Certified by:

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SmartLogging 2018 Annual audit Report for:

## The Trust to Conserve Northeast Forestlands in Augusta, Maine, USA

Certificate code: Auditors: Audit Dates: Report Finalized: RA-SL-000001 Randy Coots 25 & 26 October 2018 23 January 2019

Operation Contact: Address:

Ted Wright 110 Sewall Street Augusta, Maine 04332

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#### INTRODUCTION

The purpose of this report is to document annual audit conformance of **The Trust to Conserve Northeast Forestlands**, hereafter referred to as SmartLogging Operation (SLO). The report presents the findings of NEPCON auditors who have evaluated company systems and performance against the SmartLogging standards and policies. Section 2 of this report provides the audit conclusions and any necessary follow-up actions by the SLO through corrective action requests.

NEPCON audit reports include information which will become public information. Sections 1-3 will be posted on NEPCON's website. All appendices will remain confidential.

Dispute resolution: If NEPCON clients encounter organizations or individuals having concerns or comments about NEPCON and our services, these parties are strongly encouraged to contact NEPCON regional or Headquarters offices directly (see contact information on report cover). Formal complaints or concerns should be sent in writing.

#### AUDIT FINDINGS AND RESULTS

#### 1.1. Audit conclusion

Based on the SLO's conformance with SmartLogging requirements, the audit team makes the following recommendation:			
	Certification requirements <u>met</u> , certificate maintenance recommended Upon acceptance of NCR(s) issued below		
	Certification requirements <u>not met</u> : Conformance with Major NCR(s) required		
Additional comments:			
Issues identified as controversial or hard to evaluate.		None	

#### 1.2. Changes in the SLO operation, structure, group membership, etc.

Two group members have retired from logging and left the group in 2018. Another group member was removed from the group. The group increased membership with 11 new members, bringing the total of group members to 103. There were no other changes to the operation or structure of the group.

#### **1.3.** Conformance with applicable corrective action requests

The section below describes the activities of the certificate holder to address each applicable corrective action request issued during previous evaluations. For each NCR a finding is presented along with a description of its current status. Failure to meet NCRs will result in nonconformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the NEPCON certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

NCR Status Categories	Explanation
Closed	Certified operation has successfully met the NCR and addressed the underlying nonconformance.
Open	Certified operation has <u>not met</u> the NCR; underlying nonconformance is still present. NCR becomes a Major NCR with a 3-month deadline for conformance

 $\boxtimes$  Check if N/A (there are no open NCRs to review)

#### 1.4. New nonconformity reports issued as a result of this audit

No NCR's were issued as a result of this audit.

#### 1.5. Audit observations

**Observations** are very minor problems or the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future.

No observations were issued as a result of this audit.

#### AUDIT PROCESS

#### **1.6.** Auditors and qualifications:

Auditor Name	Randy Coots	Auditor role	Lead Auditor
Qualifications:	field of forestry for over 30 y Forestry, West Virginia Divis Georgia Pacific Corp., Collin forestry consultant. He is a S Forester (#1547), and a West	ears. He has wision of Forestry is Hardwoods, Society of Ame st Virginia Reg ne Board of Dir ciation. Randy gement and C Auditor trainin	sistered Professional Forester ectors of the WVRPF and the currently is an employee of hain of Custody Associate.

#### 1.7. Audit schedule

Date	Location /Main sites	Principal Activities
October 22- 23, 2018	Off-site	Audit prep, travel.
October 25, 2018	Brunswick, Maine area	Opening meeting
October 25, 2018	Brunswick, Maine area	site visits of Group Members
October 26, 2018	Brunswick, Maine area	site visits of Group Members
October 26, 2018	Brunswick, Maine area	Closing Meeting
December 7, 2018	Off-site	Report

Total number of person days used for the audit:2 = number of auditors participating 1 times total number of days spent for the audit 2

There are currently 103 logging contractors in the TCNEF group. The auditor visited eight contractors on 9 sites over the 2-day field audit.

#### **1.8.** Stakeholder consultation process

During the certification audit process stakeholders may be consulted by the auditor(s). Stakeholder consultation carried out during a SmartLogging audit may provide evidence concerning harvester conformance with the SL standard. Stakeholders may

include forest industry (including loggers, foresters, mill personnel, log purchasers, workers etc.) landowners, government regulatory agencies, and community members.

