DATE: May 20, 2019

TO: RMC Governing Board

FROM: Mark Stanley, Executive Officer


PROGRAM AREA: All

PROJECT TYPE: Technical Assistance

JURISDICTION: Regionwide

PROJECT MANAGER: Joseph Gonzalez

RECOMMENDATION: That the RMC Governing Board approve the development of RMC’s Proposition 68 Technical Assistance Program

PROJECT DESCRIPTION:

Exhibit A – DRAFT RMC Proposition 68 Technical Assistance Program (TAP)

The California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 (Proposition 68) approved by voters of the State of California pursuant to Section 8008(b)(1) provides the opportunity to assist grantees with technical assistant during the process of applying for funding. RMC development of a Prop 68 TAP program for grantees will help ensure projects compete equally and are more competitive in the goal of meeting RMC’s mission.

The structure of the TAP program is being designed to provide information, tools, resources, and strategies to help applicants through all stages of grant initiation, grantmaking, and project completion. RMC Prop 68 TAP will be available throughout the funding period of Prop 68 and will include outreach and programs to provide application assistance to eligible applicants.

The following are the primary goals of RMC’s TAP:

1. Ensure that all Cities, local agencies, and non-profits throughout the RMC region, and especially High-Need or Very-High-Need areas, are well informed regarding available RMC Proposition 68 competitive grant program opportunities, TAP as a resource, and the steps required to receive these resources;
2. Maximize participation in RMC’s Prop 68 grant program from High-Need or Very-High-Need Study Areas by providing proactive and flexible technical assistance throughout the grant continuum to help with applying for funding, administering grants, and completing and maintaining projects;
3. Create and support relationships between agencies, organizations, and technical experts and mentors throughout the County;
4. Support organizational capacity-building among RMC’s Prop 68 applicants to increase their ability to administer grants;
5. Place emphasis on delivering successfully completed projects to park and open space users.

RMC Prop 68 eligible grantees may submit a request for technical assistance and indicate which TAP elements they are interested in prior to and during competitive grant Call-for-Projects.

TAP elements have varying requirements for eligibility, with some elements available to the general public, some to all eligible applicants, and some to eligible grantees on a selective and/or competitive basis due to limited availability of resources. TAP consists of six elements that support all stages of the grant continuum, each element is described below.

1. Web Design and Development
   1.1. New website
   1.2. Online Grant Management System
   1.3. Geospatial Web Development

2. Resource Toolkits
   -Topics include: Community Engagement, Technical Assistance Directories, Grant Application, Grant Writing, Grant Implementation, Maintenance Guides, and additional toolkits (as determined by feedback).

3. Technical Advisors

4. Training and Education
   -Topics include: Community Outreach and Engagement, Grant Application Process, Introduction to Competitive Grants, Grant Writing, Project Management, Grant Administration, Maintenance Guides for native landscapes, and additional workshop topics (as determined by feedback).

5. Ongoing Technical Support from RMC
   -Ongoing Support
   -TAP Case Managers

6. Professional Services
   -Grant Writing Support
   -Community Outreach and Engagement
   -Construction Administration

As shown in Figure 1, different TAP elements will be available at appropriate stages throughout the grant continuum. For example, Professional Services and Training and Education focused on grant writing will be available prior to the grant application due date. Resource Toolkits, the Technical Assistance Directories, and Ongoing Technical Assistance Support from RMC will be available throughout the grant process.

TAP funding will come from RMC’s Prop 68 Technical Assistance funds, which is up to 10 percent of RMC’s overall Prop 68 allocation.

The first two years of TAP will be the development and pilot phase of the grant program and focus more on the Project Development and Grant Application and Award on the Grant Program Continuum. Full implementation will occur year 3 and 4, and all TAP elements detailed in this report will be available including service areas that were unavailable during the earlier phases. These elements will be designed to help agencies and organizations gain adequate knowledge, experience, and resources and increased independence in grant processes.
**Figure 1: TAP along the Grant Project Continuum**

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<th>Grant Project Continuum</th>
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**BACKGROUND:** Pursuant to Section 8008(b)(1) of Proposition 68, the $4 Billion Parks, Environment, and Water Bond (June 2018), up to 10% of the funds available may be allocated for technical assistance to disadvantaged communities. RMC’s Technical Assistance Program (TAP) supports local communities with direct application assistance with the goal of facilitating access to the Conservancy’s funding programs. RMC recognizes barriers to accessing resources, including:
- Familiarity with RMC’s grant application process,
- Appreciation of the complexity of well-designed parks, open space, and multi-benefit projects,
- Commitment to work with and engage the community,
- Ability to successfully manage projects to completion, and
- Ability to successfully operate and maintain completed projects.
The RMC Prop 68 TAP creates a more equitable playing field by helping under-resourced applicants access Conservancy funds.

