

IN THE CIRCUIT COURT OF THE
SEVENTH JUDICIAL CIRCUIT, IN AND
FOR FLAGLER COUNTY, FLORIDA

PHILIP LOWE and
SARAH THOMPSON-LOWE,

CASE NO.: 2016 CA 000180

Plaintiffs,

v.

BRYAN STREETMAN,

Defendant.
_____ /

COMPLAINT FOR INJUNCTIVE RELIEF

COME NOW, the Plaintiffs, PHILIP LOWE and SARAH THOMPSON-LOWE, by and through the undersigned counsel, and hereby file this Complaint for Injunctive Relief to enjoin the Defendant, BRYAN STREETMAN, and as grounds therefore state the following:

JURISDICTION AND VENUE

1. This action is subject to the jurisdiction of this Honorable Court under Section 26.012, Florida Statutes, as it involves an action seeking equitable (i.e., injunctive) relief.
2. The cause of action complained of in this case arose in the City of Palm Coast in Flagler County, Florida.

PARTIES

3. Plaintiff, PHILIP LOWE, is an individual who resides at 29 Collingwood Lane, Palm Coast, Florida 32137.
4. Plaintiff, SARAH THOMPSON-LOWE, is an individual who resides at 29 Collingwood Lane, Palm Coast, Florida 32137.
5. The Plaintiffs, PHILIP LOWE and SARAH THOMPSON-LOWE, are married.

6. The Defendant, BRYAN STREETMAN, is an individual who resides at 25 Collingwood Lane, Palm Coast, Florida 32137.

GENERAL ALLEGATIONS

7. The Plaintiffs and Defendant are next-door neighbors on Collingwood Lane in Palm Coast, with each of their respective properties located on the canal waterway.

8. The Plaintiffs have owned and resided at the property located at 29 Collingwood Lane in Palm Coast since 1999.

9. The Defendant has owned and resided at the property located at 25 Collingwood Lane in Palm Coast since 2013.

10. Throughout the duration of their residency at 29 Collingwood Lane, the Plaintiffs have maintained bird gourds on their dock, which have served as nesting sites for Purple Martin birds, a species protected under several federal statutes, including the Migratory Bird Treaty Act (1918) and the Lacey Act (1980).

11. Purple Martin birds provide several benefits to the public and neighborhood, including, but not limited to, a reduction in mosquitos during the summer months.

12. Many of the Plaintiffs' and Defendant's neighbors are senior citizens, who enjoy spending time outdoors and often participate in recreational bird watching on the canal waterway.

13. The Plaintiffs maintain a total of twenty-four (24) bird gourds, in three (3) sets of eight (8) placed at the top of metal poles, which are affixed to the Plaintiffs' dock seasonally and are typically set up by the Plaintiffs in January and taken down in July.

14. Several other neighbors, including those residing at 31 Collingwood Lane and 11 Collingville Court, seasonally maintain bird gourds on their respective docks and/or properties.

15. Shortly after the Plaintiffs set up bird gourds on their dock in late January 2016, the Defendant, BRYAN STREETMAN, began broadcasting loud predatory bird sounds daily from an outdoor speaker beginning at dawn and continuing until dusk in an effort to discourage all types of birds from coming near his or the Plaintiffs' properties.

16. On or about January 17, 2016, the Plaintiffs filed a complaint with the City of Palm Coast Code Enforcement Division regarding the Defendant's actions described in Paragraph 15 above.

17. On or about January 28, 2016, a neighborhood group opposed to the Defendant's actions was formed and created a Petition that was signed by approximately eighteen (18) members of the surrounding neighborhood community. (A copy of the Petition is attached hereto as "Exhibit A").

18. Throughout January and February of 2016, the Defendant flew a drone aircraft in the rear portion of his property and on several occasions flew the drone aircraft on or above the Plaintiffs' property or very close to the bird gourds affixed to the Plaintiffs' dock where Purple Martin birds had begun nesting, resulting in several altercations between Plaintiffs and the Defendant.

