

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-1125, SUB 9
DOCKET NO. W-1125, SUB 10

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1125, Sub 9

In the Matter of)	
Greater Kinnakeet Shores Home Owners, Inc.)	
c/o Pat Weston, P. O. Box 853, Avon, North)	
Carolina 27915,)	
Complainant)	
v.)	ORDER APPOINTING
Outer Banks/Kinnakeet Associates, LLC.,)	CAROLINA WATER SERVICE,
Defendant)	INC. OF NORTH CAROLINA AS
)	EMERGENCY OPERATOR,
)	APPROVING RATES, AND
)	REQUIRING CUSTOMER
DOCKET NO. W-1125, Sub 10)	NOTICE AND SUBMISSION OF
)	CUSTOMER INFORMATION
In the Matter of)	
Kashf Ain, 17715 Dry Mill Road, Leesburg,)	
Virginia 20175,)	
Complainant)	
v.)	
)	
Outer Banks/Kinnakeet Associates, LLC.,)	
Defendant)	

BY THE COMMISSION: On June 28, 2022, the Commission issued an order in the above-referenced dockets directing Outer Banks/Kinnakeet Associates, LLC (OBKA) to appear before the Commission on Friday, July 22, 2022, at 10:00 a.m. in Commission Hearing Room 2115, Dobbs Building, 430 North Salisbury Street, Raleigh, North Carolina, and show cause why the Commission should not exercise its authority under N.C. Gen. Stat. § 62-116(b) to appoint an emergency operator to furnish sewer utility service to the Kinnakeet Shores subdivision¹. Docket No. W-1125, Sub 9 involves the complaint of

¹ In the order granting this franchise to OBKA and approving rates in Docket No. W-1125, Sub 0, the franchise area included the Kinnakeet Shores Subdivision and nearby commercial development, including Hatteras Plaza, Sun Coast Realty Office, U.S. Post Office – Avon, and Kinnakeet Shores Clubhouse, in Dare County. Any reference to the Kinnakeet Shores subdivision and abbreviations for same

Greater Kinnakeet Shores Home Owners, Inc. (HOA) against OBKA, and Docket No. W-1125, Sub 10 involves the complaint of Kashf Ain against OBKA. Both complaints pertain to OBKA's ownership and operation of the Kinnakeet Shores Wastewater Treatment Plant (WWTP).

The order also, among other things, consolidated Docket No. W-1125, Sub 9 and Docket No. W-1125, Sub 10, scheduled an expert witness hearing on these consolidated dockets to be held in conjunction with the show cause hearing, and directed the participation of the Public Staff by providing expert witness testimony related to the allegations of the complaints and the Commission's investigation into whether to appoint an emergency operator.

On July 22, 2022, following the show cause and expert witness hearing, the Commission issued an order finding that a real emergency exists at the WWTP, as the WWTP is in very poor condition and in need of significant repair, is in non-compliance with its permits, is not treating wastewater received, is not providing customers adequate service, and as OBKA does not have the technical, managerial, and financial capacity to become compliant with its obligations. (Emergency Order) In the Emergency Order, the Commission instructed the Public Staff to (1) confirm whether Carolina Water Service, Inc., of North Carolina (CWSNC) is willing to serve as emergency operator and, if so, pursuant to what conditions; (2) confirm whether OBKA consents to the appointment of an emergency operator; and (3) report to the Commission as soon as possible, but no later than noon on Friday, July 29, 2022, on the foregoing matters.

On July 29, 2022, the Public Staff filed its report stating that Ray E. Hollowell, Jr. (Mr. Hollowell), sole company official and managing member of OBKA, had yet to confirm whether OBKA consents to the appointment of an emergency operator, but that CWSNC is willing to serve as the emergency operator of the OBKA owned Kinnakeet Shores WWTP and Kinnakeet Shores Collection System (WWTP), subject to certain conditions.

CWSNC CONTINGENCIES AS EMERGENCY OPERATOR

The Public Staff states in its report that CWSNC's agreement to serve as the emergency operator of the WWTP is contingent upon the following conditions, quoted verbatim below:

1. CWSNC intends to operate the Kinnakeet Shores system with contract labor and provide management and oversight through use of its existing CWSNC staff in North Carolina;
2. CWSNC anticipates being able to begin serving as emergency operator for the Kinnakeet Shores system two weeks after being appointed;
3. CWSNC has requested that the Commission's Order appointing CWSNC as the emergency operator clearly state:

in this Order includes those commercial properties and any additional commercial properties currently serviced by the Kinnakeet Shores WWTP for any use throughout this order.

