



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0135

Minutes of the July 13, 2005 meeting of the
Commission on Governmental Ethics and Election Practices
Held in the Commission's Meeting Room,
PUC Building, 242 State Street, Augusta, Maine

Present: Chair Jean Ginn Marvin; Hon. Michael Bigos; Hon. Vinton E. Cassidy; Hon. Andrew Ketterer. Staff: Executive Director Jonathan Wayne; Counsel Phyllis Gardiner.

At 9:03 a.m., Chair Ginn Marvin convened the meeting. The Commission considered the following items:

Agenda Item #1 – Ratification of Minutes of the February 17, 2005 and March 9, 2005 meetings

Chair Ginn Marvin moved, Mr. Ketterer seconded, and the Commission members voted unanimously (4-0) to adopt the minutes of the February 17, 2005 and March 9, 2005 meetings.

Agenda Item #3 – Late Filing Penalty/Hon. Edward R. Dugay

Because the respondent for Agenda Item #2 had not arrived, the item was postponed until later in the meeting.

The director explained that Rep. Edward R. Dugay and attorney Michael K. Mahoney were at the meeting to submit a presentation to the Commission and to answer any questions the members might have for them. Rep. Dugay was a traditionally financed candidate running for re-election in the 2004 elections. Because his opponent, Christopher Cambron, was a Maine Clean Election Act (MCEA) candidate, Rep. Dugay was obligated to file additional reports stating his total receipts for the election. Rep. Dugay did not file the reports on time. As a result, Mr. Cambron did not receive \$146 in matching funds to which he was entitled eighteen days before the election. Mr. Cambron should have received another \$1,045 twelve days before the election, but received it six days later due to Rep. Dugay's late filing. The director recommended Rep. Dugay pay a civil penalty of \$10,170 which was one-third of the maximum penalty.

Rep. Dugay and his attorney, Michael Mahoney, took the floor. Mr. Mahoney requested the Chair's permission to briefly run through some highlights of the facts. He explained that Rep. Dugay had made two submissions the previous night and the morning of the Commission meeting. The first submission was a copy of a receipt. Mr. Mahoney indicated that the Commission staff had initially determined that Rep. Dugay entered the 2004 election cycle with a balance of \$897 that had carried over from the 2002 campaign. Mr. Mahoney said that Rep.

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Dugay did not think that information was correct. Rep. Dugay had found documentation confirming that in 2003 he made a \$500 payment to an outside contractor for work that was done during the 2002 campaign. Therefore his balance should have been \$397.

The second piece of information submitted related to calculations that were made in the analysis memo drafted by Commission staff prior to the meeting. Mr. Mahoney indicated that one major point in the staff memo was that Rep. Dugay was six days late in filing his 12-day accelerated report in the 2004 election cycle and that he raised \$1,045 over the MCEA allocation. Mr. Mahoney said that, of that amount, \$450 consisted of two contributions dated between October 14th and 19th but which were not actually received by Rep. Dugay until October 26th. Mr. Mahoney explained that Rep. Dugay had a post office box and the checks came in sealed envelopes. They were picked up by a campaign staffer and placed in his car without Rep. Dugay's knowledge. It was not until October 26th when Rep. Dugay was cleaning his car that he found the envelopes, opened them up, and found the two checks totaling \$450. Mr. Mahoney stated that it was their position that given the fact that Rep. Dugay had no access to the checks, was not aware of their existence and had no idea they were in the car, he therefore could not reasonably be considered to have received these checks for purposes of determining contribution totals. Mr. Mahoney went on to conclude that if the \$450 was deducted from the \$1,045 then they were left with a total of \$595 in contributions for the period of October 14th to October 19th.

Mr. Mahoney continued to say that Rep. Dugay's earlier submission had four main points. First, the violations were not intentional and Rep. Dugay made his filings with the good-faith belief that they were on time and accurate. Second, Mr. Mahoney pointed out that they did not believe great harm was done as a result of the late filings. He agreed that Mr. Cambron was disadvantaged as a result of the late filings, but he believed that there were certain facts that mitigated the harm. Rep. Dugay did notify the Commission on October 27th of his true campaign totals, giving Mr. Cambron almost a full week to spend the last matching funds he was given. Mr. Mahoney indicated that Mr. Cambron did spend almost \$1,000 in matching funds almost immediately on radio ads. Third, Rep. Dugay did win by a fairly comfortable margin. Mr. Mahoney stressed that it was not an excuse, but he did not believe the result of the election would have been different if the funds were made available earlier in the campaign.