19. On or about February 14, 2016, Delphine Meyers, a neighbor residing at 11 Collingville Court, directly across the canal waterway from the Plaintiffs' residence, observed a powerful, bright red and green laser beam being emitted into her residence from a laser bird deterrent system mounted on the second floor rear deck of the Defendant's residence and filed an Incident Report with the Flagler County Sheriff's Office. (A copy of the Incident Report/CAD Narrative is attached hereto as "Exhibit B").

20. In mid-February 2016, a copy of the Petition (*See*, "Exhibit A") was mailed to the City of Palm Coast Code Enforcement Division, the Mayor of Palm Coast, and the City Manager of Palm Coast.

21. On or about February 19, 2016, the City of Palm Coast Code Enforcement Division sent the Defendant a Notice of Violation, citing violations of Section 35-76(d)(1) of the City of Palm Coast Code of Ordinances for nuisance related to the Defendant's use of the laser bird deterrent system and Section 35-52(6) for Loud and Raucous Noise. (A copy of the Notice of Violation is attached hereto as "Exhibit C").

22. On or about February 22, 2016, the undersigned attempted to resolve this matter by sending the Defendant a Cease and Desist Letter requesting that the Defendant cease flying his drone on the Plaintiffs' property or near the Plaintiffs' bird gourds and cease his use of the laser bird deterrent system. (A copy of this correspondence is attached hereto as "Exhibit D").

23. Shortly following the Defendant's receipt of this letter, the Defendant placed an inflatable "air dancer" device, which emits considerable noise from the blower that keeps the device inflated, in a further attempt to deter birds from the Defendant's and Plaintiffs' properties and to cause annoyance to the Plaintiffs and neighbors.

24. The Defendant has ceased his use of the light system of the laser bird deterrent device, however, the Defendant continues to fly his drone aircraft near the Plaintiffs' property and now employs two (2) grey box devices, which emit high frequency noise for approximately thirty (30) seconds every five (5) minutes, and such use is systematic and continuous.

25. This high frequency noise is audible within the Plaintiffs' residence and has affected the behavior of the Plaintiffs' dogs while in their backyard.

26. The high frequency noise and actions of the Defendant have affected the nesting habits of the Purple Martin birds, which have consistently nested on the Plaintiffs' property for over a decade.

27. The Defendant has retained counsel and the undersigned has attempted to resolve these issues with opposing counsel, but has been unsuccessful in reaching an agreement.

28. The undersigned has requested that Defendant's counsel provide the make and model of the devices in use by the Defendant to determine the type/decibel levels of the noise(s) being emitted, but has been unable to obtain such information.

COUNT I
INJUNCTIVE RELIEF

29. The Plaintiffs restates and incorporates by reference Paragraphs 1 through 28 of the above Complaint as if fully set forth herein.

30. The actions of the Defendant are in violation of the City of Palm Coast Code of Ordinances and federal statutes, including the Migratory Bird Treaty Act (1918) and the Lacey Act (1980).

31. The Defendants systematic and continuous broadcasting of high frequency noise has affected the Plaintiffs' ability to sleep at night and the constant and continual repetition of the noise is a serious discomfort, distress, and inconvenience to the Plaintiffs and other neighbors and would be a source of discomfort, distress, and inconvenience to any person of normal sensibilities.

32. The constant repetition of the noise has caused and continues to cause the Plaintiffs serious annoyance and discomfort, in addition to mental and physical distress. The

noise will, if permitted to continue, cause serious and irreparable injury to the comfort of any person of normal sensibilities occupying the Plaintiffs' residence.

33. The noise and impairment of the comfort and health of any person occupying the Plaintiffs' residence has caused and will continue to cause the value of the Plaintiffs' property to depreciate.

