



STATE OF WASHINGTON  
**PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

IN RE COMPLIANCE	)	PDC CASE NO: 1217
WITH RCW 42.17A	)	
	)	
Clear Ballot Choices (Pacific	)	
International Terminals LLC)	)	
	)	REPORT OF INVESTIGATION
	)	
Respondent.	)	
_____	)	

I. BACKGROUND

- 1.1 Clear Ballot Choices (Pacific International Terminals LLC) (hereafter, Clear Ballot Choices or CBC) is a political committee that was active in the 2015 elections in Whatcom County. The committee initially formed with the goal of preventing Proposition 9 (a charter amendment providing for Whatcom County Council redistricting) from appearing on the November 3, 2015 general election ballot. The committee’s purpose evolved to supporting Proposition 1, which pertained to district-only voting in county council elections, supporting Propositions 2 and 3, which limited the power of the county council to amend the county charter, and opposing Proposition 9.
- 1.2 Propositions 1, 2, 3, and 9 were all approved by Whatcom County voters in the November 3, 2015 general election.
- 1.3 Through the post-election period ending on November 30, 2015, Clear Ballot Choices raised \$66,549 and spent \$68,259, including debts and obligations. Approximately 95% of the committee’s funding was contributed by Pacific International Terminals LLC, making the terminal a “sponsor” of CBC under Washington law. As of the committee’s most recent PDC filings, CBC has a \$2,421 cash balance and \$4,734 in unpaid liabilities, a deficit of \$2,313.
- 1.4 On October 30, 2015, Alex Ramel filed a complaint against CBC. On November 16, 2015, Sandra Robson filed an additional complaint against CBC. **(Exhibits 1, 2.)**

## II. ALLEGATIONS IN COMPLAINT

2.1 Together, the complaints filed by Alex Ramel and Sandra Robson alleged that Clear Ballot Choices did not timely register as a PAC; failed to properly identify itself as a sponsored committee in its initial registration by including the name Pacific International Terminals LLC in the committee's name; failed to timely report contribution and expenditure activity; and failed to file contribution and expenditure reports electronically; alleged violations of RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, and RCW 42.17A.245.

## III. FINDINGS

3.1 PDC staff obtained a formal response to the Ramel and Robson complaints from Ron Reimer, CBC's registered campaign manager, and supplemental responses from Tom Perry, CBC's treasurer. Staff reviewed additional documentation from the committee, in the form of written communications concerning or discussing monetary and in-kind contributions to the committee by Pacific International Terminals LLC and copies of the committee's voter contact communications and political advertising. Finally, staff conducted interviews with the following individuals:

- Ron Reimer, CBC Campaign Manager;
- Tom Perry, CBC Treasurer;
- Steve Groen, CBC Secretary;
- Tony Larson, Director of the Whatcom Business Alliance and Publisher of its magazine, *Business Pulse*, and a local activist who volunteered to assist CBC in its 2015 election campaign activity; and
- Dan Brady, a representative of Pacific International Terminals LLC, who later provided legal counsel to CBC.

All interviews were taken under oath, and were recorded.

3.2 An overview of the evidence and testimony reviewed by staff indicates the following:

- No evidence was found that CBC was a sponsored committee at the time of its initial registration on October 7, 2015, and failed to disclose its status as a sponsored committee, or identify Pacific International Terminals LLC as its sponsor. All voter contact communications that the committee sponsored identified Pacific International Terminals in the required statement of sponsor identification.

