

**BEFORE THE CITY COUNCIL
FOR THE CITY OF BEXLEY, OHIO**

CONSECUTIVE PRIMES, LLC, <i>et al.</i>,	:	
	:	
Appellants,	:	
	:	Application No. BZAP-21-47
v.	:	Appeal No. 22-1
	:	
BOARD OF ZONING AND PLANNING FOR THE CITY OF BEXLEY, OHIO,	:	
	:	
	:	
Appellee.	:	

**BRIEF OF APPELLANTS CONSECUTIVE PRIMES, LLC,
NATHAN SAMPSON, AND KEITH WITT IN SUPPORT OF APPEAL**

I. INTRODUCTION

This appeal concerns an arbitrary decision by the Board of Zoning and Planning (“BZAP”) denying a straightforward variance in contravention of this Council’s prior precedent. Appellants Consecutive Primes, LLC (“Property Owner”), Nathan Sampson, and Keith Witt (collectively, “Applicants”) are restoring and improving the historic Huntington House located at 81 North Drexel Avenue (“Property”), which has sat vacant for years. Due to the unique configuration of the Property, the Applicants need a variance to permit a pool and pavilion in the “front yard,” a space that indisputably functions as the Property’s backyard. The City’s professional zoning staff and Architectural Review Board (“ARB”) therefore recommended approval of the variance and this Council granted the *very same variance* to the prior owners of the Property. Yet, BZAP lost its way – ignoring the legal standards and overwhelming evidence in Applicants’ favor – and arbitrarily denied the variance in a 3-2 split decision.

BZAP’s decision cannot stand for several reasons. First, in violation of BZAP’s own Rules and Regulations, BZAP prohibited the Applicants from introducing evidence on the variance

factors. Second, the *only* evidence before BZAP established that a variance is warranted. By way of example only:

- Members of BZAP acknowledged that the Property is, undoubtedly, one of a kind. Not only is the Property one of the largest lots in the City, it is a corner lot with a home that faces the interior of the block with no formal rear yard. A variance is therefore the only way this Property can have an accessory structure, such as a pool.
- The proposed pool is intentionally designed to be entirely private and will not impact the neighboring property owners, most of whom also have pools. The pool is nearly 20% *smaller* than what is permitted and sits nearly ten feet *further* away from the neighbors' property line than what is required.
- Despite having no obligation to do so under the Zoning Code, the Applicants will provide extensive screening around the pool, including a masonry privacy wall and mature evergreen trees. The Applicants have incorporated several elegant design features that will buffer the Property's yard from the neighboring property without sacrificing this historic home's unique orientation and design.

Simply put, the unrefuted evidence established that this is the quintessential case for a variance.

Now, the Applicants find themselves before City Council to right BZAP's wrong. As detailed more fully below, BZAP's decision violated BZAP's Rules and Regulations, the Zoning Code, and Ohio law. Worse, if left to stand, BZAP's decision will expose the City to unnecessary liability for the deprivation of the Applicants' rights to due process and equal protection under the Ohio and United States Constitutions. City Council should therefore reverse BZAP's arbitrary decision and approve a variance to enable the construction of a pool on the Property.

II. BACKGROUND

A. The City Routinely Permits Accessory Uses and Structures, Such as Pools, in the Side or Front Yards of Corner Lots.

The Zoning Code expressly permits accessory uses or structures, such as pools, in the City's residential neighborhoods. Zoning Code Section 1252.15 states that “[a]n accessory use or structure **shall be permitted** in association with a principal residential structure” provided that certain requirements are met. (Zoning Code § 1252.15 (emphasis added).) Section 1252.15(g)

further provides, in part, that “[a]ccessory structures and uses shall be permitted only in the rear yard and shall be at least three feet from all property and right-of-way lines. . . .” (*Id.* § 1252.15(g).) Nevertheless, the City routinely grants variances from Section 1252.15(g) where appropriate.

For example, on numerous occasions the City has permitted owners of corner lots to construct accessory structures, such as pools, in the side or front yard. (Ex. 1.) There are at least eight corner lots with pools in the City, including four in the immediate vicinity of the Property:



(*Id.*)¹ Significantly, Council granted the prior owners of the Property a variance to place a pool in the front yard in 2007. (Ex. 2.) Likewise, the neighbors directly to the west of the Property – Tom and Leigh Ann Hadley – were granted a variance to place a pool in their side yard. (Ex. 1.)