34. The constant repetition of the noise has caused harassment to the local Purple Martin birds during their nesting season in violation federal statutes, specifically, the Migratory Bird Treaty Act (1918) and the Lacey Act (1980), and has resulted in a considerable reduction of nesting birds.

35. The Plaintiffs have no adequate remedy at law that will prevent the irreparable harm cited above.

36. It is in the public interest that this Court grant preliminary and permanent injunctive relief preventing the Defendant from taking the arbitrary and unlawful actions cited above.

WHEREFORE, the Plaintiffs demand judgment against the Defendant as follows:

A. That the Court enter preliminary and permanent injunctive relief enjoining the Defendant: (1) from continuing the use of his laser bird deterrent system such that beams of light are broadcasted onto the Plaintiffs' property; (2) from continuing to fly his drone aircraft on the Plaintiff's property or near the Plaintiff's bird gourds; (3) from continuing to emit predatory bird sounds and/or high frequency noises from his property; and (4) from taking any actions to harass Purple Martin birds during their nesting season;

B. That the Court issue a temporary restraining order enjoining the Defendant: (1) from continuing the use of his laser bird deterrent system such that beams of light are

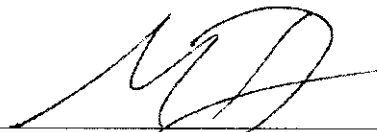
broadcasted onto the Plaintiffs' or other neighbors' properties; (2) from continuing to fly his drone aircraft on the Plaintiff's property or near the Plaintiff's bird gourds; (3) from continuing to emit predatory bird sounds and/or high frequency noises from his property; and (4) from taking any actions to harass Purple Martin birds during their nesting season;

C. That the Court award the Plaintiffs' court costs incurred herein; and

D. That the Court award the Plaintiffs such other relief as determined to be just and proper.

RESPECTFULLY SUBMITTED this 1ST day of APRIL, 2016.

BY:



MARCUS THOMPSON, ESQ.

Florida Bar No.: 0110643

Law Office of Marcus Thompson, PLLC

320 High Tide Drive, Suite 101A

Saint Augustine, FL 32080

Phone: (904) 342-8262 | Fax: (904) 512-0230

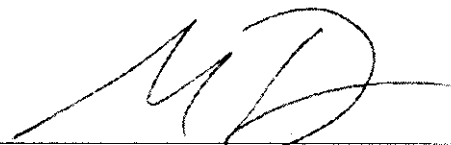
Email: service@marcusthompsonlaw.com

Secondary: marcus@marcusthompsonlaw.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to **Ryan Mitchell, Esq.**, of McCullough & Mitchell, PLLC, 7463 Windermere Road, Suite A, Orlando, Florida 32835, to ryan@mmlawpa.com, on this 1ST day of APRIL, 2016, in accordance with Fla. R. Jud. Admin. 2.516.



MARCUS THOMPSON, ESQ.
Florida Bar No.: 110643
Law Office of Marcus Thompson, PLLC
320 High Tide Drive, Suite 101A
Saint Augustine, FL 32080
Phone: (904) 342-8262 | Fax: (904) 512-0230
Email: service@marcusthompsonlaw.com
Secondary: marcus@marcusthompsonlaw.com
Attorney for Plaintiffs

January 28, 2015

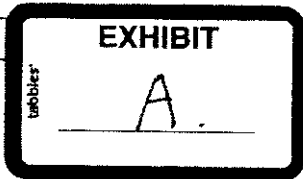
We, the undersigned, Homeowners in the C-Section of Palm Coast, north of Palm Harbor Parkway and bordered by Cimmaron and Cottonwood, do file the following petition of complaint against Bryan Streetman of 25 Collingwood Lane for broadcasting a recording of shrill and screeching predatory bird sounds to discourage birds from nesting in our area. This noise starts approximately at 7:15 am and continues all day until after dark. This has gone on for more than two weeks. He also did the same thing last summer for a short time.