- a. That CWSNC as emergency operator shall not be responsible for, or liable for, any acts, omissions, system operations and maintenance, or system installations, occurring prior to the date of the appointment as emergency operator.
- b. That CWSNC shall have no responsibility for OBKA's handling of customer deposits, if any, or any other obligations or liabilities of OBKA arising from its operation of the water and wastewater utility systems.
- c. That CWSNC shall not be responsible for, or liable for, any acts, omissions, obligations, or liabilities of OBKA; Ray E. Hollowell, Jr. (Mr. Hollowell); the owners of any property on which the utility assets are located, or any of them.
- d. That CWSNC as emergency operator shall be made financially whole by being reimbursed for all capital investment for replacements and upgrades, earn the Commission approved return on CWSNC's capital investments, earn the Commission approved operating margin on CWSNC's reasonable operating expenses, recovering all of CWSNC's reasonable operating expenses as emergency operator.
- e. That there be a true up at the time CWSNC is relieved of its duties.
- f. That upon appointment of CWSNC as emergency operator, the customers of this system shall be subject to the applicable CWSNC uniform rates.
- g. That CWSNC as emergency operator may petition the Commission at any time to be discharged as the emergency operator, which discharge the Commission shall approve.

Public Staff Report at 2-3. The Public Staff states that it fully supports the conditions required by CWSNC for its appointment as Emergency Operator.

CWSNC'S PLAN TO ALLEVIATE EMERGENCY

The Public Staff also provides information concerning CWSNC's plan to alleviate the emergency that currently exists within the Kinnakeet Shores WWTP and Kinnakeet Shores Collection System. The Public Staff states that based on North Carolina Department of Environmental Quality (DEQ), Division of Water Resources (DWR), Water Quality Regional Operations Section records, and its preliminary due diligence, CWSNC anticipates spending no less than \$1,000,000 for necessary replacements and upgrades to the WWTP. In its preliminary due diligence, CWSNC identified the immediate needs which must be addressed to alleviate the emergency, and materially improve the operation and compliance status of the WWTP to require repairing or replacing: (a) the existing irrigation system for effluent disposal; (b) critical pumps, motors, and blowers;

(c) electrical systems; (d) emergency generator; (e) UV disinfection system; (f) stairs and walkways; (g) building roof; and (h) tank coatings.

The Public Staff states that CWSNC has agreed to immediately invest its own funds to expedite the system improvements and bring the system closer to permit compliance. While CWSNC's advancement of the plant improvement capital funds will greatly accelerate the necessary renovations and replacements, CWSNC would be fully reimbursed for the expeditious capital renovations through eventual distribution of the bond funds and rates subject to true up. Per the Public Staff, CWSNC notes that this process will be more expedient than postponing renovations until after the Commission receives the forfeited bond proceeds. The Public Staff states that the costs for the necessary immediate improvements are estimated to materially exceed OBKA's existing \$110,000 bond amount.

The Public Staff notes that obtaining qualified entities to serve as emergency operators has become more difficult, and traditional ratemaking approaches have failed to compensate emergency operators for the substantial financial and management resources required to operate and maintain a water or wastewater utility system owned by another entity. Therefore, the Public Staff recommends the following:

- a. CWSNC be authorized to earn a return on investment in plant and recover the annual depreciation expense related to the investment. The Public Staff maintains that an appropriate return would be the overall rate of return of 7.14% which is the same return approved for CWSNC for its other North Carolina service areas by general rate case order issued April 8, 2022, in Docket No. W-354, Sub 384, which is based on a capital structure of 49.80% long-term debt with an embedded cost of 4.85%, and 50.20% common equity with an equity return of 9.40%.
- b. That CWSNC may petition the Commission for approval to adjust the rate of return to the most recent approved rate in its most recent rate case order.
- c. That CWSNC should be allowed to earn a margin on its reasonable and prudent operating expense. As CWSNC would receive the annual depreciation funds as its plant investment declines, the operating margin would not apply to the depreciation expense as is normal rate making practice under the operating ratio Montclair method previously approved by the Commission. The Public Staff recommends that a 7.14% operating margin will be fair compensation for CWSNC given the magnitude and difficulty of its responsibilities as emergency operator of the OBKA sewer utility system.

