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January 31, 2008

VIA U.S. Mail

The Honorable Carlos M. Gutierrez
Secretary of Commerce
Herbert C. Hoover Building
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

OS EXECUTIVE SECRETARIAT
2008 FEB 7 4 PM 12:16

RE: Notice of Appeal of G. Walter Swain from Objection of the Delaware Department of Natural Resources & Environmental Control to the Consistency for the Swain's Marina Project

Dear Secretary Gutierrez:

Enclosed for filing on behalf of G. Walter Swain in accordance with 15 C.F.R. § 930.125, is the above-referenced Notice of Appeal under the Coastal Zone Management Act ("CZMA"), 16 U.S.C. §§ 1451 *et seq.* A check in the amount of \$500.00 for payment of the appeal fee specified in 15 C.F.R. § 930.125(c) is also enclosed.

If I can be of any further assistance, please do not hesitate to contact me at 302-674-3841.

Respectfully Submitted,



John W. Paradee

JWP/lwr

Enclosures

cc: Mr. Joel La Bissonniere, Assistant General Counsel for Ocean Services w/enclosures
Ms. Sarah W. Cooksey, DNREC Division of Soil and Water Conservation w/enclosures
The Honorable John A. Hughes, Secretary of DNREC w/enclosures

**UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF COMMERCE**

G. WALTER SWAIN,

Appellant,

v.

DELAWARE DEPARTMENT OF NATURAL
RESOURCES AND ENVIRONMENTAL
CONTROL,

Respondent.

Case No. _____

**APPEAL OF G. WALTER SWAIN UNDER THE
COASTAL ZONE MANAGEMENT ACT**

On January 3, 2008, the Delaware Department of Natural Resources and Environmental Control's Division of Soil and Water Conservation ("DNREC") objected to G. Walter Swain's ("Applicant") certification of his project's consistency with the Delaware Coastal Management Program ("DCMP"). Mr. Swain hereby requests that—under Section 307(c)(3)(A), 16 U.S.C. § 1456(c)(3)(A), of the Coastal Zone Management Act ("CZMA" or "the Act")—the Secretary of Commerce override DNREC's objections to the certification of his project's consistency with the DCPM. As a threshold matter, DNREC's objections are invalid under 15 C.F.R. § 930.129(b). DNREC's objections should also be overridden on a substantive basis under 15 C.F.R. § 930.121. The grounds for this appeal are as follows:

1. DNREC's objection was not in compliance with § 307(c)(3)(A) of the Act and the regulations in Subpart D of 15 C.F.R. § 930. As a threshold matter, therefore, DNREC's

objection is invalid under 15 C.F.R. § 930.129(b). Mr. Swain filed his request for a Coastal Zone Consistency Determination with DNREC on April 25, 2005. Since then, DNREC (i) repeatedly delayed its review without justification; (ii) improperly stayed the six-month consistency review period; (iii) failed to timely identify specific enforceable policies under the DCPM with which the project is inconsistent; and (iv) failed to provide Mr. Swain with timely notice of the reasons for the substantial delay in its review.

2. The project for which Mr. Swain provided the Consistency Certification is consistent with the objectives or purposes of the Act—16 U.S.C. § 1456(c)(3)(A)—and 15 C.F.R. § 930.121.

Factual Background

1. Mr. Swain owns land at the confluence of Cedar Creek and Mispillion River, on County Road 203 in Milford, Sussex County, Delaware. This location has been used commercially as a marina since before the 1930s and was formerly the site of a 26 slip marina owned by Ms. Dorothy Bennett.

2. In 1992, a hurricane destroyed much of the marina and its structures. At the time of the storm there were 106 mooring pilings and 26 boat slips.

3. On July 7, 1997, the Applicant filed an application with DNREC for a subaqueous land permit (CL-3807/97) to repair and replace the marina and structures that were destroyed by the 1992 storm. DNREC issued the permit on June 1, 1998 for 38 slips.

