



State Water Resources Control Board

August 20, 2020

VIA ELECTRONIC MAIL

TO: ATTACHED SERVICE LIST

AMADOR WATER AGENCY HEARING: NOTICE OF CHANGE FROM IN-PERSON HEARING TO REMOTE HEARING AND PROCEDURAL RULING FOLLOWING THE AUGUST 12, 2020 PRE-HEARING CONFERENCE

On July 7, 2020, the State Water Resources Control Board (State Water Board or Board) issued a [Notice of Public Hearing and Pre-Hearing Conference](#) (Hearing Notice), regarding Amador Water Agency's (Amador) petition for partial assignment of State Filed Application 5647 and accompanying Application 5647X03, and reversion of rights previously assigned to Jackson Valley Irrigation District (JVID) under State Filed Application 5648 (Permit 12167). The State Water Board subsequently issued a [Notice of Rescheduling of Public Hearing](#) on July 15, 2020.

To organize the conduct of the hearing, the State Water Board held a Pre-Hearing Conference on Wednesday, August 12, 2020.

By email dated August 6, 2020, the State Water Board Hearing Team (Hearing Team) staff circulated a document titled "[Pre-Hearing Conference Information for the Amador Water Agency Hearing](#)" to the parties in advance of the Pre-Hearing Conference. I appreciate the parties' cooperation and participation during the Pre-Hearing Conference and the written comments submitted by Amador in its August 11, 2020, Pre-Hearing Conference Statement (Statement).

During the Pre-Hearing Conference, the parties were generally in agreement on multiple discussion topics, which are memorialized in this ruling. I also took certain procedural issues under consideration and this ruling responds to those procedural issues and the comments and requests made during the Pre-Hearing Conference. Lastly, this ruling provides guidance and clarification on conduct and expectations for the upcoming hearing.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Hearing Procedures and Deadlines

Change of In-Person Hearing to Remote Hearing

During the Pre-Hearing Conference, the participants agreed to participate in the hearing remotely via an online audio-visual conferencing platform. Therefore, the hearing will take place via the Zoom platform on the previously noticed hearing dates, September 29 and 30, 2020. Video sharing will be required of parties, their representatives, and witnesses when testifying or presenting arguments during the remote hearing.

Detailed instructions on how parties and interested persons may join the hearing via Zoom to participate in the remote hearing will be provided closer to the hearing date.

Interested persons, including members of the public, who will not be making oral policy statements, may watch or listen via webcast on the [CalEPA website](#).

Individuals who require special accommodations are requested to contact staff by email at wr_hearing.unit@waterboards.ca.gov prior to the hearing.

Deadlines for Case-in-Chief Presentations and Cross-Examination Exhibits

Parties provided input on potential deadlines for submitting to the Board, and serving on all other parties, case-in-chief PowerPoint presentations and any additional exhibits for use during cross-examination. In its Statement, Amador suggested a deadline of September 23 or 24, 2020 for cross-examination exhibits. Discussion during the Pre-Hearing Conference also included the possibility of an earlier deadline of September 21, 2020 to allow for sufficient time for the parties and Hearing Team to review cross-examination exhibits. Parties did not have strong preferences on exact dates; however, parties seemed to be in agreement that the deadline for case-in-chief PowerPoint presentations be earlier than the deadline for cross-examination exhibits so that parties may have more time to prepare cross-examination exhibits.

I am requiring that all presentations to be used during cases-in-chief be submitted to the Board by **12:00 p.m. (noon) on September 21, 2020**. Because these presentations are a summary of previously submitted testimony and exhibits and must not contain new information, **citations to witnesses' testimony and exhibits must be included on each slide of the PowerPoint presentation** for ease of reference. PowerPoint presentations should be submitted in both PowerPoint and Adobe Portable Document Format (PDF).

To give parties sufficient time to prepare cross-examination exhibits while also giving the parties and the Hearing Team adequate time to review exhibits prior to the hearing,

all cross-examination exhibits must be submitted by **12:00 p.m. (noon) on September 24, 2020.**

Rebuttal Schedule

During the Pre-Hearing Conference, I stated that I was inclined to pause the hearing after the presentation of cases-in-chief and set a later hearing date for rebuttal and any subsequent phases to ensure that the hearing proceeds efficiently. No parties objected to a proposed rebuttal date of October 22, 2020 or the requirement for written rebuttal testimony to be submitted in advance. Amador did, however, express a concern about the potential for the hearing to run longer than originally planned. Amador also proposed a deadline of October 15, 2020 for receipt and service of rebuttal exhibits. No other parties objected to these proposals.