Chair Ginn Marvin asked if the members had any questions of Mr. Mahoney before Rep. Dugay began. Mr. Bigos asked the name of the staffer who picked up the checks and what his position was. Rep. Dugay responded that Andy Hackett was the staffer who was responsible for picking up the mail and sorting it out. At the time of the campaign, Andy was getting ready to go into the Marine Corps. Rep. Dugay explained that he had asked Andy to keep track of all the money coming in and that Andy would report to him the amounts so that he could maintain an Excel spreadsheet of all money that came in.

Mr. Ketterer asked if Mr. Mahoney thought that Rep. Dugay did not receive the checks because he did not open the checks until later. Mr. Mahoney explained that he did not believe Rep. Dugay was in possession of the checks because he was not aware of them in his car and that other people had access to his vehicle. Mr. Ketterer argued that someone constructively possesses whatever is in their home or car, and he referred to a court case regarding finding

drugs in a vehicle. Mr. Mahoney agreed, but argued that this was a different case because Rep. Dugay had no idea they were even in his car and that other people had access to his car.

At this time Mr. Cassidy asked why the staffer, Andy Hackett, would make lists of things that came in, but did not list those two checks along with everything else. Chair Ginn Marvin asked Rep. Dugay to hold off answering as Mr. Ketterer had one more question for Mr. Mahoney. Mr. Ketterer asked what Mr. Mahoney thought the outcome of this case should be. Mr. Mahoney said that he did not have a specific number to provide, but recommended a penalty of significantly less than the amount recommended by the Commission staff. Mr. Mahoney thought the penalty should be the total amount of the unreported funds, \$1,045 plus \$146 for a total of \$1,191. Mr. Ketterer asked that he give a specific recommendation later. Chair Ginn Marvin asked why these two documents were not submitted until now, and pointed out that this issue had been going on since October. Mr. Mahoney explained that it was something that had just come to their attention through the frequent conversations he and Rep. Dugay had been having regarding this hearing.

Rep. Dugay explained another incident relating to Mr. Hackett and how he had given him checks that needed to be mailed out, but Andy had forgotten them and they were later found with the two unopened checks in the console of the car. Rep. Dugay went on to explain that Andy left for the military on October 15th and that he had hired another campaign helper. Rep. Dugay stated that the new campaign helper was asked to sort out the mail and log it in, which Rep. Dugay then transposed onto his Excel spreadsheet. Chair Ginn Marvin asked if there were any additional questions. At this point Rep. Dugay and Mr. Mahoney conversed for a moment. Rep. Dugay explained his medical problems that occurred on October 21st, the day of a campaign debate, and that he was put on Demerol for a kidney stone, which might have contributed to some misjudgment on his part. He confused a trash can for a water fountain while he was at the debate. It was not until he received a phone call from Commission staff the next day that he realized he was late in filing the report.

The director recommended to the Commission that it should not accept that a candidate can say he didn't know about checks and not be held responsible. The director stated that the penalty would drop from \$10,170 to \$7,400 if the Commission was willing to accept the argument that Rep. Dugay had not received the checks until October 26th. He said the Commission still had not heard from Rep. Dugay: did he understand the importance of not receiving more than \$4,072, and what instructions did he give to Mr. Hackett about not going over that amount. The director expressed his concern that when Rep. Dugay filed his October 22nd affidavit stating that his receipts had not exceeded \$4,072, they actually had exceeded that amount.

Counsel Phyllis Gardiner pointed out that the issue was when the Commission felt Rep. Dugay had received the checks. She also believed the Commission should hear from the Representative about the points raised by the director.

Rep. Dugay explained that he did not understand that the outstanding amount of \$897 from the last election counted toward the general election. Mr. Mahoney took the floor. He explained that when Rep. Dugay received the call from the Commission staff to send in his accelerated report, he checked the spreadsheet, which did not reflect the \$450 in campaign funds. The only explanation was that the log was incorrect due to the staffer inputting the wrong information.