**FISCAL INFORMATION:** There is no fiscal impact with development of the Proposition 68 Technical Assistance Program (TAP).

Chapter 852, Statutes of 2017, SB5 allocates to RMC in Chapter 7, 80100 (a)(1)(B) thirty-seven million five hundred thousand dollars ($37,500,000) and in Chapter 8, 80110(b)(6) thirty million dollars ($30,000,000). Pursuant to Section 8008(b)(1) of Proposition 68, up to 10% of the funds available may be allocated for Technical Assistance to disadvantaged communities.

**LEGISLATIVE AUTHORITY AND RMC ADOPTED POLICIES/AUTHORITIES:** The Rivers and Mountains Conservancy (RMC) statute provides in part that:

Section 32602: There is in the Resources Agency, the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy, which is created as a state agency for the following purposes:

(a) To acquire and manage public lands within the Lower Los Angeles River and San Gabriel River watersheds, and to provide open-space, low-impact recreational and educational uses, water conservation, watershed improvement, wildlife and habitat restoration and protection, and watershed improvement within the territory.

(b) To preserve the San Gabriel River and the Lower Los Angeles River consistent with existing and adopted river and flood control projects for the protection of life and property.

(c) To acquire open-space lands within the territory of the conservancy.

Section 32604: The conservancy shall do all of the following:

(a) Establish policies and priorities for the conservancy regarding the San Gabriel River and the Lower Los Angeles River, and their watersheds, and conduct any necessary planning activities, in accordance with the purposes set forth in Section 32602.

(b) Approve conservancy funded projects that advance the policies and priorities set forth in Section 32602.

(d) To provide for the public's enjoyment and enhancement of recreational and educational experiences on public lands in the San Gabriel Watershed and Lower Los Angeles River, and the San Gabriel Mountains in a manner consistent with the protection of lands and resources in those watersheds.

Section 32614: The conservancy may do all of the following:

(b) Enter into contracts with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties, and enter into a joint powers agreement with a public agency, in furtherance of the purposes set forth in Section 32602.

(e) Enter into any other agreement with any public agency, private entity, or person necessary for the proper discharge of the conservancy's duties for the purposes set forth in Section 32602.

(f) Recruit and coordinate volunteers and experts to conduct interpretive and recreational programs and assist with construction projects and the maintenance of parkway facilities.

Further, Section 32614 provides that: The conservancy may do all of the following:

(g) Undertake, within the territory, site improvement projects, regulate public access, and revegetate and otherwise rehabilitate degraded areas, in consultation with any other public agency with appropriate jurisdiction and expertise, in accordance with the purposes set
forth in Section 32602. The conservancy may also, within the territory, upgrade deteriorating facilities and construct new facilities as needed for outdoor recreation, nature appreciation and interpretation, and natural resources projection. The conservancy may undertake those projects by itself or in conjunction with another local agency; however, the conservancy shall provide overall coordination of those projects by setting priorities for the projects and by ensuring a uniform approach to projects. The conservancy may undertake those projects with prior notification to the legislative body of the local agency that has jurisdiction in the area in which the conservancy proposes to undertake that activity.

Section 32614.5:

(a) The conservancy may award grants to local public agencies, state agencies, federal agencies, and nonprofit organizations for the purposes of this division.

