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BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for a Key
Employee License Regarding:

DARREN REED

Applicant.

CGCC Case No. CGCC-2019-0411-4G
BGC Case No. BGC-HQ2019-00014SL

DECISION AND ORDER

Hearing Date: September 25, 2019
Time: 10:00 a.m.

This matter was heard by the California Gambling Control Commission (Commission) pursuant to Business and Professions Code sections 19870 and 19871 and Title 4, California Code of Regulations (CCR) section 12060(b), in Sacramento, California, on September 25, 2019.

Noel Fischer, Supervising Deputy Attorney General, State of California, represented complainant Stephanie Shimazu, Chief of the Bureau of Gambling Control (Bureau), Department of Justice, State of California.

Darren Reed (Applicant) was present at the hearing on his own behalf without representation.

During the administrative hearing, Presiding Officer Russell Johnson took official notice of the following: (1) the Notice and Agenda of Commission Hearing; (2) the Conclusion of Prehearing Conference Letter; (3) the Notice of Evidentiary Hearing and Prehearing Conference with attachments and; (4) Applicant's signed Notice of Defense.

During the administrative hearing, Presiding Officer Russell Johnson admitted into evidence the following exhibits offered by the Bureau:

(1) Statement to Respondent; Statement of Reasons; excerpts from the California Business and Professions Code and California Code of Regulations, Bates Nos. 001-021;

(2) March 6, 2017 (Redacted) Application for Interim Key Employee License, GEKE-002300, Bates Nos. 022-023;

(3) March 13, 2017 Correspondence Re: Interim Key Employee License, GEKE-002300,

1 Bates Nos. 024-026;

2 (4) April 7, 2017 (Redacted) Application for Gambling Establishment Key Employee
3 License and Key Employee Supplemental Background Investigation Information, Bates Nos.
4 027-043;

5 (5) February 26, 2019 (Redacted) Gambling Establishment Key Employee Initial
6 Background Investigation Report, Level III with attachments, Bates Nos. 044-069;

7 (6) March 7, 2019 Notice of Cancellation of Interim Portable Personal Key Employee
8 License, Bates Nos. 070-071;

9 (7) April 11, 2019 Commission Licensing Division Memorandum, Bates Nos. 072-078;

10 (8) April 15, 2019 Referral of Initial Key Employee License Application to an Evidentiary
11 Hearing, Bates Nos. 079-082;

12 (9) April 22, 2019 Notice of Defense signed by Applicant, Bates Nos. 083-085;

13 (10) License History for Darren Reed, Bates Nos. 086-088;

14 (11) (Redacted) Correspondence, Bates Nos. 089-147:

15 a. March 19, 2018 correspondence between Associate Governmental Program
16 Analyst Rick Williams and Applicant, Bates No. 090-097;

17 b. April 2, 2018 correspondence from Applicant to Rick Williams, Bates Nos. 098-
18 100;

19 c. April 20, 2018 correspondence from Rick Williams to Applicant, Bates Nos. 101-
20 102;

21 d. April 25, 2018 correspondence between Rick Williams and Applicant, Bates Nos.
22 103-111;

23 e. May 5, 2018 correspondence from Rick Williams to Applicant, Bates Nos. 112;

24 f. May 16, 2018 correspondence from Rick Williams to Applicant, Bates Nos. 113;

25 g. April 7-May 16, 2018 correspondence between Rick Williams and the State of
26 Nevada Gaming Control Board regarding Applicant's Nevada License information,
27 Bates Nos. 114-121;