Id. at 5-6.

The Public Staff states that CWSNC should be allowed to charge Kinnakeet Shores' customers its current uniform sewer rates. CWSNC's current rates have been in effect since April 8, 2022, pursuant to the Commission's Order in Docket No. W-354,

Sub 384. Based on the ratemaking approach described in the preceding paragraphs, the Public Staff recommends that the Commission appoint CWSNC as emergency operator of the OBKA sewer utility system and grant a rate increase from OBKA's current rates to CWSNC's uniform flat rate sewer charges on a provisional basis as exemplified in Appendix A attached to the Public Staff's Report.

OBKA'S REFUSAL TO CONSENT TO APPOINTMENT OF CWSNC AS EMERGENCY OPERATOR

OBKA has fully participated in this matter with the filing of responsive pleadings, a motion to strike, a motion to dismiss, representation by three separate attorneys, and the filing of memoranda stating the utility's vacillating positions on the direction the utility would prefer the matter to proceed.

On the morning of July 22, 2022, the day of the hearing, Mr. Hollowell filed an affidavit through the utility's attorney, Patrick Buffkin, stating that he, on behalf of OBKA, executed an Asset Purchase Agreement between OBKA and Currituck Water and Sewer, LLC. (Currituck), in contemplation of the sale of the Company's assets, subject to the Commission's approval of the transfer of the OBKA's certificate of public convenience and necessity.

Also on July 22, 2022, at the beginning of the show cause and expert witness hearing which began at 10:00 a.m., Mr. Buffkin informed the Commission that his representation had been terminated² that morning prior to the commencement of the hearing, and the contract between OBKA and Currituck was no longer being pursued.

Additionally on July 22, 2022, Mr. Hollowell filed in these dockets a letter titled "RESPONSE TO HEARING TODAY, JULY 22, 2022 BEFORE THE NORTH CAROLINA UTILITIES COMMISSION" (July 22 Letter) in which Mr. Hollowell states that despite driving overnight to attend the hearing, he turned around near the Virginia state line to return to Cleveland, Ohio for heart catheterization procedures scheduled for 2:00 p.m. that afternoon. He states that he dismissed his attorney at 7:43 a.m. In the letter, Mr. Hollowell informed the Commission that he was no longer proceeding with the sale of OBKA to Currituck, that he was preparing to sell OBKA to CWSNC and that sales documents regarding the sale to CWSNC would be executed that day. Finally, Mr. Hollowell states in the letter that he was prepared to suggest OBKA's bond funds be given to the new operator, and he would "certainly do the same thing with Carolina Water if that is acceptable to . . . the Commission."

On July 29, 2022, the Public Staff filed a report with the Commission indicating that it had made multiple attempts to contact Mr. Hollowell by telephone and email to confirm whether OBKA consents to the appointment of an emergency operator. The Public Staff states that it received a call from Mr. Hollowell that morning wherein he indicated that he

² Mr. Buffkin is the third attorney to move to withdraw as counsel of record for OBKA in this docket.

would either send an email to the Public Staff or make a filing in these dockets. However, no email or filing was made prior to the noon deadline established in the Emergency Order for a response.

Following the noon deadline on July 29, 2022, Mr. Hollowell emailed the Public Staff correspondence (July 29 Email) stating that his consent to the appointment of an Emergency Operator is contingent upon the designee and that OBKA objects to the appointment of CWSNC as the emergency operator. In this correspondence, Mr. Hollowell informs the Commission that OBKA has again entered into an agreement with Currituck for the sale of the WWTP and will not enter into a purchase agreement with CWSNC “now or at anytime in the future.” The information provided in the July 29 Email directly contradicts the information provided in the July 22 Letter, a contradiction Mr. Hollowell freely admits in paragraph 11 of the July 29 Email.

