

**BEFORE THE
SURFACE TRANSPORTATION BOARD (STB)**

Finance Docket No. 36025

**TEXAS CENTRAL RAILROAD AND INFRASTRUCTURE, INC. &
TEXAS CENTRAL RAILROAD, LLC AUTHORITY
TO CONSTRUCT AND OPERATE PASSENGER
LINE BETWEEN DALLAS, TX AND HOUSTON, TX**

**Negatively Impacted Private Property Landowner's Response in Opposition
to Petitioner's Response to Surface Transportation Board's Request for
Additional Information Dated June 20, 2019 Referencing Texas Central's
May 4, 2018 Petition to Reopen Proceeding**

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ENTERED
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October 4, 2019
Part of
Public Record

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This is to advise that I, as a Private Property Landowner in Two (2) Texas Counties (Montgomery and Leon Counties, Texas) am 100% Against the Texas Central Partners/Railway proposed High Speed Rail between Houston and Dallas, TX.

For the record, I hereby "Object", due to lack of supportive evidence of such a right to or need for (As Supported by the following statements in this Objection Letter), Texas Central Entities' Requested STB Jurisdiction and Request Immediate "Denial" by the STB for the Texas Central Entities being awarded STB Jurisdiction Consideration and/or Exemption from State or Local Rules and Regulations. I find it extremely interesting that Texas Central made many press

releases and social media advertisements immediately following the July 18, 2016 STB Denial that they were extremely happy the STB ruled Texas Central was not qualified to be under the STB Jurisdiction and Oversight stating further they did not want Federal Government Oversight to slow their project down. Now, Texas Central today, over Three years later and with very little land actually purchased for this project, is asking for the STB to take over Jurisdiction of their project while also asking for Project & Construction Approval as part of an Interstate Rail Network, all based on a recent simple and STILL speculative “Through Ticketing Arrangement” with Amtrak. It is beyond any competent or legal rationale how a simple ticketing arrangement with a Cancellation Clause and No FRA Approved Houston Station Location can turn a company who cannot even prove they are a railroad in the state of Texas (Further explained below) to now be qualified as part of an Interstate Rail Network.

• BACKGROUND:

As a reminder of the STB’s 2016 Denial to Texas Central for Jurisdiction, The STB stated ” In addition, the Board noted that “[TCR] makes clear that the Line would not directly connect, nor would it be feasible to directly connect, with Amtrak.” In rendering its decision, the Board articulated the principle that “whether an intrastate rail passenger service is part of the interstate rail network is a fact-specific determination based on the totality of circumstances” and “no one factor is controlling.”

Unlike the situation in *California High-Speed Rail Authority—Construction Exemption—In Merced, Madera and Fresno Counties, Cal.*, FD No. 35724, 2013 WL 3053064 (STB served June 13, 2013) (“*Cal-HSR I*”), the Project will not be part of the “interstate rail network” nor will it connect with any existing line of railroad that is part of the general system of rail transportation. The lack of a physical connection with Amtrak or the General Rail System stands in sharp contrast with the Board’s review of the California High-Speed Rail Authority’s Revised Business Plan. As the Board explained, the Authority’s “blended” approach to the construction and operation of the rail system would involve “the integration of high-speed trains with existing intercity and commuter/regional rail systems via coordinated infrastructure ... and scheduling, ticketing and other means.” **None of those jurisdictional conferring factors exist here.**

In *Cal-HSR I*, the Board also highlighted the fact that “the Authority’s business plans and environmental documents indicate that Amtrak operations over the rail system prior to the initiation of high-speed rail operations would be a key component of its blended implementation strategy.”¹⁵ Interconnectivity with Amtrak operations would be achieved by servicing terminals that would provide “connections to Amtrak’s long-distance interstate routes.”¹⁶ By way of example, the Board noted that “Los Angeles Union Station, the preferred HST station option to serve Los Angeles, is the primary destination for several existing passenger rail services, including Amtrak’s intercity service (Pacific Surfliner) and four interstate lines (Southwest Chief, Texas Eagle, Coast Starlight, and Sunset Limited).”¹⁷ In finding jurisdiction, the Board identified several factors on which it based its decision:

1. Extensive interconnectivity with Amtrak;
2. Interstate passenger service;

3. Stations connected to Amtrak;
4. Amtrak would operate on the tracks; and
5. Blended operations with Amtrak.

It is my position that Texas Central has not even come close to proving any of this in answering any of the Five Questions submitted to them by the STB AND in their recent response. It is therefore, Unjustifiable, that the STB would now simply consider any ruling on this matter to be solely based on Texas Central's answers to the Five STB Questions. In order to maintain Credibility and Integrity in the STB process, the STB Must include a reevaluation of its Previous Communications in their previous Denials to Texas Central and Communications to the Public as to what is the Jurisdiction basis **in addition to full evaluation of Texas Central's recent answers to the STB Five Questions.**

Additionally, TAHSR pointed out "TCR's proposed system utilizes Japanese technology that lacks interoperability. The Project "will run on dedicated HSR tracks for passenger rail service only and cannot travel on other rail lines."¹³ Likewise, no other rail lines can run on TCR's tracks." So there can be no Physical Connection with other Carriers. So in my view using a Soft Connection with a Gap as described by Texas Central is Diluting the true Intent of being a true part of the "Interstate Rail Network". The following represents my specific reasons for my request for total Denial of Texas Central's Petitions:

- **Texas Central is Not a RR under Texas Law with No Survey Rights or Right to Condemn Property (Ref. Rail 4 Transp. Policy Obj. #9):**
 1. Texas Central has never met the State Statutes to be recognized as an "Operating RR" in the State of Texas, referencing the 2007 and 2012 State Statutes tests.
 2. As documented in the Case-law results of Three court cases, Inclusive of Two Summary Judgments, and One Full Trial (Only Case Being Appealed) represented by Five Texas Counties out of Nine Rural Counties, Texas Central was Denied their Claim to be a RR Under Texas Law and therefore did not possess Survey Rights. So with these court case results, Today Texas Central has no right to Condemn Texas Private Property under Eminent Domain (ED) which I contend supports the rationale for Texas Central's interest now vs. in 2016 to ask for support from the STB to attempt to override Texas Law.
 3. Contrary to Texas Central's propaganda and statements to both Federal and State Legislators and Agencies, the Rural Landowners of Texas by large are not interested in having anything to do with Texas Central or its uneconomic Project. Approximately at least 75% of the entire Rural ROW is NOT under control by any form of contracts of Texas Central but under control of the Landowners and that is unlikely to change unless under the Unfounded and Unprecedented "Taking" of Private Property for this For-Profit Private Company without a substantiated or legitimate comprehensive proof of "Need or Necessity" by the General Public. In fact, the Private Landowners who will be making the greatest sacrifice will likely see Zero Benefit from the project which has been a significant reason for their Opposition.
 4. Allow me to also point out that the California Disastrous HSR Project that has ruined so much property needlessly and supported by the STB still has yet to complete the purchase of all required ROW. Therefore, unlike a road or pipeline or transmission lines where ED is extremely clear and easily proven by those really having the power, it would be wise for the STB to never in the future facilitate or be a regulatory partner

with a company who cannot even prove ED power to anyone, including the Courts to date.

- **Monopoly, Restraint of Trade, and Manipulation of the Regulatory Process (Ref. Rail 4 Transp. Policy Objs. #1,#3,#4,#5,#6,#12):**

1. A rule of Jurisdiction over Texas Central by the STB would constitute in my view a manipulation of an arm of the US Federal Government to facilitate the formation of a Monopoly on US Soil via approval by the STB of a Proprietary Safety Management System supplied to Texas Central via a Foreign Company who will be mostly funded by Foreign Japanese Entities. This system, unlike most all of the Interstate Rail Network, will not allow any use of facilities or tracks by any existing or newly formed RR companies and of course could eliminate Competition due lack of cost sharing by other Foreign HSR Operators in expansion of the HSR network. Testimony as such has already been documented by Texas Central's Competition in the public domain as well as in testimony to the last Texas Legislative Session of 2019. Referencing the Sherman Act, "**Section 2 of the Sherman Act** makes it unlawful for any person to "monopolize, or attempt to monopolize, or combine or conspire with any other person or persons, to monopolize any **part** of the trade or commerce among the several States, or with foreign nations."
2. Additionally, restraint of trade is involved here as the "Through Ticketing Agreement with Amtrak" will eliminate a Low Cost Bus Service between Houston and Longview, TX connecting the two AMTRAK services (per Texas Central's Petition, they will suspend operation of this Bus System) while replacing it with a much more expensive, likely at least Eight Times the higher ticket cost to Consumers, that being by the Texas Central HSR route between Houston and Dallas, TX.
3. I might also mention that if the FRA RPA is written totally based on a Japanese HSR Proprietary Safety Management System that no other entity can use or connect to, And if the STB rules to take Jurisdiction, that this STB action would constitute and facilitate a conspiracy within our Federal Government by two Federal Transportation Departments to create a Monopoly in conjunction with Texas Central in violation of the Sherman Act to by lending favor and aid to an Intrastate "Private" Development Venture via a Japanese HSR System funded mostly by Japanese entities, including the Government via the Japanese Bank, while taking Texas land from US Private Property Owners.