B. The Property Owner Restores and Improves the Huntington House.

The Huntington House, a historic home built by Francis Ropes Huntington in 1923, is located on the Property, a corner lot on the northwest intersection of Clifton Avenue and Drexel Avenue. The home itself is uniquely situated on the northern portion of the Property with its front entry facing the residences on Drexel Avenue and Commonwealth Park South to the north:

¹ The Property is outlined in yellow in Exhibit 1. The surrounding corner lots with pools are outlined in blue in Exhibit 1 and include 80 North Drexel Avenue, 90 North Columbia Avenue, 2355 Commonwealth Park South, and 64 Stanbery Avenue.



(Ex. 3, Image from the Franklin County Auditor’s Website.) As a result of the configuration of the Property and the orientation of the home, what is technically considered the “front yard” of the home along Clifton Avenue functions as the home’s backyard. (*Id.*)

While prior owners of the Property made efforts to revitalize the historic home over the last few decades, the home recently sat vacant for several years, incurring water damage and other issues. In 2019, the Property Owner – an entity owned by Alex Timm and Adam Craig – purchased the Property. The Property Owner made substantial investments into restoring and improving the home for the benefit of their family and all residents. (Ex. 1, p. 2.) As a part of that process, the Applicants applied for a variance to place a pool in the front yard.

C. The ARB Unanimously Recommends Approval of the Pool Design and Location.

The Applicants first applied to the ARB for approval of a certificate of appropriateness for the pool, pool house, and fence in the front yard. Under the Zoning Code, it is the ARB that is charged with maintaining “a high character of community development,” ensuring “the compatibility of new development,” protecting “real estate within the City from impairment . . . of value,” preserving “buildings . . . of historic significance,” and regulating “the design . . . of accessory [structures].” (Zoning Code § 1223.03.) Therefore, the ARB was responsible for

or typical, it is very unique . . .” (*Id.* at 1:06.) In addition, the Applicants explained the reasoning behind the precise location of the pool in the “front” yard. The Applicants testified that the pool is located on the west side of the Property to align with the historic home. (*Id.* at 1:19.) Moreover, the pool could not be located further east on the Property because it would result in the destruction of mature trees and sit too closely to the intersection of Drexel Avenue and Clifton Avenue. (*Id.*)

E. The City’s Professional Zoning Staff Supports the Variance Application and BZAP Tables the Application to Allow the Applicants to Meet with the Neighbors.

On March 24, 2022, BZAP held a second hearing on the application. The City’s professional zoning staff first noted that the City previously granted a variance for a pool in “almost . . . the identical location that is being proposed.” (March 24, 2022 BZAP Meeting Video.) Staff further emphasized that the City granted similar variances to adjacent and nearby properties, including 90 North Columbia Avenue and 50 North Drexel Avenue. (Staff Report p. 2.)

With respect to the proposed pool location, Staff opined that the unique orientation of the home and the Property made the pool location entirely appropriate:

The front of many of the houses surrounding this property do not face the front of the platted lots . . . **In some cases, this may make the location of the pool and pool-house in a front yard less out of character.** For this lot, the **unusual location** of the principal structure . . . which is pushed to the north end of the property, **leaving very little back yard and a large front yard is not out of character with the surrounding development.**

(*Id.* (emphasis added).) Because the 2007 variance expired, Staff recommended that the Board adopt a new variance for the construction of the pool in the front yard. (*See id.* p. 6.) During the March BZAP meeting, BZAP Members also recognized the Property’s unique attributes, including that the Property is one of the largest properties in the City, the home is located on the northern side of the Property, and the home faces north towards the interior of the block. (*Id.* at 1:10.)

One neighboring property owner, Tom Hadley, expressed unsubstantiated concern regarding the variance application. (*Id.* at 0:51.) Even though Mr. Hadley benefits from a similar

variance for a pool in his side yard, Mr. Hadley speculated about noise that might be generated by “events” that could be held at the Property Owner’s pool. (*Id.* at 0:58.) Second, despite the fact that the variance application states that the pool is more than *eighteen* feet from Mr. Hadley’s property, Mr. Hadley mistakenly testified that the proposed pool would be located *five* feet from his property line. (*Id.*) Following Mr. Hadley’s testimony, BZAP tabled the application at the Applicants’ request to allow the Applicants adequate time to meet with Mr. Hadley.