Stakeholder type (i.e. Industry, landowners, government, community)	Number of Stakeholders consulted	Stakeholder issues (if any)
TCNEF Staff	1	None
Group Members	8	None
Contractor employees	5	None

#### **1.9.** Changes to Certification Standards

SmartLogging standard used in audit:	SmartLogging Generic Certification Standard, Version 6, SL-02 SmartLogging Group Certification Standard, Version 1, SL-03
Revisions to the standard since the last audit:	<ul> <li>No changes to standard.</li> <li>Standard was changed (detail changes below)</li> </ul>
Changes in standard:	N/A
Implications for SLO:	Not applicable - no new requirements

## APPENDIX I: List of visited sites (confidential)

Location	Logger	Site description / Audit Focus and Rationale for selection
Sedgewick, Maine	XXXX	A 140-acre operator selection harvest to remove all softwoods and hardwoods over 18" stump diameter, to promote the growth of the oak and maple regeneration. Harvest plan was reviewed. Active harvesting during audit. No stream crossing. Did inspect a wet area crossing. Utilized tree tops and matts for crossing. xxxx acknowledged that all BMP training is done by the Professional Logging Contractors. Spill kits were observed on location. xxxx is a fourth- generation logger operating 2 harvesting crews.
North Port, Maine	XXXX	A 154-acre tract, operator selection harvest as a cleaning from being high graded 10 years before. Harvest instructions were to leave the oak and tamarack in the stand while releasing existing regeneration. Old rock walls located on the property were being protected from harvest damage. Produced chips on the landing for biomass market. Spill kit observed on location. During interview asked logging crew member when do you clean up a spill, and he answered that all spills are cleaned up.
Nobleboro, Maine	XXXX	A 47-acre marked timber harvest. Timber marking had been done by a forestry consultant. Harvest area adjoined a youth summer camp. At time of visit harvest activity was still on going. No stream crossing on harvest area. A 75' buffer was in place, marked with blue paint, to protect the adjoining lake. Reviewed harvest contract. XXXXX operates 3 mechanical crews and one hand cutting crew.
Harpswell, Maine	XXXX	A 30-acre marked thinning of a white pine stand. A hand cutting operation. Reviewed harvest plan and contract. A buffer zone in excess of 100 feet was maintained to an inlet of the Atlantic Ocean. At time of visit job was not active due to wet weather conditions.
Harpswell, Maine	XXXX	Second crew of XXXX just getting started on a 20-acre marked timber harvest. Property lines marked with flagging and painted. No stream crossing to inspect. Do to wet weather conditions crew was not on site at time of visit.

Augusta, Maine	XXXX	A 30-acre marked thinning of a white pine stand. Observed an active stream crossing where tree tops and brush were placed in the approaches and in the stream bed and bridge mats were then placed over top of the brush. Water was flowing thru the channel with no sediment noticed. Logger stated that once the harvesting is completed the mats and brush will be removed from stream channel. A 75-foot buffer was in place to protect the lake frontage. Reviewed harvest plan.
Sidney, Maine	XXXX	A 50-acre overstory removal harvest to promote existing regeneration. Area had been high- graded 10 years prior. Been in the Master Logger program since 2004. At time of visit harvesting had been completed one month prior. No stream crossing. Interviewed crew member, his son XXXX, who is planning on taking over the company in the future.
Mercer, Maine	XXXX	A 25-acre variable diameter limit harvest to remove old ice damaged trees and release regeneration. At time of visit active operations underway. Reviewed harvest plan and maps. A 75-foot buffer located to protect lake frontage. Observed a stream crossing utilizing tree tops and brush laid down in a thick bed. A small catch basin was in place to catch any siltation should it occur.
Augusta, Maine	XXXX	A 65-acre loggers choice harvest with the goal of removing 40% of existing basal area and removing diseased and damaged trees from previous harvest. A 250-foot buffer zone was laid out along Togus Stream that surrounds the tract. No crossings were used.

