ El Dorado County Board of Supervisors Policy Manual web site:
https://www.edcgov.us/Government/BOS/Policies/Pages/policy_manual.aspx#SectionD

Government Code 65863.8 sets forth requirements for analysis of the impact of the conversion, closure or cessation of use on the displaced residents. The availability of adequate replacement housing in mobile home parks and relocation costs, among other things, must be addressed. If conversion to a resident owned community is done under the Subdivision Map Act¹⁰ (SMA), specific SMA statutes apply regarding notices, impact reports, rights to purchase, and increases in rent for non-purchasers. The SMA establishes a minimum standard for local regulation of conversions of mobile home parks into other uses; however the code does “not prevent a local agency from enacting more stringent measures.”

The conversion of mobile home parks into condominium subdivisions under the SMA requires the park owner to convert each pad into a separate property interest, or “condominium.” Once the separate interests are created, the park operator must offer each existing tenant the option to either purchase the space or condominium or to continue residency as a tenant. This conversion process can take anywhere from 18 months to several years.

This has become controversial because the conversion process is said to effectively nullify the application of the local RSO once the park is converted; however, the law provides protections for residents who do not or cannot purchase their spaces. To minimize economic displacement of non-purchasing residents, the SMA requires the park operator to phase out rent control over a four year period for non-lower income non-purchasing residents. Rent increases that may be charged to lower income non-purchasing residents are limited to the lower of a CPI increase or the average space rent increase for the last four years. This rent increase protection remains as long as the resident resides in the park and is low income; however, it does not carry forward to new tenants.

The Golden State Manufactured Home Owners League (GSMOL)¹¹ reports that there are over 40 jurisdictions in California, primarily cities that have Mobile Home Park Closure and/or Conversion Ordinances. These closure ordinances outline more stringent procedures to be followed in the event a park owner applies for a permit to close or convert the park to another use. This type of ordinance became important several years ago when real estate prices skyrocketed and developers became very interested in purchasing mobile home parks to convert them to commercial and other uses.

According to GSMOL, state code only loosely protects mobile home residents in case of a park closure so it became critical for jurisdictions to design special ordinances to protect the rights of

¹⁰ Subdivision Map Act - Government Code Section 86410
https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=2.&title=7.&part=&chapter=1.&article=1

¹¹ GLMHOL Mobile Home Park Closure Conversion Ordinances <https://www.gsmol.org/resources/ordinances/>

mobile home owners who are frequently lower-income seniors and families on fixed incomes. Key provisions of most conversion ordinances include expanded criteria for an impact report, relocation counselor requirements, in-place market value to be used as a standard for reimbursement of home value to the displaced resident, comparable relocation provisions, and payment of full costs of moving the mobile home and fixtures.

The Housing Element of the County General Plan under Measure HO-2013-23 directs the County to develop a mobile home park conversion policy with measures to encourage retention of mobile home and manufactured home housing, aid in relocation, and provide compensation to owners and residents. The County prepared a draft ordinance in 2007 with the cooperation of a Board-appointed Mobile Home Task Force, but the effort was unsuccessful. The County does not have a Mobile Home Park Closure or Conversion Ordinance in place at this time.

Arguments For and Against Rent Stabilization

Following a limited on-line document review, the occurrence of the same general arguments for and against rent stabilization can be found. In the absence of local data, there are no compelling arguments for or against a countywide RSO.

Mobile home owners in favor of RSOs contend that: 1) mobile home park rent stabilization provides relief to mobile home park tenants from excessive rent increases; 2) a shortage of mobile home spaces exists in the area causing artificial increase in space rent; 3) mobile homes are costly and difficult to move; 4) excessively high space rent drives down the price of mobile homes should an owner elect to sell a mobile home; and 5) high rental rates will more negatively impact seniors and other persons on a fixed income.

Park owners and others opposed to RSOs contend that: 1) mobile home park rent rates should be left to adjust themselves by operation of market forces without government intervention; 2) rent control imposes a severe and continuing burden on the landowner. For example, if rent restrictions are too onerous, rents cannot keep up with inflation; repair and/or replacement of aging infrastructure is difficult; no incentive to make new investments; concern about pass-through of increases in taxes, assessments and fees; pass through of major improvements; maintenance and repair costs are always increasing; 3) RSOs are technical and complicated, are costly to prepare, and implementation requires considerable staff time and public hearing time; 4) RSOs require administrative oversight thus requiring additional staff which must be managed, supervised and funded by a public entity; and 5) RSOs have been the subject of a great deal of litigation and a public entity may incur substantial legal expenses and costs to defend a lawsuit.

Additional arguments for and against a RSO can, and have been made. Providing an exhaustive list would be impossible, and as stated earlier, all stakeholders have legitimate and understandable concerns.

Alternatives to Rent Stabilization

Several jurisdictions around the state have adopted alternative measures to an RSO in order to address rent insecurities in their communities. These RSO alternatives include Model Leases and Memorandums of Understanding (MOU); Resident Assistance Programs (Space Rent Subsidy); conversion to resident ownership; County purchase of mobile home parks to stabilize rents; and purchase by non-profit entities.