Rep. Dugay explained that Mr. Hackett was trained in what needed to be put in the log, and that he worked in a medical records office so he was proficient in spreadsheets and money. Mr. Mahoney indicated that all the blame could not be put on the staffer and that Rep. Dugay did take part of the blame.

Chair Ginn Marvin asked for a motion. Mr. Ketterer asked for an amount from Mr. Mahoney. Mr. Mahoney recommended a penalty that was equivalent to the dollar amount that was unreported and in excess of the MCEA amount. Mr. Mahoney made the distinction of when the checks were opened and received, and went on to explain that since Rep. Dugay did not receive those checks until October 26th the penalty should be reduced because he had no idea that there was money unopened. Therefore, Mr. Mahoney recommended a total of \$920 for the penalty.

Chair Ginn Marvin asked if there was a motion from the Commission members. For discussion purposes only, Mr. Bigos moved for the Commission to adopt a penalty of \$3,500 based on the factual findings that Rep. Dugay did not receive the checks until he found or opened them in his car and that he did report them when they were found. Mr. Ketterer seconded the motion for discussion purposes only. Mr. Bigos said that it was very important to understand that the harm that was caused did have an effect on the campaign. He felt that the fact that Rep. Dugay had won the election by two to one should not have any effect on the penalty. Mr. Bigos went on to explain that this level of penalty would be consistent with other penalties that had been issued in previous cases. Mr. Cassidy explained that he was bothered that the public funds are supposed to be available for the opponent who has been outspent and the lateness in the filing of reports was a problem to him.

Mr. Ketterer brought up the following points for discussion. The problem with saying that the checks were not received by Rep. Dugay until he found them is that it would not be good public policy. Mr. Ketterer stated that the public policy issue for the Commission was: who bears the risk, or who will be hurt, by a staffer oversight. Mr. Ketterer agreed that the amount of votes received made somewhat of a difference. He indicated that Mr. Cambron might have used radio ads because he did not have enough time to get newspaper ads out. Chair Ginn Marvin said that when she was running she would stand at the post office box and open all mail to see what was coming in, so she was a little confused as to why Rep. Dugay did not do the same. Chair Ginn Marvin also indicated that Rep. Dugay has had issues in the past and was concerned that the Commission was not doing its best to keep everyone on a level playing field. She said she also did not think that not knowing about checks was a good excuse, but agreed that it is what happened.

Chair Ginn Marvin asked the director if he had any numbers to propose for a penalty. The director stated the Election Law contained a maximum penalty if Rep. Dugay had persuaded the Commission that he had tried in good faith to comply with the law. If the members were persuaded of his good faith effort but the Commission rejected the late checks argument, then the maximum penalty would be \$4,110. If the Commission did credit the arguments surrounding the late checks then the maximum was \$2,760.

Chair Ginn Marvin asked about the amount first recommended by staff at the meeting, \$10,170. The director explained that was only a recommendation and the Commission had a considerable

amount of discretion in assessing the penalty. The director went on to explain that the Commission could pick a daily amount and then multiply that by the number of days the report was late. The staff had recommended the daily amount be equal to the unreported amount. Mr. Bigos proposed the Commission make a finding that Rep. Dugay did make a bona fide effort to comply with the statutes when the checks were found. Mr. Bigos stated that he was open to any thoughts or changes the other members might have regarding his motion. Mr. Ketterer then asked if Mr. Bigos was making a motion to assess a penalty somewhere between the \$4,110 and the \$2,760. Mr. Bigos agreed. Chair Ginn Marvin asked if there were other questions. Mr. Ketterer pointed out the importance of finding there was an ethics violation.

Chair Ginn Marvin offered an amendment that the members should go along with the Commission staff's recommended penalty of \$4,110. Mr. Bigos withdrew his motion.

Chair Ginn Marvin moved, Mr. Bigos seconded, and the Commission voted unanimously (4-0) to assess Rep. Dugay a civil penalty of \$4,110.

Mr. Ketterer stated that a MCEA candidate could indeed be harmed whenever someone on the opposing side files a report erroneously or late. He went on to stress that this is a very serious situation and that the penalty could have been much larger, but given the circumstances surrounding the case, there was a good-faith effort to do everything fairly. Mr. Cassidy agreed with what Mr. Ketterer said and went on to say that he thought the penalty amount was fair.

