

COMMON INTEREST COMMUNITY BOARD

MINUTES OF MEETING

The Common Interest Community Board (Board) met on September 21, 2023, at the Perimeter Center, 9960 Mayland Dr., Richmond, VA 23233, in Board Room 2.

The following members were present:

Catherine Noonan
David S. Mercer, Vice-Chair
Lori Overholt
Anne Sheehan
Scott Sterling
Tracey Talbert
Margaret Tunstall

Board members Maureen Baker, Matt Durham, Thomas Mazzei, and Katherine Waddell were not in attendance at the meeting.

DPOR staff present for all or part of the meeting included:

Demetrios J. Melis, Director
Kishore Thota, Chief Deputy Director
Tanya Pettus, Board Administrator
Joseph C. Haughwout, Jr., Regulatory Affairs Manager
Amy Goobic, Executive Assistant

Josh Laws, Assistant Attorney General with the Office of the Attorney General, was present.

Finding a quorum of the Board present, Mr. Mercer called the meeting to order at 10:03 a.m. **Call to Order**

Mr. Mercer requested that Board members and staff introduce themselves. Ms. Noonan and Ms. Talbert were welcomed as newly appointed Board members. **Introductions**

Ms. Pettus advised the Board of the emergency evacuation procedures. **Emergency Evacuation Procedures**

Mr. Mercer requested agenda item IX. d., Consider Authorizing NOIRA for CIC Association Registration Regulations General Review, be moved to the end of the agenda. **Approval of Agenda**

Ms. Noonan moved to amend the agenda. Ms. Talbert seconded the motion which was unanimously approved by: Noonan, Mercer, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Sheehan moved to approve the agenda as amended. Ms. Tunstall seconded the motion which was unanimously approved by: Noonan, Mercer, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Sheehan moved to approve the minutes from the June 2, 2023, Ombudsman Regulatory Review Committee meeting; and the June 8, 2023, Board meeting. Ms. Noonan seconded the motion which was unanimously approved by: Noonan, Mercer, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Approval of Minutes

Ms. Pettus advised the Board that former CIC Board Administrator Joesph Haughwout is now the Regulatory Affairs Manager for the agency, and that Lee Bryant is now serving as Regulatory Operations and Board Administrator but was unable to attend the meeting.

DPOR Staff Updates

Ms. Pettus also advised that as the Executive Director position is currently vacant, she has taken on a portion of the responsibilities of that office.

No members of the public were present to address the Board on topics other than case files to be presented.

Public Comment Period

Ms. Overholt recused herself from the meeting for discussion and deliberation of File Number 2021-02487.

Recusal of Board Member

Paul Schmidt, attorney for Atlantic Community Management Corporation, was present and addressed the Board. Mr. Schmidt took exception to the Board's jurisdiction over his client but thanked the Presiding Officer for a fair and well thought out recommendation.

File Number 2021-02487, Atlantic Community Management Corporation

In the matter of **File Number 2021-02484, Atlantic Community Management Corporation**, the Board members reviewed the record which consisted of the investigative file, the transcript, and exhibits from the Informal Fact-Finding Conference, and the Summary of the Informal Fact-Finding Conference as well as the Presiding Officer's recommendation.

Ms. Sheehan moved to accept the Presiding Officer's recommendation and find Atlantic Community Management Corporation in violation of the following Board regulations: 18 VAC 48-50-190.19 as provided in Count 1, 18 VAC 48-50-190.17 as provided in Count 2, 18 VAC 48-50-

190.12 as provided in Count 3, and 18 VAC 48-50-190.10 as provided in Count 4. Mr. Sterling seconded the motion which was unanimously approved by: Noonan, Mercer, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Noonan then moved to accept the sanctions as recommended and impose the following: a monetary penalty of \$500.00 for the violation as provided in Count 1, a monetary penalty of \$1,000.00 for the violation as provided in Count 2; no sanction for the violation as provided in Count 3, and monetary penalty \$500.00 for the violation contained in Count 4, for a total monetary penalty of \$2,000.00. Ms. Tunstall seconded the motion which was approved by members: Noonan, Mercer, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Overholt returned to the meeting

In the matter of **File Number 2023-01113, Property Management Associates LLC, dba PMA**, the Board members reviewed the record which consisted of the investigative file, the transcript, and exhibits from the Informal Fact-Finding Conference, and the Summary of the Informal Fact-Finding Conference as well as the Presiding Officer's recommendation.

