

DAVID E. DOBIN

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June 23, 2020

VIA EMAIL

Attorney Melanie Bachman,
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: PETITION NO. 1371 – THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY PETITION FOR A DECLARATORY RULING, PURSUANT TO CONNECTICUT GENERAL STATUTES §4-176 AND §16-50K, FOR THE PROPOSED 667 LINE REBUILD PROJECT CONSISTING OF THE REPLACEMENT AND RECONDUCTORING OF APPROXIMATELY 6.1 MILES OF ITS EXISTING NO. 667 69-KILOVOLT (KV) ELECTRIC TRANSMISSION LINE STRUCTURES WITHIN EXISTING EVERSOURCE ELECTRIC TRANSMISSION LINE RIGHT-OF-WAY BETWEEN FALLS VILLAGE SUBSTATION IN FALLS VILLAGE (CANAAN) AND SALISBURY SUBSTATION IN SALISBURY, CONNECTICUT, TRAVERSING CANAAN, SHARON AND SALISBURY, AND RELATED SUBSTATION AND ELECTRIC TRANSMISSION LINE STRUCTURE IMPROVEMENTS.

Dear Attorney Bachman:

On behalf of Sandra K. Boynton, Trustee, enclosed for filing please find the attached Application for Party Status and To Reverse or Modify Declaratory Ruling, Verification, Affidavit of Sandra K. Boynton, and Affidavit of Devin McEwan. One hard copy of this letter and enclosures is being mailed to the office of the Siting Council and copies are being sent by electronic mail to the parties on the Service List dated May 9, 2019.

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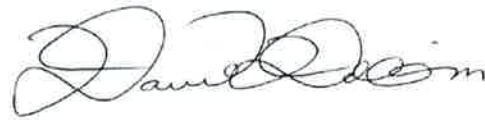
In addition, please enter the following appearances on behalf of the Sandra K. Boynton, Trustee, in the above referenced proceeding:

David A. Ball, Esq.
David E. Dobin, Esq.
Cohen and Wolf, P.C.
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I certify that a copy hereof has been sent on this date to all participants of record as reflected on the Council's service list dated May 9, 2019.

Please do not hesitate to contact me if you have any questions regarding this submission.

Very truly yours,



David E. Dobin

cc: Service List (*Via Electronic Mail*)

Enclosure

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION NO. 1371 – THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY PETITION FOR A DECLARATORY RULING, PURSUANT TO CONNECTICUT GENERAL STATUTES §4-176 AND §16-50K, FOR THE PROPOSED 667 LINE REBUILD PROJECT CONSISTING OF THE REPLACEMENT AND RECONDUCTORING OF APPROXIMATELY 6.1 MILES OF ITS EXISTING NO. 667 69-KILOVOLT (KV) ELECTRIC TRANSMISSION LINE STRUCTURES WITHIN EXISTING EVERSOURCE ELECTRIC TRANSMISSION LINE RIGHT-OF-WAY BETWEEN FALLS VILLAGE SUBSTATION IN FALLS VILLAGE (CANAAN) AND SALISBURY SUBSTATION IN SALISBURY, CONNECTICUT, TRAVERSING CANAAN, SHARON AND SALISBURY, AND RELATED SUBSTATION AND ELECTRIC TRANSMISSION LINE STRUCTURE IMPROVEMENTS.

PETITION NO. 1371

JUNE 23, 2020

**APPLICATION FOR PARTY STATUS
AND TO REVERSE OR MODIFY DECLARATORY RULING**

The above-captioned proceeding concerns the May 8, 2019 petition of Connecticut Light and Power Company d/b/a Eversource Energy Corporation for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for replacing over 50 towers and reconductoring approximately 6.1 miles of the transmission line that connects Falls Village Substation and Salisbury Substation (the "Petition"). The Siting Council ("Council") approved the Petition on June 7, 2019 (the "Decision").