The City of West Sacramento has adopted a voluntary program as an alternative to a RSO. A Mobile Home Park Task Force was established in 2008 to develop a Mobile Home Park Improvement Plan¹² consisting of a standardized rental agreement (Model Lease), operating standards, and an infrastructure improvement fund. The program was amended in 2009 with an ordinance to require park owners in the jurisdiction to report rent increases annually to ensure the City stays informed of and continues to monitor rent increases in mobile home parks.

Other cities have adopted RSOs with a provision that park owners that have executed a Memorandum of Understanding (MOU) with the jurisdiction would be exempt from the RSO. The MOUs might specify that all residents will be offered long term leases including moderate rent increase limits. For example, the Model Lease provides for space rents to rise at the CPI plus the pass-through of property taxes and capital improvements, and by 15 percent on vacancy. The public cost to develop and implement the RSO was not mitigated in this case by the MOU option. However, an MOU option without a RSO would more closely resemble the West Sacramento model.

In some rare cases, cities have used local redevelopment funds (no longer available in California) or public housing authority funds to either purchase mobile home parks outright to manage rents or to create a subsidy program to assist rent-challenged, low income mobile home owners. Some subsidy programs have been funded through agreements with park owners in lieu of RSOs or as part of the RSO.

¹² City of West Sacramento, Community Development, Mobilehome Parks at http://www.cityofwestsacramento.org/city/depts/comdev/hci/community_investment_activities/mobilehome/default.asp

As described in a case study included in the 2008 Marina Mobile Home Report by Michael St. John¹³, Stanislaus County formed an Ad Hoc committee to negotiate with a park ownership group to address substantial rent increases in those parks the group owned in Ceres, Modesto and Riverbank. Negotiations ultimately failed. The Committee proceeded to draft a mobile home park rent control ordinance for consideration by the County culminating a year of meetings with tenant groups and mobile home park owners. No countywide RSO was agreed upon at the time¹⁴.

Conclusion

As previously stated, in the absence of local data, there is no compelling argument for or against a countywide RSO. It is unclear if the group of constituents who met with County staff in January 2018 represents a significant number of mobile home park residents with rent increase concerns, or if there is significant or compelling evidence for the County to divert its limited resources to undertake a lengthy and time consuming RSO process. To determine if El Dorado County mobile home park residents require legal protection from excessive space rent increases, a study of current space rent, historic annual rent increases, demographics, and comparable rents must be explored.

When the City of Marina commissioned a study in 2007 to look into the status of mobile home park residency in the City, they began by asking relevant questions to inform their study. Many of these same questions could help inform the County of El Dorado, should the Board of Supervisors provide direction to staff to move forward with a study for a countywide RSO.

1. Are the mobile home space rents in the County too high, too low, or about average?
2. Is there a problem about space rents that the County should address?
3. Are the prices at which mobile homes are selling reasonable, considering the overall market?
4. Is there an actual or perceived problem that rent control might address?
5. Is there a rent problem or an income problem that can be addressed?
6. Has something changed from the situation that has prevailed, without rent control, for many years?
7. Are park owners in any way exploiting the "captive" nature of the mobile home resident/mobile home park relationship?
8. Are mobile home residents more financially challenged than homeowners or apartment dwellers in the County?

¹³ St. John & Associates, Articles & Reports, Marina Mobile Home Report, December 2008, Michael St. John, et al. at <http://stjohnandassociates.net/propertyManagementArticles.html>

¹⁴ Board of Supervisors of the County of Stanislaus Agenda Summary at <http://www.stancounty.com/bos/agenda/2007/20070327/e01.pdf>

9. Is it possible or likely that space rents in the County would increase significantly in the foreseeable future?
10. Have space rents increased significantly in surrounding communities?
11. How do mobile home parks fit into the County's plans for future development, including plans for creating and preserving affordable housing?
12. What might be the effects of rent control on residents, park owners, taxpayers, and the County?
13. How do the costs of mobile home residency compare to the costs of living in a single-family home or an apartment in the county?
14. Are there alternative programs that might balance the market and address financial insecurity more effectively than rent control?
15. Are there mobile home residents for whom paying space rent is a financial burden?

While development of a rent control ordinance will require significant and difficult decision points regarding issues such as determining the amount of allowable increases, frequency of increases, and vacancy control or decontrol, there are a fair number of existing ordinances that the County can draw from in drafting a proposed ordinance.

The more fundamental and difficult questions are whether or not rent control is appropriate for El Dorado County and whether or not rent control will have the intended effect of advancing and preserving affordable housing. Answering these questions is complicated by the fact that there are numerous studies and papers written to address some of the multitude of issues and economic impacts associated with rent control ordinances. As would be expected with such a contentious subject, there are varying expert opinions as to the effectiveness of rent control to advance and preserve affordable housing.

Developing a countywide RSO will require an extensive amount of research and analysis and stakeholder engagement. The experience of other jurisdictions that have considered adopting a rent control ordinance, whether successfully or not, demonstrates that it is a long complicated process because housing insecurity stirs deep emotions, but at the same time, all stakeholders have legitimate and understandable concerns and arguments for and against this type of ordinance.

Please let me know if you have any questions or require additional information relative to this matter.

- c. Karl Weiland
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