Ms. Talbert moved to accept the Presiding Officer's recommendation and find Property Management Associates LLC, dba PMA in no violation of the Board's regulations as provided in Count 1, and in violation of 18 VAC 48-50-220.D as provided in Count 2. Ms. Sheehan seconded the motion which was unanimously approved by: Noonan, Mercer, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Noonan then moved to accept the sanctions as recommended and impose a monetary penalty of \$400.00 for the violation as provided in Count 2. In addition, for the violation of Count 2, Property Management Associates LLC, dba PMA will be placed on probation for a period of one year. If at any time during the probationary period the Board finds that Property Management Associates LLC, dba PMA has violated the Board's regulations regarding responses to inquiries by the Board or its agents and/or provision of records to the Board or its agents, the Board shall revoke Property Management Associates LLC, dba PMA's license. Ms. Sheehan seconded the motion which was approved by members: Noonan, Mercer, Sheehan, Sterling, Talbert, and Tunstall.

Return of Board Member

File Number 2023-01113, Property Management Associates LLC, dba PMA

Mr. Mercer recused himself from the meeting for discussion and deliberation of File Number 2023-00417.

Recusal of Board Member

Ms. Sheehan assumed Chair of the Board.

In the matter of File Number **2023-00417, Purple Sage Cluster Inc.**, the Board members reviewed the Consent Order. Purple Sage Cluster Inc. admits to a violation of 18 VAC 48-70-50.4 as outlined in Count 1, and consents to the imposition of a monetary penalty of \$450.00 for violation of Count 1, and Board costs of \$150.00. Ms. Talbert moved to approve the terms of the Consent Order as presented. Ms. Tunstall seconded the motion which was unanimously approved by: Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

File Number 2023-00417, Purple Sage Cluster Inc.

Mr. Mercer returned to the meeting and resumed as Chair of the Board.

Return of Board Member

In the matter of File Number **2023-00259, Jeffrey O-Brien Bloxsom**, the Board members reviewed the Consent Order. Jeffrey O-Brien Bloxsom admits to a violation of 18 VAC 48-70-190.1 as outlined in Count 1, and consents to the imposition of a monetary penalty of \$1,500.00 for violation of Count 1, and Board costs of \$150.00. In addition, the Board shall waive imposition of the \$1,500.00 monetary penalty provided Bloxsom provides to the Board, in a form acceptable to the Board, evidence of completion of the following courses:

File Number 2023-00259, Jeffrey O'Brien Bloxsom

1. M-100: The Essentials of Community Management;
2. M-204: Community Governance;
3. M-205: Risk Management; and
4. M-206: Financial Management.

Proof of completion must be provided within thirty (30) days of the effective date of the Order. If Bloxsom fails to comply with these conditions, the full monetary penalty will be automatically imposed.

Ms. Noonan moved to approve the terms of the Consent Order as presented. Ms. Talbert seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

In the matter of **File Number 2023-02755, CJB Management LLC**, the Board members reviewed the record which consisted of the application file, transcript and exhibits from the Informal Fact-Finding Conference, and the Presiding Officer's Summary and Recommendation. Ms. Overholt moved to accept the recommendation of the Presiding Officer and approve CJB Management LLC's application for a Common Interest Community Manager license. Ms. Tunstall seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

File Number 2023-02755, CJB Management LLC

Mr. Haughwout provided an update on regulatory action.

Update on Regulatory Actions

Draft proposed amendments to the CIC Manager Regulations were submitted for Executive Branch review March 14, 2022, and is currently under Executive Branch review at the Governor's office. At the request of the Governor's office, the Board voted on June 6, 2023, to reconvene the regulatory review committee to revisit proposed amendments.

The Notice of Intended Regulatory Action (NOIRA) for the general review of the CIC Ombudsman Regulations will be published in the Virginia Register on September 25, 2023. A 30-day public comment period will begin on September 25, 2023, and end October 25, 2023. The Board will review public comments and consider proposed draft amendments to the regulations at its December 14, 2023, meeting.

The Board authorized the filing of a NOIRA and a formation of a committee for the general review of the f CIC Condominium Registration Regulations on June 8, 2023. The NOIRA is currently in development and a regulatory review committee is being formed.