CONCLUSION

While Mr. Hollowell’s correspondence has repeatedly provided consent to the appointment of an emergency operator, he is under the mistaken impression that he can direct which company the Commission may choose to appoint as that emergency operator. Mr. Hollowell states in his July 29 Email that he has had time to “further consider the best and most expeditious course of action to meet the needs of the community.” However, that analysis is within the sole purview of the Commission and not up to the discretion of any party or utility appearing before it. Mr. Hollowell has filed an affidavit and other statements stating that he intends to transfer this OBKA facility first to Currituck, then to CWSNC, and then a reversal back to Currituck; but a search of the docket shows that no transfer application has been filed and no docket has been reserved to accept the filing of a transfer application. The Commission is not persuaded by Mr. Hollowell’s filings and finds that Mr. Hollowell’s communications lack candor. Mr. Hollowell’s actions have stalled and thwarted the provision of adequate sewer service to the residents and property owners of Kinnakeet Shores subdivision.

OBKA and Mr. Hollowell, sole company official and managing member of OBKA, have failed to act on the requirements of the North Carolina Utilities Commission, the North Carolina Division of Environmental Quality (DEQ), and the Public Staff, as described in the Commission’s Order Declaring an Emergency and Directing Public Staff to Identify Emergency Operator issued on July 22, 2022. Mr. Hollowell has refused to voluntarily surrender control of the system and has failed to properly maintain and operate the WWTP in accordance with State standards and provide adequate, and in some instances any, sewer utility service to his customers. He has refused to make the needed repairs to have the moratorium lifted, refused to alleviate the emergency conditions affecting the service territory, and refused to take action to stop current and continual damage to the surrounding environment, which constitutes an abandonment of this system.

The failure of OBKA to provide adequate sewer utility service to the franchise area continues to constitute an emergency as defined in N.C.G.S. § 62-116(b)³ and, in addition, OBKA's failure and continued refusal to alleviate the emergency has reached such an egregious level as to constitute an abandonment of the system. Moreover, this emergency situation will only worsen with the continued and constant inflow of untreated sewage to the WWTP, and there is no alternative supplier of wastewater treatment available to these customers.

OBKA has been given more than ample opportunity to correct the problems on its own or surrender the system to allow a viable operator to alleviate the emergency, yet has refused to do so. Accordingly, the Commission finds that it should appoint CWSNC as the emergency operator of the WWTP pursuant to N.C.G.S. § 62-116(b), and hereby does grant emergency and temporary operating authority to CWSNC, who now successfully operates water and sewer systems in the coastal areas of North Carolina and is willing and capable of assuming the duties of emergency operator for the Kinnakeet Shores WWTP and Kinnakeet Shores Collection System.

Because of OBKA's lack of response to continued requests from the DEQ and the Public Staff to improve its system, the system is in a dilapidated and malfunctioning state. Therefore, the Commission should restrict the use of the lands, rights-of-way, ponds, and all facilities of the WWTP for the provision of sewer utility service and require OBKA to immediately turn over the customer names, addresses, and billing information concerning the Kinnakeet Shores subdivision no later than Wednesday, August 10, 2022, at 5:00 p.m., by filing the detailed and complete list confidentially in the Commission's STAR database.

Due to increasing difficulty in finding emergency operators and the failure of traditional ratemaking approaches to compensate emergency operators for the substantial financial and management resources required to alleviate emergency conditions and operate and maintain a wastewater utility system owned by another entity, implementing increased rates pursuant to the rate structure proposed by CWSNC and recommended by the Public Staff is just and reasonable and should be approved. Accordingly, CWSNC should be allowed to charge Kinnakeet Shores' customers its current uniform flat rate sewer charge on a provisional basis. CWSNC's current rates have been in effect since April 8, 2022, pursuant to the Commission's Order in Docket No. W-354, Sub 384.

The Commission shall maintain jurisdiction over the emergency operator and these proceedings should any further order be required in the future.

³ Section 62-116(b) defines an emergency as the imminent danger of losing adequate water or sewer utility service or the actual loss thereof.