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- 1 h. September 10, 2018 correspondence from Rick Williams to Applicant, Bates Nos.
2 122;
- 3 i. September 13, 2018 correspondence from Applicant to Rick Williams, Bates Nos.
4 123-124;
- 5 j. January 15, 2019 correspondence from Andrea Farris, Manager I, Cardroom
6 Licensing Section to Applicant, Bates Nos. 125-126;
- 7 k. January 29, 2019 correspondence from Applicant to Rick Williams and Andrea
8 Farris, Bates Nos. 127-129;
- 9 l. January 30, 2019 correspondence from Rick Williams to Applicant, Bates Nos.
10 130;
- 11 m. January 31, 2019 correspondence from Andrea Farris to Applicant, Bates Nos.
12 131-137;
- 13 o.¹ February 5, 2019 correspondence from Applicant to Rick Williams and Andrea
14 Farris, Bates Nos. 138-146;
- 15 n. February 5, 2019 correspondence from Rick Williams to Applicant, Bates Nos.
16 147;
- 17 (12) Telephone Logs
- 18 a. Rick Williams call to Bass & Associates, April 5, 2018, Bates Nos. 149;
- 19 b. Rick Williams call to Rev Crest Inc., April 5, 2018, Bates Nos. 150;
- 20 c. Rick Williams call to Applicant, September 10, 2018, Bates Nos. 151;
- 21 d. Rick Williams call to U.S. Department of Education, February 5, 2019, Bates Nos.
22 152;
- 23 e. Rick Williams call to Bass & Associates, February 5, 2019, Bates Nos. 153;
- 24 f. Rick Williams call to Rev Crest Inc., February 5, 2019, Bates Nos. 154;
- 25 g. Rick Williams call to Darren Reed, February 5, 2019, Bates Nos. 155;
- 26 h. Rick Williams call to Coast Professionals, February 5, 2019, Bates Nos. 156;

27 ¹ These exhibits were marked out of order and are listed here consistent with the TOC.
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1 i. Rick Williams call to Bass & Associates, February 14, 2019, Bates Nos. 157;
2 (13) *Butte County Credit Bureau A Corp. vs. Tina Marie Reed and Darren J. Reed* (Sup.
3 Ct. Butte County, 2014, No. 162511), Acknowledgement of Satisfaction of Judgment, Bates Nos.
4 158-160;

5 (14) Proof of Service, Bates Nos. 161-162.

6 During the administrative hearing, Presiding Officer Russell Johnson admitted into
7 evidence the following exhibits offered by the Applicant:

8 Exhibit A: Letters of Reference:

- 9 1. Letter of Reference by Richard L. Warner, JR., Bates Nos. 001;
- 10 2. Letter of Reference by Jose Cano, Bates Nos. 002;
- 11 3. Letter of Reference by Julio Garcia, Bates Nos. 003;
- 12 4. Letter of Reference by Tony Wagenman, Bates Nos. 004.

13 At the request of the Commissioners, the record was left open for Applicant to submit
14 additional documents to be admitted into evidence, including 2017 and 2018 tax returns, a copy
15 of Applicant's original Free Application for Federal Student Aid (FAFSA), documents
16 evidencing the debt owed and payments made to the Department of Education and any documents
17 related to the *North Star Capital Acquisition* case.

18 After the hearing, but before the close of the administrative record, Applicant submitted
19 documents to the Presiding Officer. After considering Mr. Fischer's objections to certain
20 documents, the following additional exhibits were admitted into evidence by Presiding Officer,
21 Russell Johnson²:

22 Exhibit C: Debt Resolution Account Information, Bates Nos. 006-007;

23 Exhibit D: Debt Resolution Payment History, Bates Nos. 008-009;

24 Exhibit G: 2017 Tax Return Transcript, Bates Nos. 014-018;

25 Exhibit H: 2018 Tax Return Transcript, Bates Nos. 019-022.

26 The record was closed and the case submitted on November 13, 2019.

27 ² Additional exhibits were submitted, but were not admitted into evidence due to
28 objections received by Mr. Fisher.

1 FINDINGS OF FACT

2 1. Applicant has been employed by Casino 99, located in Chico, California since
3 October 1999. He was employed initially as a house proposition player. On February 26, 2017, he
4 was promoted to the position of shift manager, a key employee position.

5 2. On March 6, 2017, Applicant submitted an Application for Interim Key Employee
6 license.

7 3. On March 13, 2017, the Commission issued Applicant an Interim Key Employee
8 License valid through March 31, 2019, number GEKE-002300.

9 4. On April 7, 2017 the Bureau received Applicant's Application for Gambling
10 Establishment Key Employee License as well as a Key Employee Supplemental Background
11 Investigation Information with attached schedules (collectively "Application").

12 5. On the Application, Applicant stated under penalty of perjury that he had never
13 been a party to any litigation or arbitration and had not had a judgment or lien filed against him
14 within the last 10 years. Applicant also stated that he did not have any unpaid debt/loan turned
15 over to a collection agency or deemed uncollectable within the last 10 years.

16 6. In the course of the Bureau's background investigation, the Bureau determined
17 that Applicant had \$42,718.62 in outstanding federal student loan debt owed to The Department
18 of Education (DOE).