The exempt action for the regulatory amendment of the CIC Ombudsman Regulations pursuant to House Bill 1627 and Senate Bill 1042 were filed on September 15, 2023. Proposed draft regulatory amendments are currently undergoing Executive Branch review.

The exempt action for regulatory amendments to the CIC Manager Regulations, CIC Association Registration Regulations, and the CIC Ombudsman Regulations pursuant to changes resulting from the enactment of Chapters 387 and 388 of the 2023 Acts of Assembly were filed on September 15, 2023. Proposed draft regulatory amendments are currently undergoing Executive Branch Review.

The exempt action for regulatory amendments to the Time-Share Regulations pursuant to House Bill 1955 and Senate Bill 969 is in the process of being filed for Executive Branch review.

Mr. Haughwout provided information on the status of the periodic review of the Boards' regulations. There were no public comments received germane to Chapter 10, Chapter 45, Chapter 50, Chapter 60, or Chapter 70 of the Board's regulations, for which the public comment period was held from July 31, 2023, to August 21, 2023. However, Mr. Haughwout presented a comment pertaining to Chapter 70 received on July 13, 2023, during the periodic review of the Condominium, as well as his response to the commenter. Mr. Sterling moved to have Mr. Haughwout contact the commenter to invite him to submit the comment during the public comment period of the CIC Ombudsman Regulations general review. Ms. Tunstall seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

**Periodic Review of
Board's Regulations**

Mr. Haughwout then asked the Board to consider whether to repeal, amend or retain as is Chapter 10, Chapter 45, Chapter 50, Chapter 60, and Chapter 70 of the Board's regulations, as part of the periodic review. Ms. Overholt moved to retain the regulations as is. Ms. Tunstall seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Pettus asked the Board to consider authorizing a NOIRA for general review of the Time-Share Regulations and to form a regulatory review committee. Ms. Overholt moved to authorize staff to file the NOIRA and form a regulatory review committee. Ms. Sheehan seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall. Ms. Overholt volunteered for the regulatory review committee. Ms. Pettus advised she will reach out to Board members not present and other stakeholders, in consultation with Ms. Overholt, for additional committee members. The Board agreed by consensus.

**Consider
Authorizing NOIRA
& Committee
Membership for the
General Review of
Time-Share
Regulations**

Ms. Pettus advised the Board that as discussed earlier in the meeting, the NOIRA for the general review of the Condominium Regulations and formation of a regulatory review committee was authorized at the June 8, 2023, Board meeting. Ms. Pettus asked members of the Board to consider serving on the committee. Ms. Noonan and Ms. Talbert volunteered to serve on the committee. Ms. Pettus will reach out to board members not present and other stakeholders, in consultation with the Board Chair, for additional committee members. The Board agreed by consensus.

**Consider
Condominium
Regulations
Regulatory Review
Committee
Membership**

As the Board voted to reconvene the CIC Manager Regulatory Review Committee at its June 8, 2023, Board meeting, Ms. Pettus asked the Board to review the Committee membership roster, originally established in 2021, to determine whether the Board would like to update the roster based on changes to Board membership since that time. During discussion, Ms. Noonan and Ms. Talbert volunteered to serve on the committee. The Board agreed by consensus to retain the original Committee membership, with the addition of Ms. Noonan and Ms. Talbert. Ms. Pettus advised she would reach out to the existing Committee members to see if they would be interested in serving.

**Consider CIC
Manager Regulation
Regulatory Review
Committee
Membership**

Ms. Pettus asked the Board to consider adopting a policy for requests for continuance of decisions for disciplinary and licensing cases. The Department suggests adopting such a policy in order to create consistency among all Boards within the agency when considering requests for continuance. Ms. Pettus advised that pursuant to the Administrative Process Act (APA), a case decision must be made within 90 days of an Informal Fact-Finding conference (IFF); however, the Code of Virginia also provides a means for respondents or their attorneys to request case decisions to be rendered later than the 90-day timeframe from the date of the IFF. After review and discussion, Ms. Noonan moved to adopt the following policy as written:

**Consider Board
Policy on
Continuance of Case
File Decisions**

1. All requests for a continuance of a case must be in writing.
2. Requests for a continuance of a licensing case may be granted administratively by the Board's Executive Director or designee.
3. Requests for a continuance for disciplinary cases in which the recommended sanction does not include license revocation may be granted administratively by the Board's Executive Director or designee. The Executive Director may only grant one continuance to the next meeting for any case. Any further requests for a continuance may only be granted by vote of the Board at the next meeting in which the case is to be considered.
4. Requests for a continuance for disciplinary cases in which the recommended sanction includes license revocation may only be granted by vote of the Board at the meeting in which the case is scheduled to be considered.

