

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24A-0166CP

IN THE MATTER OF THE APPLICATION OF GOOD MOUNTAIN ADVENTURES LLC FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO OPERATE AS A
COMMON CARRIER BY MOTOR VEHICLE FOR HIRE.

**INTERIM DECISION OF
ADMINISTRATIVE LAW JUDGE
MELODY MIRBABA
SCHEDULING HEARING, ESTABLISHING PROCEDURES
AND DEADLINES, ADDRESSING OUTSTANDING
MOTIONS AND DISMISSING INTERVENTIONS**

Mailed Date: June 18, 2024

I. STATEMENT, SUMMARY AND PROCEDURAL HISTORY

A. Statement and Summary

1. This Decision schedules a fully remote evidentiary hearing for September 6 and 9, 2024; establishes procedures and deadlines relating to that hearing; memorializes other rulings made during the June 14, 2024 Prehearing Conference; and denies the Motion to Set Aside, Modify or Stay Interim Order R24-0365-I (Motion) filed by NDW Enterprises LLC, doing business as Ski Town Transportation (Ski Town) on June 12, 2024.

B. Procedural History¹

2. On April 4, 2024, Applicant Good Mountain Adventures LLC (Good Mountain or Applicant) initiated this matter by filing the above-captioned Application (Application). The Application seeks a Certificate of Public Convenience and Necessity (CPCN) to operate as a common carrier by motor vehicle for hire for the transportation of passengers in call-and-demand

¹ Only the procedural history necessary to understand this Decision is included.

shuttle and charter service between all points in the following Colorado counties: Eagle, Pitkin, Grand, Chaffee, Summit, Park, Fremont, Teller, El Paso, Pueblo, Douglas, Jefferson, Clear Creek, Gilpin, Boulder, Larimer, Denver, Arapahoe, Weld, Broomfield, Adams, Lake, and Routt.²

3. On April 8, 2024, the Public Utilities Commission (the Commission) provided public notice of the Application, per § 40-6-108(2), C.R.S.³ The Notice requires that interventions be filed in this Proceeding within 30 days, by May 8, 2024.⁴

4. The following entities filed timely motions seeking to intervene in this matter: Colorado Jeep and Off Road Tours, Inc. (Colorado Jeep); Five Nineteen LLC, doing business as Fresh Tracks Transportation (Fresh Tracks); CKIMY, LLC, doing business as iLIMO (iLIMO); Aspire Tours, LLC (Aspire); Tava Cab LLC, doing business as Tava Cab (Tava Cab); Mountain Star Transportation LLC, doing business as Explorer Tours (Mountain Star); Pikes Peak Cab LLC, doing business as Pikes Peak Transport (Pikes Peak Transport); Ullr Tours, LLC doing business as the Colorado Sightseer (Colorado Sightseer); and Denvers Airport Transportation, LLC (Denvers Airport).

5. On May 15, 2024, the Commission deemed the Application complete and referred the matter to an Administrative Law Judge (ALJ) for disposition by minute entry.

6. On May 29, 2024, Ski Town filed a Petition for Leave to Intervene (Ski Town's Intervention).

7. By Decision No. R24-0365-I, issued on May 30, 2024, the ALJ acknowledged the following entities as intervening parties: Colorado Jeep, Fresh Tracks, iLIMO, Aspire, Tava Cab, Mountain Star, Pikes Peak Transport, and Denvers Airport.⁵ The same Decision approved the

² Application at 4. *See* Notice of Applications and Petitions filed April 8, 2024 (Notice) at 2.

³ *See* Notice at 2.

⁴ Notice at 1.

⁵ Decision No. R24-0365-I (mailed May 30, 2024) at 21.

requests of the following entities to be represented by non-attorneys: Good Mountain, Colorado Jeep, Fresh Tracks, iLIMO, Colorado Sightseer, Aspire, Tava Cab, Mountain Star, and Denver's Airport.⁶ In addition, the Decision rejects Ski Town's Intervention, and requires Colorado Sightseer to file a copy of its Letter of Authority by June 12, 2024 and Pikes Peak Transport to either have an attorney enter an appearance on its behalf or make a filing identifying the non-attorney that it wishes to represent it in this Proceeding, with information establishing that person's authority to do so by June 12, 2024.⁷ The Decision also established a June 12, 2024 deadline for any party to file a motion to set aside, modify or stay Decision No. R24-0365-I and schedules a fully remote Prehearing Conference for June 14, 2024 at 11:00 a.m., to move this matter forward.⁸ The Decision warns that "failure to appear at the prehearing conference may result in decisions adverse to [parties'] interests, including . . . dismissing Interventions . . ."⁹