19 7. In the course of the Bureau's background investigation, the Bureau determined
20 that Applicant had two civil judgments rendered against him in the cases of *Butte County Credit*
21 *Bureau A Corp. v. Tina Marie Reed and Darren J. Reed* (Sup. Ct. Butte County, 2014, No.
22 162511) (hereafter *Butte County Credit Bureau*) and *North Star Capital Acquisition v. Darren*
23 *Reed* (Sup. Ct. Glenn County, 2008, No. 08SCV00862) (hereafter *North Star Capital*
24 *Acquisition*).

25 8. On or about February 26, 2019, the Bureau submitted a Gambling Establishment
26 Key Employee Initial Background Investigation Report to the Commission recommending that
27 the Commission deny Applicant's Application on the basis that Applicant has a negative financial
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1 history and provided untrue or misleading information on the Application.

2 9. On March 7, 2019, Applicant's Interim Key Employee License was cancelled
3 pursuant to California Code of Regulations, title 4, section 12354, subdivision (e)(1).

4 10. On April 11, 2019, pursuant to California Code of Regulations, title 4, section
5 12054, subdivision (a)(2), the Commission voted to refer consideration of the Application to an
6 evidentiary hearing to be conducted before the Commission as a Gambling Control Act (GCA)
7 hearing under the provisions of California Code of Regulations, title 4, section 12060.

8 11. Commission staff received a Notice of Defense form from Applicant signed on
9 April 22, 2019 requesting an evidentiary hearing.

10 12. Applicant testified that he enrolled in the University of Phoenix (UOP) with the
11 goal of becoming an Athletic Director. Applicant testified that he was unaware of the total cost of
12 attending UOP when he enrolled and the application process was entirely online. Applicant
13 testified that if he had known it would cost \$42,000 to attend two years of classes at UOP, he
14 would not have enrolled.

15 13. Applicant also testified that his wife handled the family finances until last year and
16 she would be more knowledgeable regarding the reasons that their family was unaware of the
17 outstanding student loan debt at the time he filled out the Application.

18 14. Applicant's wife, Tina Reed, testified that Applicant attended UOP for two years
19 beginning in 2010. Ms. Reed assisted Applicant with his FASFA form. Ms. Reed testified that her
20 understanding in 2010 was that a UOP would send a bill for her husband's classes each semester.
21 Ms. Reed paid the bills as they were received and assumed that any other costs were covered by
22 financial aid. Applicant stopped attending UOP in 2012 and the Reeds did not receive any further
23 bills in the mail from UOP.

24 15. Ms. Reed testified that her first indication that Applicant had unpaid student loan
25 debt occurred in May 2017, when their 2016 tax refund of approximately \$5,000 was withheld by
26 the Internal Revenue Service (IRS). Ms. Reed testified that she was unable to obtain assistance
27 from the IRS by phone and ultimately she sent a letter in an attempt to determine why their tax
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1 refund was withheld. Eventually, Ms. Reed received a letter from the IRS stating that their refund
2 was withheld due to unpaid student loan debt. The correspondence received did not include any
3 information about the lender or total amount owed.

4 16. Ms. Reed testified that around the same time that she received a response from the
5 IRS, she received a letter from a collection agency, TCI, which was retained by UOP. TCI stated
6 that if Applicant paid \$518 the remainder of the amount owed to UOP would be forgiven.
7 Applicant made the payment in October 2017. A letter from TCI was admitted into evidence
8 confirming that Applicant's account was considered resolved as of November 22, 2017. At that
9 point, Ms. Reed and Applicant believed that the withheld taxes coupled with their recent payment
10 fully satisfied Applicant's student loan debt.

11 17. Ms. Reed testified that she received a form relating to the forgiven student loan
12 debt and they claimed the amount of the forgiven debt as income on their taxes. Thereafter, the
13 Reeds did not receive any additional correspondence from a collection agency or the IRS
14 indicating that additional money was owed for Applicant's UOP classes.

15 18. Ms. Reed testified that she was confused that money was owed separately to DOE
16 and UOP. Ms. Reed testified that she didn't realize that UOP was so expensive and it is much
17 more expensive than her own education and her son's tuition at the University of Illinois.

18 19. Ms. Reed testified that prior to notification from the Bureau, she and Applicant
19 were unaware that additional funds were owed to the DOE. Ms. Reed testified that Applicant has
20 since set up a payment plan for his outstanding debt to the DOE.