F. The Applicants Meet with Neighbors and Make Numerous Changes to the Pool Design to Address the Neighbors’ Unfounded Concerns.

Following the March 24, 2022, BZAP meeting, the Applicants met with the Hadleys to discuss their concerns. (April 28, 2022 Meeting Video at 0:32-:36.) While there is no requirement under the Zoning Code to provide screening, the Applicants made numerous accommodations to provide the Hadleys with additional visual screening and sound buffering. (*Id.*) First, the Applicants moved the pool equipment away from the Hadleys’ yard. (*Id.*) Second, the Applicants raised the masonry wall on the western side of the pool from 4’8” tall to 6’0” tall. (*Id.*) And third, the Applicants changed the audio system to face away from the Hadleys’ yard. (*Id.*) The Applicants made every feasible accommodation for the neighbors – in excess of what is required under the Zoning Code – to a design previously and unanimously approved by the ARB and staff.

G. BZAP Prohibits the Applicants from Introducing Evidence, Ignores the Evidence That the Applicants Were Able to Introduce, and Arbitrarily Denies the Variance.

On April 28, 2022, BZAP held another hearing on the application. At the outset, BZAP instructed the Applicants that the Applicants could speak for only five minutes. (April 28, 2022 Meeting Video at 0:23.) During the Applicants’ presentation, BZAP Member Marsh directed Applicants to “wrap up.” (*Id.* at 0:34.) Further, when the Applicants’ counsel attempted to address the variance factors, BZAP prohibited the Applicants from doing so. (*Id.* at 0:57; 1:09.)

Nevertheless, the *only* competent evidence presented at the hearing established that a variance is appropriate. The Applicants presented evidence that the Property is truly unique – it is the *only* Property in the City that is a corner lot with the home facing the interior of the block – making it the ideal case for a variance. (*Id.* at 0:23.) In addition, numerous neighbors testified in support of the variance. By way of example only:

- Kristina Johnson testified that the vacant house was a blight on the neighborhood. Ms. Johnson expressed appreciation for the Applicants’ investments in the community, efforts to work with the neighbors, and willingness to provide considerable screening around the pool and pavilion.
- Amy Grace Ulman testified on behalf of herself and her husband Doug Ulman to the enormity of the project and her gratitude that Alex Timm and Adam Craig are willing to invest in the Property and the City. Mrs. Ulman complimented the substantial screening and landscaping in the design and location of the pool.

(*Id.* at 0:39; 0:45.) Other community members likewise expressed their support. (*Id.* at 0:48.)

The Applicants also testified to the substantial accommodations that had been made over the last month to address the Hadleys’ unfounded concerns. (*Id.* at 0:32-:36.) With these changes, the pool will not be visible or audible from the Hadleys’ yard:



(Ex. 4 (rendering of the Property facing west).)

The Hadleys again simply offered speculation regarding the noise from various types of

“parties” that would be held on the Property. (*Id.* at 0:40.) The Hadleys requested that the pool be moved ten feet to the east, a request that is not only arbitrary but simply infeasible for several reasons. First, the pool is situated as far away as possible from the intersection for safety purposes. (*See* Ex. 4.) Second, as the ARB recognized, the pool is properly aligned with the home from an architectural perspective. (April 28, 2022 Meeting Video at 1:01.) Third, moving the pool and pool house further east would put several large trees in the middle of the Property at risk. (*Id.* at 0:55.) At bottom, the Applicants have designed the pool with as much screening as possible without sacrificing substantial safety, architectural, and environmental considerations.

All of this evidence was ignored by BZAP. Rather than following the terms of its own Zoning Code and the undisputed evidence at the hearing, BZAP erroneously denied the variance in a 3-2 split decision with Chairperson Behal recusing himself. (*Id.* at 1:10; April 28, 2022 Record of Action.) BZAP failed to address *any* of the variance factors in its decision. (*Id.*) The Applicants were therefore forced to appeal BZAP’s arbitrary and unconstitutional decision. Pursuant to Zoning Code Section 1226.19, Applicants initiated this appeal to City Council.