These sounds are affecting our quality of life and makes the outdoor areas of our homes unusable. The volume of this recording has been increasing daily. At least two City employees, John Beaudet and Michael Hadden, have heard these annoying sounds. This is a harassment of Palm Coast senior citizens and is a major annoyance to all of us tax payers.

This was first reported to Code Enforcement on January 17, 2016.

- John Hill 31 Collingwood Ln
- Joseph Cook 31 Collingwood Ln
- R. HENDERSON 33 Collingwood Ln
- John Thompson 33 Collingwood Ln
- MATON HOAD 35 Collingwood Ln
- LINDA TOWN 35 Collingwood Ln
- Richard Washington 12 Collingville Ct.
- Kenneth Washington 11 Collingville Ct
- John Washington 11 Collingville Ct
- Richard Washington 10 Collingville Ct
- Barry Washington
- Dr. Phyllis - 9 Collingville Ct.
- Philip W. Gunn 29 Collingwood Ln
- Susan Thompson - 29 Collingwood Lane
- Yvonne D. Page - 20 Cedar Harbor Ct
- Sharon J. Ray 16 Cedar Harbor Ct
- Linda Ray 16 Cedar Harbor Ct

Original to Mayor Jon Nettles
 copy to: Jim Linder, City Manager
 copy to: Code Enforcement





Flagler County Sheriff's Office

James L. Manfre
SHERIFF

Accountability • Integrity • Respect

CASE CARD

Date: 2-14-16 Case #: 13491-16
Deputy: J. CASTANHEIRA ID #: 545
Incident Type: Civil

If you have additional information that can assist in the investigation, please call 386-313-4911 and ask to speak with a deputy.

CONTACT INFORMATION

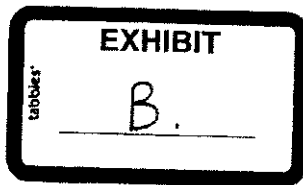
Investigative Services Division 386-586-4801
Victim Advocate 386-586-4801
Records 386-586-4815
Property & Evidence 386-586-4824
Communications 386-313-4911

For Emergencies, Call 911

How are we doing?

Complete a Citizen's Survey online at
www.flaglersheriff.com

A State Accredited Law Enforcement Agency





Incident Report

Flagler County Sheriff's Office
901 East Moody Blvd
Bunnell, FL 32110
386-437-4116

Print Date/Time: 02/15/2016 14:18
Login ID: VCochran

Flagler County Sheriff's Office
ORI Number: FL0180000

Incident: 2016-00013491

Incident Date/Time:	2/14/2016 7:28:00 PM	Incident Type:	Civil
Location:	11 COLLINGVILLE CT PALM COAST FL 32137	Venue:	Palm Coast
Phone Number:	(386)446-3142	Source:	Phone
Report Required:	No	Priority:	Code 1
Prior Hazards:	No	Status:	Investigate
LE Case Number:		Nature of Call:	

Unit/Personnel

Unit	Personnel
A321	376-Bender
A322	545-Castanheira

Person(s)

No.	Role	Name	Address	Phone	Race	Sex	DOB
	Caller	MYERS, DELCI	<UNKNOWN>				

Vehicle(s)

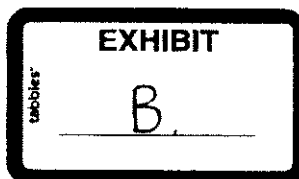
Role	Type	Year	Make	Model	Color	License	State
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Disposition(s)

Disposition	Count
AT1	2

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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CAD Narrative

02/14/2016 19:29:13 Sisti, Amy Narrative: RP ADV HER NEIGHBOR IS TRYING TO GET RID OF BIRDS WITH A LASER LIGHT AND HE KEEPS POINTING IT AT HER HOUSE

02/14/2016 19:29:37 Sisti, Amy Narrative: HE LIVES AT 25 COLLINGWOOD LN HES ACROSS CANAL FROM RP