4. The Applicant then filed a Section 10/404 application with the U.S. Army Corps of Engineers after receiving the DNREC permit. Due to various delays, however, the DNREC permit expired before the federal permit review was completed.

5. In 2004, the Applicant again began the process to rebuild the marina—into a project called “Swain’s Marina.” He hired an environmental consulting firm, Environmental Resources, Inc., and began compiling the information needed for the application process.

6. On April 14, 2005, the Applicant filed an application for a Subaqueous Lands Permit with DNREC’s Division of Water Resources. An application for the appropriate permits was also filed with the U.S. Army Corps of Engineers.

7. On April 25, 2005, the Applicant requested a federal consistency determination for Swain’s Marina with respect to the Delaware Coastal Management Program from DNREC’s Division of Soil & Water Conservation.

8. On May 25, 2005, DNREC acknowledged receipt of Mr. Swain’s request and sent a letter to the Applicant requesting additional information for Federal Consistency Determination (FC 05.083).

9. After receiving the letter, Mr. Swain’s environmental consultant, David Hardin, corresponded with representatives from DNREC by phone and email in order to get the necessary materials together. An August 2, 2005 email from Bonnie Willis at DNREC further explained what DNREC’s issues were and what additional materials were required.

10. On January 12, 2006, the Applicant provided the additional information to DNREC in response to the May 25, 2005 letter and August 2, 2005 email. On January 31, 2006, DNREC acknowledged receipt of the information, stated that the application was now ready for review, and set a deadline for its review to be completed by April 17, 2006.

11. Mr. Swain’s project was then placed on public notice by DNREC for a period of 30 days on February 5, 2006.

12. On March 23, 2006, the Applicant received another letter from DNREC informing him that his review period was being extended by 90 days and that additional information was again required. The deadline was unilaterally reset to July 17, 2006.

13. On June 30, 2006, the Applicant got another letter from DNREC asking for more information and informing the Applicant that it would not complete its review of the project within the 180 day period. DNREC then stated that if the Applicant did not agree “to place the project on hold” it would be denied based on “insufficient information” under 15 C.F.R. § 930.64(d).

14. DNREC also required that the Applicant submit additional information within 90 days of the letter, and then DNREC would get a new full 180-day review period. Facing no other options, Mr. Hardin signed the agreement on July 13, 2006, thereby extending the review period to an unspecified date.

15. On July 5, 2006, the Applicant provided additional requested materials to DNREC.

16. On September 29, 2006, DNREC sent Mr. Hardin a letter reminding him that the materials responsive to DNREC’s June 30, 2006 request were due by October 16, 2006, although DNREC would be willing to grant a request for an extension.

17. On October 14, 2006, the Applicant, through Mr. Hardin, requested a 30-day extension, agreeing to provide the additional materials by November 16, 2006.

18. On November 16, 2006, the Applicant provided DNREC with all the additional information DNREC had requested, thereby again completing the application process and restarting DNREC’s new 180-day review period, which would now set the deadline at May 16, 2007—although this was never explicitly set out in a written agreement between the parties.

19. May 16, 2007 came and went, and the Applicant heard nothing from DNREC about his Consistency Determination request. Despite repeated efforts to inquire about the status, the Applicant received no response.

20. After hearing nothing from DNREC for eight months after submitting the final materials, the Applicant hired legal counsel. On July 16, 2007, counsel for the Applicant sent DNREC a letter inquiring as to the status of the review. DNREC ignored this correspondence as well. Hearing nothing, a follow-up letter was sent on August 20, 2007, informing DNREC that legal action would be taken if it continued to ignore Mr. Swain and his application.

21. On August 30, 2007, DNREC finally responded and informed the Applicant that the application was taking longer to review than usual. Regarding the substantial delay, DNREC informed counsel for the Applicant that the “project was placed on HOLD on July 13, 2006.” Despite the terms of the *temporary* stay agreement Mr. Hardin signed on July 13, 2006, giving DNREC another 180-day period, DNREC’s new position was that the project was on an indefinite HOLD for as long as it chose. DNREC gave the Applicant no deadline for its review or any indication how long its “HOLD” would be.