Mr. Mahoney stated that Rep. Dugay wanted to work out some sort of monthly installment plan with the Commission staff. Chair Ginn Marvin said that it would be something he could speak to the director about.

Agenda Item #4 – Inquiry by David F. Emery Regarding Forming an Exploratory Committee and Permissible Expenditures of Maine Clean Election Act Funds

Mr. Emery introduced Mr. Steve Lechner who would be serving as his campaign attorney.

The director explained that Mr. Emery posed four questions to the Commission regarding his possible run for governor: what actions would cause him to be considered an official candidate; could he form an exploratory committee to raise and spend funds while maintaining the option of participating in the MCEA; could he pay MCEA funds to his own polling and analysis firm to provide services to the campaign; and could MCEA funds be used to reimburse a gubernatorial candidate for meals, traveling (including out-of-state), and lodging.

Mr. Emery thanked the Commission staff for proposing answers to his questions so promptly and for being so helpful. He explained that the questions were posed before the campaign so that he would know more about what his options were before choosing to run as a traditionally financed candidate or MCEA candidate.

Chair Ginn Marvin explained that the Commission members would be walking through the questions one by one. Mr. Emery said that he believed the staff memo provided sufficient guidance on his first question regarding what actions would cause him to be considered a

candidate. Mr. Ketterer stated that there were benefits to running as a MCEA candidate, such as not having to spend lots of time and effort raising funds for the campaign. He also said that there were certain liabilities in running as a MCEA candidate, such as spending limitations. Mr. Ketterer said that he thought of Mr. Emory as a candidate, and while he understood Mr. Emory's desire to not commit himself one way or the other, Mr. Ketterer didn't think it would be possible for Mr. Emory to accept private contributions other than seed money and then to run as a MCEA candidate.

Mr. Lechner asked the members to consider who would be cut out of a state-wide race if an individual could not run as a MCEA candidate because they were precluded from organizing an exploratory committee for their campaign. He indicated that people from the private sector would need to do some legwork to see whether they could run.

Mr. Bigos thanked Mr. Emery and Mr. Lechner for coming in and speaking with the Commission regarding their questions. He explained that Maine Law indicated that candidates benefit from stating they are a candidate because they get to start generating media coverage, and are able to do campaign research.

Chair Ginn Marvin moved to the third question regarding a candidate using MCEA funds to pay his own firm for a public opinion poll. The members were in agreement that the Commission staff had answered this question. Mr. Emery agreed.

Chair Ginn Marvin moved on to the fourth question regarding reimbursement of MCEA funds for food and travel. The director explained that the staff recommendation was that MCEA candidates were allowed to spend public funds on food for events or meetings, but could not spend public funds on meals that were personally consumed. Some 2004 candidates believed it was appropriate for them to be able to use public funds for meals while on the road. Chair Ginn Marvin stated that the Commission could prohibit using public funds for meals or they could go to a per diem option. The director suggested maybe using fixed rates for meals while on the road or for travel. The director suggested they could look at the rate for governmental employees who work for the State and see what restrictions apply to them. Mr. Cassidy agreed with the suggestion. Mr. Bigos also agreed, but had a concern that they would be establishing an entitlement that anyone who wants to run a campaign has the right to fill out the paperwork and get the money.

Mr. Emery stated he believed the restriction on the candidate was a bit much. He stated that it was not a big deal financially, and anyone running for office should be able to afford a hamburger, but it was more of a burden from the bookkeeping aspect. Mr. Emery was in agreement with the idea to have a per diem rate. He explained the reason that he posed the question was to clarify things for himself, and it would have no effect on whether or not he chose to run. Chair Ginn Marvin explained that the choices left to the Commission were either the candidate had to pay for his own meals and travel or the Commission could set up a per diem situation. Chair Ginn Marvin asked the director to put together some per diem numbers for the Commission for the August meeting.

Chair Ginn Marvin asked Mr. Emery if he had any other questions. Mr. Emery did not have any other questions. He thanked the Commission for their consideration.

Agenda Item #5 – Final Adoption of Major Substantive Rule Amendments

The director explained that the Commission had provisionally adopted amendments to its Rules on April 8th, 2005. The amendments were well received by the Legislature, but the Legislature requested the Commission change one rule in particular. The director and Counsel Phyllis Gardiner drafted the new language, which could be found on pages 15 and 37 of the amendments.