Ms. Sheehan seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Pettus informed the Board that Heather Gillespie, CIC Ombudsman, was unable to attend the meeting. The Board was provided with a report from Ms. Gillespie containing statistics on complaints received by the Ombudsman's office, as well as compliance and enforcement statistics.

Ombudsman Report

Josh Laws, Assistant Attorney General, provided an update on ongoing litigation.

Litigation Update

Ms. Pettus informed the Board that in reviewing current Board financials concern was raised by staff that the Board's Recovery Fund may have insufficient funds should there be multiple claims made against the fund. Pursuant to §54.1-2354.2 of the Code of Virginia, moneys remaining in the CIC Management Information Fund at the end of each fiscal year may be transferred to the Board's Recovery Fund at the Board's discretion. Ms. Pettus asked the Board to consider transferring money from the CIC Management Information Fund to the Recovery Fund.

**Discussion of
Management
Information Fund
Transfer**

After lengthy discussion, Ms. Talbert moved to transfer \$750,000 from the CIC Management Information Fund to the Board's Recovery Fund. Ms. Overholt seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Pettus provided the Board with the most recent financial statements.

**Board Financial
Statements**

Board members considered the following future meeting dates:

**Consider 2024
Meeting Dates**

- March 28, 2024
- May 13, 2024, tentative if needed for work on regulatory reviews
- May 30, 2024, tentative if needed for work on regulatory reviews
- June 6, 2024
- September 27, 2024
- December 5, 2024

Ms. Noonan moved to approve the 2024 meeting dates as presented. Ms. Talbert seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Board members considered the following Resolutions for Service:

Consider
Resolutions for
Service

Jim Foley

WHEREAS, **Jim Foley**, did faithfully and diligently serve as a member of the Common Interest Community Board from 2019 to 2023;

WHEREAS, **Jim Foley**, did devote generously of his time, talent and leadership to the Board;

WHEREAS, **Jim Foley**, did endeavor at all times to render decisions with fairness and good judgement in the best interest of the citizens of the Commonwealth and these professions; and

WHEREAS, the Common Interest Community Board wishes to acknowledge its gratitude for devoted service of a person who is held in high esteem by the members of the Board and the citizens of the Commonwealth;

NOW THEREFORE BE IT RESOLVED, by the Common Interest Community Board this twenty-first day of September 2023, that **Jim Foley** be given all honors and respect due him for his outstanding service to the Commonwealth and its citizens; and

BE IT FURTHER RESOLVED, that this Resolution be presented to him and be made a part of the official minutes of the Board so that all may know of the high regard in which he is held by this Board.

Eileen M. Greenberg

WHEREAS, **Eileen Greenberg**, did faithfully and diligently serve as a member of the Common Interest Community Board from 2021 to 2023;

WHEREAS, **Eileen Greenberg**, did devote generously of her time, talent and leadership to the Board;

WHEREAS, **Eileen Greenberg**, did endeavor at all times to render decisions with fairness and good judgement in the best interest of the citizens of the Commonwealth and these professions; and

WHEREAS, the Common Interest Community Board wishes to acknowledge its gratitude for devoted service of a person who is held in high esteem by the members of the Board and the citizens of the Commonwealth;

NOW THEREFORE BE IT RESOLVED, by the Common Interest Community Board this twenty-first day of September 2023, that **Eileen Greenberg** be given all honors and respect due her for her outstanding service to the Commonwealth and its citizens; and

BE IT FURTHER RESOLVED, that this Resolution be presented to her and be made a part of the official minutes of the Board so that all may know of the high regard in which she is held by this Board.

Mr. Sterling moved to adopt the resolutions as presented. Ms. Overholt seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

Ms. Pettus asked the Board to consider Training Program Review Committee membership as some of the members are no longer serving on the Board.

**Consider Training
Program Review
Membership**

Ms. Tunstall and Ms. Talbert volunteered to serve on the Training Program Review Committee. The Board agreed by consensus to have Ms. Tunstall and Ms. Talbert serve on the Committee.