22. After hearing nothing for over another month, counsel for the Applicant sent a letter to the Secretary of DNREC again inquiring about the status and the reason for the undue delay.

23. After hearing nothing from DNREC for another three months, DNREC’s Division of Water Resources objected to the Applicant’s consistency certification on January 3, 2008.

24. DNREC’s decision came over two-and-a-half years (32 months) from the date Mr. Swain filed his application. After missing two consecutive 180-day review periods, DNREC

unilaterally decided to put the project on an indefinite “hold” without ever informing the Applicant or getting his consent.

**DNREC’s Consistency Objection Did Not Comply With
Coastal Zone Management Act or its Regulations**

Regulation 15 C.F.R. § 930.129(b) states that, as a threshold matter, “if the State agency’s consistency objection is not in compliance with Section 307 of the Act and the regulations contained in [subpart D of 15 C.F.R. Part 930], the Secretary shall override the State’s objection.” In this case, the State’s objection did not comply with § 307 of the Act and with 15 C.F.R. § 930.60 (Subpart D). DNREC’s objection, therefore, must be overridden.

1. DNREC’s Unreasonable Delay and Indefinite “Hold” on the Project’s Certification Violated Section 307(c)(3)(A) of the CZMA

Section 307(c)(3)(A) of the Act states, in relevant part, that:

At the earliest practicable time, the state or its designated agency shall notify the Federal agency concerned that the state concurs with or objects to the applicant’s certification. If the state or its designated agency fails to furnish the required notification within six months after receipt of its copy of the applicant’s certification, the state’s concurrence with the certification shall be conclusively presumed.¹

In this case, Mr. Swain submitted his certification of consistency on April 25, 2005. After complying with DNREC’s request to submit additional information, on January 31, 2006, DNREC acknowledged receipt of the information and stated that the application was ready for review, starting the 180-day review period. Although DNREC set an initial deadline of April 17, 2006, it later extended the deadline to July 17, 2006—still within the original 180-day review period from January 31, 2006.

¹ 16 U.S.C. § 1456(c)(3)(A).

On June 30, 2006, however, DNREC requested additional information and informed the Applicant that it would not complete its review of the project within the 180 day period—by July 17, 2006. DNREC then strong-armed the Applicant into agreeing to a stay, threatening that if the Applicant did not agree “to place the project on hold” it would be denied based on “insufficient information” under 15 C.F.R. § 930.64(d).

The terms of the “agreement” dictated by DNREC were that the Applicant had 90 days to submit the additional requested information after which DNREC would get a new 180-day review period. On November 16, 2006, the Applicant provided DNREC with all the additional information DNREC had requested, thereby again completing the application process and restarting DNREC’s new 180-day review period, which would now set the deadline at May 16, 2007—although this date was never explicitly set out in a written agreement between the parties.

Although all necessary information for DNREC’s review of the Applicant’s consistency certification was provided on November 16, 2006, DNREC failed to furnish the required notification whether it concurred with or objected to the Applicant’s certification within six months after second 180-day review period. Under § 307(c)(3)(A) of the Act, DNREC’s concurrence with the Applicant’s certification was thus presumed.

DNREC’s objection to the Applicant’s consistency certification, more than six months after the receipt of the Applicant’s completed certification request, violates § 307(c)(3)(A) of the Act.

2. DNREC’s Unreasonable Delay and Indefinite “Hold” on the Project’s Certification Violated 15 C.F.R. § 930.60 (Subpart D)

Section 930.60(a) states that “the State agency’s six-month review period (see § 930.62(a)) of an applicant’s consistency certification begins on the date the State agency receives the consistency certification required by Sec. 930.57 and all the necessary data and information

required by § 930.58(a).” This occurred on January 31, 2006, when DNREC acknowledged the receipt and sufficiency of the information submitted by the Applicant and informed him the review period had begun.