Pursuant to applicable law, including Conn. Gen. Stat. §§ 16-50n and 4-177a, and the Regulations of Connecticut State Agencies § 16-50j-14, Sandra K. Boynton, Trustee as set forth in the Quitclaim Deed recorded May 1, 2015 at Book 245, Page 408 of the Salisbury Land

Records (“Boynton”) hereby requests that the Connecticut Siting Council (“Council”) designate her as a party in this proceeding.

Further, because Eversource did not provide notice of the filing of the Petition as required by *Conn. Gen. Stat.* § 4-176, and pursuant to *Conn. Gen. Stat.* § 4-181a, Boynton requests that the Council reverse its June 7, 2019 decision granting the Petition, or modify its decision in order to mitigate the substantial adverse environmental impact that will occur, including the extensive tree removal and vegetative clearing Eversource has proposed, and require Eversource to justify the need for such destructive and unnecessary removal of trees and vegetation.

In further support of this Application, Boynton submits the Affidavit of Devin McEwan (“McEwan Aff.”) and Affidavit of Sandra K. Boynton (“Boynton Aff.”) being filed together with this Application.

I. **Background**

Boynton owns three properties in Salisbury through which the subject transmission line runs, identified as lots 162, 163 and 165 of Map Sheet 11 (See Petition, Attachment A) (the “Properties”). (Boynton Aff., ¶¶ 3-5). Figure 1 below contains an image of Map Sheet 11 to the Petition, with Boynton’s Properties outlined in red.



Figure 1. Boynton Properties, Petition, Att. A, Map Sheet 11

Under *Conn. Gen. Stat.* § 4-176(c), Eversource was required to provide written notice of the filing of the Petition to all abutting property owners, including Boynton, at the time that Eversource filed its Petition in May 2019. The Petition for a Declaratory Ruling Notice Requirements dated March 2015¹ provide that, “[i]t is the petitioner's burden to ensure that all abutters are identified and notified . . . and to provide proof of such notice.” Eversource’s “proof” that it provided notice to the abutters is buried in Attachment G to its Petition. Attachment G contains a letter from the Eversource Property Manager that is not addressed to any specific person and the affidavit of an Eversource Transmission Siting Specialist. The affidavit contains one line about service upon owners of abutting properties. While the affidavit states that “notice of the petition for a declaratory ruling of” was made upon the affected municipalities, the affiant certifies only that he “caused *notice of the proposed modifications* to be served by mail or courier upon owners of abutting properties shown on the maps in Attachment A to the Petition.” (Petition, Att. G) (emphasis added). The affidavit *does not* state that Eversource notified abutters of the filing of the Petition. Moreover, Eversource has not identified the dates or addresses where such notice was provided, the contents of that notice, how the notice was given, or any tracking information for service by mail or courier.

Boynton, on the other hand, has submitted facts providing that Eversource failed to provide notice of the filing of the Petition in May 2019. (*See* Boynton Aff.; McEwan Aff.). Boynton never received a copy of the letter included in Attachment G or any other written notice of the filing of the Petition, either at 212 Dugway Road or at the mailing address on the field card associated with the Properties. (Boynton Aff., ¶¶ 8-10). In addition, she was only recently made

¹ This document is currently available from the Siting Council’s website at: <https://www.ct.gov/csc/lib/csc/guides/guides2015/20150316-memo-penoticrequirements.pdf#56864>.

aware of the filing of the Petition and the existence of this proceeding. Her son, Devin McEwan, who currently resides on one of the Properties (212 Dugway) and was living there in May 2019, also states that he never received a copy of the letter included in Attachment G or any other written notice of the filing of the Petition. (McEwan Aff., ¶¶ 8-9). If Boynton had received proper notice of the filing of the Petition, she would have filed for party status and submitted evidence demonstrating that the work proposed by Eversource – and specifically, the extensive and unnecessary tree removal and vegetative clearing on the Properties – is overkill, and would have a substantial environmental impact. (Boynton Aff., ¶ 12).