- **Through Ticketing Agreement Cancellation Clause and Houston Station Location Represents Speculation on top of Speculation (Ref. Rail 4 Transp. Policy Obj. #9):**

1. Texas Central "Through Ticketing Agreement" Remains post Texas Central's STB Answers Speculative to say the least, is on the verge of a fraudulent act by Texas Central, and is also a manipulation of an arm of the US Federal Government Rule making process due to the Agreement containing a 90 Day Cancellation Clause. This means Texas Central could use the STB to obtain power over the State of Texas and Private Landowners with a very weak agreement that only adds at start up approximately 0.10% ridership to the Texas Central HSR projections and then could on day ONE of HSR Operation, Cancel the Through Ticketing Agreement with AMTRAK while having done extreme harm to the State of Texas and its Private

Property Owners. The STB would open itself up not only to that contained in the Monopoly discussion above, a violation of US Law, but for great liability over a fraudulent False Scam Agreement designed by Texas Central, signed off on by AMTRAK, and Approved and Used as a rationale for Jurisdiction by the STB.

2. Additionally, I am sure the STB is fully aware that the Houston Station Location at the NW Mall area has not been Officially chosen/approved by the FRA today, therefore, Texas Central's response is again at yet another level of extreme speculation because their responses to the STB "Through Ticketing" Agreement did not include Answers to those questions as they apply to the other Alternative Houston Station Sites. I have seen nothing from the STB pointing this fact out in any manner so is the STB ignoring this important fact in its rule making process and allowing Texas Central to only respond based on today what is a Speculative Unapproved Houston Station Location? That in my view introduces a huge question in the fairness, credibility, and integrity of the STB regulatory process. So in summary, this is a speculative Agreement on a Speculative Houston Station Location and the STB cannot ignore this fact in its Jurisdiction determination.

- **Texas Central Non-Responsive to STB Questions #1 & #4:**

1. In the STB Question #1, the STB asked two parts of a question, the second part being "the number and percentage of Texas Central passengers who would transfer to the relevant Amtrak services". This latter part of Question #1 was NOT answered by Texas Central, but only the first part of the question. There should be NO Partial Credit for an Unanswered Part of a Question!
2. I contend Texas Central did NOT directly respond at all to the STB's Question #4 asking for past Case-law where there was Jurisdiction taken by the STB based on a "Through Ticketing Agreement" (Component #1) **AND** one where two transportation entities were joined to be part of the Interstate Rail Network but without a hard connection, that is a Gap per the STB (Component #2). In lieu of finding such Case-law with both Components combined as requested by the STB, Texas Central communicated Case-law where a "Through Ticketing Arrangement" existed, then went on to provide separate non-combined Case-law examples of Jurisdiction where two transportation entities were joined to become part of the Interstate Rail Network but without a hard connection, with a Gap. Instead of Texas Central answering the question as posed by the STB with combined components of Case-law, Texas Central attempted to explain via simple singular component Case-law that a "Hard Connection" is not required and a "Gap" still constitutes connection to the Interstate Rail Network? So Texas Central's methodology to respond with Case-law examples of Independent Components is a huge difference than the combined Case-law as requested by the STB. Therefore, I suggest the STB considers Texas Central's data for #4 as Non-Responsive to the STB Question.

- **No Substantial Effect on Interstate Commerce, AMTRAK Ridership:**

1. Rightly so and as explained in the JBJQ Ranch's Response to Petitioner's Response of STB's Request, the US Supreme Court in United States vs. Lopez, 514 U.S. 549 (1995) found a regulation unconstitutional if the activity being controlled does not have a substantial effect on Interstate Commerce.