Section 930.60(c) states that:

The State agency’s determination that a certification and necessary data and information under paragraph (a) of this section is complete is not a substantive review of the adequacy of the information received. If an applicant has submitted all necessary data and information required by § 930.58, then a State agency’s or Federal agency’s assertion that the submitted information is substantively deficient, or **a State agency’s or Federal agency’s request for clarification of the information provided, or information or data requested that is in addition to that required by § 930.58 shall not extend the date of commencement of State agency review.**

In this case, after DNREC had advised the Applicant his certification was complete, DNREC sent a letter on March 23, 2006 requesting additional data and extending the date of the agency’s review. More information was again requested on June 30, 2006, and this time DNREC forced the Applicant to consent to an improper “hold” on its review. Both of these actions violate 15 C.F.R. § 930.60(c).

Regarding DNREC’s “hold” on the certification process, 15 C.F.R. § 930.60(b) states that:

(b) State agencies and applicants (and persons under subpart E of this part) may mutually agree in writing to stay the six-month consistency review period. **Such an agreement shall be in writing and state a specific date on when the stay will end.** The State agency shall provide a copy of the written agreement to the Federal agency and the Federal agency shall not presume State agency concurrence with an applicant's consistency certification when such a written agreement to stay the six-month consistency review period is in effect. **The State agency shall not stop, stay, or otherwise alter the consistency review period without such a written agreement with the applicant.**

Here, DNREC told the Applicant that it could either agree to its improper “hold” on the project or face an improper objection. DNREC threatened that it would object to the Applicant’s

consistency based on insufficient information even though it previously told the Applicant his certification was complete. DNREC's heavy-handed agreement, however, violates 15 C.F.R. § 930.60(b) for the following reasons:

The Agreement does not state a *specific date when the stay will end*. Instead, the Agreement says that the Applicant has 90 days to submit his information and then a *new* 180-day period will begin. DNREC, however, did not give a new end date—likely because it never intended to meet it anyway. DNREC acknowledged that the Applicant had provided all the new required information on November 16, 2006. Thus, 180 days from November 16, 2006, would be May 16, 2007. That would be the *latest* DNREC's new deadline could be. But, DNREC did not provide its consistency determination by May 16, 2007. Instead, DNREC took over *eight months* from that date to make its determination. This unreasonable and unjustifiable delay violated 15 C.F.R. § 930.60(b).

The Applicant did not consent to an indefinite “hold” as DNREC suggests. In response to Mr. Swain's lawyer's letter, on August 30, 2006, DNREC responded that “if the review requires time beyond the 180 days, the State agency and applicant may mutually agree to suspend the consistency time clock (HOLD) extending the review period until all matters can be resolved.” This statement is both legally and factually wrong.

First, 15 C.F.R. § 930.60(b) provides for no such indefinite “hold” until “all matters can be resolved.” Rather, it requires that any “agreement shall be in writing and state a specific date on when the stay will end.” That did not happen here. Second, the Applicant never agreed to an indefinite “hold” on the project. The terms of the agreement stated that after he provided all new required information, a new 180-day period would begin. That began on November 16, 2006. Section 930.60(b) does not allow—or even mention—indefinite holds, and even if it did, the

Applicant never agreed to one. For these additional reasons, DNREC's unreasonable and unjustified delay violated 15 C.F.R. § 930.60(b).

3. DNREC's Violation of § 307 and 15 C.F.R. § 930 (Subpart D) Requires that, as a Threshold Matter, the Secretary Override DNREC's Consistency Objection

In light of DNREC's procedural violations, the Secretary must override DNREC's consistency objection as a threshold matter under 15 C.F.R. § 930.129(b).