Board members reviewed an email received from Norman Dailey, in which Mr. Dailey expressed his concerns over his association's compliance with its own bylaws and governing documents, and the Board's lack of purview over the matter. Staff's response to Mr. Dailey was also reviewed by the Board.

Other Business

Mr. Haughwout presented to the Board for review draft proposed amendments to the CIC Association Registration Regulations. After review and discussion, Mr. Haughwout asked the Board to consider authorizing staff to file a NOIRA for the general review of the regulations. Ms. Overholt moved to authorize the filing of the NOIRA for the general review of the CIC Association Registration regulations. Mr. Sterling seconded the motion which was unanimously approved by: Mercer, Noonan, Overholt, Sheehan, Sterling, Talbert, and Tunstall.

**Consider
Authorizing NOIRA
for CIC Association
Registration
Regulations General
Review**

Mr. Mercer reminded Board members to complete their conflict of interest forms.

**Complete Conflict
of Interest Forms
and Travel
Vouchers**

There being no further business, the meeting was adjourned at 11:56 a.m.

Adjourn



Matt Durham, Chair



Kishore S. Thota, Secretary

STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT

TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government

1. Name David Mercer
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)
4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?

- No; I **do not** have a personal interest in any transactions taken at this meeting.
- Yes - If yes, please answer the following questions.

A. VIII (c)
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

Represent Purple Sage Cluster

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

- D. I am able to participate in this transaction fairly, objectively, and in the public interest. or
- I did not participate in the transaction.

6. Signature of Board Member:


Signature

9/21/23
Date

**STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT**

**TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government**

1. Name Catherine Noonan
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)

4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?

No; I **do not** have a personal interest in any transactions taken at this meeting.

Yes - If yes, please answer the following questions.

A. _____
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

D. I am able to participate in this transaction fairly, objectively, and in the public interest. or

I did not participate in the transaction.

6. Signature of Board Member:



Signature

9/21/23
Date

STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT

TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government

1. Name Lori Overholt
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)
4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?

No; I **do not** have a personal interest in any transactions taken at this meeting.

Yes - If yes, please answer the following questions.

A. VIII. a
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

Owner of Management Company hired to replace disciplinary co., have knowledge outside of review

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

VSA Association Management

D. I am able to participate in this transaction fairly, objectively, and in the public interest. or

I did not participate in the transaction.

6. Signature of Board Member:

Lori J Overholt
Signature

9/21/23
Date

STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT

TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government

1. Name Scott E. Sterling
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)
4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?

- No; I **do not** have a personal interest in any transactions taken at this meeting.
 Yes - If yes, please answer the following questions.

A. _____
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

- D. I am able to participate in this transaction fairly, objectively, and in the public interest. or
 I did not participate in the transaction.

6. Signature of Board Member:

Scott E. Sterling
Signature

21 Sept 2023.
Date

**STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT**

**TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government**

1. Name Tracey Talbert
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)
4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?
 No; I **do not** have a personal interest in any transactions taken at this meeting.
 Yes - If yes, please answer the following questions.

A. _____
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

Common Interest Community Manager

- D. I am able to participate in this transaction fairly, objectively, and in the public interest. or
 I did not participate in the transaction.

6. Signature of Board Member:

Tracey E. Talbert
Signature

Sept. 21, 2023
Date

**STATE AND LOCAL GOVERNMENT
CONFLICT OF INTERESTS ACT**

**TRANSACTIONAL DISCLOSURE STATEMENT
for Officers and Employees of State Government**

1. Name Margaret Tunstall
(Name of Board Member)
2. Title: Board Member
3. Agency: DPOR/Common Interest Community Board
(Name of Board)
4. Meeting/IFF Date: 09/21/2023

5. Do you have a personal interest in the following transaction?

- No; I **do not** have a personal interest in any transactions taken at this meeting.
- Yes - If yes, please answer the following questions.

A. _____
(Agenda Item)

B. Nature of Personal Interest Affected by Transaction:

C. I declare that I am a member of the following business, profession, occupation or group, the members of which are affected by the transaction:

- D. I am able to participate in this transaction fairly, objectively, and in the public interest. or
- I did not participate in the transaction.

6. Signature of Board Member:


Signature

9/21/2023
Date