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301644

ENTERED
Office of Proceedings
February 16, 2021
Part of
Public Record

15 February 2021

For E-Filing 16 Feb. 2021

Ms. Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Michael Williams – Verified Notice of Exemption --
Control Exemption, F.D. 36460; and related proceeding:
S&S Shortline Leasing, LLC – Acquisition Exemption –
City of Ely and Nevada Northern Railway Foundation,
F.D. 36461

Dear Ms. Brown:

Enclosed for filing please find the following for filing in the above referenced F.D. 36460 on behalf of Michael Williams: Supplemental Comments and Verified Statement of Michael Williams. Enclosed for filing in the above referenced F.D. 36461 please find a Verified Correction for the Acquisition Exemption. These pleadings are tendered to address issues posed in this Board's Decision in the above proceedings served January 26, 2021. Mr. Williams and S&S Shortline Leasing hope that these filings will resolve the issues such that the Notices of Exemption may be allowed.

By my signature below, I certify service by email attachment Jeffrey Moreno and Jason Tutrone, Thomson Hine LLP, 1919 M St., NW, Suite 700, Washington, D.C. 20046, counsel for City of Ely, Foundation, and Great Basin.

Thank you for your assistance in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C. Montange', with a stylized flourish at the end.

Charles Montange
Counsel for Michael Williams and
S&S Shortline Leasing, LLC

Attachments:

FD 36460 – Supplemental Comments and Verified Statement
FD 36461 – Verified Correction

cc. as indicated above

BEFORE THE SURFACE TRANSPORTATION BOARD
FINANCE DOCKET No. 36460

MICHAEL WILLIAMS
VERIFIED NOTICE OF EXEMPTION –
ACQUISITION AND CONTROL EXEMPTION –
S & S SHORTLINE LEASING, LLC

SUPPLEMENTAL COMMENTS IN RESPONSE TO
DECISION REQUESTING ADDITIONAL INFORMATION
SERVED JANUARY 26, 2021

In its Decision served January 26, 2021, this Board requested some additional clarifications from Mr. Williams in this proceeding: (1) The Board asked for an explanation concerning possible inconsistencies between a statement in F.D. 35284 verified by a prior owner of S & S Shortline Leasing, LLC (S&S) in 2009, and the current owner's (Mr. Williams') statements in 2020/21; (2) possible inconsistencies with the acquisition notice filed by S&S in F.D. 36461 on November 13, 2020; (3) inconsistencies with a Notice filed by Great Basin and Northern Railroad ("Great Basin") on November 13, 2020; and (4) clarification of the dates on which two other entities (BG & CM Railroad, Inc. and Ozark Valley Railroad, Inc.) came under control of Mr. Williams and became common carrier railroads.

1. As indicated in Mr. Williams' attached Verified Statement, the statements made in 2009 in F.D. 35284 were by the owner of S & S at that time (Mr. Flanders). Williams V.S. at pp. 2-3 (response 1). Mr. Williams was not involved. He can only speculate as to Mr. Flander's reason for making the statements. He believes there are two possible explanations: (a) Mr. Flanders either expected that a lease providing for common carrier service would be entered, but none was, or (b) mistakenly presumed that a car storage lease required some kind of common carrier authorization. Id. p. 3. In all events, S & S and the City of Ely parties never entered into a common carrier lease. Id. The undersigned understands that the City of Ely parties in a separate pleading also intend to address this issue.

2. S&S is correcting and/or clarifying the statements in the Notice of Exemption for Acquisition in F.D. 36461 coterminous with this filing to remove the perceived inconsistencies. See Williams V.S. at 4 (response 2).

3. The undersigned understands that the City of Ely parties are separately responding to the Board's inquiry concerning inconsistencies with statements in Great Basin's notice of exemption filed November 20, 2020. Mr. Williams indicates he regards the referenced Great Basin notice as consistent with the settlement under which S & S will hold property interests only north of M.P. 127 and Great Basin will hold property interests only south of M.P. 127. Under the

settlement, Mr. Williams expects S & S will pursue and provide common carrier services north of M.P. 127 and he understands Great Basin would be responsible for those activities south of M.P. 127. Williams V.S. at 4-5 (response 3).