Moreover, during discussions Boynton and Devin have had with Eversource, of which there were several, Eversource’s representatives did not mention the filing of the Petition. When Boynton and her son learned that the Petition had been filed, they took steps to retain counsel and intervene in this proceeding as quickly as possible. (Boynton Aff., ¶ 17; McEwan Aff., ¶ 14).

As a result of Eversource’s failure to notify Boynton of the filing of the Petition, Boynton was deprived of the opportunity to request party status in this case and to provide evidence demonstrating that the work proposed in Eversource’s Petition would have a substantial environmental effect on her Properties. Specifically, the Petition sought approval to engage in 15 feet of tree clearing on the north side of Eversource’s right-of-way and approximately 25 feet of tree clearing on the south side of Eversource’s right-of-way, as depicted on Attachment B to the Petition. (Petition, at pp. 4-5). In total, Eversource states that the project will involve removing trees from *over 13 acres of forest land*. (Petition, at p. 5).

The adverse environmental effects of Eversource’s proposed work are particularly stark as they relate to Boynton’s Properties. Figure 2 below contains a photograph of the westward

view of the transmission line from the driveway on Boynton's Properties (LLN Number 163). That Property is designated as open space. (Boynton Aff., ¶ 6).



Figure 2. Westward view of transmission line (LLN Number 163).

Eversource's representatives have tagged for removal the cedar trees under the transmission lines (and far away from the proposed new structures) depicted in Figure 2. These cedar trees act as a screen. Removal of the trees would result in an unsightly view from the driveway entrance. Although the cedars appear to be within Eversource's right-of-way, the trees are not tall and Eversource has not demonstrated how or why they pose any threat to the transmission line, especially since the new line will be significantly higher than the existing one. Indeed, the cedar trees have been located well within the original 50-foot zone of vegetation management for years and Eversource has never deemed them problematic in the past. (Boynton Aff., ¶ 14-16; McEwan Aff., ¶¶ 11-13).

Recent attempts to communicate with Eversource to try to resolve Boynton's concerns about the removal of trees and the massive amount of vegetative clearing on the Properties have failed, with Eversource's representatives refusing to change their plans and making it clear they

intend to destroy the trees of concern and move forward with the clearing. (Boynton Aff., ¶ 17; McEwan Aff., ¶ 14).

While Eversource states that tree clearing will be required “to accommodate access road installations and improvements, work pads and pull pad installation and for required conductor clearances,” (See Petition, at p. 4) none of the trees slated for removal obstruct any access road and Eversource did not provide the National Electric Safety Codes clearance standards that require the removal of these trees. (Boynton Aff., ¶ 16; McEwan Aff., ¶ 13).

II. Boynton’s Request for Party Status Should Be Granted

Boynton’s request for party status is governed by *Conn. Gen. Stat.* § 4-177a, which requires Boynton to state facts that demonstrate that her “legal rights, duties or privileges shall be specifically affected by the agency’s decision in the contested case.” *Conn. Gen. Stat.* § 4-177a(a)(2). Boynton is the record owner of Properties on which Eversource’s work – including tree removal and vegetative clearing – will be performed and provided evidence attesting to the effect on her Properties. As a result, she has stated sufficient facts demonstrating that her legal rights, duties or privileges are specifically affected by the Council’s decision on the Petition.

Although *Conn. Gen. Stat.* § 4-177a(a)(1) required that a request for party status be filed at least five days before the hearing on Eversource’s Petition, *Conn. Gen. Stat.* § 4-177a(c) authorizes the Council to waive the five-day requirement “at any time before or after commencement of the hearing . . . on a showing of good cause.” As demonstrated above, the only reason that Boynton did not file a request for party status prior to the hearing in this matter is because Eversource failed to provide notice of the Petition’s filing as required by the Council. Moreover, the facts described above show that Eversource’s project will have a substantial adverse environmental effect on Boynton’s Properties, in addition to over 13 acres of forest land.