21 20. During the course of the background investigation, the Bureau's Associate
22 Governmental Program Analyst, Rick Williams, made requests to Applicant for more information
23 regarding his student loan debt. Applicant's responses were consistent with the testimony by
24 Applicant and his wife at the hearing that they incorrectly believed that the Applicant's student
25 loan debt was satisfied after they settled their debt owed to UOP.

26 21. The testimony of Applicant and Ms. Reed that they were not aware of Applicant's
27 outstanding student loan debt at the time Applicant filled out the Application and correspondence
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1 with Mr. Williams was credible.

2 22. The Bureau admitted a Satisfaction of Judgment in the case, *Butte County Credit*
3 *Bureau v. Tina Marie Reed, et al.* The Statement of Reasons alleges that the judgment was
4 rendered against Applicant for approximately \$6,159, but no documentary evidence was admitted
5 to verify the amount of the judgment.

6 23. Ms. Reed testified that she was aware of the judgment against her in *Butte County*
7 *Credit Bureau* case. She became aware of the judgment in approximately 2014 after the court
8 proceedings had already concluded. Ms. Reed stated that the judgment was related to her unpaid
9 medical bills and she told her husband about the unpaid bills in 2014. Ms. Reed testified that she
10 made payments and fully satisfied the judgment by 2017.

11 24. Applicant testified that at the time he filled out the Application and responded to
12 inquiries by Mr. Williams, he did not recall the existence of the *Butte County Credit Bureau*
13 judgment. Applicant's explanation is reasonable given that he was never in court for the *Butte*
14 *County Credit Bureau* case, the judgment related to his wife's medical bills, and his wife was the
15 one who made the monthly payments. Further, the judgment was satisfied in 2017 and Applicant
16 had not discussed the judgment with his wife since 2014. Applicant admits that he should have
17 disclosed the judgment on the Application, but was adamant that he did not intend to withhold
18 information from the Bureau.

19 25. Applicant's testimony that he forgot about the *Butte County Credit Bureau*
20 judgment at the time that he filled out the Application and responded to the Bureau's inquiries
21 was credible.

22 26. The Statement of Reasons alleges that a civil judgment was rendered against
23 Applicant in the case *North Star Capital Acquisition* in the amount of \$3,744. However, no
24 evidence was admitted by the Bureau to substantiate the existence of this judgment.

25 27. Applicant and Ms. Reed both testified that they have no knowledge of the *North*
26 *Star Capital Acquisition* judgment. Ms. Reed testified that she has never seen the judgment and
27 doesn't know if it's against her or her husband or both. Applicant testified that he has made many
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1 attempts to contact North Star Capital Acquisition to determine whether the judgment exists, but
2 he has not been able to confirm it. Correspondence between the Applicant and Mr. Williams
3 demonstrates that Applicant attempted to search online court records and asked Mr. Williams for
4 assistance in identifying what the judgment was for. Based on the evidence, it remains unclear to
5 the Commission whether the *North Star Capital Acquisition* judgment was a liability that
6 Applicant was required to disclose.

7 28. The testimony of Applicant and his wife that they were not aware of the *North Star*
8 *Capital* judgment at the time that Applicant filled out the Application and responded to the
9 Bureau's inquiries was credible. The testimony that Applicant and his wife have been unable to
10 confirm the existence of, or the underlying allegations leading to, the judgment is also credible.

11 29. Applicant and his wife satisfied the judgment in the *Butte County Credit Bureau*
12 case and the outstanding student loan debt owed to UOP. Applicant began making payments to
13 the DOE for the remaining student loan debt after the Bureau notified him of the outstanding
14 balance. Applicant's efforts to resolve these outstanding debts weigh in favor of granting his
15 Application.

16 30. Gary Harris, Community Property Holder with Casino 99 testified that Applicant
17 worked for Casino 99 for three years, first as a dealer and then he was promoted to a key
18 employee. Mr. Harris testified that Applicant is trusted to supervise up to 8 employees and 50
19 players when a tournament occurs. Mr. Harris also testified that Applicant provides great
20 customer service and has not had any disciplinary issues during his tenure at Casino 99.

21 31. Applicant submitted a character reference by Richard Warren, Jr. Mr. Warren
22 wrote that he has known Applicant for over 10 years. Mr. Warren's son was coached by
23 Applicant on a little league team and Mr. Warren also coached high school football with
24 Applicant. Mr. Warren wrote that Applicant is of good moral character, behaves ethically,
25 exhibits good judgment, and works diligently to serve his community.