III. ARGUMENT

BZAP’s decision to deny the Applicants’ variance application violates BZAP’s Rules and Regulations, the City’s Zoning Code, Ohio law, and the Ohio and United States Constitutions. Therefore, BZAP’s decision should be reversed and City Council should approve the variance.

A. Assignment of Error No. 1: BZAP Erred by Failing to Follow Its Own Rules and Regulations.

BZAP’s decision should be reversed because BZAP failed to follow its own Rules and Regulations to the prejudice of the Applicants. BZAP’s Rules and Regulations set forth separate and distinct procedures for “General Public Comment,” “Recommendations to Council / Public Hearings,” and “Administrative or Quasi-Judicial Hearings.” (Ex. 5, Rule 17(a), (b), and (c).)

With respect to general public comments, recommendations to Council, or public hearings, BZAP “may, in its discretion, limit . . . the time each speaker may speak.” (*Id.* Rule 17(a) and (b).) In administrative or quasi-judicial hearings, however, BZAP is not granted the same discretion. (*Id.* Rule 17(c).) Instead, BZAP “will hear relevant testimony upon the application before it from persons with standing, including applicants . . .” (*Id.*)

Here, BZAP sat in a quasi-judicial capacity when it considered the application. *Mobil Oil Corp. v. Rocky River*, 38 Ohio St. 2d 23, 31 (1974) (“[t]he granting or denial of a variance is an administrative or quasi-judicial decision”). Yet, at the start of the hearing, BZAP instructed the Applicants that they would be permitted to speak for only five minutes. (April 28, 2022 BZAP Meeting Video at 0:23.) Just a few minutes into the Applicants’ presentation, Member Marsh stated to the Applicants, “you’re gonna need to wrap up.” (*Id.* at 0:34.) Further, when the Applicants attempted to introduce evidence on each of the variance standards, Member Marsh stated, “I think we’ve had enough testimony.” (*Id.* at 1:09.) Under BZAP’s own Rules and Regulations, however, BZAP did not have the authority to limit Applicants’ introduction of evidence. For this reason alone, BZAP’s decision should be reversed.

B. Assignment of Error No. 2: The Variance Application Meets All Necessary Requirements for a Variance.

The application meets all of the necessary requirements for a variance under the Zoning Code and Ohio law. BZAP’s denial of the variance is therefore arbitrary and should be reversed.

Section 1226.11 of the Zoning Code – which mirrors the considerations for a variance under Ohio law – sets forth the factors for determining whether a variance should be granted. *Duncan v. Middlefield*, 23 Ohio St. 3d 83 (1986). Both the Zoning Code and Ohio law require the City to consider the following seven factors:

1. Whether the property in question will yield a reasonable return or whether there can be any beneficial use of the property without the variance;

2. Whether the variance is substantial;
3. Whether the essential character of the neighborhood would be substantially altered or whether adjoining properties would suffer a substantial detriment as a result of the variance;
4. Whether the variance would adversely affect the delivery of governmental services (e.g., water, sewer, garbage);
5. Whether the property owner purchased the property with knowledge of the zoning restriction;
6. Whether the property owner's predicament feasibly can be obviated through some method other than a variance; and
7. Whether the spirit and intent behind the zoning requirement would be observed and substantial justice done by granting the variance.

(Zoning Code § 1226.11(c).) All seven factors are to be considered, but no single variance factor controls. *Duncan*, 23 Ohio St. 3d at 86. “A property owner is not denied the opportunity” to establish that a variance is warranted, “for example, simply because he purchased the property with knowledge of the zoning restrictions.” *Id.* Here, the evidence provided by the Applicants is more than sufficient to establish that each factor is met, as this Council already determined when it approved the variance in 2007. As such, City Council should overturn BZAP’s arbitrary denial.

1. The Property Will Not Yield Adequate Return Absent a Variance.

First, BZAP’s arbitrary denial of the variance will have a detrimental impact on the Property’s value. It is undisputed that the Property’s “front” yard is the Property’s only usable yard space. (March 24, 2022 Staff Report.) As demonstrated by the surrounding properties, a pool is the highest and best use of the Property’s yard. (Ex. 1.) For properties of like size and caliber, a pool is an expected attribute and a substantial component of the Property’s value. (*See id.*) For this reason, several surrounding homes of similar size and quality have pools. (*Id.*) Therefore, prohibiting a pool on the Property will negatively impact the Property’s value.