### APPENDIX II: List of stakeholders consulted (confidential)

#### List of TCNEF Staff Consulted

<b>Name</b> [Last, First]	<b>Title</b> [Affiliation, if any]	<b>Contact</b> [preferably email or phone, if available; otherwise address ]	Type of Participation Notification, interview, and/or public meeting.
Ted Wright	Executive Director	executivedirector@tcnef.org	Interview

#### List of other Stakeholders Consulted

Name	Organization	Contact	Type of Participation
XXXX	XXXX	XXXX	Interview
XXXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview
XXXX	XXXX	XXXX	Interview

#### **APPENDIX III: SmartLogging standard conformance (confidential)**

The table below demonstrates conformance or non-conformance with the SmartLogging standard. The NEPCON Task Manager should provide guidance on which sections of the standard should be evaluated in a particular audit. NEPCON may evaluate only a subset of the standard in any one particular audit provided that the SLO is evaluated against the entire standard by the end of the certificate duration. Findings of conformance or non conformance at the criterion level will be documented in the following table with a reference to an applicable CAR or OBS. The nonconformance and CAR is also summarized in a CAR table in Section 2.4. All non-conformances identified are described on the level on criterion though reference to the specific indicator shall be noted. Criteria not evaluated are identified with a NE.

P&C	Conform ance: Yes/No/ NE	Findings	CAR OBS (#)
		Subject Area 1: Legal Requirements	
1.1	NE		
1.2	NE		
1.3	Yes	XXXXX	
		Subject Area 2: Harvest Planning and Monitoring	
2.1	NE		
2.2	Yes	Review of documents and interviews reveal a good understanding of the need for the required elements of this criteria. Harvest plans contained all pertinent information for the tracts being harvested, including a prescription for the tract, protection of riparian areas, penalty clauses, liability clauses, and close out measures. Field observation also showed a good application of written prescriptions. All agreements reviewed had been signed by landowners. Included with the plans were maps of the tracts delineating the boundaries and SMZs. It was noted in the plans that no other special sites existed on these tracts, either cultural or ecological. No contracts had language allowing the sale area to be audited to SmartLogging standards, but the Master Logger group member agreements provide for independent auditing, and the auditor was allowed full access to all sites.	

2.3	Yes	All sites audited were inspected prior to harvest by the logger		
		with the landowner or landowner's representative confirming		
		the limitations placed in the plan, including boundaries, SMZs,		
		stream crossings, trails, roads and closeout procedures.		
		Boundaries were clearly marked on the ground as observed		
		by the auditor.		
2.4	NE			
2.5	NE			
		Subject Area 3: Harvesting Practices		
3.1	Yes	The auditor verified through documentation and observation		
		that all applicable BMPs had been followed and that BMP use		
		was specified in the harvest plans and service contracts.		
		All group members interviewed had attended BMP training		
		through the Northeast Certified Master Logger Program. The		
		group members received training on SL requirements upon		
		joining the group.		
		The soull's group if a difference in DMD group and the la		
2.0		The auditor verified that a current BMP manual was available.		
3.2 3.3	NE NE			
3.4	NE			
	NE			
3.5				
3.6	NE			
3.7	NE			
3.8	NE NE			
3.9		Subject Area 4: Community Values		
4.1	NE			
1.1		Subject Area 5: Occupational Health and Safety		
5.1	Yes	All contractors had written safety plans and policies meeting		
		the requirements of this indicator. Some use the Master		
		Logger template and others use a custom plan tailored to their		
		operation. All contractors with employees have workman's		
		compensation insurance. This auditor did not observe any		
		unsafe activities.		
5.2	Yes	The auditor verified through documentation, that all		
		employees received OSHA and general safety training		
		through the Northeast Certified Master Logger Program.		
		Visual inspection showed that all employees were wearing		
		proper PPE for their assigned jobs. All sites visited were		
		mechanical harvesting operations.		
		Evaluations of safety performance on large operations are		
		formal with documentation occurring, informal evaluations are		
		more likely on small operations.		
		All employees had cell phones and radios in equipment to		
		communicate with other employees.		
	I	communicate with other employees.		

Subject Area 6: Business Viability				
6.1	NE			
6.2	NE			
6.3	NE			
6.4	NE			
	Subject Area 7: Continuous Improvement and Innovation			
7.1	NE			
	Subject Area 8: Silviculture and Reforestation			
8.1	NE			
8.2	NE			
8.3	NE			

#### **APPENDIX IV: Chain of Custody Conformance (confidential)**

<u>2.5</u>: Documentation is used and retained for monitoring the movement of forest products from forest of origin to destination.