02/14/2016 19:31:43 Castanheira, John Narrative: Dispatch received by unit A322

02/14/2016 19:31:56 Sisti, Amy Narrative: RP ADV THIS IS AN ON GOING PROB W MALE THE CITY HAS BEEN INVOLVED W THIS TOO

02/14/2016 20:13:19 Bender, George Narrative: Dispatch received by unit A321

02/14/2016 21:06:16 Castanheira, John Narrative: Upon arriving on scene, I made contact with the caller, Deici Myers. She explained to me that a neighbor of hers which house is positioned behind hers across the canal recently installed some sort of laser device in a second floor window. I observed the device illuminating a green and red laser beam which rotates in a circular direction. The laser beams were peering through the windows in the callers home. The caller feels that the laser beams are violation her privacy and space. The caller further explained that her neighbor is doing this to deter a bird which migrates on her property and several other properties in the area. There only appears to be a statute for pointing a laser at an individual driving a vehicle or pointing it at a plane. I attempted to make contact with the resident which has the light but noone answered the door. The device appears to be on a timer as it only comes on approx every 5 minutes.

EXHIBIT

B.

lebbles



LAW OFFICE OF MARCUS THOMPSON

PERSONAL INJURY | SMALL BUSINESS LAW | CRIMINAL DEFENSE

www.marcusthompsonlaw.com

Marcus Thompson, Esq.

February 22, 2016

VIA UPS OVERNIGHT DELIVERY

Mr. Brian Streetman
25 Collingwood Lane
Palm Coast, Florida 32137

RE: CEASE AND DESIST – PRIVATE NUISANCE/TRESPASS

Dear Mr. Streetman:

My firm represents Mr. Philip Lowe, Mrs. Sarah Lowe-Thompson, and Ms. Delphine Meyers with regard to a potential claim against you for Private Nuisance and/or Trespass arising out of your recent use of a drone aircraft and laser deterrent system surrounding their respective properties. It is respectfully requested that any and all future correspondences regarding this matter be directed to my firm at the address listed below.

It is my clients' contention that your recent actions involving the flight of a drone aircraft and your persistent use of a laser bird deterrent on or near their property constitute a private nuisance and/or trespass under Florida law. My clients demand that you immediately cease and desist such activity; otherwise, they shall be forced to petition the court of competent jurisdiction for an injunction enjoining such activity and seeking any applicable damages.

Under Florida law, a "private nuisance" is defined as an unreasonable, unwarranted, or unlawful interference in the use and enjoyment of another individual's property. Whether or not an action or conduct is a private nuisance depends on whether the use of the property is reasonable under the circumstances and whether there is actual physical discomfort. Beckman v. Marshall, 85 So. 2d 552 (Fla. 1956). By contrast, a "trespass" acts that interfere with a plaintiff's exclusive possession of real property. A trespass is a direct infringement of one's right of property while with respect to a nuisance; the infringement is the result of an act that is not wrongful in itself, but only in the consequences that flow from it.

Specifically, it is my clients' contention that your action of flying a drone equipped with propellers along the edges of my clients' property lines creates excessive noise that interferes

320 High Tide Drive, Suite 101A
Saint Augustine, Florida 32080
Office: (904) 342-8262 Fax: (904) 512-0230 Direct: (904) 377-7261



Mr. Brian Streetman

February 22, 2016

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with the use and enjoyment of my clients' respective properties, thus constituting a private nuisance. Furthermore, in several videos obtained from my client, it appears that the drone you are operating is equipped with a camera. I would draw your attention to the recently enacted Fla. Stat. § 934.50, which provides that:

"A person [. . .] may not use a drone equipped with an imaging device to record an image of privately owned real property or of the owner, tenant, occupant, invitee, or licensee of such property with the intent to conduct surveillance on the individual or property captured in the image in violation of such person's reasonable expectation of privacy without his or her written consent."