2. The Variance Is Not Substantial.

Second, the undisputed evidence is that the variance is *not* substantial for several reasons. The portion of the Property abutting Clifton Avenue functions as the Property's backyard. (March 24, 2022 Staff Report.) Thus, a pool is appropriately located in the proposed location. (*Id.*) In addition, the pool is nearly 20% smaller than the Zoning Code allows. (Ex. 4.) Further, the pool sits more than eighteen feet from the Hadleys' property line, exceeding setback requirements by ten feet. (*Id.*) Finally, the Applicants made substantial accommodations for the neighbors that are not even contemplated by the Zoning Code, including adding an opaque masonry wall and tree screening, moving the pool equipment, and making changes to the exterior AV equipment to minimize sound. In sum, the Applicants have made every feasible effort to minimize the variance.

3. The Variance Is Consistent with the Character of the Neighborhood and Neighbors Will Not Be Adversely Impacted.

Third, the variance is consistent with the character of the neighborhood. The City previously permitted at least eight property owners to construct pools on corner lots, including four in the immediate vicinity of the Property. (Ex. 1.) Indeed, the neighbors to the west – the Hadleys – were granted the same variance to place a pool in their side yard. (*Id.*) For this reason, the variance will make the Property *more* consistent with surrounding properties.

Further, adjacent landowners will not suffer a “substantial detriment” as a result of the variance. To the contrary, the overwhelming majority of nearby landowners support the variance application. (April 28, 2022 Meeting Minutes.) The only neighbors in opposition to the variance – the Hadleys – expressed nothing more than unfounded speculation regarding potential noise from certain types of “events” or “parties” on the Property. *Hindu Soc’y of Greater Cincinnati v. Union Twp. Bd. of Zoning Appeals*, 12th Dist. Clermont, No. CA2018-11-081, 2019-Ohio-2494, ¶ 29 (holding that speculation and opinion could not be considered in administrative appeal because

“legal matters are determined by facts, not beliefs or desires”). For this reason alone, the Hadleys’ unsubstantiated opinions should not have been considered by BZAP.

In addition, the Applicants have made every effort to address the Hadleys’ concerns. To start, the Applicants agreed to provide a masonry wall and mature evergreen trees between the Hadleys’ yard and the Property. (Ex. 4.) When the Hadleys remained unsatisfied, the Applicants increased the height of the wall, moved the pool equipment further away from the Hadleys’ yard, and changed the direction of the audio equipment. (*Id.*) While the Hadleys’ continue to request that the pool be moved to the east, the Hadleys’ request is infeasible. Moving the pool would sacrifice the architectural design by disrupting the alignment with the home, put several mature trees at risk, and create safety issues by moving the pool closer to the intersection. (December 2, 2021 BZAP Meeting Video at 1:19.) Therefore, the Applicants have provided the Hadleys with every reasonable and feasible accommodation. Therefore, the third variance factor is satisfied.

4. The Variance Will Not Adversely Affect the Delivery of Governmental Services.

Fourth, it is undisputed that the variance will not adversely affect the delivery of governmental services. Therefore, this factor weighs in favor of granting the variance.

5. The Property Owner Had No Knowledge of the Zoning Restriction.

Fifth, the Property Owner had no knowledge of the zoning restriction. As Mr. Timm testified, the prior owners of the Property and a prior architect informed Mr. Timm that the City considered the proposed pool location to be the Property’s backyard. (April 28, 2022 Meeting Video at 0:37.) The prior owners stated that Council had previously approved a pool in this very location. (*Id.*; Ex. 2.) Further, the prior architect informed Mr. Timm that a variance would *not* be required for the pool. (April 28, 2022 Meeting Video at 0:37.) The Property Owners therefore reasonably believed that the City would permit a pool in the proposed pool location. (*Id.*)

6. The Predicament Cannot Be Obviated Through Some Other Method.

Sixth, this predicament cannot be obviated through some other method. The Zoning Code allows a property owner to construct a pool on their property. (Zoning Code § 1252.15.) Here, the northern portion of the Property – what is technically considered the backyard – is not large enough to include a pool. Moreover, for all intents and purposes, this southern portion of the Property – what is technically considered the front yard – functions as the Property’s backyard. Therefore, a variance is the *only* way for a pool to be constructed on the Property.