8. On June 6, 2024, Colorado Sightseer filed a copy of its Letter of Authority.

9. On June 12, 2024, Ski Town filed its Motion.

10. The ALJ held the Prehearing Conference as noticed on June 14, 2024 at 11:00 a.m.

The following entities appeared: Good Mountain, iLIMO, Colorado Sightseer, Aspire, Mountain Star, Pikes Peak Transport, Denver's Airport, and Ski Town. Colorado Jeep, Fresh Tracks and Tava Cab did not appear, although the hearing was approximately 45 minutes long. This Decision memorializes the rulings made during the Prehearing Conference, among other matters.

⁶ *Id.* at 22.

⁷ *Id.*

⁸ *Id.* at 22-23.

⁹ *Id.* at 21.

II. FINDINGS, ANALYSIS, AND CONCLUSIONS

A. Issues Addressed During Prehearing Conference

11. During the Prehearing Conference, the ALJ found that Colorado Sightseer complied with Decision No. R24-0365-I's requirement to file a copy of its Letter of Authority and that its Letter of Authority (filed on June 6, 2024) establishes that it has properly intervened in this matter. As such, Colorado Sightseer was acknowledged as an Intervener in this Proceeding. The ALJ found that Pikes Peak Transport failed to make the filings required by Decision No. R24-0365-I, but since it appeared at the Prehearing Conference, allowed Pikes Peak Transport to address the issues required by the filings. Mr. Marcos Griego, a non-attorney, indicated that he is one of Pike Peak Transport's owners and that the company wishes to be represented by him in this Proceeding. He was surprised that the filing was not made, and indicated that someone else at Pikes Peak Transport was supposed to make the filing. Based on the foregoing, the ALJ found that Pikes Peak Transport is eligible to be represented by Mr. Griego and approved him doing so here.¹⁰

12. *Pikes Peak Transport and Mr. Griego are specifically advised and on notice that although they were given some leeway since they appeared at the Prehearing Conference despite failing to make the required filings, moving forward, failure to meet a filing deadline or comply with a decision will be met with negative consequences, including dismissing it as an Intervener.* Just as every other non-attorney in this Proceeding Mr. Griego will be held to the same standard as an attorney. In addition, Mr. Griego is the approved representative for Pikes Peak Transport, which means that he is responsible for meeting all filing deadlines on Pikes Peak Transport's

¹⁰ See Rule 1201(b)(II) of the Commission's Rules of Practice and Procedure, 4 *Code of Colorado Regulations* (CCR) 723-1, § 13-1-127(2) and (2.3)(c), C.R.S.

behalf, and therefore, asserting that someone else was responsible for meeting a filing deadline will not be accepted as an excuse for failing to make required filings.

13. During the Prehearing Conference, all parties except for Ski Town agreed that the evidentiary hearing should be scheduled as a fully remote hearing. Given this, and that Ski Town is not a party, the ALJ approved the parties' request to hold the hearing as a fully remote hearing. In addition, with the parties' input, the ALJ scheduled the fully remote hearing for September 6 and 9, 2024 and established deadlines to file and serve exhibits, exhibit and witness lists, prehearing motions, and statements of position (as set forth in the ordering paragraphs below).

14. In addition, the ALJ dismissed the Interventions filed by Colorado Jeep, Fresh Tracks and Tava Cab for failing to appear at the Prehearing Conference.¹¹ Decision No. R24-0365-I specifically advises parties that "failure to appear at the prehearing conference may result in decisions adverse to their interests, including . . . dismissing Interventions . . ."¹² The Commission's Certificate of Service for Decision No. R24-0365-I indicates that the Decision was properly served on Colorado Jeep, Fresh Tracks and Tava Cab on May 30, 2024 through the Commission's E-Filing System (E-Filing System).¹³ In addition, the Prehearing Conference was scheduled for more than two weeks after Colorado Jeep, Fresh Tracks and Tava Cab were provided notice of the Prehearing Conference. Thus, although Colorado Jeep, Fresh Tracks and Tava Cab were provided proper notice of the Prehearing Conference and had ample time before the Prehearing Conference

¹¹ Counsel for Ski Town stated that while he does not represent Tava Cab, its owner told him that she was struggling with intervention procedures before the Commission. Counsel gave no indication that Tava Cab's representative had difficulties appearing for the prehearing conference in this case.