The statute further provides that "the owner, tenant, occupant, invitee, or licensee of privately owned real property may initiate a civil action for compensatory damages for violations of this section and may seek injunctive relief to prevent future violations of this section against a person, state agency, or political subdivision that violates paragraph (3)(b). In such action, the prevailing party is *entitled to recover reasonable attorney fees* from the nonprevailing party based on the actual and reasonable time expended by his or her attorney billed at an appropriate hourly rate." [*Emphasis added*].

My clients also contend that your use of a laser bird deterrent system pointed in the direction of my clients' respective properties constitutes both a "private nuisance" and a "trespass." Of particular concern is a recent incident that occurred on February 14, 2016, from which a Incident Report was prepared by the Flagler County Sheriff's Office ("FCSO"). On this date, my client, Delphine Meyers, contacted FCSO to report bright laser beams coming through the rear windows of her home. Upon arrival, Officer John Castanheira personally observed your device illuminating a green and red laser beam which rotates in a circular direction. Officer Castanheira further observed the laser beams peering through the windows of Ms. Meyers' home. I understand that the laser deterrent system is set up to pan at approximately one hundred eighty (180) degrees and affects both Ms. Meyers residence and the Lowe residence. It is quite clear that use of this laser deterrent system constitutes an unreasonable interference with my clients' use and enjoyment of their respective properties thus qualifying as a "private nuisance and the laser's unjustifiable intrusion into my client's home constitutes "trespass."

I understand that these actions taken by you are center around your concerns about a native bird, the Purple Martin, that commonly nest in the area and have done so for a significant amount of time. As you are likely aware, the Purple Martin is a federally protected native species under the Migratory Bird Treaty Act (1918) and the Lacey Act (1980). As such, it is unlawful to "kill, trap, or *harass*" Purple Martins. Should your actions continue, my clients shall ensure that any federal violations are adequately documented, reported to the appropriate authorities, and that you are prosecuted accordingly.

It is our hope that these issues can be resolved peacefully and respectfully, without the necessity of litigation. My clients and I request that you take steps to address these concerns and discontinue these actions immediately. Please contact my office via telephone at (904) 342-



Mr. Brian Streetman
February 22, 2016
Page 3 of 3

8262, or in writing to: Law Office of Marcus Thompson, PLLC, 320 High Tide Drive, Suite 101A, Saint Augustine, Florida 32080, to further discuss these issues and work towards an amicable resolution. Should you fail to respond to this letter or remedy the aforementioned nuisances within ten (10) days, I shall be forced to file a Petition for Injunction in Flagler County Circuit Court. I look forward to working with you to find a peaceful solution to this matter.

Sincerely Yours,



MARCUS THOMPSON, ESQ.

Cc: Philip Lowe
Sarah Thompson-Lowe
Delphine Meyers





160 Lake Avenue
Suite 141
Palm Coast, Florida 32164

**CODE ENFORCEMENT DIVISION
NOTICE OF VIOLATION**

REPEAT VIOLATION RECURRING VIOLATION

ADDRESS: 25 Collingwood Ln

OWNER/AGENT/TENANT: Streetman, B

DATE: 2-19-16 TIME: 09:00

OFFICER'S NAME: Hadden

OFFICER'S SIGNATURE: M. Hadden

For additional information, contact Code Enforcement
at (386) 986-3764 8:00 AM-5:00 PM (7 Days a Week)

