CLAIM AGAINST THE COUNTY OF STANISLAUS
(Government Code Section 910.et seq.)

Claimants:
Name Michael R. O'Neal SSN# N/A Date of Birth N/A
Address 7818 Rodden Road, Oakdale, CA 95361
Phone Number (858) 759-0200
Name, address and phone number of person to receive notices concerning this claim. Michael A. Conger, Esquire, Law Office of Michael A. Conger, P.O. Box 9374, Rancho Santa Fe, CA 92067

Date and time when damage or injury occurred. April 28, 2009

Location of occurrence. Foster Theater - Gallo Center, 1001 I Street, Modesto, CA 95354

Circumstances of occurrence. See Supplemental Claim Information attached at Exhibit 1.

Description of loss, damage or injury. Pursuant to Government Code Section 910, subdivision (f) the amount exceeds $10,000 and would not be a limited civil case.

Name(s) of County Employee(s) causing injury, damage or loss, if known. StanCERA Board, including Maria De Anda, Jim De Martini, Mike Fisher, Gordon Ford, Darin Gharat, Mike Lynch and Ron Martin

Amount claimed at present including estimated amount of any prospective loss. Pursuant to Government Code Section 910, subdivision (f) the amount exceeds $10,000 and would not be a limited civil case.

Names and addresses of witnesses, doctors and/or hospitals. See attached Exhibit 2.

Claim must be signed and dated by claimant or person acting on claimant's behalf.

DATED: 9/22/2009 SIGNED: _____
Claimant(s)

~WARNING~

Section 72 of the Penal Code provides:

"Every person who, with intent to defraud, presents for allowance or for payment to any state board or officer, or to any county, town, city, district, ward or village board or officer, authorized to allow or pay the same if genuine, any false or fraudulent claim, bill, or account, voucher, or writing, is guilty of a felony"

This document is a public record and pursuant to the California Public Record Act must be made available for inspection and copying upon the request of any person, including, but not limited to a representative of the news media. (Please see California Government Code sections 6250 et seq.)

SEE REVERSE SIDE FOR INSTRUCTIONS

INSTRUCTIONS FOR FILING CLAIMS

1. All claims must be completed in their entirety, giving a precise description of the date, location and circumstances giving rise to the claim. Written estimates or bills, if available, should be attached to claim form. Auto damage requires two written estimates.

2. Claims should be filed with the Board of Supervisors of the County of Stanislaus, 1010 10th St., Suite 6500, Modesto, CA 95354.

3. A claim relating to a cause of action for death or injury to a person or to personal property or to growing crops shall be presented not later than ***six months after the accrual of the cause of action***. A claim relating to any other cause of action shall be presented not later than one year after the accrual of the cause action.

4. All claims shall be signed by the claimant or a person acting on his/her behalf and shall bear the date of such signing.

5. Claims will be deemed filed on date of actual receipt at the Office of the Board of Supervisor.

WARNING: CLAIMS NOT FILED IN ACCORDANCE WITH THESE INSTRUCTIONS MAY BE DEEMED TO BE INSUFFICIENT AND MAY BE REJECTED OR DENIED.

Claims properly filed in accordance with these procedures will be acted upon by the Board of Supervisors, and notice of said action shall be forwarded to the person designated in said claim to receive such notice.

SUBJECT TO CERTAIN EXCEPTIONS, CLAIMANTS HAVE ONLY SIX MONTHS FROM THE DATE THAT NOTICE OR DENIAL IS DEPOSITED IN THE MAIL OR PERSONALLY DELIVERED TO THEM TO FILE A COURT ACTION ON SAID DENIED CLAIM (See Government Code Section 945.6).

A claimant may seek the advice of an attorney of claimant's choice in connection with any action on said claim. If claimant desires to consult an attorney, claimant should do so immediately.

Acceptance of any claim by the Board of Supervisory does not prejudice the rights of the Board to reject or deny a claim determined by the Board to be insufficient or not a proper claim against this governmental agency.

This document is a public record and pursuant to the California Public Record Act must be made available for inspection and copying upon the request of any person, including, but not limited to a representative of the news media. (Please see California Government Code sections 6250 et seq..)