¹² Decision No. R24-0365-I, ¶ 63.

¹³ Certificate of Service for Decision No. R24-0365-I (showing Colorado Jeep, Fresh Tracks and Tava Cab as having been served through the E-Filing System). See Rule 1205(b) of the Commission's Rules of Practice and Procedure, 4 *Code of Colorado Regulations* (CCR) 723-1 (all registered filers in the Commission's E-Filings System expressly agree to accept service through the E-Filing System and filing through the E-Filing System constitutes service on registered users).

to file a motion seeking to continue or be excused from appearing at the Prehearing Conference, none of them did so. In addition, given Decision No. R24-0365-I's advisements that failure to appear may result in interventions being dismissed, the ALJ concludes that when they failed to appear at the duly noticed Prehearing Conference, Colorado Jeep, Fresh Tracks and Tava Cab knowingly risked that their Interventions would be dismissed. For the foregoing reasons, the Interventions filed by Colorado Jeep, Fresh Tracks and Tava Cab are dismissed, and they are no longer parties to this Proceeding.

B. Ski Town's Motion to Set Aside

15. Ski Town filed its Motion per Commission Rule 1502, 4 CCR 723-1, though it does specify the paragraph of that Rule under which it files the Motion.¹⁴ Under Rule 1502(c), 4 CCR 723-1, a person aggrieved by an interim decision may file a written motion with the officer entering the decision to set aside, modify, or stay the interim decision. Ski Town's Motion seeks to set aside, modify, or stay Decision No. R24-0365-I.¹⁵ Based on the foregoing, the ALJ construes the Motion as being filed under Rule 1502(c), 4 CCR 723-1.

16. Ski Town's Motion asks that the ALJ essentially reverse Decision No. R24-0365-I's rejection of its Intervention and allow it to intervene in this Proceeding. In support, Ski Town largely repeats its grounds to intervene in this Proceeding.¹⁶ Ski Town characterizes Decision No. R24-0365-I as taking issue with its position that this Proceeding involves more than \$15,000 such that it required counsel to represent it here.¹⁷ This is incorrect. For several reasons, Decision No.

¹⁴ Ski Town's Motion at 1.

¹⁵ *Id.* at 3-4.

¹⁶ *Id.* at 1-4.

¹⁷ *Id.* at 4.

R24-0365-I rejects Ski Town's Intervention for failing to establish good cause for its untimely Intervention.¹⁸

17. Ski Town argues that it should not be punished for filing its Intervention late so that it could obtain counsel.¹⁹ As noted in Decision No. R24-0365-I, the Commission may allow late interventions for good cause shown.²⁰ As good cause for its late Intervention, Ski Town states:

Admittedly, Ski Town's attorney was not out of the country until May, and this application was noticed on April 8, 2024. However, Ski Town needed to comply with internal procedures which includes the inquiry into the potential impact of a grant of this application on its operations and the extent of potential diversion by a grant of this application before committing financial resources, manpower, and time to this proceeding. This took up a good portion of the 30 day period. Ordinarily, this would not have been a problem but for Ski Town's attorney being out of the country in May.²¹

18. Since the Application was noticed on April 8, 2024, the deadline to file Interventions was May 8, 2024.²² Much like its Intervention, Ski Town's Motion again fails to indicate that its counsel was out of the country for any part of the 30-day intervention period from April 8 to May 8, 2024. To the contrary, the Motion indicates that counsel was in the country for the majority of the intervention period, from April 8 to April 30, 2024.²³ What is more, although the Motion vaguely states that counsel was out of the country "in May," it does not indicate that counsel was out of the country in May *during* the intervention period (*i.e.*, from May 1 to 8, 2024).²⁴ If counsel was not out of the country until after May 8, 2024, it could not be argued in good faith that Ski Town was unable to have counsel file an intervention on its behalf by the deadline because counsel was out of the country. Ski Town's failure to assert with specificity when

¹⁸ Decision No. R24-0365-I at 18-19.