I have considered the parties' input and the hearing will take a scheduled break between the end of the parties' cases-in-chief, including cross-examination, and the commencement of parties' presentation of rebuttal. A hearing date for rebuttal testimony has been scheduled for **October 22, 2020, beginning at 9:00 a.m.** I will also require parties to submit written rebuttal testimony and exhibits in advance by **12:00 p.m. (noon) on October 15, 2020.** Written rebuttal submittals should include rebuttal witnesses' written testimony, statements of qualifications (if not already submitted as part of a case-in-chief), other rebuttal exhibits, and an updated exhibit identification index.

As a general reminder, rebuttal evidence is limited to evidence that is responsive to evidence presented in connection with another party's case-in-chief, and it does not include evidence that should have been presented during the case-in-chief of the party submitting rebuttal evidence. It also does not include repetitive evidence. Cross-examination of rebuttal evidence will be limited to the scope of the rebuttal evidence. **To ensure that it is within the scope of rebuttal, parties' written rebuttal witness testimony and exhibits must clearly indicate the case-in-chief evidence to which the rebuttal evidence is responsive.** If a rebuttal submission does not clearly cite to another party's case-in-chief evidence as the basis of rebuttal, that portion of the testimony or exhibit may be stricken.

Guidance and Deadline for Policy Statements

Conducting the hearing via Zoom will still provide interested persons, including members of the public, the opportunity to present policy statements. Consistent with the Hearing Notice, persons who wish to participate in the hearing by presenting a policy statement only will have the opportunity to orally summarize their statements on

the first day of the hearing.¹ Persons presenting policy statements are requested to submit their written policy statements to the Board before they are presented. As discussed during the Pre-Hearing Conference, persons who wish to submit a written policy statement only, without appearing at the hearing, may do so, and an oral summary is not required. All policy statements must be received by **9:00 a.m. on the first day of the hearing, September 29, 2020**. Because ex parte rules are in place, interested persons must copy the service list when submitting any policy statement.

Clarification of Presentation of Exhibits During Remote Hearing

During the remote hearing, the Hearing Team will control the screen and share all exhibits, PowerPoint presentations, and any other documents that need to be displayed. Witnesses and attorneys, or other party representatives, may request that staff share specific exhibits and advance PowerPoint slides during their presentations or during cross-examination.

Manner by Which Objections Should Be Made During Remote Hearing

During the Pre-Hearing Conference, parties provided input on how best to make objections during the remote hearing. Multiple parties explained the importance of making timely objections in order to prevent a witness from answering a question and expressed concern with relying on digital means to object (e.g., Zoom's 'Raise Hand' feature). I understand the parties' concerns regarding the need to hear and respond to objections in a timely manner. In order to ensure objections are handled appropriately during the hearing, party representatives should interject orally when they have an objection and provide the substance of their objection after I call upon them. If multiple party representatives object simultaneously, I will try my best to call upon party representatives in the order in which the objections were received. However, please keep in mind this may be difficult to determine via Zoom.

Hearing Dry Run

Parties expressed interest in participating in a dry run of the hearing via Zoom a few days prior to the hearing to give parties an opportunity to test equipment and see how staff plan to display presentations and exhibits. The dry run will not include a complete rehearsal of testimony. Participation in the dry run is encouraged but not required.

By email dated August 14, 2020, staff asked parties to notify staff of any conflicts with a dry run at **11:00 a.m. on September 25, 2020**. No parties indicated any conflicts;

¹ Instructions on how interested persons may join the hearing via Zoom to orally present policy statements during the remote hearing will be provided closer to the hearing date.

therefore, a dry run of this hearing has been scheduled for that date and time. Zoom meeting details will be provided closer to that date.

File Transfer Protocol (FTP) Accounts for the Submittal and Exchange of Documents

The State Water Board is providing access to two secure File Transfer Protocol (FTP) accounts to facilitate the electronic service of parties' exhibits and provide downloadable copies of hearing documents. The FTP accounts will avoid issues with file size limitations and also alleviate the need for parties to send any physical storage devices to other parties and to the Board.