2. Justice Rehnquist stated in part: ...In Jones & Laughlin Steel, the Court warned that the scope of the Interstate commerce power “must be considered in light of our dual system of government and may not be extended so as to embrace effects upon Interstate commerce so indirect and remote that to embrace them, in view of our complex society, would effectually obliterate the distinction between what is national and what is local and create a completely centralized government”.
3. With only at start-up approximately 16 AMTRAK passengers transferring to the D-H HSR, no more than three times a week each way, there is NO Substantial effect on Interstate Commerce as a result of the measly 0.1% of the HSR Ridership (Not really accurately characterized by Texas Central as Less than 1% but should have been Way Less than 1%) resulting from AMTRAK transfers. As mentioned previously also, the removal of a bus service for AMTRAK passengers between Houston and Longview, TX is additionally a negative effect on Interstate Commerce and at a much higher cost to the Consumer by being forced to take the HSR to north Texas.

- **Low Voltage Safety Concerns (Ref. Rail 4 Transp. Policy Objs. #3,#8):**

1. The Texas Central HSR operates on a Low Voltage system, unlike other Rail Systems in the US. Because of likely interference by the HSR system when crossing or running near the existing RRs having different systems, Safety experts provided testimony during the 2019 Texas Legislative session on how this could cause significant safety operating concerns due to direct interference. I strongly suggest this issue is evaluated fully by the STB as part of the reevaluation of Texas Central's request. The STB should review the testimony to the Texas House Transportation HSR Subcommittee and Senate Transportation Committee regarding Bills associated with compatibility of the HSR with multiple types of train technology.
2. This issue actually highlights one of likely many negative impacts of allowing a HSR system to operate in the US without it having interoperability capability. I am sure there are many other issues and concerns that the STB must evaluate, particularly when it involves the Safety of the Public and protection of rail assets.

- **Cross Texas Transmission Moved Off of The HSR Route, the Utility Corridor, Less Environmental Impact Elsewhere:**

1. Referencing the April 24, 2015 , Cross Texas Transmission, LLC filing to the Public Utility Commission of Texas (PUCT) for a Certificate of Convenience and Necessity for the Limestone to Gibbons Creek 345 kV Transmission Line Project including Freestone, Grimes, Leon, Limestone and Madison Counties; PUC Docket No. 44649, SOAH Docket No. 473-15-3596: This project was going to cross my property along the Proposed HSR Utility Corridor, just one quarter mile north of where the Texas Central HSR ROW will converge with the Utility Corridor running south beginning in Leon County, Texas.
2. The PUCT issued Cross Texas permission to construct the line on January 13, 2016. Ultimately this project was moved further to the west approximately 10 miles or more and did not cross my property. After making a contact regarding why the project was ultimately moved westward by the PUCT, I was told the new location resulted in less Environmental Impact vs. being adjacent to the Utility Corridor. I suggest the STB contact the PUCT to obtain the records on Environmental Concerns in Leon County,

Texas that caused such relocation as the HSR Route is adjacent to the same corridor, but just on the East side vs. West side.

3. I also suggest the STB evaluate the negative carbon emissions Environmental Impact/Damage of the HSR Construction that will more than make up for any positive results of the electrical systems for many years to come into the future (**Ref. Rail 4 Transp. Policy Obj. #14**) **AND** the potential destruction of Free Flowing Surface Springs and Deep Underground Springs that were NOT evaluated by the FRA DEIS since Texas Central did not have access to much or most of the land for “Boots on the Ground” investigation, particularly important for Leon County, TX.

- **STB Jurisdiction Over Texas Central will Constitute Violation and Total Conflict with Most All of the Fifteen Objectives of the Rail 4 Transportation Policy Specified by the ICCTA (See Ref. w/Each Issue):**