¹⁹ Ski Town's Motion at 5.

²⁰ Rule 1401(a), 4 CCR 723-1.

²¹ Motion at 4.

²² See Notice at 1.

²³ See Motion at 4. *id.*

²⁴ *Id.*

in May counsel was out of the country is inexplicable given that its Motion seeks to set aside a Decision which explicitly relied on the Intervention's failure to allege that its counsel "was out of the country for any part of, let alone the entire 30-day period that Ski Town had to file its Intervention."²⁵ Thus, it is difficult to view Ski Town's continued ambiguity as to counsel's availability as anything other than intentional. Ski Town could have easily indicated in its Motion the dates in May that counsel was out of the country, but it did not.

19. Likewise, Ski Town's statements that it required much of the 30-day intervention period to comply with its own internal procedures to determine the potential impact of granting the application is similarly vague and ambiguous. Ski Town provides no factual basis to support its assertion that it could not determine whether to intervene in this Proceeding well within the 30-day intervention period.²⁶ Indeed, it does not explain the internal procedures that it had to comply with to reach this determination, or why such procedures could not be complied with expeditiously to meet the filing deadline. As such, even if the ALJ assumes, *arguendo*, that counsel was out of the country starting May 1, 2024 despite that Ski Town makes no such assertion, the Motion does not establish that Ski Town was unable to have counsel file an Intervention during the several weeks it had in April to do so.

20. For the reasons discussed, the ALJ finds that Ski Town has again failed to establish good cause for its late Intervention, and as such, has failed to provide grounds to reverse, modify, set aside, or stay Decision No. R24-0365-I. As noted in that Decision, allowing Ski Town's late Intervention in these circumstances is akin to finding that the Commission's deadlines are mere suggestions. For all these reasons, Ski Town's Motion is denied.

²⁵ Decision No. R24-0365-I at ¶ 55.

²⁶ No other Intervener had similar issues.

C. Deadline to File a Motion to Set Aside, Modify, Reconsider, Stay or Make this Decision Immediately Appealable

21. Commission Rules allow parties to file a motion to set aside, modify, or stay an interim decision, and to seek an order making an interim decision immediately appealable to the Commission.²⁷ However, Commission Rules do not establish a timeframe within which such a motion must be filed after the subject interim decision has been issued. In an abundance of caution, and to avoid unnecessary delay and uncertainty, this Decision establishes a June 25, 2024 deadline for such motions. Motions seeking to make this Decision immediately appealable filed after June 25, 2024 will be denied as untimely. Similarly, motions to set aside, modify, or stay this Decision filed after June 25, 2024 will be denied as untimely.

D. Additional Advisements

22. *Applicant is on notice* that failure to appear at the evidentiary hearing may result in dismissal of the Application for failing to pursue or prosecute it.

23. At the hearing, Applicant bears the burden of proof by a preponderance of the evidence to show that it has met the legal requirements to be granted the requested authority.²⁸ Among the legal requirements, Applicant must establish that it is financially, operationally, and managerially fit to conduct the proposed operations and that the public convenience and necessity requires the proposed service.²⁹ In deciding the latter question, the Commission applies the regulated monopoly doctrine,³⁰ which requires that an applicant demonstrate the public needs the proposed service; that granting the authority is in the public interest; and that the existing service

²⁷ Rule 1502(c) and (d), 4 CCR 723-1.

²⁸ §§ 24-4-105(7); 13-25-127(1), C.R.S.; Rule 1500, 4 CCR 723-1.

²⁹ Rule 6203(a)(XI), 4 CCR 723-6. *See* § 40-10.1-201(1), C.R.S.

³⁰ *Ephraim Freightways Inc. v. Pub. Utils. Comm'n*, 380 P.2d 228, 230 (Colo. 1963).

is inadequate.³¹ The question is not whether the extent of business in a particular area is sufficient to warrant more certified carriers, but whether the public convenience and necessity demand the service of an additional carrier.³²

24. Although the Applicant bears the burden of proving that the incumbent carrier's service is substantially inadequate, "where an applicant's evidence tend[s] to prove the existing carrier's substantial inadequacy, 'it [is] incumbent upon [the existing carrier] to rebut this evidence.'"³³

25. Given the above, the following process will apply during the evidentiary hearing. Applicant will present its evidence first and that Interveners will have an opportunity to cross-examine any witnesses that Applicant presents. Once Applicant has completed its evidentiary presentation, Interveners will have an opportunity to present any additional evidence or witnesses they wish to offer, and Applicant will have an opportunity to cross-examine any witnesses that Interveners present. Once Interveners have completed their evidentiary presentation, Applicant will have an opportunity to present evidence in rebuttal to evidence that Interveners present.