GL:mp
Rev 04/20/09

EXHIBIT 1

EXHIBIT 1

SUPPLEMENTAL CLAIM INFORMATION

Please Note:

This claim is made as a representative claim on behalf of all retired members of the Stanislaus County Employees' Retirement Association ("StanCERA")

On or about April 28, 2009, StanCERA breached its constitutional, fiduciary, and statutory duties by (1) transferring $10 million from a non-valuation reserve used to provide STAR COLA benefits to be applied as an employer contribution for fiscal year 2009-2010; (2) transferring $50 million from the Medical Insurance Fund to valuation reserves for the purpose of further reducing employer contributions; and (3) lengthening the amortization period from 20 to 30 years.

StanCERA's transfer of $10 million from a reserve for the STAR COLA to be used as an employer contribution violates two provisions of the California Constitution, article XVI, section 17(a) (the exclusive benefit rule) and 17(b) (precedence to participants of the system).

StanCERA's transfer $50 million from the Medical Insurance Fund to valuation reserves for the purpose of further reducing the County's contribution violates the same constitutional provisions.

StanCERA's lengthening of the amortization period to 30 years, without assurance from the County that there will be no wage growth during this period, violates Government Code section § 31453.5 (requiring unfunded liability to be amortized).

1. Transfer of $10 Million from STAR COLA Reserve To Offset County's Employer Contribution.

StanCERA is governed primarily by provisions of the California Constitution and the Government Code. The constitutional provisions applicable here are article XVI, section 17(a) and (b), which provide in relevant part:

> "(a) . . . The assets of a public pension or retirement system are *trust funds* and [are] held for the *exclusive* purposes of providing benefits to participants in the pension or retirement system and their beneficiaries and defraying reasonable expenses of administering the system."

"(b) The members of the retirement board of a public pension or retirement system shall discharge their duties with respect to the system solely in the interest of, and for the exclusive purposes of [1] providing benefits to[] participants and their beneficiaries, [2] minimizing employer contributions thereto, and [3] defraying reasonable expenses of administering the system. *A retirement board's duty to its participants and their beneficiaries shall take precedence over any other duty.*" (Italics added.)

StanCERA violated both of these provisions in transferring $10 million from trust fund assets to be applied to the County's employer contribution for the fiscal year beginning on July 1, 2009.

The italicized language of section (b) was added by the California Pension Protection Act of 1992, following approval of the voters of Proposition 162 on the General Election Ballot of November 1992. That ballot initiative contained very germane language, as will be discussed below.

The conduct of the retirement board is also regulated by the statutes in Government Code section 31450, et seq. (sometimes referred to as the County Employees Retirement Law or "CERL"). The County is required by statute to contribute a percentage of covered salary to StanCERA. (Gov. Code, §§ 31453.5, 31454.) The plan's funding policy provides for periodic employer contributions at actuarially determined rates that, expressed as percentages of annual covered payroll, are designed to accumulate sufficient assets to pay benefits when due. The primary sources to finance benefits StanCERA provides are accumulated through income on investments and the collection of employer and employee contributions.

The Board has a fiduciary duty to manage the retirement fund, which is a "trust fund established . . . for the exclusive benefit of active and retired employees and their survivors and beneficiaries." (80 Ops. Cal. Atty. Gen. 36, Opinion 96-301, citing Gov. Code, §§ 31588, 31595.) However, the board of StanCERA could be strongly tempted to favor the County because a majority of the Board owe their positions as trustees to their relationships with the County. Of the Board's nine members, one is an ex officio County official, the County Treasurer, and four are appointed by the County board of supervisors. (Gov. Code, § 31520.1.)

Prior to 1992, the frequent "raiding" of public pension funds to balance the budgets of governmental entities eventually became intolerable to the People of California. In 1992, Proposition 162 was placed on the ballot by those who opposed AB702, a bill which passed the Legislature and was signed by Governor Wilson. (*Singh v. Board of Retirement* (1996) 41 Cal.App.4th 1180, 1191.) *Just like the disputed practice of StanCERA in this case*, that bill permitted the Legislature and the Governor to use reserve funds in a retirement system to substitute for normal state payments required to fund the system—thereby freeing state money to help close a budget shortfall. (*Id.* at pp. 1191-1192.) In essence, AB702 permitted a retirement board's fiduciary duty to provide and protect benefits to its participants and their beneficiaries to

be subordinated to the objective of minimizing employer contributions.