1. As a reminder the Fifteen Objectives are: (1) to allow, to the maximum extent possible, competition and the demand for services to establish reasonable rates for transportation by rail; (2) to minimize the need for Federal regulatory control over the rail transportation system and to require fair and expeditious regulatory decisions when regulation is required; (3) to promote a safe and efficient rail transportation system by allowing rail carriers to earn adequate revenues, as determined by the Board; (4) to ensure the development and continuation of a sound rail transportation system with effective competition among rail carriers and with other modes, to meet the needs of the public and the national defense; (5) to foster sound economic conditions in transportation and to ensure effective competition and coordination between rail carriers and other modes; (6) to maintain reasonable rates where there is an absence of effective competition and where rail rates provide revenues which exceed the amount necessary to maintain the rail system and to attract capital; (7) to reduce regulatory barriers to entry into and exit from the industry; (8) to operate transportation facilities and equipment without detriment to the public health and safety; (9) to encourage honest and efficient management of railroads; (10) to require rail carriers, to the maximum extent practicable, to rely on individual rate increases, and to limit the use of increases of general applicability; (11) to encourage fair wages and safe and suitable working conditions in the railroad industry; (12) to prohibit predatory pricing and practices, to avoid undue concentrations of market power, and to prohibit unlawful discrimination; (13) to ensure the availability of accurate cost information in regulatory proceedings, while minimizing the burden on rail carriers of developing and maintaining the capability of providing such information; (14) to encourage and promote energy conservation; and (15) to provide for the expeditious handling and resolution of all proceedings required or permitted to be brought under this part.
2. Utilizing my comments included here comparing them with the aforementioned objectives, in conjunction with the fact that Texas Central has not opened up its books to the Public on Project Cost and Funding that would include Taxpayer Funded RR Loans, I contend that Texas Central’s HSR Project is in Conflict with at least Ten of the above Fifteen Objectives (**Ref. Rail 4 Transp. Policy Obj. #13**).
3. Further to the **Rail 4 Transp. Policy Obj. #8**, it is important for the STB to understand that the topic of “Flooding Potential” as a direct result of all of the “BERMS”

(around 50% of the Route Distance in DEIS) being installed by this project has never been addressed by any Regulatory body to date, inclusive of the FRA published DEIS. As an example, after Hurricane Harvey, Houston, TX evaluated via flood modeling changes to the Flooding Maps and has made changes. But Zero Modeling has been performed due to the new Berm Dams being installed by Texas Central. The STB, in the name of anything that could be a “detriment to the public health and safety”, must critically and accurately evaluate this particular public hazard prior to Accepting Jurisdiction of this HSR Project.

- **Glenn A. Mannina’s Personal Testimony to Texas Legislators:**

1. The STB will find Attached my personal testimony in opposition to this Texas Central HSR Project regarding Threats to me personally of a Legal Injunction because I Denied Texas Central the right to survey my property. This testimony was provided to both the Texas State House Transportation HSR Subcommittee hearing And to the Texas State Senate Transportation Committee hearing on several Common Sense Bills introduced to this past 2019 Texas State Legislative Session. This example is in direct conflict with the **Rail 4 Transp. Policy Obj. #9**.

In Summary, I officially request Texas Central’s 2018 request for Reopening their Petition and for STB Jurisdiction or any Exemption to Construct or override any State or County Laws be DENIED and the STB Uphold its original July 18, 2016 Denial for Jurisdiction based on: 1) Texas Central Not being a RR under Texas Law by Texas State Statutes or Today by Case-law results, 2) Potential of US Government Agency facilitating a Monopoly and Restraint of Trade in violation of the Sherman Act, 3) ”Through Ticketing Agreement” still Speculative as inclusive of a Texas Central Cancellation Clause with AMTRAK, 4) Texan Centrals Answers to the STB questions based only on a Speculative Unapproved Location of the Houston Station, 5) Texas Central being Non-Responsive to Question #1 on Passenger Transfer and #4 on Combine Components of Case-law as asked by the STB, 6) Lack of a Substantial Effect on Interstate Commerce based on minuscule AMTRAK customer ridership, 7) Low Voltage Safety Issues and its Safety System not being Interoperable or Connective to other rail systems thereby facilitating an unsafe and a monopoly system, 8) Environmental Concerns in general as documented by so many comments to the Weak FRA DEIS, but in particular, during Construction that will eliminate any air quality gains of an electric train for so many years into the future, 9) Conflict with at a minimum, Ten of the Fifteen Objectives of the Rail 4 Transportation Policy. Generally speaking, this Petition by Texas Central is Speculation on top of Speculation without a solid AMTRAK Agreement, an attempt to misuse the power of the STB, to circumvent State and County Laws, and to use the Federal Government via the STB to circumvent Texas Landowner Private Property Rights.