26 32. Jose Cano wrote that he has known Applicant for 19 years and coached football
27 with Applicant for two seasons. Mr. Cano wrote that Applicant has a tremendous work ethic
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1 while working with student-athletics and has handled his professional responsibilities with zest
2 and positive energy.

3 33. Julio Garcia wrote that he had known Applicant for five years and coached
4 football with him. Mr. Garcia notes that Applicant has positively changed the lives of young
5 students and athletes and has a good work ethic, is loyal, caring, supportive, knowledgeable, and
6 organized.

7 34. Tony Wagenman wrote that he has known the Applicant for fifteen years on a
8 personal and professional level. Mr. Wagenman considers Applicant to be a person of
9 unquestionable integrity and character. Mr. Wagenman shared a story of a situation that occurred
10 when Applicant was a coach and Mr. Wagenman was the President of a youth organization.
11 Applicant had to make the difficult decision of reporting an error to a governing body knowing
12 that it would negatively affect Applicant and his team's standing. Mr. Wagenman wrote that by
13 making the right decision to report the error, Applicant exemplified the traits an organization
14 strives for when searching for mentors for youth.

15 35. The testimony of Mr. Harris coupled with the letters of recommendation, are
16 persuasive that Applicant is a good employee and a person of good character. Applicant has met
17 his burden of proving that he is a person of good character, honesty and integrity.

18 36. All documentary and testimonial evidence submitted by the parties that is not
19 specifically addressed in this Decision and Order was considered but not used by the Commission
20 in making its determination on Applicant's Application.

21 LEGAL CONCLUSIONS

22 37. Division 1.5 of the Business and Professions Code, the provisions of which govern
23 the denial of licenses on various grounds, does not apply to licensure decisions made by the
24 Commission under the Gambling Control Act. Business and Professions Code section 476(a).

25 38. Public trust and confidence can only be maintained by strict and comprehensive
26 regulation of all persons, locations, practices, associations, and activities related to the operation
27 of lawful gambling establishments and the manufacture and distribution of permissible gambling
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1 equipment. Business and Professions Code section 19801(h).

2 39. The Commission has the responsibility of assuring that licenses, approvals, and
3 permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose
4 operations are conducted in a manner that is inimical to the public health, safety, or welfare.
5 Business and Professions Code section 19823(a)(1).

6 40. An “unqualified person” means a person who is found to be unqualified pursuant
7 to the criteria set forth in Business and Professions Code section 19857, and “disqualified person”
8 means a person who is found to be disqualified pursuant to the criteria set forth in Business and
9 Professions Code section 19859. Business and Professions Code section 19823(b). The
10 Commission has the power to deny any application for a license, permit, or approval for any
11 cause deemed reasonable by the Commission. Business and Professions Code section 19824(b).

12 41. The Commission has the power to take actions deemed to be reasonable to ensure
13 that no ineligible, unqualified, disqualified, or unsuitable persons are associated with controlled
14 gambling activities. Business and Professions Code section 19824(d).

15 42. Every key employee shall apply for and obtain a key employee license. Business
16 and Professions Code section 19854(a).

17 43. No person may be issued a key employee license unless the person would qualify
18 for a state gambling license. Business and Professions Code section 19854(b).

19 44. The burden of proving his or her qualifications to receive any license from the
20 Commission is on the applicant. Business and Professions Code section 19856(a).

21 45. At an evidentiary hearing pursuant to Business and Professions Code sections
22 19870 and 19871 and Title 4, CCR section 12060(b), the burden of proof rests with the applicant
23 to prove his or her qualifications to receive any license under the Gambling Control Act. Title 4,
24 CCR section 12060(i). Business and Professions Code section 19856(a).

25 46. An application to receive a license constitutes a request for a determination of the
26 applicant’s general character, integrity, and ability to participate in, engage in, or be associated
27 with, controlled gambling. Business and Professions Code section 19856(b).

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1 47. No gambling license shall be issued unless, based on all of the information and
2 documents submitted, the commission is satisfied that the applicant is a person of good character,
3 honesty and integrity. Business and Professions Code section 19857(a).

4 48. An application for a Key Employee License shall be denied by the Commission if
5 the applicant is found unqualified pursuant to the criteria set forth in subdivisions (a) or (b) of
6 Business and Professions Code section 19857.