26. *Interveners are on notice* that the ALJ will deem their failure to appear at the evidentiary hearing as abandoning or withdrawing their Interventions and opposition to the Application and may result in granting the Application without an evidentiary hearing. *Applicant is on notice* that the ALJ will deem its failure to appear at the evidentiary hearing as abandoning the Application and will dismiss it without prejudice.

³¹ Rule 6203(a)(XVII), 4 CCR 723-6. See § 40-10.1-201(1), C.R.S.; *Durango Transp. Inc. v. Pub. Utils. Comm'n*, 122 P.3d 244, 248-49 (Colo. 2005); *Ephraim Freightways Inc. v. Public Utilities Comm'n*, 380 P.2d 228, 231-32 (Colo. 1963).

³² See *Durango Transp. Inc.*, at 250 *Ephraim Freightways Inc.*, at 231.

³³

27. The hearing will be held using the web-hosted service, Zoom. Attachment A hereto includes important technical information and requirements to facilitate remote hearing participation. All those participating in the hearing must carefully review and follow all requirements in this Decision and Attachment A.

28. Attachment B includes important information and requirements relating to presenting evidence electronically at the hearing, and thus, it is extremely important that all parties review and follow the requirements in Attachment B.

29. To minimize the potential that the hearing may be disrupted by non-participants, the link and meeting ID or access code to attend the hearing will be provided to the parties by email before the hearing, and the parties will be prohibited from distributing that information to anyone not participating in the hearing. Parties will receive an email with information needed to join the hearing at the email addresses on file with the Commission for this Proceeding. As such, it is important that all parties ensure that the Commission has the correct email address for them.

30. All parties must be familiar with and follow the Commission's Rules of Practice and Procedure, 4 CCR 723-1, and the Commission's Rules Regulating Transportation by Motor Vehicle, 4 CCR 723-6. The parties may obtain a copy of these rules from the Commission in hard copy or on the Commission's website at: <https://www.colorado.gov/pacific/dora/pucrules>.

III. ORDER

A. It Is Ordered That:

1. Consistent with the above discussion, Ullr Tours, LLC doing business as The Colorado Sightseer (Colorado Sightseer) is acknowledged as an intervening party, and Pikes Peak Cab LLC, doing business as Pikes Peak Transport (Pikes Peak Transport) may be represented by non-attorney Mr. Marcos Griego.

2. The Interventions filed by Colorado Jeep and Off Road Tours, Inc. (Colorado Jeep); Five Nineteen LLC, doing business as Fresh Tracks Transportation (Fresh Tracks); and Tava Cab LLC, doing business as Tava Cab (Tava Cab) are dismissed, consistent with the above discussion. Colorado Jeep, Fresh Tracks and Tava Cab are no longer parties to this Proceeding.

3. The Motion to Set Aside, Modify or Stay Interim Order R24-0365-I filed by NDW Enterprises LLC, doing business as Ski Town Transportation on June 12, 2024 is denied, consistent with the above discussion.

4. Based on the foregoing, in addition to Good Mountain Adventures LLC, (Good Mountain), the following entities are parties to this Proceeding: CKIMY, LLC, doing business as iLIMO (iLIMO); Colorado Sightseer; Aspire Tours, LLC (Aspire); Mountain Star Transportation LLC, doing business as Explorer Tours (Mountain Star); Pikes Peak Transport; and Denvers Airport Transportation, LLC (Denvers Airport).

5. Any party wishing to file a motion to set aside, modify, or stay this Decision per Rule 1502(c) of the Commission's Rules of Practice and Procedure 4 *Code of Colorado Regulations* (CCR) 723-1 must file such a motion no later than **5:00 p.m. on June 25, 2024**. Any party seeking to file a motion seeking an order making this Decision immediately appealable to the Commission per Rule 1502(d), 4 CCR 723-1 must file such a motion no later than **5:00 p.m. on June 25, 2024**.