The substitution of reserve account funds for state payments was "'viewed by opponents as unwise and unfair, and many called it one more "raid" on the pension system.' [Citation.]" (*Id.* at p. 1192.) Proposition 162 was intended by its proponents to "insulate the administration of retirement systems from oversight and control by legislative and executive authorities" and to "return control of the actuarial function to the retirement boards themselves." (*Ibid.*) "This 'increased level of independence would make the [retirement] systems less of a target for *local and state officials looking for a way to balance a budget.*' [Citation.]" (*Ibid.*, italics added.)

Among other things, Proposition 162 added the final sentence of section 17(b): "A retirement board's duty to its participants and their beneficiaries shall take precedence over any other duty." That sentence restricts the discretion of retirement boards by *prioritizing* the objectives of trust fund administration. The unambiguous language of the new sentence makes it plain that a retirement board's fiduciary duty to provide and protect benefits to its participants and their beneficiaries is paramount and cannot be subordinated to any lesser objective of "minimizing employer contributions" (§ 17(b)).

The meaning of the last sentence of section 17(b) is clear. "Precedence" means "priority of importance," "formal preference." (Webster's Ninth New Collegiate Dictionary (1984) p. 925.) Just as state constitutional provisions may be said to take "precedence" over state statutes, just as federal statutes may be said to take "precedence" over conflicting state statutes, the final sentence of section 17(b) establishes that a retirement board's "duty to its participants and their beneficiaries shall take precedence over any other duty." A retirement board's duty to members is its *highest obligation.* Before any subordinate duty may be performed, a retirement board must fulfill its paramount duty to provide and protect benefits to participants and their beneficiaries. (§ 17(b).) Any conflict between another permissible objective of trust fund administration, such as "minimizing employer contributions," and the objective of "providing benefits to[] participants and their beneficiaries," must be resolved in favor of the latter. If an administrative decision intended to "minimiz[e] employer contributions" would adversely affect the protection of earned, vested benefits and the providing of ancillary benefits to members, *it may not be undertaken*, because a retirement board's fiduciary duty to members is of paramount importance and priority.

The intent and broad purpose of the People in enacting the California Pension Protection Act of 1992 is shown from its text. Section Two includes "Findings and Declarations" explaining the need for Proposition 162:

> Section Two. Findings and Declarations. The People of the State of California hereby find and declare as follows:
>
> (a) Retired citizens depend upon their pension benefits to meet basic necessities such as food and shelter during their retirement years. For many elderly citizens

who are not eligible to participate in Social Security, pension benefits are their sole source of financial support and security.

(b) Teachers, firefighters, police officers and other local, school and state employees depend on promised pension benefits, which must be protected from political abuse and misappropriation.

(c) *Politicians have undermined the dignity and security of all citizens who depend on pension benefits for their retirement by repeatedly raiding their pension funds.*

(d) Political meddling has driven the federal Social Security system to the brink of bankruptcy. To protect the financial security of retired Californians, politicians must be prevented from meddling in or looting pension funds.

(e) *Raids by politicians on public pension funds will burden taxpayers with massive tax increases in the future.*

(f) *To protect pension systems, retirement board trustees must be free from political meddling and intimidation.*

(g) The integrity of our public pension systems demands that safeguards be instituted to prevent political "packing" of retirement boards, and encroachment upon the sole and exclusive fiduciary powers or infringement upon the actuarial duties of those retirement boards.

(h) In order to protect pension benefits and to avoid the prospect of higher taxes, the People must act now to shield the pension funds of this state from abuse, plunder and political corruption. (Ballot Pamphlet, p. 70, italics added.)

Section Three includes a statement of the People's "Purpose and Intent" in enacting the California Pension Protection Act of 1992:

Section Three. Purpose and Intent. The People of the State of California hereby declare that their purpose and intent in enacting this measure is as follows:

(a) *To protect pension funds so that retirees and employees will continue to be able to enjoy a basic level of dignity and security in their retirement years.*

(b) To give voters the right to approve changes in the composition of retirement boards containing elected retirees or employee members.

(c) *To protect the taxpayers of this state against future tax increases which will*

be required if state and local politicians are permitted to divert public pension funds to other uses.

(d) *To ensure that the assets of public pension systems are used exclusively for the purpose of efficiently and promptly providing benefits and services to participants of these systems, and not for other purposes.*

(e) To give the sole and exclusive power over the management and investment of public pension funds to the retirement boards elected or appointed for that purpose, to strictly limit the Legislature's power over such funds, and *to prohibit* the Governor or *any executive or legislative body of any political subdivision of this state from tampering with public pension funds.*

(f) To ensure that all actuarial determinations necessary to safeguard the competency of public pension funds are made under the sole and exclusive direction of the responsible retirement boards.