(b) Grants to nonprofit organizations for the acquisition of real property or interests in real property shall be subject to all of the following conditions:
   (1) The purchase price of any interest in land acquired by the nonprofit organization may not exceed fair market value as established by an appraisal approved by the conservancy.
   (2) The conservancy approves the terms under which the interest in land is acquired.
   (3) The interest in land acquired pursuant to a grant from the conservancy may not be used as security for any debt incurred by the nonprofit organization unless the conservancy approves the transaction.
   (4) The transfer of land acquired pursuant to a grant shall be subject to the approval of the conservancy and the execution of an agreement between the conservancy and the transferee sufficient to protect the interests of the state.
   (5) The state shall have a right of entry and power of termination in and over all interests in real property acquired with state funds, which may be exercised if any essential term or condition of the grant is violated.
   (6) If the existence of the nonprofit organization is terminated for any reason, title to all interest in real property acquired with state funds shall immediately vest in the state, except that, prior to that termination, another public agency or nonprofit organization may receive title to all or a portion of that interest in real property, by recording its acceptance of title, together with the conservancy’s approval, in writing.

(c) Any deed or other instrument of conveyance whereby real property is acquired by a nonprofit organization pursuant to this section shall be recorded and shall set forth the executor interest or right of entry on the part of the state.
RMC PROP 68

TECHNICAL ASSISTANCE PROGRAM
Introduction

Pursuant to Section 8008(b)(1) of Proposition 68, the $4 Billion Parks, Environment, and Water Bond (June 2018), up to 10% of the funds available may be allocated for technical assistance to disadvantaged communities. RMC’s Technical Assistance Program (TAP) supports local communities with application assistance with the goal of facilitating access to the Conservancy's funding programs. RMC recognizes barriers to accessing resources, including:

- Familiarity with RMC’s grant application process,
- Appreciation of the complexity of well-designed parks, open space, and multi-benefit projects, including strategic land acquisitions,
- Commitment to work with and engage the community,
- Ability to successfully manage projects to completion, and
- Ability to successfully operate and maintain completed projects.

RMC offers a TAP program to help ensure eligible grantees receive funding and successfully complete and maintain their RMC Proposition 68 projects.

TAP program provides information, tools, resources, and strategies to help applicants through the stages of project conceptualization, grant initiation, grantmaking, and project completion. In addition to RMC staff, these resources include peer-to-peer mentoring, access to best-practices, identifying technical resources, and providing professional grant writing and facilitation services. TAP will be available for the next three-four years, until RMC’s allocated funding is expended, and will include outreach and programs to provide application assistance to eligible applicants. Some TAP resources are available to all applicants; however, applicants with projects in High-Need or Very-High-Need Areas have preferential access to TAP.
Technical Assistance Program Contents

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Section 1: Program Goals

The following are the primary goals of RMC’s TAP:

1. Ensure that all Cities, local agencies, California recognized native American tribes, and non-profits throughout the RMC region, and especially High-Need or Very-High-Need areas, are well informed regarding available RMC Proposition 68 competitive grant program opportunities, TAP programs as a resource, and the steps required to receive these resources;

2. Maximize participation in RMC’s Prop 68 grant program from High-Need or Very-High-Need Areas by providing proactive and flexible technical assistance throughout the grant continuum to help with applying for funding, administering grants, and completing and maintaining projects;

3. Create and support relationships between agencies, organizations, and technical experts and mentors throughout the County;

4. Support organizational capacity-building among RMC’s Prop 68 applicants to increase their ability to administer grants;

5. Place emphasis on delivering successfully completed projects to park and open space users.
Section 2: Accessing Technical Assistance

RMC Prop 68 eligible grantees may submit a request for technical assistance and indicate which TAP elements they are interested in prior to and during competitive grant Call-for-Projects. As an initial step to understanding and addressing technical assistance needs, the request of technical assistance needs can be updated as needed by applicants and/or RMC Project Analysts as technical assistance needs arise or change. RMC Project Analysts can also choose to recommend or offer TAP elements to eligible applicants and grantees at any time.
Section 3: TAP Elements

TAP consists of six elements that support all stages of the grant continuum:

1. Web Design and Development
2. Resource Toolkits
3. Technical Advisors
4. Training and Education
5. Ongoing Technical Support from RMC
6. Professional Services

TAP elements have varying requirements for eligibility, with some elements available to the general public, some to all eligible applicants, and some to eligible grantees on a selective and/or competitive basis due to limited availability of resources. Each element is described below.