- CBC's October 7, 2015 C-1pc Political Committee registration was untimely with respect to the committee's original plan in August 2015 of gathering signatures in an attempt to keep Whatcom County Proposition 9 off the ballot. However, the registration was submitted before any contribution and expenditure activity concerning propositions 1, 2, 3, and 9, which activity formed the basis for this complaint. In that sense, the registration may be viewed as substantially timely.
- CBC's initial contribution and expenditure activity, consisting of \$38,554.56 in monetary and in-kind contributions from Pacific International Terminals, was disclosed in a timely or substantially timely manner in paper reports filed on October 13, 2015.
- Electronic filings disclosing this same activity were not submitted in a timely manner. However, this lateness may be partially explained by PDC staff's delay in providing a filer ID number to the committee for electronic filing, once that ID had been assigned.
- CBC disclosed \$1,250 in debts for Facebook ads and \$3,484.45 for live calls, both reportedly incurred on election day, November 3, 2015. These debts were still outstanding as of CBC's most recent report filed on March 10, 2016 for the reporting period ending on February 29, 2016. Because live call vendors typically utilize voter data returned from elections officials, showing who has yet to return a ballot, it is unlikely that such calls were first ordered on election day, though they may have been performed on election day. Despite repeated requests from PDC staff, CBC would not confirm the date that the \$4,734.45 in debts were first incurred, or that CBC possessed documentation of the dates of the obligations.
- CBC volunteer Tony Larson acted in conjunction with others to make, direct, or authorize contribution, expenditure, strategic or policy decisions on behalf of CBC, but was not listed as a committee officer on any C-1pc registration filed for the committee. Mr. Larson also executed payments to CBC's vendors and deposited contributions in the committee's campaign account. Under the law, this last duty is specifically reserved for a political committee's registered treasurer or deputy treasurer.

3.3 **Status of CBC as a Sponsored Committee:** Tony Larson stated in an interview under oath that CBC initially formed in August 2015 for the purpose of keeping Charter Amendment 9 off the ballot. He stated that he became involved in the committee's activities subsequently, at the point when it became clear that amendment 9 would in fact reach the ballot, and the

committee would also campaign in support of propositions 1, 2, 3. Mr. Larson stated that based on his experience in marketing, he was asked to assist in funding and executing a voter contact program. He stated that he “put some feelers out there” to see what funding was available, and that this included speaking with the 22-member board of directors of the Whatcom Business Alliance.

- 3.4 With the exception of Dan Brady, Mr. Larson stated that he did not speak with any representative of Pacific International Terminals LLC concerning funding for CBC. In separate interviews, Ron Reimer, Steve Groen, and Tom Perry also stated that they had no contact with agents of the terminal regarding a contribution.
- 3.5 Dan Brady stated that beginning in approximately early August 2015, he and Mr. Larson both took part in a series of meetings concerning the effort to amend the county charter, and who would be involved in supporting or opposing the various proposals being discussed. Mr. Brady stated that, at this stage, he was not providing legal representation to either Pacific International Terminals LLC or CBC, but took part in the meetings as an interested community member. He stated that Craig Cole, a representative of Pacific International Terminals, took part in at least one of these meetings, but that there was no discussion at the meetings of funding that the terminal could or would provide for a political campaign.
- 3.6 Mr. Brady stated that in late August, he contacted Mr. Larson as a representative of the terminal: *“I said, I’m representing the Terminal in their interest in Whatcom County elections in 2015. They are interested in getting involved in the elections for these ballot measures, and if he created a committee, we’d be interested...if he did in fact create a committee as he indicated, we might be interested in contributing to it.”* In a separate interview under oath, Mr. Larson stated that he did not recall Mr. Brady identifying the terminal as his client during this early contact, but did recall discussion of a possible contribution from some source.
- 3.7 On October 7, 2015, Mr. Brady sent Mr. Larson an email with the subject line “next steps.” **(Exhibit 3.)** In the email, Mr. Brady stated that a “sizable contribution” was on its way to CBC, that it would be made through a physical check, and would arrive that Friday (October 9, 2015). Mr. Brady and Mr. Larson each stated in separate interviews that other than Mr. Brady’s description of the contribution as “sizable,” there was no information communicated at any point about the amount that would be contributed, and no pledge of a specific amount.
- 3.8 In separate interviews, Tony Larson and Dan Brady stated that Mr. Brady recommended Revolvis Consulting as a suitable vendor to carry out Clear Ballot Choices’ voter contact campaign. Mr. Brady stated that Justin

Matheson, a representative of Revolvix, visited Pacific International Terminal's corporate office in Seattle, picked up the terminal's initial \$25,000 contribution to Clear Ballot Choices, and delivered the check to Tony Larson at a meeting with Mr. Brady the same day in Bellingham: *"That was the occasion that I met with them, to make sure they hired somebody...so I sat down with them, and I think they started right then."* Mr. Brady stated that he didn't believe Mr. Larson had any idea up to that point how much Pacific International Terminals would contribute to the committee, since the terminal didn't make that decision until approximately a week before its contribution was made. In a separate interview, Mr. Larson confirmed that he was unaware of the amount of the terminal's contribution until he obtained possession of the check.