I certify that I have this day served copies of the document upon the Parties of Record in this proceeding, by U.S. Mail or E-mail. [by method of service consistent with 49 C.F.R. 1104.12(a)].

/s/Glenn A. Mannina

October 4, 2019

Glenn A. Mannina

Private Property Landowner in Montgomery and Leon Counties, TX

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PERSONAL TESTIMONY OF TEXAS CENTRAL'S USE OF EMINENT DOMAIN POWER AND THREATS AGAINST LANDOWNERS FOR SURVEY RIGHTS

BY LANDOWNER, GLENN A. MANNINA (Leon and Montgomery Counties)

ATTACHMENT TO STB FILING OF OCTOBER 4, 2019

1. My Name is Glenn A. Mannina and I am testifying On Behalf of Myself
2. My Testimony is in FAVOR of ALL Twelve (11) Subcommittee House Bills associated with the Texas Central HSR Project and in FAVOR of Senate Bills associated with Private Property Owner/Texas Resident and Taxpayer Protections and Safeguards relative to the Texas Central HSR Project.
3. In particular, My Testimony is Most Relevant and In FAVOR of Senator Brandon Creighton's S.B. 478, Rep. Ben Leman's H.B. 2716 & Rep. Ashby's H.B. 1242.
4. I am a landowner in Montgomery and Leon Counties, TX and have Five Pipelines and Three Transmission lines across my two properties.
5. Since I have owned the land, I have experienced the installation of Two pipelines and One Transmission line.
6. I am very familiar with Eminent Domain (ED) processes and I know what proof of ED Power looks like.
7. I have also testified to the House Land and Resource Management Committee before on the subject of ED Abuse and made suggestions to that Committee for ED Law Upgrades prior to this legislative session.
8. I have been following the Texas Central HSR Project since January, 2015.
9. The HSR Route is around 300' from my SW Property Corner in Leon County.
10. On August 9, 2016, I attended a Grimes County Press Release event regarding the new County Rule requiring a County Permit and Proof of Eminent Domain (ED) prior to approval of a HSR to cross County property. That day I gave a TV interview in opposition of Texas Central HSR project to KBTX, College Station.
11. Then on August 16, 2016, I received a phone call from Mr. Ken Williams at around 4:00 pm. with Contract Land Services (CLS) representing TCR asking for permission to get on my property to survey, even though my property was not on the route.
12. Three other properties converged at my same property corner.
13. I brought the subject up regarding ED Power and told Mr. Williams that I understood Texas Central has never proven ED power to any of the Landowners, certainly not to me personally, as I have asked for that proof a number of times.
14. He then said, "Well They Say they have it".

15. After more questions, he then stated that Texas Central "Believes they possess ED Power".
16. I "DENIED" the request. Immediately, Mr. Williams told me he was told to make sure that I was aware that I might receive a Legal Letter from TCR followed by a Legal Injunction Filed Against me personally that would enjoin me from being able to Stop Texas Central from Surveying my property.
17. I considered this a "Threat" and told Mr. Williams so and stated I am prepared to defend against TCR's request to access my property.
18. I asked Mr. Williams to please Document that I considered his statement a "Threat" as I too was documenting it that way on my end.
19. I also asked him to get that Legal Letter to me ASAP via Certified Mailing so I could turn it over to my Lawyer.
20. Although that next week I began to determine who would represent me in this matter, I never received the Legal Letter and have not to this day.
21. However in my view, the "Threat" remains to this day.
22. I feel these bills are Common Sense Legislation for protection of private property rights.
23. It is ridiculous that these bills are needed is because Texas Central has proven the existing Texas ED Laws are weak enough to allow abuse in the system.
24. It is also ridiculous that Current Texas Law would allow a Private Company to disregard Private Property Rights, negatively impact Private Property when the Private Company does not possess adequate project funding to even finish design, begin construction, or complete the project through Start-Up.
25. Unfortunately when the Abuse occurs, the lawmakers must approve new legislation to eliminate the abusive situations so private property rights may be retained.
26. Anything less would say Private Property Rights have no meaning in the State of Texas?
27. If what Texas Central is doing is in accordance with the Law, then my neighbor and I can tomorrow form an LLC and name ourselves a RR and begin to threaten Landowners with ED Powers we do not really have.
28. I am willing to answer any questions you all might have for me.

/s/Glenn A. Mannina

Glenn A. Mannina

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