3.1. Website Design and Development

3.1.1 New website:

RMC will develop a new website that is responsive to both mobile devices and web standards. The new website needs to incorporate the state of California approved template and requirements and be easy for users to navigate and access resources.

RMC proposes the following solution for a new website:

1. A custom website layout that will utilize the WordPress Content Management System with a custom theme that will provide a mobile responsive layout for RMC Website Visitors.
2. The initial build of the website will include optimization for technical standards.
   a. Existing content as appropriate will be moved and implemented into the new theme and layout,
   b. Technical SEO will utilize best practices,
   c. Website will be 100% ADA compliant.
3. Hosting
   a. Website will require at least a standard LAMP/C-panel server for hosting

3.1.2 Online Grant Management System:

RMC proposes the development of an Online Grant Management System (GMS) to accept applications for Proposition 68 Grant Funds, manage those grants, and close completed grants. The GMS will create a digital record of all grant applications, grant administration records, and grant closing documents. The GMS will also be used to facilitate communication between applicants/grantees and RMC staff. The GMS will seek to be financially sustainable and integrated into RMC grant delivery process for future grant
programs through RMC; RMC will use Prop 68 TAP funds for initial development of GMS system.

The GMS will streamline the grant application, administration, and closing processes through the use of digital records and communication. The GMS ensures that records and communication are maintained in a manner that facilitates access and ease of use. The GMS will also include mechanisms designed to help RMC comply with State reporting requirements.

3.1.3 Geospatial Web Development:

RMC proposes to create a full service, user-centered web application, which integrates the Grant Management System (GMS) with a geospatial web portal. This would combine open source mapping with Content Management Systems, that would work well on both desktop and mobile devices, for a range of users over a long period. Such a system would also allow RMC to create more flexible automated reporting, for the RMC and for various user purposes.

The primary goal of this web tool is for the creation of an online tool and workspace that will assist both the RMC and eligible agencies with map-aspects of Proposition 68 grant application and grant management processes.

At a minimum, the tool will allow eligible applicants to complete the following:

- Update RMC project inventory data on an ongoing basis, with a method for grantees and RMC staff to update data on a regular basis.
- Generate a GIS-based representation of the proposed project boundary, vicinity map, footprint, and service area.
- Print and export information related to proposed projects in various formats, including PDF and spreadsheets.

At a minimum, the online workspace will allow RMC to provide for reporting expenditures of Prop 68, including spatial distribution of funds and grants awarded/not awarded.

3.2. Resource Toolkits

Resource toolkits cover a range of important topics related to the grant continuum, and applicants can use toolkit resources for support during the grant process. These resources can assist grantees conducting community engagement, creating promotional materials for outreach, support in writing grant applications, preparing required documents such as project budgets, and navigating RMC Prop 68 grant application processes. The types of available resource toolkits, which will be available on RMC’s website, may include and are not limited to the following:

- Community Outreach and Engagement
  - Best practices for outreach and engagement
  - Social media outreach guides
  - Community Events calendar
  - PowerPoint templates for community engagement meetings/workshops
Resource toolkits will be available to the general public and will be available on RMC’s website. Resource toolkits will be updated routinely.

3.3 Technical Advisors

Technical Advisors will provide strategic support and guidance to RMC on topics ranging from park and open space planning and development, ecology and ecosystem planning services, hydrology and hydraulics, community engagement, construction, grant writing, among others, to support RMC strategic planning, evaluation of RMC Prop 68 grant projects, and overall technical support for the RMC Prop 68 grant program. Technical Advisors will be professionals, independent contractors or representatives from agencies and organizations.

Technical Advisors will be recruited by RMC through a Request for Qualification (RFQ) process, and a list of qualified consultants will be routinely updated. Because RMC Technical Advisors may participate in the evaluation and scoring of competitive Prop 68 grant applications, selection of Technical Advisors will avoid potential conflicts of interest.

3.4. Training and Education

To better equip applicants about RMC Prop 68 grant process, RMC will hold training and education workshops throughout the year on a range of applicable topics. RMC may
require all grantees attend periodic training on selected topics of importance. Workshops will be led either by RMC or outside instructors/consultants. Workshop presentations will be recorded and posted to the RMC website for those not able to attend in person. Workshop topics may include and are not limited to the following:

- Community Outreach and Engagement
- Grant Application Process
- Introduction to Competitive Grants
- Grant Writing
- Project Management, including finances
- Grant Administration
- Park and Open Space Planning 101
- Maintenance Guides for native landscapes
- Additional workshop topics will be developed based on request and observed needs.