4. BG & CM and Ozark were both incorporated by Mr. Williams and received common carrier authority before they became common carrier railroads. Williams V.S. at 5-6 (response 4) (also attaches corroborating articles of incorporation). As indicated in more detail in the Williams V.S., the following sequence obtained in both cases: incorporation, common carrier authority obtained, acquisition of rail assets, and consequent commencement of rail operations. Id. at 6 (providing dates). According to Mr. Williams, BG & CM became a common carrier on August 19, 2005 and Ozark on June 27, 2009. Id. at 6.

Additional item. In its January 26 Decision, this Board also placed the Notice filed in Michael Williams – Control Exemption – McCloud Railway Company, F.D. 36474 in abeyance and referenced a letter received from the United States Forest Service in connection with that proceeding. Mr. Williams has caused McCloud to submit the permit application sought by the USFS, and is responding to follow-up requests received to date. Mr. Williams is moving as expeditiously as possible to resolve USFS issues in connection with McCloud.

Conclusion

In light of the above, Mr. Williams respectfully requests that the control exemption sought in this proceeding be granted.¹

Respectfully submitted,

s/ Chas. Montange

Charles H. Montange
Law Offices of Charles H. Montange
426 NW 162d St.
Seattle, WA 98177
(206) 546-1936
Attorney for S&S Shortline Leasing, LLC

Att: Verified Statement by Michael Williams

For filing: 16 Feb. 2021 (first business day after holiday due date)

¹ Mr. Williams is seeking compatible relief in a separate filing in F.D. 34661 (S&S Acquisition). Mr. Williams expects to seek compatible relief in F.D. 36474 (McCloud control) after further response to USFS.

BEFORE THE SURFACE TRANSPORTATION BOARD

FINANCE DOCKET No. 36460

MICHAEL WILLIAMS

VERIFIED NOTICE OF EXEMPTION –

ACQUISITION AND CONTROL EXEMPTION –

S & S SHORTLINE LEASING, LLC

VERIFIED STATEMENT OF MICHAEL WILLIAMS IN RESPONSE
TO BOARD'S DECISION SERVED JANUARY 26, 2021

(for filing by 15 February 2021)

The undersigned, Michael Williams, responds as follows to the Board's Decision served January 26, 2021, requiring certain additional clarifications in connection with this and other proceedings. This matter appears to arise from my original acquisition of S&S Shortline Leasing, LLC ("S&S").

As I read this Board's January 26, 2021 decision in F.D. 36460, 36461 and 36474, the Board asks for four additional clarifications: (1) an explanation for a perceived inconsistency between a statement in S&S's Verified Notice of Exemption filed in F.D. 35284, on July 31, 2009, to the effect that an agreement "has been reached" between S&S, City of Ely and Foundation, and my statement filed December 29, 2020, in F.D. 36460 indicating my understanding that the

anticipated lease amendment (expanding the car storage lease to include common carrier operations) did not transpire.

(2) An explanation of the perceived contradiction with a representation in the Acquisition Notice (F.D. 36461) at p. 3 that S&S currently operates the Line pursuant to S&S Shortline Leasing, LLC – Operation Exemption – City of Ely, FD 35284, served August 14, 2009.

(3) An explanation of a perceived contradiction with a representation by Great Basin in its Notice at p. 3, Nov. 13, 2020, filed in F.D. 36459 to the effect that S&S had agreed to discontinue its service over a 0.9-mile segment of track.

(4) Additional information about the dates BG & CM and Ozark became rail carriers in relation to when Michael Williams controlled these entities.

The Board also noted that it was holding F.D. 36474 (Michael Williams – Control Exemption – McCloud Railway Company) in abeyance due to the above uncertainties. In a footnote, the Board noted that the United States Forest Service had expressed concerns in that proceeding. Slip Op. at 4 & n.6.

Response:

(1) The representation made by S&S in 2009 over which this Board expresses concern was before I acquired S&S and before I had any involvement in S&S. I can only provide what I have been told in the course of litigation between S&S and City of Ely and Foundation which began in 2015 and which the parties now seek to