One FTP account will allow parties to upload submittals ahead of time. **Parties are required to use this FTP account to submit to the Board and serve on all other parties written testimony and other exhibits, exhibit identification indices, and presentations** for all phases of the hearing. Although it will be possible to upload documents at any time, submittals must be uploaded no later than the established deadlines. No other parties will be able to view submittals until after the deadlines. Parties are required to send an email to the service list and the Hearing Team after they have uploaded documents.

The second FTP account will allow parties and interested persons to download documents. The Hearing Team will make timely submittals available for download after the appropriate deadlines and notify the service list when they are available. Parties must then serve submittals on the other parties by sending an email to the service list and the Hearing Team confirming that their submittals are available and accurate. Service will be considered timely and complete if such an email is sent **no later than 12:00 p.m. (noon) on the day after the deadline.**

To expedite service, **motions, objections, and correspondence should be submitted to the Board and served on other parties via email, rather than through the FTP account process**, unless file size limitations prevents service via email. If parties submit any documents to the Board and serve them on other parties by email, rather than through the FTP account process described in the attached instructions, parties must include a statement of service.

For full guidance on the FTP accounts, please see the attached Notice of Availability of FTP Accounts for the Amador Water Agency Hearing (Attachment 1).

Guidance on Format of Document Submittals

Amador requested clarification regarding the requirement in the Hearing Notice that electronic submission of documents be in PDF. In accordance with page 5 of Information Concerning Appearance at Water Rights Hearings (enclosed with the

Hearing Notice), documents submitted or served electronically must be in PDF except for the following types of documents submitted in Microsoft Office-supported formats:

- Microsoft Excel for spreadsheets
- Microsoft PowerPoint for slide presentations
- Microsoft Excel or Word for exhibit identification indices

The exceptions described above allow for certain documents to be submitted in formats other than PDF. Please note that all documents, including presentations, must contain page numbers. When preparing presentations to accompany oral testimony, include references on each slide to the specific exhibit(s) and/or portion(s) of your written testimony, including page numbers, that contain the information presented. Any presentations should be submitted in both PowerPoint format and PDF. If any party has questions regarding the format of a particular exhibit that deviates from the norm, please contact Hearing Team staff prior to the deadline for submitting the exhibit.

Summary of Hearing Schedule and Deadlines

The following schedule and deadlines apply to this hearing. Please see the attached Notice of Availability of FTP Accounts for the Amador Water Agency Hearing (Attachment 1) for more detailed information regarding submittal and service of hearing documents through the FTP accounts. If parties submit any documents to the Board and serve them on other parties by email, rather than through the FTP account process described in the attached instructions, parties must include a statement of service by the deadlines listed below:

- **September 2, 2020, 12:00 p.m. (noon)** – Deadline to submit case-in-chief exhibits and exhibit identification indices to the Board and serve on all other parties.
- **September 9, 2020, 12:00 p.m. (noon)** – Deadline to submit any objections to case-in-chief evidence to the Board and serve on all other parties. Submitting objections is optional. Parties will be permitted to respond orally to any written objections during the hearing.
- **September 21, 2020, 12:00 p.m. (noon)** – Deadline to submit case-in-chief PowerPoint presentations to the Board and serve on all other parties.
- **September 24, 2020, 12:00 p.m. (noon)** – Deadline to submit cross-examination exhibits to the Board and serve on all other parties.
- **September 25, 2020, 11:00 a.m.** – Opportunity for parties to participate in a dry run of the hearing procedures via Zoom. Participation is encouraged but not required.

- **September 29 and 30, 2020, beginning at 9:00 a.m.** – Hearing to be conducted remotely via Zoom. All policy statements must be submitted to the Board and copied to the service list prior to the start of the hearing.
- **October 15, 2020, 12:00 p.m. (noon)** – Deadline to submit written rebuttal testimony and rebuttal exhibits to the Board and serve on all other parties.
- **October 22, 2020, beginning at 9:00 a.m.** – Rebuttal phase of hearing to be conducted remotely via Zoom.

Instructions on how parties may join via Zoom to participate in the dry run and hearing will be provided closer to the scheduled dates.

Any submittals to the Board by email should be addressed to wr_hearing.unit@waterboards.ca.gov, with the subject of “Amador Water Agency Hearing.”