(g) *To affirm the legal principle that a retirement board's duty to its participants and their beneficiaries takes precedence over any other duty.* (*Ibid.*, italics added.)

Section Five provides an express rule of liberal interpretation: "The provisions of this act shall be liberally interpreted to effect their purposes." (Ballot Pamphlet, p. 71.)

The available interpretative aids—the ballot analysis, the official summary, and the arguments—show that the central purpose of Proposition 162 was to prevent governmental entities from manipulating public pension funds to reduce employer contributions. As the Court of Appeal held in *Westly v. Board of Administration* (2003) 105 Cal.App.4th 1095, 1111: "In keeping with the foregoing" findings, declarations, and statements of purpose and intent, "the thrust of the ballot arguments in favor of [a]rticle XVI, section 17[,] is to prevent the Legislature [and local governmental entities] from 'raiding' pension funds." "The summary argument in favor states that [a]rticle XVI, section 17[,] would 'stop politicians from raiding the pensions of . . . public employees.' [Citation.] The claims address the means by which the Legislature on previous occasions had altered its contributions to the retirement system. [¶] The full argument in favor of the initiative warns that politicians would continue to raid the pension funds of retirees unless [a]rticle XVI, section 17[,] was passed. It complains it was 'not right' to allow politicians to 'balance their budgets on the backs of seniors and retirees.' [Citation.] [¶] . . . The rebuttal argument states the proposition's opponents are 'trying to mislead the voters.' 'The central purpose of this measure is to STOP POLITICIANS FROM USING PUBLIC PENSION FUNDS TO BAIL THEM OUT WHEN THEY FAIL TO KEEP GOVERNMENT SPENDING UNDER CONTROL.' [Citation.]" (*Ibid.*)

The interpretative aids show, in addition, that the voters were well aware that prioritizing

the duties of retirement boards, and thereby limiting the ability of such boards to manage trust funds to "minimiz[e] employer contributions" (§ 17(b)), could have fiscal consequences. The "Summary of Legislative Analyst's Estimate of Net State and Local Government Fiscal Impact" recognizes the "[p]otential costs to employers as a result of public pension system giving highest priority to providing benefits to members and their beneficiaries" as one of several fiscal impacts of the measure. (Ballot Pamphlet, p. 36.) The voters were informed that there could be *additional public costs* if the provision of benefits to members and their beneficiaries was made the highest fiduciary duty of pension boards.

The detailed "Analysis by the Legislative Analyst" provides in part:

Proposal

This measure makes several *changes* to constitutional provisions related to public retirement systems: . . .

• . . . The measure . . . specifies that each board is to give *highest* priority to providing benefits to members and their beneficiaries. . . .

Fiscal Effect

. . . .

Board Responsibility to Pension Members. The requirement that pension system boards give highest priority to providing benefits to members and their beneficiaries could result in *higher costs to employers*. As discussed above, providing benefits is currently one of three basic, and *equal*, responsibilities of the pension boards. *Placing benefits as the highest priority could result in higher costs to employers if board decisions increase benefits without equal consideration to the cost for those benefits.* These potential costs are unknown, and are dependent on future decisions of *pension system boards*." (Ballot Pamphlet, p. 37, italics added.)

That language informed voters that pension benefits may be increased as a result of "board decisions," not just employer decisions.

The "Rebuttal to Argument in Favor of Proposition 162" stated in part:
PROPOSITION 162 ENDS TAXPAYER OVERSIGHT.

Pension boards currently have to *balance* the interests of taxpayers with those of retirees. This is only fair, since nearly $5 billion a year in tax dollars go toward public pension funds. Proposition 162 *destroys this balance*, and instead requires pension boards to make *increased benefits* their number one priority, regardless of taxpayer cost. (Ballot Pamphlet, p. 38, italics added.)

That argument certainly highlighted the expected effect of the proposition.

The "Argument Against Proposition 162" stated in part:

> Proposition 162 requires retirement boards to make providing or increasing benefits their number one priority, regardless of the costs to the taxpayers. . . . PROPOSITION 162 WOULD REQUIRE A PENSION BOARD TO DISREGARD THE INTERESTS OF TAXPAYERS. (Ballot Pamphlet, p. 39.)