settle by S&S acquiring MP 0 (Cobre) to MP 127 (near McGill Junction). I have been told that S&S upon signing the initial lease essentially at the same time began negotiating through its manager Mr. Flanders an expanded deal with representatives of the Foundation through its representative Mr. Bassett. Whatever the course of that discussion, the only matter to which the parties agreed in a writing was to expand the car storage area from Cobre to Shafter (original lease signed July 2009) to include Shafter to McGill (August 2009), as determined by the Seventh Judicial District Court of the State of Nevada, in *City of Ely v. S&S Shortline Leasing*, CV -15-1506071, June 23, 2020, at 7-8 (only writing sufficient to comply with Nevada statute of frauds). The only lease, as I have previously indicated, was for car storage. I can speculate that Mr. Flanders thought the Foundation and City were about to agree to expand the lease not only to McGill but also to encompass common carrier when S&S applied for an operator exemption. But if this were true, Ely and Foundation only expanded the lease to extend car storage to McGill Junction (roughly MP 128). In that case, Mr. Flanders for S&S may have making a representation he felt accurate, but events did not turn out as he expected. On the other hand, I can also speculate that Mr. Flanders accurately understood he would have a car storage lease all the way to McGill and mistakenly felt he needed an operator's exemption that. In either event, S&S's lease did not provide for common carrier operations and S&S did not

provide such services. S&S hopes that the settlement for which the notices of exemption are sought in F.D. 34640 and 34641 not only will resolve all remaining contract issues between the parties to the settlement (S&S, Foundation and Ely), but also will resolve or moot the pertinent regulatory issues.

(2) S&S is amending its Acquisition Notice (F.D. 36461) to provide that it operated MP 0.00 to MP 127.9 per a lease with City and Foundation for car storage purposes only. S&S is further amending its Notice to acknowledge that this Board authorized common carrier operations in F.D. 35284, served August 14, 2009, but such authority is permissive not mandatory, and inasmuch as S&S did not acquire real property interests sufficient to provide common carrier services, did not exercise the authority granted. S&S regrets that use of the term “pursuant to” as used in its Acquisition Notice in F.D. 36461 has caused a perceived contradiction. The line was never operated “pursuant to” the authority in F.D. 35284 in the sense of operating for common carrier purposes. It was operated for car storage only and had a lease only for that purpose.

(3) I cannot speak directly to Great Basin’s representations. I am informed by my counsel that Great Basin will file a pleading addressing its representations. Speaking in general, S&S seeks to acquire the line from City of Ely and Foundation (its current owners) from MP 0.00 (Cobre) south to MP 127.00 (near McGill), inclusive of all common carrier obligations. S&S is foregoing all

property interests over MP 127.00 to MP 127.9, including specifically its car storage lease. Since S&S will have no property rights under the settlement over MP 127.0 to MP 127.9 (0.9 mile of track), it is appropriate for all regulatory rights (permissive or mandatory) be transferred to an entity which will hold the property rights for any operations after the settlement is consummated. For the 0.9 miles in question, it is my understanding that the City of Ely and the Foundation intend that that entity be Great Basin. To the best of my knowledge, no common carrier services have been provided on 127.0 to 127.9 pursuant to the authorization in F.D. 35284 by any entity, but should the Board authorize the transactions for which authority is sought in F.D. 36460 and F.D. 36461, and should S&S be able to attract common carrier business now that the litigation will have been settled, then Great Basin necessarily would seek authority as needed to be the operator for common carrier purposes from MP 127 southward on property owned by City of Ely and/or Foundation. In short, I do not regard Great Basin's representations as contradictory but instead as designed to remove all ambiguities as to what entity holds common carrier rights on MP 127 to MP 127.9.

(4) BG & CM Railroad, Inc. was incorporated by Michael Williams on October 23, 2002. As per my original response, BG & CM is owned by my wife and myself. A copy of the articles of incorporation and a recent report as filed with the Idaho Secretary of State are attached. BG & CM was the first entity

owned by Mr. Williams which later became a common carrier railroad upon its acquisition of a line from Great Northwest Railroad as authorized in F.D. 34713, served July 6, 2005. Ozark Valley Railroad, Inc. was incorporated by Michael Williams on January 29, 2007. As per my original response, Ozark Valley Railroad is owned by my wife and myself. A copy of the articles and a recent report as filed with the Missouri Secretary of State are attached. Ozark Valley Railroad acquired a line from the Kansas City Southern pursuant to F.D. 34989, served June 8, 2007. The Board's January 26 decision, slip op. at 3, asks me to confirm when BG & CM and Ozark Valley Railroad became common carriers. I previously stated that the first applicable deed and bill of sale for a common carrier line for BG & CM was executed on August 19, 2005, well after the effective date of the authorization for the transaction (transfer of assets) in question. It is my understanding that the date of the deed (August 19, 2005) is the date on which BG & CM actually became a common carrier. In the case of Ozark Valley, the relevant deeds show execution on June 29, 2007, several days after the effective date of the relevant STB authorization. It is my understanding that this date (June 29, 2007) is the date on which Ozark Valley became a common carrier.