As a result, Boynton has established good cause to be made a party to this proceeding, and her request for party status should be granted.

III. Boynton's Application to Reverse or Modify the Council's Decision Should Be Granted

The Council's decision should be reversed and/or modified due to the failure to provide notice to Boynton, as described above. In addition, *Conn. Gen. Stat.* § 4-181a(b) provides that “[o]n a showing of changed conditions, the agency may reverse or modify the final decision, at any time, at the request of any person or on the agency's own motion.” In the present case, changed conditions exist by virtue of the facts described above demonstrating that Eversource did not provided notice of the filing of the Petition to abutters. Moreover, Boynton has demonstrated that Eversource's destructive removal of trees on her Properties – without clear justification – will have a substantial environmental impact, drastically alter the views of her Properties, and result in loss in the value of the Properties, unreasonable interference with her and her son's (and any future owners') enjoyment of the Properties. (Boynton Aff., ¶ 18).

In addition to establishing good cause to be made a party to this proceeding, Boynton has also established a basis for reversing or modifying the decision. Eversource failed to comply with the notice requirements imposed by law and Boynton has demonstrated changed conditions in the form of new material facts that justify reversing or modifying the final decision. Boynton, therefore, moves the Council to reverse the final decision and require Eversource to file an Application for Certificate of Environmental Compatibility and Public Need so that the Council can fully evaluate the adverse environmental effects caused by the project. Alternatively, Boynton requests that the Council modify its decision in order to mitigate the substantial adverse environmental impact that will occur, including the extensive tree removal and vegetative

clearing Eversource has proposed, and require Eversource to justify the need for such destructive and unnecessary removal of trees and vegetation.

WHEREFORE, the undersigned requests that the Council grant her Application for Party Status and to Reverse or Modify the Council's Decision.

Respectfully Submitted,

SANDRA BOYNTON, TRUSTEE

By: /s/ David E. Dobin

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CONNECTICUT SITING COUNCIL

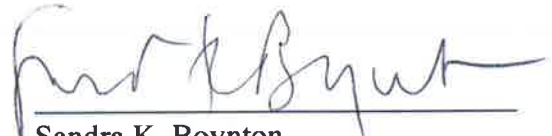
PETITION NO. 1371 – THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY PETITION FOR A DECLARATORY RULING, PURSUANT TO CONNECTICUT GENERAL STATUTES §4-176 AND §16-50K, FOR THE PROPOSED 667 LINE REBUILD PROJECT CONSISTING OF THE REPLACEMENT AND RECONDUCTORING OF APPROXIMATELY 6.1 MILES OF ITS EXISTING NO. 667 69-KILOVOLT (KV) ELECTRIC TRANSMISSION LINE STRUCTURES WITHIN EXISTING EVERSOURCE ELECTRIC TRANSMISSION LINE RIGHT-OF-WAY BETWEEN FALLS VILLAGE SUBSTATION IN FALLS VILLAGE (CANAAN) AND SALISBURY SUBSTATION IN SALISBURY, CONNECTICUT, TRAVERSING CANAAN, SHARON AND SALISBURY, AND RELATED SUBSTATION AND ELECTRIC TRANSMISSION LINE STRUCTURE IMPROVEMENTS.

PETITION NO. 1371

JUNE 22, 2020

VERIFICATION

Personally appeared Sandra K. Boynton, Trustee as set forth in the Quitclaim Deed recorded May 1, 2015 at Book 245, Page 408 of the Salisbury Land Records, and made oath to the truth of the facts contained in the Application for Party Status and to Reverse or Modify the Council's Decision.


Sandra K. Boynton

SUBSCRIBED AND SWORN TO before me this 22nd day of June, 2020.