- 3.9 The initial \$25,000 contribution check from Pacific International Terminals to CBC was dated October 8, 2015 and deposited on October 9, 2015. **(Exhibits 4, 5.)** On October 12, 2015, Tony Larson sent an email to Tom Perry, informing him that the contribution had been deposited. **(Exhibit 6.)** Mr. Perry manually filed a C-3 Monetary contributions report on October 13, 2015, disclosing receipt of the \$25,000 contribution on October 9, 2015. **(Exhibit 7.)**
- 3.10 Prior to the above dates, on October 7, 2015, Tom Perry filed an electronic C-1pc Political Committee registration on behalf of CBC. **(Exhibit 8.)** On this initial registration, Mr. Perry did not include the name of any sponsor in the committee's name; at that point, CBC had received no contributions and no pledged contributions of any specific amount, and there were therefore no contributors or other persons who qualified as a "sponsor" under RCW 42.17A.005(42)(b). Mr. Perry mailed a signature card for electronic filing to the PDC on October 13, 2015, and the October 7, 2015 C-1pc was processed as filed on that day. **(Exhibit 9.)** Although the committee had gained a sponsor during the interim, it appears that CBC's registration was accurate when originally filed on October 7, 2015.
- 3.11 On October 19, 2015, the same day that he filed an electronic C-3 report disclosing the initial \$25,000 contribution from Pacific International Terminals, Mr. Perry filed an amended C-1pc registration indicating that the terminal was CBC's sponsor. **(Exhibit 10.)**
- 3.12 In his formal response to the complaint, Ron Reimer stated that all voter contact communications sponsored by CBC included Pacific International Terminals in the committee's name and sponsor ID. **(Exhibit 11.)** PDC staff reviewed copies of the committee's political advertising and confirmed Mr. Reimer's statement. **(Exhibit 12.)**
- 3.13 **Timeliness of CBC's Political Committee Registration:** As indicated above, CBC initially formed in August 2015 for the purpose of keeping

Charter Amendment 9 off the Whatcom County ballot. In his interview under oath, Tony Larson stated that CBC gathered signatures in an attempt to prevent an election on the amendment, but abandoned those plans when it became clear that they would be unsuccessful. He stated that from that point and into September 2015, the committee began to prepare for a campaign on propositions 1, 2, 3, and 9; this activity forms the basis of this complaint. Although CBC's C-1pc processed on October 13, 2015 may not have been timely when viewed in light of the committee's August 2015 activity, the original filing date (October 7, 2015) predates all contribution and expenditure activity undertaken with respect to propositions 1, 2, 3, and 9.

3.14 **Timeliness of Contribution and Expenditure Disclosure:** CBC received \$38,554.56 in monetary and in-kind contributions from Pacific International Terminals on October 9, 2015, including \$13,554 in survey research and voter data. **(Exhibits 5, 13.)** The C-3 disclosing the initial \$25,000 deposit was due to be filed on October 12, 2015, and was filed in a substantially timely manner on October 13, 2015. **(Exhibit 7.)** The C-4 Summary, Full Report of Receipts and Expenditures was timely filed on October 13, 2015. **(Exhibit 14.)**

3.15 In reviewing reports filed by CBC for this investigation, staff noted approximately \$34,582 in expenditures that the committee disclosed for the first time on the C-4 report **(Exhibit 15)** filed on December 10, 2015 for the post-general election period, October 27 – November 30, 2015, either as cash outlays or outstanding debts:

Vendor	Date Paid	Amount	Description
REVOLVIS CONSULTING INC.	2015-10-30	6974.9	DAWN DAIS DESIGN: MAILER
PRINT NW	2015-10-30	3037.79	POSTAGE FOR MAILER
MOORE INFORMATION INC.	2015-11-17	6000	POLLING
REVOLVIS CONSULTING INC.	2015-11-25	10000	DAWN DAIS DESIGN: CROSSVOTER FACEBOOK ADS
REVOLVIS CONSULTING INC.	2015-11-25	2048.75	CALIFORNIA MARKETING GROUP: LIVE CALLS
REVOLVIS CONSULTING INC.	2015-11-25	864	CALIFORNIA MARKETING GROUP: LIVE CALLS
REVOLVIS CONSULTING INC.	2015-11-25	459.36	CALIFORNIA MARKETING GROUP: LIVE CALLS
REVOLVIS CONSULTING INC.	2015-11-25	350.46	CALIFORNIA MARKETING GROUP: LIVE CALLS
REVOLVIS CONSULTING INC.	2015-11-25	112.2	CALIFORNIA MARKETING GROUP: LIVE CALLS

Vendor	Date Incurred	Amount	Description
REVOLVIS CONSULTING INC.	2015-11-3	1250	FACEBOOK ADS AND DESIGN
REVOLVIS CONSULTING INC.	2015-11-3	3484.45	CALIFORNIA MARKETING GROUP: LIVE CALLS

These last \$4,734.45 in debts for Facebook ads and live calls, reportedly incurred on election day, were still outstanding as of CBC's most recent report filed on March 10, 2016 for the reporting period ending on February 29, 2016. **(Exhibit 16.)**

- 3.16 Through legal counsel Mark Lamb, CBC stated that approximately \$29,847.46 in expenses paid up to November 25, 2015 were both incurred and paid during the post-general election reporting period of October 27 – November 30, 2015, and were thus timely disclosed on December 10, 2015. Despite repeated requests from PDC staff, Mr. Lamb did not address the \$4,734.45 in debts for Facebook ads and live calls that his client reportedly incurred on election day, neither did he confirm that CBC possessed documentation of the dates of those obligations. **(Exhibit 17.)**
- 3.17 **Alleged Failure to Electronically File Contribution and Expenditure Reports:** CBC did not mail its signature card for electronic filing until October 13, 2015, six days after Tom Perry electronically filed the committee's C-1pc registration on October 7, 2015. **(Exhibit 18.)** The signature card was activated by PDC staff on October 15, 2015, however staff did not provide a filer ID to CBC for electronic filing until four days later, on October 19, 2015, after being contacted again by Mr. Perry. **(Exhibits 9, 19.)** On that day, Mr. Perry electronically filed the C-3 and C-4 report that he paper-filed in a timely or substantially timely manner on October 13, 2015. It thus appears that the lateness of CBC's electronic filings was caused by the campaign's delay in mailing its signature card, and exacerbated by PDC staff's delay in providing a filer ID.
- 3.18 **Status of CBC Officers:** In staff's interviews with the above individuals, staff found evidence that the registered officers of CBC, Ron Reimer, Steve Groen, and Tom Perry, had little involvement in the activities of the committee compared with Tony Larson and Dan Brady, who were not registered officers.
- 3.19 Mr. Larson and Mr. Brady testified that they, and not Mr. Reimer or Mr. Groen, recruited Mr. Perry to serve as CBC's treasurer. **(Exhibits 20, 21.)** Mr. Brady testified that he and Mr. Larson met with the committee's vendor to discuss the committee's campaign activity. Mr. Brady testified that on one or more occasions, Mr. Larson obtained possession of monetary contributions delivered to him by that vendor, acting on behalf of Pacific International Terminals LLC. **(Exhibit 21.)** Mr. Larson and Mr. Perry testified that Mr. Larson deposited all contributions in the committee's campaign account, despite not being registered as a treasurer or deputy treasurer for CBC. **(Exhibits 20, 22.)** Mr. Larson testified that he maintained CBC's checkbook and cut checks to vendors. **(Exhibit 20.)** Mr. Perry testified that he directed vendors to send invoices to Mr. Larson for payment. **(Exhibit 22.)**
- 3.20 The testimony and evidence reviewed by staff indicates that Dan Brady and Tony Larson communicated contribution and expenditure information to Tom Perry for reporting on behalf of CBC, but did not engage in similar communications with Ron Reimer or Steve Groen. **(Exhibits 23, 24.)** Mr. Perry stated that early in CBC's campaign, he exchanged emails with Ron