The Application is Consistent With the Objectives of the CZMA

DNREC's consistency objection must also be overridden for another independent reason; Mr. Swain's project is consistent with the objectives and purposes of the CZMA. Under 15 C.F.R. § 930.121 "a federal license or permit activity, or a federal assistance activity, is 'consistent with the objectives or purposes of the Act' if it satisfies each of the following three requirements:"

(a) The activity furthers the national interest as articulated in § 302 or § 303 of the Act, in a significant or substantial manner.

(b) The national interest furthered by the activity outweighs the activity's adverse coastal effects, when those effects are considered separately or cumulatively.

(c) There is no reasonable alternative available which would permit the activity to be conducted in a manner consistent with the enforceable policies of the management program. The Secretary may consider but is not limited to considering previous appeal decisions, alternatives described in state objection letters and alternatives and other information submitted during the appeal.

Mr. Swain's project satisfies these three requirements.

1. The Swain's Marina Project Furthers the National Interest in a Significant and Substantial Manner

The Swain's Marina project promotes the national interest defined in Sections 302 and 303 of the Act, in a significant and substantial manner. Section 302(a) of the Act states that "there is a national interest in the effective management, beneficial use, protection and

development of the Coastal Zone.” Similarly, Section 302(a) of the Act states that “the coastal zone is rich in a variety of natural, commercial, recreational, ecological, industrial, and esthetic resources of immediate and potential value to the present and future well-being of the Nation.”

In this case, the Swain’s Marina project will revitalize the marina for the commercial, recreational, and aesthetic benefits that the public has enjoyed since before the 1930s. As noted above, this site was been continuously operated as a marina in Delaware from before 1930 through 1992, when a storm destroyed the infrastructure. In 1997, when Mr. Swain began his efforts to bring back the marina, due to high public demand, DNREC issued him a permit. The marina would have been rebuilt at that time except for timing and delay issues regarding federal permits from the Army Corps of Engineers. Mr. Swain is now simply seeking to return the site to the vibrant coastal commercial and recreational hub it once was. This goal is consistent with § 302 of the Act.

Mr. Swain’s project is also consistent with § 303(1) which states the national policy is “to preserve, protect, develop, and where possible, *to restore or enhance*, the resources of the Nation’s coastal zone for this and succeeding generations.” Similarly, §§ 303(2)(E) and (F) are realized through Swain’s Marina which state:

to encourage and assist the states to exercise effectively their responsibilities in the coastal zone through the development and implementation of management programs to achieve wise use of the land and water resources of the coastal zone, giving full consideration to ecological, cultural, historic, and (sic) esthetic values as well as the needs for compatible economic development, which programs should at least provide for—

(E) public access to the coasts for recreation purposes,

(F) assistance in the redevelopment of deteriorating urban waterfronts and ports, and sensitive preservation and restoration of historic, cultural, and esthetic coastal features.

Swain's Marina will once again allow the public to access the waters along the Mispillion River where they have for decades and will redevelop and revitalize the marina's current dilapidated and damaged structures. This project will greatly benefit the citizens of Delaware and the public at-large by revitalizing this once vibrant area with a new, modern marina. The recreational, commercial, cultural, historic, and aesthetic improvements this project will bring to the area will benefit the national interest in a significant and substantial manner and promote the tenets of the CZMA.

2. The National Interest Furthered by the Swain's Marina Project Outweighs Any Putative Adverse Coastal Effects

The impact of the Swain's Marina Project on Delaware's coastal zone is overwhelmingly positive and beneficial to the public. To the extent any adverse coastal effects are not wholly mitigated, they are far outweighed by the substantial national benefits of the Project.

DNREC's objections to Swain's Marina and its determination that the project is inconsistent with the policies of CZMA and DCMP are based entirely on speculation. DNREC's generalized and broad allegations of harm to the area's wildlife and habitat are unsupported by any scientific or objective evidence.