Neither BG & CM nor Ozark Valley Railroad was a rail carrier at the time I incorporated them. I therefore do not understand the Board's conditional

information request in the last sentence of the first full paragraph, slip op. 3, of its Decision served January 26, 2021 to be applicable.

With respect to F.D. 36474 (McCloud), the Board has not made any inquiry for additional information, other than implicitly that I respond to the items which I have enumerated as (1) to (4) above. I am hopeful that with the clarifications above, the Board will lift the order holding F.D. 36474 in abeyance and allow the exemption to become effective. The Board referenced a comment from the United States Forest Service concerning F.D. 36474 in its Decision, at slip op. p. 4, footnote 6. It is my understanding that McCloud Railway has a permit from the USFS for the four acres in question. However, USFS informs McCloud that since the owner of McCloud (owner of rail infrastructure) is no longer the same as 4 Rail (owner of the underlying right of way), USFS believes that McCloud should apply for reauthorization. McCloud has done so.

Conclusion. Given the clarifications above, I respectfully request that the Board allow the transactions for which authority is sought in F.D. 36460 and F.D. 36461. I have endeavored in good faith to comply with the Board's requirements in seeking authority for the transactions contemplated in the settlement agreement underlying the transactions. I of course stand ready to address any additional inquiries. In connection with F.D. 36474, I have acknowledged that my

application for a control exemption is after the fact and have sought to remedy this deficiency via the Notice of Exemption in F.D. 36474. Again, given the clarifications provided herein, I respectfully request that the Board authorize my acquisition of McCloud Railway Company.

Exhibits to this Verified Statement:

Exhibit 1: BG & CM articles of incorporation

Exhibit 2: BG & CM report filed with Sec'y of State

Exhibit 3: Ozark articles of incorporation

Exhibit 4: Ozark report filed with Sec'y of State



Michael Williams

I, Michael Williams, declare under penalty of perjury pursuant to 28 U.S.C. 1746 that I am the Manager of S&S Shortline Leasing, LLC, and that the foregoing is true and correct to the best of my knowledge, information and belief.



Executed on: 2/12/2021



ARTICLES OF INCORPORATION (General Business)

(Instructions on back of application)

The undersigned, in order to form a Corporation under the provisions of Title 30, Chapter 1, Idaho Code, submits the following articles of incorporation to the Secretary of State.

FILED/EFFECTIVE

2002 OCT 23 PM 1:51

STATE
CLERK

Article 1: The name of the corporation shall be:

BG & CM Railroad, Inc.

Article 2: The number of shares the corporation is authorized to issue: 100,000 No Par Value

Article 3: The street address of the registered office is: 1106 Idaho Street, Lewiston ID 83501

and the registered agent at such address is: Kerry A. Wagner

Article 4: The name of the incorporator is: Michael W. Williams

and address of the incorporator is: P. O. Box 331, Richmond MO 64085

Article 5: The mailing address of the corporation shall be:

P. O. Box 331, Richmond MO 64085

Optional Articles:

Customer Acct #:

(if using pre-paid account)

Secretary of State use only

Signature of at least one incorporator:

Michael W. Williams

Typed Name: Michael W. Williams

Typed Name: _____

g:\corpforms\corp forms\arts\inc\incprofit.p65
Revised 07/2002

Web Form

IDAHO SECRETARY OF STATE
10/23/2002 05:00
CK: 8474400 CT: 164441 RH: 642196
1 @ 100.00 = 100.00 CORP # 2
1 @ 20.00 = 20.00 EXPEDITE C # 3

C 145953



0004071775

**STATE OF IDAHO***Office of the secretary of state, Lawrence Denney***ANNUAL REPORT**

Idaho Secretary of State

PO Box 83720

Boise, ID 83720-0080

(208) 334-2301

Filing Fee: \$0.00

For Office Use Only

-FILED-

File #: 0004071775

Date Filed: 11/20/2020 6:45:43 AM

Entity Name and Mailing Address:

Entity Name: BG & CM RAILROAD, INC.