Training and Education workshops will be available to all eligible applicants and grantees. Recordings of workshops may be available to the general public on the RMC website, as well as digital versions of handouts and presentations.

3.5. Ongoing Technical Support from RMC

RMC will provide ongoing technical assistance support to prospective applicants, applicants, and grantees throughout the grant process, including prior to all application periods, during the application period, grant administration, and project implementation. Ongoing technical support include will include:

- **Ongoing Support.** Includes managing TAP, raising general awareness of TAP, focused and proactive outreach to High-Need or Very-High-Need Areas, providing feedback on grant applications, being a resource for all grant-related questions or needs, and acting as the liaison between applicants and outside professionals and mentors. RMC will also curate, coordinate, and maintain resources related to best practices, case studies, other technical assistance opportunities, other potential funding opportunities, and other resources (including toolkits and recordings of training workshops). These resources will be available to the general public on the RMC website. RMC may collaborate with other agencies and/or organizations to deliver ongoing support.

- **TAP Case Managers.** RMC will work to help ensure that High-Need or Very-High-Need Areas understand and receive the resources they need. RMC TAP Case Managers will act as liaisons to High-Need or Very-High-Need Area agencies and will work closely with these agencies throughout the grant continuum. RMC staff will screen potential applications to ensure grant funding eligibility via in-person or telephone intake interviews. Based on the assessment of these interviews, TAP Case Managers will be assigned agencies that are most in need of targeted, one-on-one guidance and will work closely with these selected agencies, assisting them through the grant continuum and helping their agency build capacity. Additional intake interviews and assessments will occur on an annual basis.
Because RMC Project Analyst will participate in the evaluation, scoring, and awarding for funds for competitive Prop 68 grant applications, RMC Project Analyst will avoid serving as TAP Case Managers to try to avoid potential conflicts of interest.

3.6. Professional Services

Professional services in a variety of areas of expertise will be available to eligible agencies and organizations from professionals contracted with RMC. Professional services may include, and are not limited to, the following:

- **Grant Writing Support.** Grant writing assistance is intended to help grant-seeking agencies and organizations successfully write competitive grant proposals. Professional services will provide either grant writing training seminars to organizations seeking to improve their grant writing skills or direct grant writing support services to organizations that have not yet written a successful grant proposal for RMC.

- **Community Outreach and Engagement.** Community outreach and engagement assistance will be available to agencies and organizations at various stages of the grant continuum. Professional services will be provided to agencies and organizations that do not have the capacity or resources to organize and conduct outreach and engagement, including developing and distributing outreach materials; facilitating meetings; support social media engagement; preparing meeting materials; and providing refreshments, child care, and/or multilingual translation or interpretive services.

- **Construction Administration.** Construction administration assistance will be available to agencies and organizations during the construction phase of capital projects funded by Prop 68. These types of professional services include project management in reviewing construction drawings and overseeing the administrative aspect of the construction process.

Additional professional service areas may be added based on participant requests and/or observed need.

Technical assistance from professional services is limited and thus not all agencies and organizations will receive these services. Funding for professional services will be distributed through a selective process to eligible applicants and grantees who report a need for professional services. RMC will determine which applicants are eligible for professional services based on a request of technical assistance, the need identified, and the Project Area’s Need Level, and match eligible applicants to specific consultants depending on the agency’s or organization’s type of need.

Any eligible applicant or grantee who reported a need for professional services but were not selected to receive professional services may submit a support letter to RMC to explain their need for professional services in further detail.
As shown in Figure 1 below, different TAP elements will be available at appropriate stages throughout the grant continuum. For example, Professional Services and Training and Education focused on grant writing will be available prior to the grant application due date. Resource Toolkits, the Technical Assistance Directories, and Ongoing Technical Assistance Support from RMC will be available throughout the grant process.

**Figure 1: TAP along the Grant Project Continuum**

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TAP funding will come from RMC’s Prop 68 Technical Assistance funds, which is up to 10 percent of RMC’s overall Prop 68 allocation.