**Definition of Forest Gate:** The forest gate is determined by contract type. For group members who purchase timber deeds or cut on shares, the forest gate is the mill scale. For group members who cut and haul for a mill, the forest gate is the landing.

Chain of Custody Criteria		Conform	Explanatory notes/ CAR or OBS
2.5.1:	A trip ticket, load receipt or other transportation document accompanies each load of forest products (e.g., logs, chips, biomass) delivered to the purchaser.	Yes 🛛 No 🗌	Each group member uses load tickets for each load of wood sent to the mills. Load tickets are used to track loads back to the source. Load ticket books were observed during on-site visits.
2.5.2:	Trip tickets, load receipts or other documentation mentioned above contain the harvester's SmartLogging certification code and Subcode (if applicable) number.	Yes No N/A 🛛	No TCNEF SL group members are currently using the Smartlogging certification code on trip tickets or other documentation.
2.5.3:	A summary of forest products, which includes at a minimum, delivery dates, destinations, volumes and species is provided to the SmartLogging auditor during the annual audit.	Yes X No N/A	Each group member keeps a record of the volume of forest products delivered to each mill. Mill receipts are verified against trip tickets and used to summarize volumes and values for group member recordkeeping and payment to landowners. Volume and species summaries were available upon request.

2.5.4: All records are kept for at least five years.	YesImage: YesImage: The group manager outlines the recordkeeping requirements for Sm on the group member agreement. A members keep records for 5 years.	
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#### **APPENDIX V: NEPCON Database Update Form**

**Instructions:** For each SL certificate, NEPCON maintains a <u>Fact Sheet</u>, which includes important summary information about the certificate. During each annual audit auditors should work with the certificate holder to verify that the Fact Sheet information is up to date as follows:

1. If changes are required (corrections, additions or deletions), **note only the changes** to the database information in the section below.

2. The changes identified to this form will be used by the NEPCON office to update the database and communicate these changes to the FSC and other worldwide certification databases.

Is current Fact Sheet accurate and up-to-date?	YES 🗌	NO 🖂
(if yes, leave section below blank)		

#### CLIENT INFORMATION (contact info for NEPCON website listings)

Organization name	
Primary Contact	Title
Primary Address	Telephone
Address	Fax
Email	Webpage

Group

Change to Group Certificate	🛛 ves 🗌 No	Change in # of	103 total members	
		group		

# APPENDIX VI: Group management conformance checklist (confidential)

Group Certification Requirements	Conform	Comments/CARs
GC 1: The group manager is an independent legal entity or an individual acting as a legal entity.	Yes ⊠ No □ N/A □	The group manager is an independent 501.c.3 non profit organization created for the purpose of overseeing programs such as SmartLogging Certification
GC 2: The group manager has sufficient legal and management authority and technical and human resources (e.g. qualified staff, equipment.) to implement their responsibilities	Yes ⊠ No □ N/A □	The auditor found the group manager has sufficient legal and management authority and the resources to implement their responsibilities based on group policies and Bylaws that specifically confer legal and administrative authority for managing the SmartLogging group.
GC 3: The responsibilities of the group manager and group members are clearly defined and documented, e.g., with respect to conforming with the SmartLogging standards and group manager policies	Yes ⊠ No □ N/A □	The responsibilities of membership in the SL group are clearly defined in the Code of Ethics Consent form signed by each member. Group manager responsibilities are outlined in the Master Logger Manual that each member receives.
<ul> <li>GC 4: Group membership requirements are documented and include:</li> <li>i. Procedures and rules of entry and exit from the certified pool</li> <li>ii. Procedures for the notification of SW of changes in membership within 30 days of changes.</li> </ul>	Yes ⊠ No □ N/A □	<ul> <li>Group membership requirements are documented and include:</li> <li>i. Procedures for entry and exit. This information is detailed in "More About the Trust to Conserve Northeast Forestlands SmartLogging Certificate". An independent board has been established to determine who may enter the group and who should have their membership suspended.</li> <li>ii. Documents observed by the auditor indicate that changes to group membership will be documented and NEPCON will be notified within 30 days.</li> </ul>
<ul> <li>GC 5: A 'consent form' or its equivalent has been signed by each group member</li> <li>The consent form at a minimum: <ol> <li>acknowledges and agrees to the obligations and responsibilities of group membership;</li> </ol> </li> <li>agrees to group membership for the full period of validity of the group certificate; and authorizes the group manager to apply for certification on the member's behalf.</li> </ul>	Yes ⊠ No □ N/A □	<ul> <li>The "Northeast Master Logger Code of Ethics" is signed by each SL group member. The consent form is specific to Master Logger certification, but the standards and practices mimic those of the SmartLogging standard. Upon signing the consent form: <ul> <li>i. All group members agree to the obligations and responsibilities of membership.</li> <li>ii. The consent form does not specifically include an agreement to remain a group member for the full period of validity of the certificate, but group members have</li> </ul> </li> </ul>