IT IS, THEREFORE, ORDERED, as follows:

1. That OBKA has abandoned the Kinnakeet Shores WWTP and Kinnakeet Shores Collection System in Dare County and that a real emergency continues to exist in this service area because there is a loss of adequate sewer utility service and an actual loss thereof for certain customers;

2. That the appointment of CWSNC as an emergency operator pursuant to N.C.G.S. § 62-116(b) is necessary to take control of and operate the public utility system of Kinnakeet Shores subdivision in order to alleviate the existing emergency and assure the continued operation of the sewer utility system;

3. That CWSNC is hereby appointed as the emergency operator of the Kinnakeet Shores WWTP and Kinnakeet Shores Collection System in Dare County subject to the conditions listed in the preceding paragraphs of this Order;

4. That OBKA be, and hereby is, in conjunction with the appointment of an emergency operator, required to: (a) make the lands, facilities, and rights-of-way, ponds, and other facilities used to render sewer utility service to all of the customers of Kinnakeet Shores subdivision available for continued use in providing such service; (b) refrain from putting the lands, rights-of-way, ponds, and other facilities heretofore used and being used to provide sewer utility service to all of the customers of Kinnakeet Shores subdivision to any other use; and (c) refrain from taking any action to frustrate, impede, impair, or interfere with such continued use of the lands, rights-of-way, ponds, and all facilities heretofore used and being used to provide sewer utility service to all of the customers of Kinnakeet Shores subdivision;

5. That OBKA is compelled to turn over to CWSNC immediately all of OBKA's customers' names, addresses, and billing information concerning the Kinnakeet Shores sewer utility customers no later than Wednesday, August 10, 2022, at 5:00 p.m., by filing a complete list, confidentially, in the Commission's online filing system;

6. That CWSNC is authorized to charge Kinnakeet Shores' customers its current uniform flat rate sewer charge on a provisional basis, said rates having been in effect since April 8, 2022, pursuant to the Commission's Order in Docket No. W-354, Sub 384;

7. That a copy of the Notice to Customers, attached hereto as Appendix A shall be mailed or hand delivered to all Kinnakeet Shores' customers within ten business days of the date the confidential list of customers is filed in this docket, and that the CWSNC shall submit to the Commission the attached Certificate of Service, properly signed and notarized, not later than ten days after the date the confidential list of customers is filed in this docket;

8. That the Schedule of Rates, attached hereto as Appendix B, is hereby approved and deemed filed with the Commission pursuant to N.C.G.S. § 62-138;

9. That the Commission shall retain jurisdiction and supervision over the emergency operator for the duration of the emergency and that CWSNC as emergency operator may petition the Commission at any time to be discharged as the emergency operator, which discharge the Commission shall approve with good cause shown; and

10. That the Commission shall provide such other and further relief as deemed necessary and required in this matter.

ISSUED BY ORDER OF THE COMMISSION.

This the 3rd day of August, 2022.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in black ink that reads "Erica N. Green". The signature is written in a cursive style with a large, stylized initial "E".

Erica N. Green, Deputy Clerk

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. W-1125, SUB 9
DOCKET NO. W-1125, SUB 10

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. W-1125, Sub 9

In the Matter of
Greater Kinnakeet Shores Home Owners, Inc.
c/o Pat Weston, P. O. Box 853, Avon, North
Carolina 27915,

Complainant

v.

Outer Banks/Kinnakeet Associates, LLC.,
Defendant

NOTICE TO CUSTOMERS OF
KINNAKEET SHORES SEWER
UTILITY SYSTEM

DOCKET NO. W-1125, Sub 10

In the Matter of
Kashf Ain, 17715 Dry Mill Road, Leesburg,
Virginia 20175,

Complainant

v.

Outer Banks/Kinnakeet Associates, LLC.,
Defendant

NOTICE IS HEREBY GIVEN that the North Carolina Utilities Commission (Commission) has appointed Carolina Water Service, Inc. of North Carolina (CWSNC) as emergency operator for the Kinnakeet Shores sewer utility system in Dare County, North Carolina.

CWSNC is currently serving as emergency operator for multiple water and wastewater utility systems throughout North Carolina. CWSNC owns and operates ten wastewater treatment plants and collection systems in the coastal region, the closest being The Village at Nags Head, which is approximately 40 miles away from the Kinnakeet Shores system. The Public Staff – North Carolina Utilities Commission recommended that CWSNC be appointed emergency operator.