Scope and Party Participation

Requests for Designation as a Party

El Dorado Irrigation District (EID) and California Sportfishing Protection Alliance, California Water Impact Network, and AquAlliance (collectively, CSPA et al.) submitted Requests for Party Designation with their Notices of Intent to Appear (NOI). In its Statement, Amador indicated that it supported allowing EID to participate as a party in this proceeding; however, Amador’s Statement did not address CSPA et al.’s request for party designation. When asked at the Pre-Hearing Conference, Amador did not have any objections to allowing CSPA et al. to participate as a party in this proceeding. No other parties objected to EID and CSPA et al. being designated parties. Therefore, I granted the requests of EID and CSPA et al. and both have been designated as parties in this proceeding.

Amador’s Request to Limit the Scope of DWR’s Direct Testimony

In its Statement, Amador requested that the Department of Water Resources (DWR) be prohibited from presenting testimony or evidence concerning the inclusion of Term 91 in any permit issued on Amador’s application unless DWR first demonstrates that this matter materially differs from the dispute litigated in *El Dorado Irrigation District v. State Water Resources Control Board* (2006) 142 Cal.App.4th 937 (*El Dorado*).

During the Pre-Hearing Conference, Amador reiterated its belief that DWR should demonstrate how the issues presented in this proceeding differ from the issues litigated in *El Dorado*. In response, DWR stated that it understands the implications of the

decision resulting from *El Dorado* and believes it is premature to limit DWR's participation at this time without having seen its testimony and evidence.

I concur with DWR that, at this point, it is premature to attempt to limit DWR's testimony. However, I am directing DWR not to attempt to relitigate any issues pertaining to Term 91 that were litigated and decided in *El Dorado*. If, after reviewing DWR's testimony, Amador objects to DWR's testimony or evidence, Amador may renew its objection and request that DWR be precluded from introducing specific exhibits or testimony.

Amador's Request to Limit the Scope of EBMUD's Testimony

In its Statement and comments during the Pre-Hearing Conference, Amador also requested that the scope of East Bay Municipal Utility District's (EBMUD) direct testimony and cross-examination be limited to the implementation of protest dismissal terms outlined in EBMUD's letter dated March 13, 2007. In its oral comments, Amador maintained the position that EBMUD should not be allowed to present testimony and evidence on all key hearing issues, and the scope of EBMUD's participation should be limited to those protest dismissal terms explicitly referenced in EBMUD's 2007 letter.

During the Pre-Hearing Conference, both Amador and EBMUD expressed their intentions to continue to negotiate an appropriate three-party stipulation and agreement with JVID. However, EBMUD stated that if Amador, EBMUD, and JVID are unable to reach such an agreement prior to the hearing, EBMUD would like to reserve its right to participate as a party and present direct testimony and cross-examination on any relevant key issues noticed for this hearing.

EBMUD explained that there is an issue concerning the storage component of Amador's application that was not addressed in its 2007 letter, and that due to developments subsequent to its 2007 letter, EBMUD believes it should be allowed to present evidence on this issue. Additionally, EBMUD clarified that there are key hearing issues, including those related to Term 91, that it does not intend to present testimony and evidence on, and EBMUD plans to present testimony and evidence only on those issues that have potential to affect EBMUD as a legal user of water.

I appreciate Amador's and EBMUD's willingness to resolve any outstanding issues by stipulation and encourage both parties, along with JVID, to continue to negotiate in order to narrow the scope of issues to be addressed through the hearing. If these entities are unable to reach a final agreement before the hearing, however, I will allow EBMUD to present testimony and evidence on any issues relevant to potential injury to EBMUD, as described in its NOI. Given the passage of time, and because Amador's and EBMUD's earlier protest resolution was not reduced to a written agreement,

EBMUD's testimony should not be limited solely to the terms agreed to in principle in EBMUD's 2007 letter.

Order of Presentation

As I announced at the Pre-Hearing Conference, the parties will present their cases-in-chief and/or conduct cross-examination in the following order:

1. Amador
2. DWR
3. EBMUD
4. EID
5. CSPA et al.

Updated Service List

An updated Service List of Parties and Interested Persons List showing EID and CSPA et al. as parties is attached to this letter.