7 49. Applicant met his burden of demonstrating that he is a person of honesty and
8 integrity. Therefore, Applicant is qualified for the issuance of a Key Employee License pursuant
9 to Business and Professions Code section 19857(a), but only through compliance with the
10 following condition: Beginning 30 days after the effective date of this Order, and every 180 days
11 thereafter, Applicant must submit to the Bureau proof of payments made or documentation
12 supporting his efforts to resolve his outstanding debt to the Department of Education.

13 50. Applicant met his burden of demonstrating that he is not a person whose prior
14 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the
15 public interest of this state, or to the effective regulation and control of controlled gambling, or
16 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in
17 the conduct of controlled gambling or in the carrying on of the business and financial
18 arrangements incidental thereto. Therefore, Applicant is qualified for the issuance of a Key
19 Employee License pursuant to Business and Professions Code section 19857(b).

20 51. Applicant has met his burden of proving that he is a person that is in all other
21 respects is qualified to be licensed as provided in the Gambling Control Act. Therefore, Applicant
22 is qualified to receive a gambling establishment key employee license pursuant to Business and
23 Professions Code section 19857(c).

24 52. Applicant has met his burden of proving that he is not disqualified from licensure
25 pursuant to Business and Professions Code section 19859.

26 NOTICE OF APPLICANT’S APPEAL RIGHTS

27 Applicant has the following appeal rights available under state law:
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1 Title 4, CCR section 12064, subsections (a) and (b) provide, in part:

2 An applicant denied a license, permit, registration, or finding of suitability, or whose
3 license, permit, registration, or finding of suitability has had conditions, restrictions,
4 or limitations imposed upon it, may request reconsideration by the Commission
5 within 30 calendar days of service of the decision, or before the effective date
6 specified in the decision, whichever is later. The request shall be made in writing to
7 the Commission, copied to the Bureau, and shall state the reasons for the request,
8 which must be based upon either newly discovered evidence or legal authorities that
9 could not reasonably have been presented before the Commission's issuance of the
10 decision or at the hearing on the matter, or upon other good cause which the
11 Commission may decide, in its sole discretion, merits reconsideration.

8 Business and Professions Code section 19870, subdivision (e) provides:

9 A decision of the commission denying a license or approval, or imposing any
10 condition or restriction on the grant of a license or approval may be reviewed by
11 petition pursuant to Section 1085 of the Code of Civil Procedure. Section 1094.5 of
12 the Code of Civil Procedure shall not apply to any judicial proceeding described in
13 the foregoing sentence, and the court may grant the petition only if the court finds
14 that the action of the commission was arbitrary and capricious, or that the action
15 exceeded the commission's jurisdiction.

13 Title 4, CCR section 12066, subdivision (c) provides:

14 A decision of the Commission denying an application or imposing conditions on license
15 shall be subject to judicial review as provided in Business and Professions Code section
16 19870, subdivision (e). Neither the right to petition for judicial review nor the time for
17 filing the petition shall be affected by failure to seek reconsideration.

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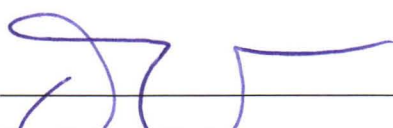
ORDER

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2 1. Applicant Darren Reed's Application for a Key Employee License is
3 APPROVED with the condition that beginning 30 days after the effective date of this Order, and
4 every 180 days thereafter, Applicant must submit to the Bureau proof of payments made or
5 documentation supporting his efforts to resolve his outstanding debt to the Department of
6 Education.


7 2. Each side to pay its own attorneys' fees.

8 This Order is effective on December 16, 2019.

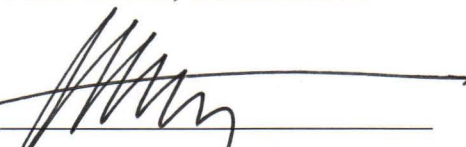
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10 Dated: 12/16/19

Signature: 
11 Jim Evans, Chairman

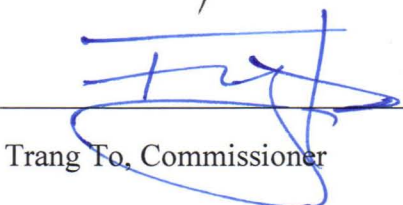
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13 Dated: 12/16/19

Signature: 
14 Paula LaBrie, Commissioner

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16 Dated: 12/16/19

Signature: 
17 Gareth Lacy, Commissioner

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19 Dated: 12/16/19

Signature: 
20 Trang Fo, Commissioner