DNREC's conclusion that the marina poses an unacceptably high potential for significant adverse impacts to rare and threatened shorebird species is not supported by the facts. The Red Knot shorebirds are not classified as either endangered or threatened species in Delaware. Although DNREC had hoped they would be classified as such, a recent determination by the Shorebird Technical Committee refused to classify the Red Knot as either endangered or threatened.

Similarly, DNREC's allegations that the marina would have any detrimental effect on the habitat, breeding, or nesting of the Red Knot is entirely speculative. It cites no scientific studies

conducted by DNREC, or any other agency, demonstrating any adverse impact by the proposed marina. The conclusion that the public would somehow be adversely affected by the marina is entirely unsupported by any objective evidence and is likewise speculative at best. The proposed marina would be constructed on Mr. Swain's private property and the public would have the benefit of its use. As discussed, the site had been a marina since before the 1930 until the time of the storm in 1992. Other than citing to unrelated and irrelevant documents and articles regarding shorebirds, DNREC's denial cites no evidence that the marina would adversely affect the public in any way.

Finally, DNREC's conclusion that the marina will have an adverse effect on water quality in the area is similarly based entirely upon pure conjecture. Other than generalized and vague allegations of adverse impact, the denial provides no evidence, scientific or otherwise, as to the effect of the marina on water quality. This site operated as a marina for decades, and was given a permit in 1997, without any concerns about water quality.

For these reasons, DNREC's objection to Mr. Swain's consistency certification is inconsistent with the CZMA, DCMP, and all of the other regulations cited by DNREC.

3. There Is No Reasonable Alternative

DNREC's consistency objection neither proposes nor suggests any reasonable alternative to the project as proposed. Additionally, DNREC fails to consider the history of the site or its own previous conduct with respect to the marina and the surrounding area, as is proper under 15 C.F.R. § 930.121(c).

Specifically, the site has been used as a marina for decades. DNREC has previously granted a marina permits for the site, and in 2002, granted permits for a site immediately adjacent to Mr. Swain's property, without requiring the owner to provide any of the application

submissions or supporting materials, evidence, and documentation which DNREC required Mr. Swain to submit in the instant case.

Furthermore, on numerous occasions, DNREC and its officers and/or employees have made offers, on behalf of the State, to purchase Mr. Swain's property (albeit at a price far less than the property's fair market value). DNREC and its officers and/or employees have repeatedly delayed the processing and consideration of Mr. Swain's application without just cause, in an effort to "wear down" Mr. Swain, in hopes that Mr. Swain would either agree to sell his property to the State or simply give up and forbear upon any further pursuit of his application. DNREC's goal all along appears to have been to prevent Mr. Swain's project, regardless of its substantive merits or compliance with the CZMA.

Request for Secretarial Action

For these reasons, and for the reasons and evidence to be set forth in the Applicant's Opening Brief, the Applicant respectfully asks the Secretary to find and conclude that:

1. DNREC failed to comply with Section 307 and Subpart D of the NOAA regulations and, therefore, pursuant to 15 C.F.R. § 930.129(b), all of DNREC's objections must be overridden.

2. The Swain's Marina Project is consistent with the objectives and purposes of the Act and, as such, all of DNREC's objections must be overridden.

Reservation of Rights

The Applicant reserves all rights to raise and address such other procedural or substantive issues that may be necessary or appropriate in support of its appeal.

Respectfully Submitted,

BY: John W. Paradee by KMB
John W. Paradee, Esquire (DE Bar #2767)
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(302) 674-3841
Attorneys for the Applicant/Appellant

DATED: January 31, 2008

CERTIFICATE OF SERVICE

Consistent with 15 C.F.R. § 930.125 and DNREC's objection letter, copies of this notice of appeal have been sent to the following:

VIA U.S. Mail

Secretary Carlos M. Gutierrez
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PRICKETT, JONES & ELLIOTT, P.A.

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PNC BANK DELAWARE
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62-8/311

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MEMO


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