Contact Information

Thank you for your participation in the Pre-Hearing Conference and for your efforts to assist the State Water Board in conducting a fair and efficient hearing. If you have any non-controversial procedural questions, please email the Hearing Team at wr_hearing.unit@waterboards.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Sean Maguire
State Water Board Member
Amador Water Agency Hearing Officer

Attachments:

1. Notice of Availability of FTP Accounts for the Amador Water Agency Hearing
2. Updated Service List of Parties and Interested Persons List

State Water Resources Control Board

NOTICE OF AVAILABILITY OF FTP ACCOUNTS FOR THE AMADOR WATER AGENCY HEARING

The State Water Resources Control Board (State Water Board or Board) has created two File Transfer Protocol (FTP) accounts to facilitate the electronic service of parties' documents and provide downloadable copies of hearing documents. The FTP accounts will avoid issues with file size limitations and will alleviate the need for parties to send any physical storage devices to other parties and to the State Water Board. The two Division of Water Rights (DWR) FTP accounts can be accessed at the links provided below.

SUBMITTING AND SERVING DOCUMENTS VIA FTP ACCOUNTS

(1) DWR UPLOAD FTP (UPLOAD) ACCOUNT:

<https://ftp.waterboards.ca.gov/?u=DWR-Hearing-FTP1&p=zH2Rtp>

Please be aware that files can only be uploaded to this FTP account.

Parties are required to upload **written testimony and other exhibits, exhibit identification indices, and presentations to their respective folders within the Amador Water Agency folder** on the UPLOAD account. Parties may upload these documents any time before the filing deadline. Although it will be possible to upload documents to the UPLOAD account at any time, exhibits must be uploaded **no later than the deadlines established by the hearing officer**.

Parties are required to send an **email to the service list and the Hearing Team when they have completed uploading their documents** to the UPLOAD account. This will initiate electronic service to the other parties. Once the deadline has passed and the Hearing Team has moved documents to the DOWNLOAD account, parties are required to send an email to the service list and the Hearing Team to complete electronic service (described below).

Once a file is uploaded to the UPLOAD account, it cannot be viewed, removed, or replaced by any party. In other words, parties will only be able to view other parties' submittals in the DOWNLOAD account (described below) after the submittal deadline and once documents have been transferred and made available by the

Hearing Team. To make any changes to uploaded documents, parties must submit a request to the Hearing Team at the email address provided below.

(2) DWR DOWNLOAD FTP (DOWNLOAD) ACCOUNT:

<https://ftp.waterboards.ca.gov/?u=DWR-Hearing-FTP2&p=YHdymY>

Please be aware that files can only be downloaded from this FTP account.

After the filing deadline, the Hearing Team will transfer all timely submitted documents from the UPLOAD account to the DOWNLOAD account and notify the parties that those documents are available to download from that account. **Parties must verify in writing that all of their documents have been properly transferred to the DOWNLOAD account before electronic service is considered complete** by sending an email to the service list and the Hearing Team confirming that their submittals are available and accurate. Service will be considered timely if such an email is sent **no later than 12:00 p.m. (noon) on the day after the deadline.**

After all documents have been transferred to the DOWNLOAD account, the Hearing Team will notify the parties that the documents are available for download. To allow the Hearing Team sufficient time to accurately transfer files, please note there will be a minimum 60-minute delay between the deadline for parties to upload documents to the UPLOAD account and the availability of those documents on the DOWNLOAD account. To make any changes to documents available for download, parties must submit a request to the Hearing Team.

SUBMITTING AND SERVING DOCUMENTS VIA EMAIL

To expedite service, **motions, objections, and correspondence should be submitted to the Board and served on other parties via email, rather than through the FTP account process**, unless file size limitations prevents service via email. If parties submit any documents to the Board and serve them on other parties by email, rather than through the FTP account process described above, parties must include a **statement of service**.

For the convenience of the parties, the Hearing Team will also transfer any emailed documents to the DOWNLOAD account and make them available for download.

If file size limitations prevent service of these documents via email, parties may submit the documents to the Board and serve them on the other parties by following the FTP account process described above. Parties that choose to upload any documents other than those that are required to be submitted and served through the FTP accounts must follow the same electronic service process described above. Please include in your email notifying the service list and the Hearing Team that new documents have been uploaded to the UPLOAD account a brief description of the documents. This will initiate electronic service to the other parties and will notify the Hearing Team that new

documents have been uploaded. The Hearing Team will then transfer those documents to the DOWNLOAD account and make them available for download.