The ballot analysis, the official summary, and the arguments presented to the voters by the proponents and opponents fairly informed the voters that the adoption of Proposition 162 could result in increased costs to taxpayers.

The People preferred those effects to a system in which local and state governmental budgets could be balanced by "raids" on pension funds by public employers. The People sought to prevent the reduction of public employer contributions by means of actuarial finagling. The People desired current taxpayers to pay the full cost of currently rendered public services, including the cost of public employee pensions. The People intended "[t]o protect the taxpayers of this state against future tax increases which will be required if state and local politicians are permitted to divert public pension funds to other uses." (Ballot Pamphlet, p. 70.) The People intended to prevent the objective of minimizing *employer* contributions to take precedence over the fiduciary duty of retirement boards to provide and protect benefits to *participants* and their beneficiaries.

In short, *the California Pension Protection Act of 1992 was intended to prevent public pension systems from being administered for the benefit of public employers rather than the employee beneficiaries*. It must be liberally construed to accomplish that purpose. StanCERA's use of trust fund assets to offset and reduce the County's current cost contributions was precisely the type of actuarial "gaming" of employer contribution rates that the People intended to prohibit.

StanCERA's recent action was undertaken as if Proposition 162 had never been enacted. StanCERA's unconstitutional action has directly saved the County over $10 million in employer contributions and reduced the size of the pension trust fund by that amount. StanCERA's duty to provide benefits[1] should have taken precedence. And its past management of the pension fund, such as approving the erroneously low County employer contribution rates, is part of the reason for the current unfunded liability. Moreover, the comments by one of the trustees that "there is really no such thing as excess earnings" ignores the statutory basis of the pension fund. "Excess earnings" is a term actually used in CERL. (Gov. Code, §§ 31592, 31592.2, 31592.3.) Thus, the board's action should be overturned on constitutional and fiduciary grounds.

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[1] It makes no difference whether the benefits are "vested" or "non-vested." StanCERA is required to use trust fund assets to provide both kinds of benefits and must give precedence to this duty over any duty it thinks it has to reduce employer contributions.

Finally, in transferring $10 million in assets from its STAR COLA reserve to valuation reserves for the purpose of offsetting employer contributions, StanCERA has apparently overlooked both Government Code section 31592.2 and a formal opinion of the Attorney General of California. The statute permits the transfer of excess earnings to county advance reserves "for the *sole* purpose of payment of the cost of benefits described in" CERL. (Italics added.) In 1996 the Attorney General of California opined that excess earnings may *not* be transferred to county advance reserves (a reserve of valuation assets) for the purpose of offsetting employer contributions. (79 Ops. Atty. Gen. 95 (1996) ["A retirement system that operates under article 5 of County Employees Retirement Law of 1937 . . . may transfer 'excess earnings' to county advance reserves solely for the purpose of paying retirement benefits and *not for the purpose of offsetting amounts owed in employer* or employee *contributions*," italics added].)"].

2. Transfer $50 Million from Medical Insurance Fund to Valuation Reserves for the Purpose of Further Reducing Employer Contributions.

For similar reasons, the board's action in also transferring $50 million from non-valuation reserves, where those funds had been specifically earmarked to use for retiree medical insurance, constitutes a violation of section 17(a) and section 17(b). It is clear for the record, including the tape recording of the meeting and from Richard Robinson's memo dated April 3, 2009, that the transfer of these funds was undertaken solely to reduce the County's employer contribution. This is precisely the type of "raiding" of trust fund assets that Proposition 162 was designed to prevent.

3. Lengthening "Amortization" Period to 30 Years.

The board's adoption of a "rolling" 30-year amortization violates CERL. Although not specifically disclosed, this type of "amortization" is negative amortization, meaning that the County is not even paying the accrued interest on the underfunding for the next three years.

The statute at issue, Government Code section 31453.5, provides:

> "Notwithstanding Section 31587, and in accordance with Section 31453 or 31510.1, the board may determine county or district contributions on the basis of a normal contribution rate which shall be computed as a level percentage of compensation which, when applied to the future compensation of the average new member entering the system, together with the required member contributions, will be sufficient to provide for the payment of all prospective benefits of such member. *The portion of liability not provided by the normal contribution rate shall be amortized over a period not to exceed 30 years.*" (Italics added.)