After reviewing the changes made to the rules, Mr. Ketterer moved, Mr. Bigos seconded, and the Commission members voted unanimously (4-0) to finally adopt the proposed amendments to the Rules.

Agenda Item #6 – Request for Waiver of Late-Filing Penalty/Debra Hart

The director explained that Ms. Hart had been a lobbyist for 20 years and had never been late on any reports. The director acknowledged that Ms. Hart normally files her reports two weeks early and due to some medical problems filed her March lobbyist disclosure reports late. She is required to file monthly reports for two clients.

The staff recommended a reduced penalty of \$100 in lieu of the \$200 penalty due to the fact that Ms. Hart had never been late and the mitigating circumstances of her medical treatment.

Ms. Hart took the floor and expressed her gratitude to the Commission staff for recommending a reduced penalty. She took full responsibility for the late reports. Ms. Hart explained that she normally files it on the 1st of each month, but because of medical problems had just forgotten to do it.

Mr. Cassidy moved, Mr. Bigos seconded, and the Commission members voted unanimously (4-0) to adopt the staff recommendation and to assess a civil penalty of \$100.

Agenda Item #7 – Referral to Attorney General/Matthew Gagnon

The director withdrew the recommendation to refer Matthew Gagnon to the Attorney General. He explained that Mr. Gagnon had been in contact with the Commission staff and would be mailing his penalty payment in the next day or so.

Mr. Ketterer moved, Mr. Bigos seconded, and the Commission members voted unanimously (4-0) to table this item until the next Commission meeting.

Agenda Item #8 – Referral to Attorney General/John Linscott

The director requested that this matter be postponed until the August meeting. Mr. Linscott had explained that he would not be able to attend the meeting due to previous engagements.

Mr. Ketterer moved, Mr. Bigos seconded, and the Commission members voted unanimously (4-0) to adopt the motion and to table this item until the next Commission meeting.

Agenda Item #9 – Referral to Attorney General/Arthur Keenan

The director explained that the Commission assessed a \$500 penalty against Mr. Keenan for filing his December 2004 campaign finance report late. The director went on to say that Mr. Keenan was very hard to contact. Numerous phone calls had been made and penalty letters had been sent out. The penalty still had not been paid and the director expressed concern that Mr. Keenan is not aware of the seriousness of this matter. The staff recommendation was to refer Mr. Keenan to the Attorney General's office for collection procedures.

Mr. Ketterer, Mr. Bigos seconded, and the Commission members voted unanimously (4-0) to refer the matter to the Attorney General's office.

Agenda Item #2 – Request for Reconsideration by Christopher M. McCarthy

The director explained that there was a late submission of a handwritten three-page letter in support of Mr. McCarthy from Mr. & Mrs. Joseph Greenier. Chair Ginn Marvin expressed gratitude for the comments but stressed the value of submitting documents one week before the Commission meeting.

The director said that Mr. McCarthy was a 2004 MCEA candidate who had received \$4,031 in public funds. Mr. McCarthy had been required to file reports on October 27 and December 14, 2004, but had not filed either of them. Mr. McCarthy received numerous notices, including the statutorily required 3-day notice, four more letters, e-mails, phone calls, and he did not respond to any of them. The director said that on January 12th, the day that Mr. McCarthy was going to be referred to the Attorney General's office as a non-filer, the staff received a fax copy of his reports. The director stated that Mr. McCarthy became a late filer, and the statutory penalties were \$3,104.64 for the October report and \$863.21 for the December report, for a total of \$3,967.85. The director also said that Mr. McCarthy was supposed to return roughly \$845 in public funds in December 2004, but had not done so until May 9th, 2005.

The director explained that Mr. McCarthy had come to the office and had tried to give back the \$845 dollars in cash and was asked to submit the money in the form of a check or money order instead. The director recapped that at the May meeting the Commission had assessed late filing penalties totaling \$3,967.85 plus another penalty of \$5,000 for failing to return unspent public funds by December 14, 2004. Mr. McCarthy was at the meeting to ask for reconsideration of the penalty. The Commission staff was in agreement with the rationale for Mr. Ketterer's motion in May, and recommended that the Commission not reconsider the penalty.