FILE NAMING CONVENTIONS

Parties must adhere to the following file naming conventions, regardless of whether documents are served via the FTP process or email:

- **Exhibits:** (Party Acronym)-(Exhibit #XX) (Document Title)
 - Example: SWRCB-01 State Filed Application 5647
- **PowerPoint presentations:** (YYYY-MM-DD) (Party Acronym) (Subject)
 - Example: 2020-09-21 AWA Case-in-Chief Presentation
 - Please note that these presentations are non-evidentiary summaries of witness testimony and exhibits to aid in oral presentations at the hearing.
- **Exhibit identification indices:** (Party Acronym)-00 Exhibit Identification Index
 - Example: SWRCB-00 Exhibit Identification Index
 - Please note that the Exhibit Identification Index is not an exhibit. The naming convention simply keeps the index at the top of a party's list of exhibits.
- **Other documents:** (YYYY-MM-DD) (Party Acronym) (Subject)
 - Example: 2020-08-06 SWRCB Pre-Hearing Conference Information
- File name lengths must be 256 characters or less

CONTACT INFORMATION

Any email submittals to the Board and any questions or requests directed to the Hearing Team regarding the FTP accounts should be addressed to wr_hearing.unit@waterboards.ca.gov, with the subject of "Amador Water Agency Hearing." **When submitting any questions or requests regarding substantive or controversial procedural matters related to this proceeding, you are required to copy the most recent service list for the proceeding.** (Gov. Code, §§ 11430.10-11430.80.)

SERVICE LIST OF PARTIES & INTERESTED PERSONS LIST

(UPDATED¹ August 20, 2020)

Amador Water Agency Hearing
Scheduled for September 29, 30, and October 22, 2020

PARTIES

THE FOLLOWING MUST BE SERVED WITH WRITTEN TESTIMONY, EXHIBITS AND OTHER DOCUMENTS. (Note: All parties have agreed to accept electronic service, pursuant to the rules specified in the hearing notice.)

AMADOR WATER AGENCY Joshua M. Horowitz Ryan S. Bezerra Holly J. Jacobson Bartkiewicz, Kronick & Shanahan, APC 1011 22 nd Street Sacramento, CA 95816 jmh@bkslawfirm.com rsb@bkslawfirm.com hjj@bkslawfirm.com	CALIFORNIA DEPARTMENT OF WATER RESOURCES Erick D. Soderlund 1416 Ninth Street Sacramento, CA 95814 erick.soderlund@water.ca.gov
EAST BAY MUNICIPAL UTILITY DISTRICT Jon Salmon Fred Etheridge 375 11 th Street, MS 904 Oakland, CA 94607 jon.salmon@ebmud.com fred.etheridge@ebmud.com	EL DORADO IRRIGATION DISTRICT Brian D. Poulsen, Jr. Elizabeth L. Leeper 2890 Mosquito Road Placerville, CA 95667 bpoulsen@eid.org eleeper@eid.org
CALIFORNIA SPORTFISHING PROTECTION ALLIANCE, CALIFORNIA WATER IMPACT NETWORK & AQUALLIANCE Chris Shutes 1608 Francisco Street Berkeley, CA 94703 blanccapaloma@msn.com Michael Jackson P.O. Box 207 Quincy, CA 95971 mjatty@sbcglobal.net	

¹ Updates include: 1) listing additional hearing date scheduled for rebuttal, 2) listing El Dorado Irrigation District (EID) and California Sportfishing Protection Alliance, et al. as parties, and 3) addition of representatives for EID and Jackson Valley Irrigation District.

INTERESTED PERSONS

THE FOLLOWING ARE INTERESTED PERSONS WHO WILL PARTICIPATE BY POLICY STATEMENT ONLY. IT IS NOT NECESSARY TO SERVE THEM WITH WRITTEN TESTIMONY, EXHIBITS, AND OTHER DOCUMENTS.

JACKSON VALLEY IRRIGATION DISTRICT Steven Fredrick Robert B. ("Bob") Maddow 6755 Lake Amador Drive lone, CA 95640 office@jvid.org steve@jvid.org RMaddow@bpmnj.com	
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