Reimer concerning electronic filing setup for the committee. However, despite the fact that he and Steve Groen were two of three registered officers for CBC, Mr. Perry testified that he had no communications with Mr. Groen about the committee's activities, and in fact did not recognize Mr. Groen's name. **(Exhibit 22.)**

- 3.21 Dan Brady testified that he did not view himself as an officer of CBC, i.e., as a person who helped to make contribution and expenditure decisions for the committee. He stated that he gave the committee no approval for its plans or the communications it produced, and offered no input on those decisions. As an example, he said that Tony Larson told him that CBC elected to become involved in the campaign supporting 2 and 3, and he (Mr. Brady) had no interest in that. **(Exhibit 21.)**
- 3.22 Staff was unable to obtain an explanation from Mr. Larson or Mr. Perry why Mr. Larson performed duties specifically reserved for committee officers (e.g. depositing contribution checks) without being listed as a registered officer in CBC's C-1pc registration. **(Exhibits 20, 22.)** Mr. Perry stated only that he didn't understand that all persons who deposit contributions for a political committee are required to be registered as a treasurer or deputy treasurer. He stated that in his experience, there are many individuals who deposit contributions and execute payments for a committee, who are not registered as committee officers. **(Exhibit 22.)**

#### IV. SCOPE

4.1 PDC staff reviewed the following documents:

1. A complaint against Clear Ballot Choices, received on October 30, 2015 from Alex Ramel;
2. A complaint against Clear Ballot Choices, received on November 16, 2015 from Sandra Robson;
3. Subsequent email correspondence received from Mr. Ramel on November 19, 2015; December 24, 2015; February 18, 2016; and February 21, 2016;
4. Subsequent email correspondence received from Sandra Robson on February 19, 2016;
5. A formal response to the complaints in PDC Case 1217, received from Ron Reimer on December 3, 2015;
6. A supplemental response received from Tom Perry on December 2, 2015;

7. Documents and evidence received from Ron Reimer on January 29, 2016;
8. Documents received from Mark Lamb, counsel to Clear Ballot Choices, on June 24, 2016;
9. Email correspondence received from Mark Lamb on July 22, 2016;
10. C-1pc Political Committee Registrations, C-3 Monetary Contribution reports, and C-4 Summary, Full Reports of Receipts and Expenditures filed by Clear Ballot Choices for the November 3, 2015 general election; and
11. A signature card for electronic filing for Clear Ballot Choices, mailed to the PDC on October 13, 2015.

4.2 The following persons participated in recorded interviews under oath:

1. Tony Larson was interviewed on April 1, 2016;
2. Ron Reimer was interviewed on April 1, 2016;
3. Steve Groen was interviewed on April 1, 2016;
4. Dan Brady was interviewed on April 27, 2016; and
5. Tom Perry was interviewed on May 26, 2016.

## V. LAW

**RCW 42.17A.005** defines the terms “sponsor” and “sponsored committee” as follows:

(42)

...

*(b) "Sponsor," for purposes of a political committee, means any person, except an authorized committee, to whom any of the following applies:*

- (i) The committee receives eighty percent or more of its contributions either from the person or from the person's members, officers, employees, or shareholders;*
- (ii) The person collects contributions for the committee by use of payroll deductions or dues from its members, officers, or employees.*

*(43) "Sponsored committee" means a committee, other than an authorized committee, that has one or more sponsors.*

**RCW 42.17A.205** requires every political committee to file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. The registered name of a sponsored committee must include the name of the person that is the sponsor of the committee. The

registration must disclose the names, addresses, and titles of the committee's officers; or if it has no officers, the names, addresses, and titles of its responsible leaders.

**WAC 390-05-245** defines "officer of a political committee" to include the following persons: Any person designated by the committee as an officer on the C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee.

**RCW 42.17A.220** requires that all monetary contributions received by a candidate or political committee shall be deposited by the treasurer or deputy treasurer in a depository in an account established and designated for that purpose.

**RCW 42.17A.005(47)** defines "treasurer" and "deputy treasurer" as the individuals appointed by a candidate or political committee, pursuant to RCW 42.17A.210, to perform the duties specified in that section.