iv. acknowledges NEPCON right		demonstrated their commitment through
to access their forest for		long-term membership in the group.
evaluation and monitoring		iii. The link between Master Logger
		certification and SmartLogging
		certification is included in the "Master
		Logger Readiness Packet." The consent
		form does not explicitly state that TCNEF
		will apply for SmartLogging certification
		on behalf of the group member, but the
		link is implicit in the overall package of
		documents received by group members.
		Auditor interviews with group members
		demonstrated that they understand the link between Master Logger certification
		and SmartLogging certification.
		iv. The consent form includes a statement
		that the group member understands that
		certification includes random field audits.
		NEPCON and/or SmartLogging auditors
		are not explicitly referenced on the
		consent form, but the link to the
		SmartLogging requirements is implied as
		described above.
GC 6: Group manager has provided		The SmartLogging standard, and related
each group member with		information on Master Logger and SmartLogging
documentation including:		certification process are included in the "Master
i. The applicable SmartLogging	Yes 🖂	Logger Readiness Packet." Other group
standard		membership requirements are described in the consent information in the "Northeast Master
i. An explanation of the certification process	N/A 🗌	
ii. An explanation of group		Logger Code of Ethics" document.
membership requirements		
GC 7: Group manager has a policy		The group manager has a clear policy for
and practice for monitoring harvest		monitoring the harvests of the group members.
practices to ensure that they are		Each new member is audited prior to entry into
meeting the SmartLogging standard		the group and is audited again for recertification
and group membership requirement?		after 2 years. For Master Loggers who have been
		certified for at least two years TCNEF audits at
	Yes 🖂	least 25% of the group members each year at the
	No 🗌	time of recertification every 4 years.
	N/A 🗌	
		In addition, members may be audited as a result
		of practices reported to the certification board by
		stakeholders. In some cased these reviews have
		resulted in some Master Loggers having their
		certification revoked, which indicates that the
GC 8: The group manager has a		internal auditing and control process is robust. The group manager, provided records for each
system for maintaining the following	Yes 🖂	member audited and has clear policies for:
records up to date at all times:		i. Maintaining an accurate and current list of
	N/A 🗌	all group members.

i List of names and addresses of group members, together with date of entry into group certification scheme;	<ul> <li>ii. Maintaining all consent forms.</li> <li>iii. Maintaining records of Master Logger interviews, audit findings, and recertification results and corrective</li> </ul>
ii Evidence of consent of all group members, preferably in the form of a signed 'consent form'	<ul> <li>actions.</li> <li>iv. Maintaining records of group member production and sales.</li> <li>v. The entrance and exit of group members is determined by an external board. A</li> </ul>
<ul> <li>Records demonstrating the implementation of any internal control or monitoring systems.</li> <li>Such records shall include records of internal inspections, non- compliance identified in such inspections, actions taken to correct any such non-compliance</li> </ul>	<ul> <li>copy of the board's decision is sent to TCNEF and is kept with the group member's, or ex-group members, file for the duration of the certification period.</li> <li>vi. All certification documents are maintained by the group manager for 5 years.</li> </ul>
viii An annual summary of production, sales and forest product purchasers of all members ; and	
<ul><li>ix The date of leaving of any group members, and an explanation of the reason why the member left the group.</li><li>x Documents are kept for five years</li></ul>	