Notary Public
My Commission Expires 10/31/2021

AFFIDAVIT OF SANDRA K. BOYNTON IN SUPPORT OF APPLICATION FOR PARTY STATUS AND TO REVERSE OR MODIFY DECLARATORY RULING

STATE OF CONNECTICUT)
) ss: Salisbury June 22, 2020
COUNTY OF LITCHFIELD)

I, Sandra K. Boynton, being duly sworn according to law, upon my oath depose and say:

1. I am over the age of eighteen (18) and believe in the obligations of an oath.
2. I have personal knowledge of the facts set forth in this Affidavit.
3. I am the record owner of the following properties:
 - a. 212 Dugway Road, Salisbury, Connecticut (Assessor's Map 8, Lot 32). This property is identified as LLN Number 162 on Attachment A, Map Sheet 11 of Eversource's Petition.
 - b. Brinton Hill Road (Assessor's Map 8, Lot 26). This property is identified as LLN Number 163 on Attachment A, Map Sheet 11 of Eversource's Petition.
 - c. Dugway Road (Assessor's Map 8, Lot 33). This property is identified as LLN Number 165 on Attachment A, Map Sheet 11 of Eversource's Petition.

These three properties are collectively referred to as the "Properties."

4. I currently own the Properties as Sandra K. Boynton, Trustee as set forth in the Quitclaim Deed recorded May 1, 2015 at Book 245, Page 408 of the Salisbury Land Records.
5. To the best of my knowledge, Figure 1 accurately identifies the Properties, highlighted in red, on Map Sheet 11 of Eversource's Petition, as follows:



Figure 1. Boynton Properties, Petition, Att. A, Map Sheet 11

6. The property at Brinton Hill Road (LLN 163) was designated as open space by the Town of Salisbury Tax Assessor as described on the Assessor's Certificate recorded at Volume 258, Page 184 of the Salisbury Land Records.

7. In May of 2019, I was the record owner of the Properties, and I have owned the Properties, in my own capacity and in my capacity as Trustee, for well over 20 years.

8. During all of 2019 and continuing through the present day, my son, Devin McEwan, has resided at 212 Dugway Road and received all correspondence sent to that address.

9. I have reviewed the copy of the letter dated May 7, 2019 included in Attachment G to Eversource's Petition.

10. I never received a copy of the letter included in Attachment G or any other written notice of the filing of the Petition. In addition, the service address listed on the property card for 212 Dugway Rd is my address, 164 Salmon Kill Rd, Lakeville, CT 06039. I never received a copy of the letter included in Attachment G or any other written notice of the filing of the Petition at this address or any other address.

11. My son, Devin McEwan, never received a copy of the letter included in Attachment G or any other written notice of the filing of the Petition.

12. Because I was unaware that the Petition had been filed, I did not have the opportunity to file a request for party status, submit evidence or file an objection prior to the Council issuing a decision approving the Petition.

13. The work proposed by Eversource in the Petition will involve the destructive and largely unnecessary removal of a significant number of trees on the Properties, and a massive expansion of vegetative clearing on my Properties.

14. The following photograph identified as Figure 2 is a fair and accurate representation of the westward view of the transmission line from the driveway on my Property (LLN Number 163):



Figure 2. Westward view of transmission line (LLN Number 163).

15. Eversource's representatives are about to remove the cedar trees under the transmission lines (and far away from the proposed new structures) depicted in Figure 2 of the Application. These cedar trees act as a screen. Removal of the trees would result in an unsightly view from the driveway entrance while removing the natural visual barrier located on the Properties.

16. The trees Eversource says it will be removing are not tall and Eversource has not provided Devin or me with any information about why they pose any threat to the transmission

line. The cedar trees have been located well within the original 50-foot zone of vegetation management for decades and Eversource has never deemed them problematic in the past. In addition, none of the trees slated for removal obstruct any access road and Eversource did not provide the National Electric Safety Codes clearance standards that require the removal of these trees.