6. A fully remote evidentiary hearing in this Proceeding is scheduled as follows:

DATE: September 6 and 9, 2024
TIME: 9:00 a.m. each day
PLACE: Join by videoconference using Zoom

7. Participants in the hearing may not distribute the hearing link, access, or ID code to anyone not participating in the hearing. Participants may not appear in person at the Commission for the above-scheduled hearing. Instead, they must participate in the hearing from remote locations, consistent with the requirements of this Decision.

8. Hearing Procedures.

a. Because the hearing will be fully remote, all documentary evidence must be presented electronically. This means that all parties must prepare any documentary evidence (exhibits) for electronic presentation. In addition to the below requirements, all parties must comply with the requirements in Attachment B, which includes additional instructions and requirements relating to presenting evidence electronically at the hearing. Attachment B is incorporated herein as if fully set forth.

b. All those participating in the hearing ***must comply*** with the requirements in Attachment A to this Decision, which is incorporated into this Decision as if fully set forth.

9. Deadlines to File Exhibits, Exhibit Lists and Witness Lists.

a. All parties must file and serve exhibits they intend to offer into evidence at the hearing, exhibit lists, and witness lists on or by the close of business on **August 2, 2024**. Witness lists must include a brief description of the witnesses' anticipated testimony and the witnesses' contact information. Exhibit lists must identify the hearing exhibit number, the full substantive title of each hearing exhibit, and include a brief description of each exhibit the party

intends to offer into evidence during the evidentiary hearing. Describing an exhibit solely by identifying the exhibit number **does not meet** this requirement (*e.g.*, describing it as “Hearing Exhibit 100” without information as to substantive nature or content of the exhibit). Any party may offer any exhibit sponsored by another party and is not required to include such an exhibit on their own exhibit list. The parties are only required to prefile and serve exhibits that they intend to offer into evidence during the evidentiary hearing. Nothing in this Decision requires the parties to prefile exhibits that may be used *solely* to impeach a witness’s testimony, to refresh a witness’s recollection, or on rebuttal.³⁴

b. This paragraph is intended to allow the parties an opportunity to amend their exhibit and witness disclosures after reviewing each other’s exhibits and witness lists disclosed per the above deadline. As such, no party may take advantage of this paragraph’s opportunity to amend exhibit and witness disclosures unless they have filed and served exhibits, and exhibit and witness lists consistent with the above requirements. Any party wishing to amend their exhibit and witness lists to add exhibits and witnesses not included in a prior exhibit and witness list must file and serve such additional exhibits and amended exhibit and witness lists on or by the close of business **on August 19, 2024**. Amended exhibit and witness lists **must list all the exhibits** that the filing party intends to offer into evidence during the hearing and **all witnesses** who may testify at hearing. Amended exhibit and witness lists **will substitute** the filing party’s initial exhibit and witness lists, and as such, may not be filed as a supplement to prior exhibit and witness list filings.

10. **Hearing Exhibit Number Block Assignments.** To efficiently organize exhibits that will be presented during the evidentiary hearing, all parties must use a unified numbering system for all hearing exhibits, marked consistent with Attachment B, using hearing exhibits

³⁴ Only the Applicant may present rebuttal evidence.

within their assigned exhibit number blocks. The parties are assigned the hearing exhibit number blocks set forth in the below table.

Party	Assigned Hearing Exhibit Numbers
Applicant	100 to 199
iLIMO	200 to 299
Colorado Sightseer	300 to 399
Aspire	400 to 499
Mountain Star	500 to 599
Pikes Peak Transport	600 to 699
Denvers Airport	700 to 799

11. Any party requiring more exhibit numbers than assigned may use the same numerical sequence of exhibit numbers assigned to them, but in the 1000 range (*e.g.*, Applicant will use hearing exhibit numbers 1100-1199; iLIMO will use hearing exhibit numbers 1200-1299, *etc.*).

12. This Decision is effective immediately.

(S E A L)



THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

MELODY MIRBABA

Administrative Law Judge

ATTEST: A TRUE COPY

A handwritten signature in cursive script that reads "Rebecca E. White".

Rebecca E. White,
Director