Development and Pilot Phase, Year 1 and Year 2

The first two years of TAP will be the development and pilot phase of the grant program and focus more on the Project Development and Grant Application and Award on the Grant Program Continuum.

The development and pilot phase will allow RMC to gain an understanding of which TAP elements or services are most needed by agencies and organizations, allow time for RMC to develop and coordinate resources, such as toolkits, that are tailored to applicant needs, and develop administrative processes that ensure easy access to TAP by all applicants.

Year 1 of the program’s development and pilot phase will focus on developing the administrative processes, content, and delivery methods of TAP, while also providing resources related to applying for Prop 68 funds, guidance/assistance in performing outreach and engagement to communities, and maintenance guides. The following TAP elements will be available during Year 1:

- Resource toolkits on RMC’s website
- Professional services for community engagement and outreach
- Training and Education workshops

RMC will release the RFQ to create a shortlist of Technical Advisors in Year 1, and

RMC will update its website in Year 1, and

RMC will scope the feasibility of developing the online GMS system and integrated Geospatial Web Development tools and determine if deliverables are reasonable for the funding source.

During Year 2 of the program’s development and pilot phase, RMC will continue to provide professional services for community engagement and outreach, provide an increased range of Training and Education workshops, and coordinate launch of Technical Assistance Directories and related resources and toolkits.

Full Implementation Phase - Year 3 through Year 4

During this period, all TAP elements detailed in this section will be available, including professional services for other service areas that were unavailable during the development and pilot phase. These elements will be designed to help agencies and organizations gain adequate knowledge, experience, and resources and increased independence in grant processes.
RESOLUTION NO. 2019-18

RESOLUTION OF THE SAN GABRIEL AND LOWER LOS ANGELES RIVERS AND MOUNTAINS CONSERVANCY (RMC) TO APPROVE RMC PROPOSITION 68: CALIFORNIA DROUGHT, WATER, PARKS, CLIMATE, COASTAL PROTECTION, AND OUTDOOR ACCESS FOR ALL ACT OF 2018, TECHNICAL ASSISTANCE PROGRAM (TAP) DEVELOPMENT

WHEREAS, The legislature has found and declared that the San Gabriel River and its tributaries, the Lower Los Angeles River and its tributaries, and the San Gabriel Mountains, Puente Hills, and San Jose Hills constitute a unique and important open space, environmental, anthropological, cultural, scientific, educational, recreational, scenic, and wildlife resource that should be held in trust to be preserved and enhanced for the enjoyment of, and appreciation by, present and future generations; and

WHEREAS, The people of the State of California have enacted the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 which provides funds for the RMC grant programs (Proposition 68 Park Bond); and

WHEREAS, It is necessary to establish a technical assistance program to facilitate disadvantaged communities access to RMC grant funds under this Bond program; and

WHEREAS, The Conservancy is seeking to approve development of RMC policies and programs for the establishment of a technical assistance program, which is consistent with the purposes of Division 22.8 of the Public Resources Code and the Proposition 68 Park Bond; and

WHEREAS, this action is exempt from the environmental impact report requirements of the California Environmental Quality Act (CEQA); and NOW

Therefore be it resolved that the RMC hereby:

1. FINDS that this action is consistent with the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy Act and is necessary to carry out the purposes and objectives of Division 22.8 of the Public Resources Code.

2. FINDS that this action is consistent with the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, which provides funds for the RMC grant programs.

3. FINDS that the actions contemplated by this resolution are exempt from the environmental impact report requirements of the California Environmental Quality Act.

4. ADOPTS the staff report dated May 20, 2019.

5. AUTHORIZES a resolution approving RMC Proposition 68: California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, Technical Assistance Program (TAP) development.
Resolution 2019-18

~ End of Resolution ~

Motion _______________________ Second: _______________________

Ayes: ________  Nays: __________ Abstentions: __________

Passed and Adopted by the Board of the
SAN GABRIEL AND LOWER LOS ANGELES RIVERS AND MOUNTAINS
CONSERVANCY on May 20, 2019

____________________________
Frank Colonna, Chair

ATTEST:

____________________________
David Edsall, Jr.
Deputy Attorney General