Mr. McCarthy stated that he did not represent himself as best he could at the first meeting. Mr. McCarthy expressed his disappointment for not getting a reduced penalty and mentioned that previous penalties for other first time candidates had been reduced. He asked the members to reconsider the penalty amount due to wrongful assumptions about why he did not give back the

\$845. Mr. McCarthy stated that attorney Daniel Billings would be willing to represent him as legal counsel. He felt he had mitigating circumstances going on in his life at that time. Mr. McCarthy stated he was in financial trouble and explained that was why he was in front of the Commission again. Mr. McCarthy went on to explain that he could not make \$900 per month payments and if he did not get a lower penalty he would negotiate with the Attorney General's officer to get a lower amount. Mr. McCarthy explained that he was willing to take out his 401K plan to pay off the penalty, so long as it was reduced. If the penalty was going to be close to \$9,000, his next action was to go to the Attorney General's office. Mr. Bigos asked if Mr. McCarthy thought there were any errors made on the Commission's part. Mr. McCarthy responded that he did not think there were errors made so much as just misinterpretations and he thought that there was more lenience shown in the past for first-time candidates.

Mr. Bigos asked if the staff had proposed a \$750 a month payment plan as opposed to the \$900 a month plan originally suggested. Mr. McCarthy was unsure of that answer. The director explained there was a newer payment plan that had been offered. The director explained that a new payment plan had been sent out to Mr. McCarthy outlining the proposed plan of \$750 a month. Mr. McCarthy agreed that he had received his copy, but it still would not be doable on his part as he has financial constraints. Mr. Bigos explained that he thought it was very helpful that the Commission staff had given the members minutes of the last meeting and he felt that there had been no errors made on the Commission's part. Mr. Bigos stated that at this point he was not leaning towards a more lenient penalty.

Mr. Joseph Greenier took the floor. He explained that he and his wife were at the meeting as concerned citizens regarding the MCEA and what it stood for. He stated that this act was for candidates who would not normally run due to money issues. Mr. Greenier likened this penalty situation to that of something that could happen in court. He felt that courts show lenience and that the Commission members should do the same. Mr. Greenier went on to say that compassion is needed in this case as Mr. McCarthy is a first-time candidate. He stated that heavily fining a candidate is not an ethical thing to do. He felt that the penalty would turn people off from running for office. Mr. Greenier informed the members that he and his wife had been to several meetings to make sure that the MCEA was being kept in place for regular people. Mr. Greenier stressed that regular people make mistakes, referring to Mr. McCarthy, and that by making an example out of them was not always the best policy. Mr. Greenier went on to say that he felt that this case did warrant a reduction and that he and his wife made many sacrifices to come to the meetings and share their feelings with the Commission members.

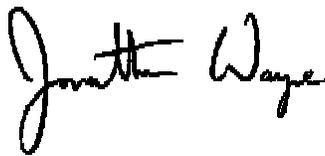
Mr. Ketterer moved to reject the request for reconsideration, and Mr. Bigos seconded. Mr. Ketterer went on to explain that the members should reject the reconsideration due to the following: Mr. McCarthy had been given ample opportunity to be heard and to present evidence that would argue for reducing the penalty. Mr. Ketterer stated that the past Commission practice of meetings had been to reduce penalties for first-time candidates due to late filing of reports, but not to reduce penalties when almost \$1,000 in public funds had been withheld. Cashing a check and allegedly making cash disbursements to those who help with the campaign is highly irregular. The candidate had not returned the money after many attempts had been made by the Commission staff to inform the candidate to do so. Mr. Ketterer stated that Mr. McCarthy held that money illegally and knowingly. He said that granting Mr. Greenier's request for the

members to show compassion for this candidate would only send out the message to future candidates that it is okay to hold on to public funds when they should be returned and as a result there would be no more funds for other candidates to use. Mr. Ketterer explained that there was no new evidence shown by Mr. McCarthy or Mr. Greenier to argue for the reduction. Mr. Ketterer stated that he felt there should be no reconsideration and that the candidate had appellate rights and he could exhaust those to his best ability.

Chair Ginn Marvin asked if there were any other questions from the members. There being none, the Commission voted unanimously (4-0) to reject the request for reconsideration.

There being no further business, the Commission adjourned.

Respectfully submitted,

A handwritten signature in black ink that reads "Jonathan Wayne". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jonathan Wayne
Executive Director