The file number of this entity on the records of the Idaho Secretary of State is: 0000444417

Address: PO BOX 612
RICHMOND, MO 64085-0612

Entity Details:

Entity Status: Active-Good Standing

This entity is organized under the laws of: IDAHO

If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: C145953

The registered agent on record is:

Registered Agent: KERRY A WAGNER
Registered Agent
Physical Address
1106 IDAHO ST
LEWISTON, ID 83501
Mailing Address

Corporate Officers and Directors:

Name	Title	Business Address
 Michael Williams	President	12085 HWY 13 RICHMOND, MO 64085

The annual report must be signed by an authorized signer of the entity.

Colin Shelman

Sign Here

11/20/2020

Date

Job Title: accountant

B00000-26263 11/20/2020 6:43 AM RECEIVED BY ID SECRETARLY CLERK LAWRENCE DENNEY

ARTICLES OF INCORPORATION
OF
OZARK VALLEY RAILROAD, INC.
A Missouri Corporation

BE IT KNOWN THAT:

The undersigned, being a natural person of the age of eighteen (18) years or more, for the purpose of forming a corporation under "The General and Business Corporation Act of Missouri" hereby adopts the following ARTICLES OF INCORPORATION:

ARTICLE I

The name of this corporation is:

OZARK VALLEY RAILROAD, INC.

ARTICLE II

The address of its initial Registered Office in the State of Missouri is: P.O. Box 612, 1202 Highway 13, Richmond, Missouri 64085, and the name of its initial Registered Agent at such address is: Michael W. Williams.

ARTICLE III

The aggregate number of shares which the corporation shall be authorized to issue shall be Thirty Thousand (30,000), which shall be common shares at a par value of One Dollar (\$1.00) each.



There are no preferences, qualifications, limitations, restrictions, and no special or relative rights, including convertible rights, in respect to the shares of each class.

ARTICLE IV

There shall be no limitation on the pre-emptive right of a shareholder to acquire additional shares of the corporation stock.

ARTICLE V

The name and place of business of each incorporator is as follows:

<u>Name</u>	<u>Address</u>
Michael W. Williams	1202 Highway 13 Richmond, Missouri 64085

ARTICLE VI

In furtherance of, and not in limitation of, the powers conferred by law, the Board of Directors is expressly authorized to make, alter, amend or repeal the Bylaws of the corporation.

ARTICLE VII

The duration of the corporation is perpetual.

ARTICLE VIII

The corporation is formed for the following purposes:

(a) To operate a rail transportation company; including rail car transportation, track repair, maintenance, and replacement, and all other acts permitted general and business corpora-

tions, and to carry on all other business incident thereto or connected therewith;

(b) To purchase, lease, hire or otherwise acquire real and personal property, improved or unimproved, of every kind and description, including franchises, easements, licenses and rights in property of every nature, and to hold, sell, dispose of, convey, mortgage, pledge, manage, lease, operate, develop, contract and to do all things necessary in connection therewith;

(c) To purchase, hold, sell or otherwise transfer shares of its own stock;

(d) To execute deeds, mortgages, deeds of trust, leases, contracts and other types of written instruments;

(e) To carry on any lawful business; and

(f) To have to exercise all powers necessary or incident to carry out its corporate purposes; to exercise all other powers permitted by law, and to possess and enjoy all rights and powers which now or at any time hereafter may be granted to or exercised by the corporation of this character.

IN AFFIRMATION, the facts stated above are true and correct.

Jan 17, 07
Date

Michael W. Williams
Michael W. Williams

State of Missouri



Robin Carnahan
Secretary of State

CERTIFICATE OF INCORPORATION

WHEREAS, Articles of Incorporation of

OZARK VALLEY RAILROAD, INC.
00793525

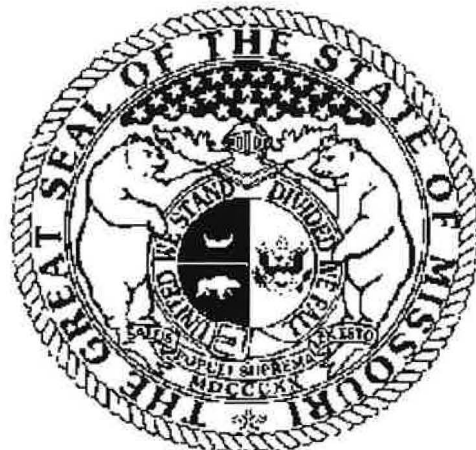
have been received and filed in the Office of the Secretary of State, which Articles, in all respects, comply with the requirements of General and Business Corporation Law.