## **APPENDIX VII: Certified Group Membership List**

1. Total # members in the certified group: 103

#### **GROUP MEMBERSHIP TABLE**

Name of Member	Registration Subcode assigned	Address	Type of Equipment	Date of entry
XXXX		XXXX		01/28/13
XXXX		XXXX		12/11/18
XXXX		XXXX		07/01/01
XXXX		XXXX		12/11/18
XXXX		XXXX		12/11/18
XXXX				07/01/05
XXX		XXXX		12/15/18
XXXX		XXXX		12/11/18
XXXX		XXXX		12/02/05
XXXX		XXXX		07/01/01
XXXX		XXXX		1/28/13
XXXX		XXXX		12/11/18
XXXX		XXXX		04/30/02
XXXX		XXXX		12/2/05
xxxx		XXXX		12/11/18
XXXX		XXXX		12/11/18

XXXX	XXXX	
		12/11/18
XXX	XXXXX	1/28/13
	XXXX	
XXXX		12/11/18
XXX	XXXX	12/11/18
	XXXX	
XXXX		12/11/18
XXXX	XXXX	40/0/05
~~~~		12/2/05
XXXX	XXXXX	40/44/40
	XXXX	12/11/18
XXXX		05/05/05
XXXX	XXXX	7/1/01
~~~~~	XXXXX	
XXXX		12/11/18
XXXX	XXXXX	12/11/18
XXXX	XXXXX	12/11/10
		06/22/07
XXXX	XXXX	12/12/18
XXXX	XXXX	
70000		5/14/10
XXXX	XXXX	
		12/12/18
	XXXXX	
XXXX		12/12/18
XXXX	XXXX	
		12/12/18
	XXXX	
XXXX		12/12/18
~~~~~	XXXX	
XXXXX		04/16/10
XXXX	XXXX	07/02/08

	XXXX	
XXXX		12/15/18
XXXX	XXXX	6/17/08
XXXX	XXXX	03/04/11
XXXX	XXXX	07/01/01
XXXX	XXXX	12/02/05
XXXX	XXXX	03/04/11
	XXXX	
XXXX		12/12/18
XXXX	XXXX	12/12/18
	XXXX	
XXXX		12/15/18
XXXX	XXXX	12/02/05
XXXX	XXXX	12/02/03
		5/5/05
XXXXX	XXXX	5,6,60
		12/15/18
XXXX	XXXX	7/1/05
	XXXX	
XXXX		12/12/18
XXXX	XXXX	
XXXX	XXXX	12/12/18
XXXX	^^^^	7/1/05
XXXX	XXXX	3/1/07
XXXX	XXXX	4/16/04
XXXX	XXXX	06/17/08
XXXX	XXXX	00/11/08
/////		12/15/18
	XXXX	
XXXX		8/6/08
XXXX	XXXX	4/16/04
XXXX	XXXX	03/04/11

	XXXXX	
XXXX		12/12/18
XXXX	XXXX	06/17/08
XXXX	XXXXX	04/16/04
XXXX	XXXXX	05/05/05
XXXX	XXXX	12/15/18
xxxx	XXXX	12/12/18
xxxx	XXXX	3/31/10
XXXX	XXXX	4/30/02
xxxx	XXXX	05/05/05
xxx	XXXX	07/01/01
xxxx	XXXX	12/15/18
xxxx	XXXX	01/28/13
XXXX	XXXX	4/16/04
xxxx	XXXX	07/02/08
xxxx	XXXX	03/31/10
xxxx	XXXX	12/15/18
xxxx	XXXXX	6/22/07
xxxx	XXXXX	4/16/04
XXXXX	XXXX	4/16/04

XXXXX	XXXX	
		12/02/05
XXXX	XXXX	12/02/05
XXXXX	XXXX	12/02/03
~~~~		08/06/08
	XXXX	
XXXXX		06/17/08
	XXXX	
XXXXX		3/4/11
XXXXX	XXXX	12/12/18
~~~~	XXXX	12/12/18
XXXX		12/15/18
	XXXX	
XXXX		12/15/18
XXXX		4/30/02
	XXXX	
XXXX		5/5/05
~~~~	XXXX	4/40/04
XXXX	XXXX	4/16/04
XXXXX		05/05/05
XXXX	XXXX	
		12/12/18
XXXX	XXXX	
		12/15/18
~~~~	XXXX	07/00/00
XXXX XXXX		07/02/08
XXXX		3/31/10
	XXXX	
XXXX		07/02/08
VVVV	XXXX	4/00/00
XXXX		4/30/02
XXXX		04/30/02

XXXX		04/16/04
XXXX		4/16/04
	XXXX	
XXXX		12/12/18
XXXX		
		05/28/10
XXXX		7/1/01