7. The Spirit and Intent of the Zoning Code Would Be Observed and Substantial Justice Will Be Done by Granting the Variance.

Seventh, the spirit and intent of the Zoning Code would be observed by granting the variance. Section 1252.15(g) of the Zoning Code requires pools to be located in the rear yard. Here, as set forth above, the proposed pool location functions as the Property’s backyard. Therefore, granting the variance is consistent with Section 1252.15(g) of the Zoning Code and consistent with this Council’s prior precedent. As Council recognized in 2007, “the unusual configuration of lots in this area and the setback of structures at the rear of the lot . . . causes the need for this variance.” (Ex. 2.)

C. Assignment of Error No. 3: Denial of the Variance Deprives the Applicants of Their Rights under the Ohio and United States Constitutions.

BZAP’s decision should be reversed because it violates the Applicants’ rights under the Ohio and United States Constitutions in at least three ways. First, under the Due Process Clause, a property owner must be provided adequate procedural rights before it is deprived of a property interest. *Wedgewood Ltd. P’ship I v. Twp. of Liberty*, 610 F.3d 340, 349 (6th Cir. 2010). Here, BZAP is required to follow the procedures outlined in the Zoning Code and BZAP’s Rules and Regulations when deciding whether to grant or deny a variance application. Yet, BZAP failed to follow its own procedures, imposed arbitrary time limits on Applicants, and deprived Applicants

from introducing evidence on the variance standards. *Supra* Sec. III(A). BZAP’s unlawful acts wrongfully deprived the Applicants of their property interests without due process of law.

Second, “[s]ubstantive due process . . . protects citizens from being subject to arbitrary or irrational zoning decisions.” *Paterek v. Vill. of Armada, Mich.*, 801 F.3d 630, 648 (6th Cir. 2015). All of the requirements for a variance have been met, as this Council previously determined in 2007. (Ex. 2.) Because there are no legitimate reasons to deny Applicants’ variance, BZAP acted in an arbitrary manner. *Supra* Sec. III(B). BZAP’s refusal to grant the application – without any analysis of the variance standards under the Zoning Code or the *Duncan* factors – wrongfully deprived the Applicants of the Applicants’ property interests.

Finally, the Applicants have an equal protection right to be treated the same under the law as others similarly situated. *See Wedgewood Ltd. Partnership v. Twp. of Liberty, Ohio*, 456 F.Supp.2d 904, 939 (S.D. Ohio 2006). In the *immediate* vicinity of the Property, there are four corner lots with pools. (Ex. 1.) In fact, the prior owners of the Property itself were previously granted a variance by City Council for a pool in the “front yard.” (Ex. 2.) BZAP is therefore treating the Applicants differently than other similarly situated landowners. Therefore, the Applicants’ equal protection rights have been violated, mandating reversal of BZAP’s decision.²

IV. CONCLUSION

For the foregoing reasons, the Applicants respectfully request that this Council reverse BZAP’s arbitrary decision and grant their request for a variance.

² Zoning decisions that impact protected classes are subject to heightened scrutiny under the Equal Protection Clause. Further, Section 637.02(a) of the City Code states that “[i]t shall be an unlawful discriminatory practice for any person to . . . [d]iscriminate against any person . . . in furnishing facilities, services, or privileges in connection with the ownership, occupancy or use of any housing accommodations because of . . . sexual orientation[.]” (Emphasis added.)

Respectfully submitted,

s/ Joseph R. Miller

Joseph R. Miller (0068463)
Elizabeth S. Alexander (0096401)
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
Phone: (614) 464-6480
Fax: (614) 719-4775
Email: jrmiller@vorys.com
esalexander@vorys.com

*Counsel for Appellants Consecutive Primes, LLC,
Nathan Sampson, and Keith Witt*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was served via email this

17th day of August, 2022 upon the following:

Clerk of Council for the City of Bexley, Ohio
Council
Matt McPeek
mmcpeek@bexley.org

Law Director for the City of Bexley, Ohio
Marc Fishel
Fishel, Downey, Albrecht & Ripenhoff, LLP
mfishel@fisheldowney.com

s/ Elizabeth S. Alexander

Elizabeth S. Alexander