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, do by virtue of the authority vested in me by law, do hereby certify and declare this entity a body corporate, duly organized this date and that it is entitled to all rights and privileges granted corporations organized under the General and Business Corporation Law.

IN TESTIMONY WHEREOF, I hereunto
set my hand and cause to be affixed the
GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, this
29th day of January, 2007.

Robin Carnahan

Secretary of State



John R. Ashcroft Secretary of State
2019-2020 BIENNIAL REGISTRATION REPORT
BUSINESS

00793525
Date Filed: 8/16/2019
John R. Ashcroft
Missouri Secretary of State

☒ I ELECT TO FILE A BIENNIAL REGISTRATION REPORT

*
SECTION 1, 3 & 4 ARE REQUIRED

REPORT DUE BY: 7/31/2019

00793525
OZARK VALLEY RAILROAD, INC.
MICHAEL W. WILLIAMS
PO BOX 612, 1202 HIGHWAY 13
RICHMOND MO 64085

RENEWAL MONTH:
APRIL

☐ I OPT TO CHANGE THE CORPORATION'S
RENEWAL MONTH TO FOR A \$25.00 FEE

PRINCIPAL PLACE OF BUSINESS OR CORPORATE HEADQUARTERS: *

10100 N Ambassador Dr (Required)

1 Suite 105

STREET

Kansas City MO 64153

CITY / STATE ZIP

If changing the registered agent and/or registered office address, please check the appropriate box(es) and fill in the necessary information.

☐ The new registered agent

IF CHANGING THE REGISTERED AGENT, AN ORIGINAL WRITTEN CONSENT FROM THE NEW
REGISTERED AGENT MUST BE ATTACHED AND FILED WITH THIS REGISTRATION REPORT.

☐ The new registered office address

Must be a Missouri address, PO Box alone is not acceptable. This section is not applicable for Banks, Trusts and Foreign Insurance.

OFFICERS

NAME AND PHYSICAL ADDRESS (P.O. BOX ALONE NOT ACCEPTABLE).
MUST LIST PRESIDENT AND SECRETARY BELOW

PRESIDENT

Williams, Mike
12085 Hwy 13

STREET

CITY/STATE/ZIP **Richmond MO 64085**

SECRETARY

Williams, Tammy
42485 Walnut

STREET

CITY/STATE/ZIP **Richmond MO 64085**

STREET

CITY/STATE/ZIP

STREET

CITY/STATE/ZIP

NAMES AND ADDRESSES OF ALL OTHER OFFICERS AND DIRECTORS ARE ATTACHED

BOARD OF DIRECTORS

NAME AND PHYSICAL ADDRESS (P.O. BOX ALONE NOT ACCEPTABLE).
MUST LIST AT LEAST ONE DIRECTOR BELOW

NAME

Williams, Mike
12085 Hwy 13

STREET

CITY/STATE/ZIP **Richmond MO 64085**

NAME

STREET

CITY/STATE/ZIP

NAME

STREET

CITY/STATE/ZIP

NAME

STREET

CITY/STATE/ZIP

The undersigned understands that false statements made in this report are punishable for the crime of making a false
declaration under Section 575.060 RSMo. Photocopy or stamped signature not acceptable.

Authorized party or officer sign here

Michael Williams

(Required)

Please print name and title of signer:

Michael Williams

NAME

President

TITLE

REGISTRATION REPORT FEE IS:

___\$40.00 If filed on or before 7/31/2019

___\$55.00 If filed on or before 8/31/2019

___\$70.00 If filed on or before 9/30/2019

___\$85.00 If filed on or before 10/31/2019

ADD AN ADDITIONAL \$25.00 FEE IF CHANGING THE RENEWAL MONTH.

**WHEN THIS FORM IS ACCEPTED BY THE SECRETARY OF STATE, BY LAW
IT WILL BECOME A PUBLIC DOCUMENT AND ALL INFORMATION
PROVIDED IS SUBJECT TO PUBLIC DISCLOSURE**

E-MAIL ADDRESS (OPTIONAL):

REQUIRED INFORMATION MUST BE COMPLETE OR THE REGISTRATION REPORT WILL BE REJECTED
RETURN COMPLETED REGISTRATION REPORT AND PAYMENT TO: Secretary of State, P.O. Box 778, Jefferson City, MO 65102