SECTION	VIOLATION	CORRECTIVE ACTION	# DAYS/HSR	CASE NUMBER
15-1 (FBC 105.1)	No Permit for _____	Obtain Permit for _____ Call (386) 986-3780 for permit information		
15-108(d)	Weeds/Overgrowth	Maintain Lawn and Landscaping		
15-108(g)	Shed/Fence/Wall Maint.	Remove or Repair _____		
15-108(h)	Inoperable/Unlicensed	Make vehicle(s) operable License or Remove Vehicle(s) from Property		
15-108(i)	Defacing Property i.e. Graffiti	Return Property to Original Condition		
15-110(a)(3)	No House Number	Attach Number to Residence		
15-114(a)	Rubbish/Trash/Garbage	Remove from Premises		
17-39(a)	Residential Rental Prog.	Register Rental Property (386) 986-3764		
24-159(a)	Swale Maintenance	Replace and/or Maintain (Residential)		
24-162(c)	Obstruction of Swale	MAINTAIN SWALE DRAINAGE (Const. Site)		
24-183()	Landscape Irrigation			
X 35-76(d)	Nuisance	<u>Liability issues (laser)</u>	<u>1 day</u>	<u>2016020653</u>
41-11(a)	Trash Containers	Conceal from Public View		
41-17(a)(5)	Trash Containers	Out too early/ Out Too Long/Check Times		
42-56	R.O.W. Obstruction			
44-34(c)	Parking of Comm.Veh./Trailer In Residential District	Remove Comm. Veh./Trailer from Res. Dist.		
44-34(d)(2)	Parking Boat/ Trailer/RV	Remove _____		
44-34(f)	Vehicle/Trailer/Boat Improperly Parked	Remove Vehicle/Trailer/Boat from Lawn/gravel		
44-34(i)	Parking in Median	Remove Vehicle from Median		
LDC 11.02.04(C1)	Tree Barricade Viol.	Install/Reinstall Tree Barricades within 2 Days and call Urban Forestry 386-986-3758		
LDC 11.02.05(A1)	Removal of Trees w/o Permit/Authorization			
LDC 11.02.05(D)(1)	Clearing w/o Permit			
LDC 11.03.01	General Landscaping Req.			
LDC 11.03.02	Specific Landscaping Req.			
LDC 12	Sign Ordinance Violation	Repair/Remove/Obtain Permit (386) 986-3751		
Other: 35-52 (w)	<u>Loud + Raucous Noise</u>		<u>1 day</u>	<u>2016020654</u>
Other:	<u>Lawn mower/Roto Tiller</u>			
Description:				
Photos:	Notes: <u>Based on Numerous Complaints</u>			

Your cooperation in having the conditions described above corrected within the stated time listed above from the date of this notice is required in order to avoid further action by the City. In the event you do not comply with the requirements of this notice, the City will pursue any and all of the following actions:

- The City may cause the necessary work to be accomplished with cost and expense of the work becoming a charge and lien against the property, and/or;
- Present the matter to the Code Enforcement Board (CEB) The CEB is empowered to impose fines at the rate of up to \$5000.00 for each day that any violations continue to exist beyond the date established for compliance in the Order. Fines become liens upon real property of the violator. There may also be an Administrative Cost imposed for EVERY CEB case.

If the violation is corrected and then recurs or if the violation is not corrected by the time specified for the correction by the code inspector, the case may be presented to the enforcement board even if the violation has been corrected prior to the board hearing.

Signature of Person Receiving Notice _____

Date _____

EXHIBIT

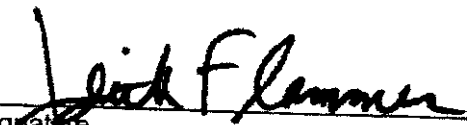
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D.

AFFIDAVIT OF SERVICE/POSTING/MAILING -- CONTINUED

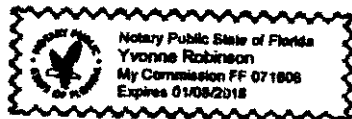
Re: Case No. 2016020653
2016020654

On the 19 day of February, 2016, at 3 o'clock PM., I personally mailed the document/letter by 1st Class & Certified Mail # 91 7199 9991 7034 5421 3070 return receipt requested.



Signature
JUDITH FLAMMER
Printed Name Cust. Svc. Rep.

SWORN TO AND SUBSCRIBED before me this 19 day of February, 2016,
by JUDITH FLAMMER, who is personally known to me.





Notary Public in and for the
County and State Aforementioned