**RCW 42.17A.210** states that no treasurer or deputy treasurer may be deemed to be in compliance with the provisions of this chapter until his or her name and address is filed with the commission.

**RCW 42.17A.235** and **RCW 42.17A.240** require political committees to file timely, complete, and accurate reports of contributions and expenditures, including the name and address of every person making a contribution of more than \$25 in the aggregate, and contributions pledged but not yet received.

**RCW 42.17A.245** requires each political committee that expended five thousand dollars or more in the preceding year or that expects to expend five thousand dollars or more in the current year to file all contribution reports and expenditure reports required under RCW 42.17A by the electronic alternative provided by the Commission.

**WAC 390-19-030** states that it is presumed that a filer "expects to expend" \$5,000 or more when any one of the following first occurs:

- (a) A filer spends at least \$5,000;
- (b) A filer is a candidate for the same office last sought and his or her campaign expenditures in the previous election for the same office were \$5,000 or more;
- (c) A filer's expenditures meet or exceed \$1,250 on or before March 31 of the current calendar year;
- (d) A filer's expenditures meet or exceed \$2,500 on or before June 30 of the current calendar year;
- (e) A filer's expenditures meet or exceed \$3,750 on or before September 30 of the current calendar year; or

(f) A filer otherwise projects that \$5,000 or more will be spent during the current calendar year.

Respectfully submitted this 29<sup>th</sup> day of September, 2016.

*T.P.*

---

Tony Perkins  
PDC Compliance Officer

### **EXHIBIT LIST**

- Exhibit 1** Complaint against Clear Ballot Choices, received on October 30, 2015 from Alex Ramel.
- Exhibit 2** Complaint against Clear Ballot Choices, received on November 16, 2015 from Sandra Robson.
- Exhibit 3** October 7, 2015 email from Dan Brady to Tony Larson.
- Exhibit 4** Copy of \$25,000 check from Pacific International Terminals, LLC to Clear Ballot Choices.
- Exhibit 5** Bank statement for Clear Ballot Choices for period of October 9 – 31, 2015.
- Exhibit 6** October 12, 2015 email from Tony Larson to Tom Perry.
- Exhibit 7** Manually-filed C-3 Monetary Contributions report, submitted on October 13, 2015 by Clear Ballot Choices.
- Exhibit 8** C-1pc Political Committee registration for Clear Ballot Choices, electronically filed on October 7, 2015.
- Exhibit 9** Signature card for electronic filing for Clear Ballot Choices, mailed to the PDC on October 13, 2015.
- Exhibit 10** Amended C-1pc Political Committee registration for Clear Ballot Choices, filed on October 19, 2015.
- Exhibit 11** December 2, 2015 formal response by Ron Reimer to complaint against Clear Ballot Choices.
- Exhibit 12** Copies of political advertising sponsored by Clear Ballot Choices.
- Exhibit 13** Email messages exchanged by Dan Brady, Tony Larson, and Tom Perry on October 12, 2015.
- Exhibit 14** C-4 Summary, Full Report of Receipts and Expenditures for Clear Ballot Choices, filed on October 13, 2015 for the 21-day pre-general election reporting period, September 1 – October 12, 2015.

- Exhibit 15** C-4 report for Clear Ballot Choices, filed on December 10, 2015 for the post-general election period, October 27 – November 30, 2015.
- Exhibit 16** C-4 report for Clear Ballot Choices, filed on March 10, 2016 for the reporting period ending on February 29, 2016.
- Exhibit 17** August 23, 2016 email from PDC staff to Clear Ballot Choices counsel Mark Lamb.
- Exhibit 18** Written statement by Tom Perry dated December 2, 2015.
- Exhibit 19** Emails exchanged between PDC staff and Tom Perry on October 19, 2015.
- Exhibit 20** Recorded interview under oath with Tony Larson on April 1, 2016.
- Exhibit 21** Recorded interview under oath with Dan Brady on April 27, 2016.
- Exhibit 22** Recorded interview under oath with Tom Perry on May 26, 2016.
- Exhibit 23** Recorded interview under oath with Ron Reimer on April 1, 2016.
- Exhibit 24** Recorded interview under oath with Steve Groen on April 1, 2016.