It is important to have well in mind the conceptual difference between "amortization" and "negative amortization." """Words used in a statute . . . should be given the meaning they bear in ordinary use."""" (*In re Marriage of Bonds* (2000) 24 Cal.4th 1, 15, quoting *Wilcox v.*

Birtwhistle (1999) 21 Cal.4th 973, 977.) "Courts frequently consult dictionaries to determine the ususal meaning of words." (*In re Marriage of Bonds*, *supra*, at p. 16 [consulting Black's Law Dictionary and the Oxford English Dictionary regarding the meaning of "voluntarily"].) In common and legal parlance, "amortization" refers to "[t]he act or result of gradually extinguishing a debt, such as a mortgage, usu[ally] by contributing payments of principal each time a periodic interest payment is due." (Black's Law Dictionary (7th ed. 1999), p. 83; 1 Webster's Third New International Dictionary (1981), p. 72.) Because the County makes periodic contributions to StanCERA on an "annual" basis, the "amortiz[ation]" required by section 31453.5 is an annual payment of interest and some portion of the principal amount of unfunded liability.

By contrast, "negative amortization" refers to "[a]n increase in a loan's principal balance caused by [periodic] payments insufficient to pay accruing interest." (Black's Law Dictionary (7th ed. 1999), p. 83.) As the adjective "negative" connotes, "negative amortization" is the *opposite* of "amortization." In the context of public pension system administration, amortization *reduces* the principal amount of unfunded liability. "Negative amortization" *increases* the principal amount of unfunded liability.

The statutory phrase "shall be amortized over a period not to exceed 30 years" actually includes two distinct requirements. The first is that unfunded liability be "amortized" or gradually reduced. The second is that the "period" of amortization, or gradual reduction, not "exceed 30 years." Because section 31453.5 provides that such unfunded liability "shall be amortized," the retirement board must require the County to contribute *at least* (1) the employer's "normal" cost (§ 31453.5); *plus* (2) the annual accrued interest on the system's unfunded liability; *plus* (3) some incremental portion of the principal amount of the unfunded liability. Section 31453.5 does not permit *negative* amortization of the unfunded liability, i.e., annual payments of *less* than the accrued interest on unfunded liability, with the result that the principal amount of the system's unfunded liability would *increase*.

The *negative* amortization of unfunded liability practiced by StanCERA[2] causes the unfunded liability of the system to *increase*; it *undermines* the "competency of the assets" of the system (§ 17(e)); and it therefore *jeopardizes* the "delivery of benefits" (§ 17(a)). Negative amortization of unfunded liability is an actuarial gimmick by which a retirement board gives precedence to "minimizing employer contributions" (§ 17(b)) rather than its paramount "duty to participants and their beneficiaries" (*ibid.*). The Legislature may properly prohibit such chicanery, and has done so (§ 31453.5), because negative amortization of unfunded liability is contrary to a retirement board's constitutional duty to give "precedence" to the interest of "participants and their beneficiaries" (§ 17(b)) in having a prefunded, defined benefit pension

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[2] The reason a 30-year amortization period includes negative amortization has to do with the wage growth assumption in the actuarial valuation. Thus, for the board to adopt negative amortization without ensuring there would be no wage growth was also imprudent, and constitutes a violation of StanCERA's duty to act prudently. (Cal. Const., art. XVI, § 17(c).)

system with assets that are competent to provide promised benefits.

EXHIBIT 2

EXHBIIT 2

Names and addresses of witnesses, doctors and/or hospitals.

NAME	ADDRESS
Wes Hall	Unknown
Clarence Willmon	Unknown
Tom Watson	Unknown
Hank Skau	Unknown
Kelly Cerny	Unknown
Deirdre McGrath	Stanislaus County Employees' Retirement Association 832 12th Street, Suite 600 Modesto, CA 95354 Mailing Address: P.O. Box 3150 Modesto, CA 95353-3150
Jeffrey Rieger	Unknown
Stephen Masarik	Unknown
Graham Schmidt	Unknown
Patrick McTighe	Unknown
Sarah Ragsdale	Unknown
Dennis Nasrawi	2621 Puccini Place, Modesto, CA 95358
Lyn Bettencourt	Unknown
Ed Washington	Unknown
Doug Estes	Unknown
Mr. Breshears	Unknown