In its preliminary due diligence, CWSNC identified the need for immediate system renovations and replacements in order to materially improve the operation and compliance of the Kinnakeet Shores sewer utility system. These immediate improvements will include repair or replacement of (a) the existing irrigation system for effluent disposal, (b) critical pumps, motors, and blowers, (c) electrical systems, (d) emergency generator, (e) disinfection system, (f) stairs and walkways, (g) building roof, and (h) tank coatings. These improvements will take a period of time to complete.

That upon appointment of CWSNC as emergency operator, the customers of this system shall be subject to CWSNC's uniform flat rate sewer charges on a provisional basis, subject to true up at the time CWSNC is relieved of its duties. The Schedule of Provisional Rates is attached hereto as Appendix B. The provisional rates will increase the monthly residential bill for homes with three bedrooms or less from \$37.44 to \$85.12. The increase will vary for residential and commercial customers greater than one REU.

CWSNC will begin as emergency operator on August 17, 2022. The telephone number to call CWSNC for service issues and billing questions is 800-525-7990.

Customers may review the complete Commission Order dated August 3, 2022, appointing CWSNC emergency operator on the Commission's website (www.ncuc.net) by clicking on Docket Search under Dockets portal; then for Docket Number, entering W-1148 Sub 9, and clicking on Documents to locate the Order dated August 3, 2022.

ISSUED BY ORDER OF THE COMMISSION

This the 3rd day of August, 2022.

NORTH CAROLINA UTILITIES COMMISSION

A handwritten signature in black ink that reads "Erica N. Green". The signature is written in a cursive, flowing style.

Erica N. Green, Deputy Clerk

SCHEDULE OF PROVISIONAL RATES

for

OUTER BANKS/KINNAKEET ASSOCIATES, LLC
(Carolina Water Service, Inc. of North Carolina, Emergency Operator)

for providing sewer utility service in

KINNAKEET SHORES SUBDIVISION,
PHASES 6 THROUGH 12 AND 15 THROUGH 22,
HATTERAS PLAZA, SUN COAST REALTY OFFICE,
HATTERAS REALTY COMPLEX, US POST OFFICE – AVON
AND KINNAKEET SHORES CLUBHOUSE

Dare County, North Carolina

Monthly Flat Rate Service, per SFE or REU: \$ 85.12

Multi-residential customers who are served by a master
meter shall be charged the flat rate per unit. \$ 85.12

New Sewer Customer Charge: \$ 27.00

Connection Fee: \$2,500 per REU ^{1/}, with a minimum of \$2,500

Reconnection Charge: ^{2/}

If sewer service is cut off by utility for good cause: Actual Cost

MISCELLANEOUS UTILITY MATTERS

Charge for processing NSF Checks: \$ 25.00

Bills Due: On billing date

Bills Past Due: 21 days after billing date

Billing Frequency: Bills shall be rendered monthly

Finance Charge for Late Payment: 1% per month will be applied to the
unpaid balance of all bills still past due
25 days after billing date.

Notes:

^{1/} REU = Residential Equivalent Unit = 360 gallons/day design flow utilizing the 2T Rules.

^{2/} The utility shall itemize the estimated cost of disconnecting and reconnecting service and shall furnish this estimate to customer with cut-off notice. Customers who request to be reconnected within nine months of disconnection at the same address shall be charged the base facility charge for the service period they were disconnected.

Issued in Accordance with Authority Granted by the North Carolina Utilities Commission in Docket No. W-1125, Subs 9 and 10, on this the 3rd day of August, 2022, effective August 17, 2022.

CERTIFICATE OF SERVICE

I, _____, mailed with sufficient postage or hand delivered to all affected customers the attached Notice to Customers issued by the North Carolina Utilities Commission in Docket No. W-1125, Subs 9 and 10, and the Notice was mailed, or hand delivered by the date specified in the Order.

This the ____ day of _____, 2022.

By: _____
Signature

Name of Utility Company

The above named Applicant, _____, personally appeared before me this day and, being first duly sworn, says that the required Notice to Customers was mailed or hand delivered to all affected customers, as required by the Commission Order dated _____ in Docket No. W-1125, Subs 9 and 10.

Witness my hand and notarial seal, this the ____ day of _____, 2022.

Notary Public

Printed Name

(SEAL) My Commission Expires: _____
Date