17. My son Devin and I have repeatedly communicated with Eversource to try to resolve our concerns about the removal of trees and the massive amount of vegetative clearing on the Properties. Eversource's representatives, however, have refused to change their plans, and have made it clear they intend to destroy the trees of concern and move forward with the clearing. During those discussions, of which there were several, Eversource's representatives did not mention the filing of the Petition. When we learned that the Petition had been filed, we took steps to retain counsel and intervene in this proceeding as quickly as possible.

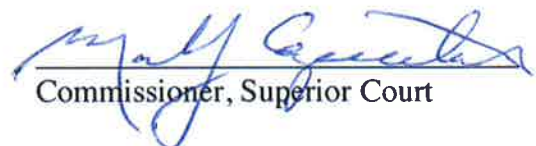
18. The removal of trees will result in loss in the value of the Properties, unreasonable interference with mine, my son's, and any future owners' present and future enjoyment of the Properties.

19. I would like to have the opportunity to contest the environmental impact on my Properties caused by this project, and Eversource's failure to propose reasonable steps to mitigate that impact. Because I never received notice of the filing of the Application, I was deprived of the opportunity to do so.



Sandra K. Boynton

Sworn and subscribed to before me
this 22nd day of June, 2020.



Commissioner, Superior Court

**AFFIDAVIT OF DEVIN MCEWAN IN SUPPORT OF APPLICATION FOR PARTY
STATUS AND TO REVERSE OR MODIFY DECLARATORY RULING**

STATE OF CONNECTICUT)
) ss: Salisbury June 22, 2020
COUNTY OF LITCHFIELD)

I, Devin McEwan, being duly sworn according to law, upon my oath depose and say:

1. I am over the age of eighteen (18) and believe in the obligations of an oath.
2. I have personal knowledge of the facts set forth in this Affidavit.
3. I am the son of Sandra Boynton, Trustee, record owner of the following

properties:

- a. 212 Dugway Road, Salisbury, Connecticut (Assessor's Map 8, Lot 32). This property is identified as LLN Number 162 on Attachment A, Map Sheet 11 of Eversource's Petition.
- b. Brinton Hill Road (Assessor's Map 8, Lot 26). This property is identified as LLN Number 163 on Attachment A, Map Sheet 11 of Eversource's Petition.
- c. Dugway Road (Assessor's Map 8, Lot 33). This property is identified as LLN Number 165 on Attachment A, Map Sheet 11 of Eversource's Petition.

These three properties are collectively referred to as the "Properties."

4. During all of 2019 and continuing through the present day I have resided at 212 Dugway Road and received all correspondence sent to that address. I am fully familiar with the Properties.

5. To the best of my knowledge, Figure 1 accurately identifies the Properties, highlighted in red, on Map Sheet 11 of Eversource's Petition, as follows:



Figure 1. Boynton Properties, Petition, Att. A, Map Sheet 11

6. The property at Brinton Hill Road (LLN 163) was designated as open space by the Town of Salisbury Tax Assessor as described on the Assessor's Certificate recorded at Volume 258, Page 184 of the Salisbury Land Records.

7. I have reviewed the copy of the letter dated May 7, 2019 included in Attachment G to Eversource's Petition.

8. I never received a copy of the letter included in Attachment G addressed to either me or my mother, or any other written notice of the filing of the Petition.

9. Because my mother and I were unaware that the Petition had been filed, we did not have the opportunity to file a request for party status, submit evidence or file an objection prior to the Council issuing a decision approving the Petition.

10. The work proposed by Eversource in the Petition will involve the destructive and largely unnecessary removal of a significant number of trees on the Properties, and a massive expansion of vegetative clearing on the Properties.

11. The following photograph identified as Figure 2 is a fair and accurate representation of the westward view of the transmission line from the driveway on the Property (LLN Number 163):



Figure 2. Westward view of transmission line (LLN Number 163).

12. Eversource's representatives have told me that they are about to remove the cedar trees under the transmission lines (and far away from the proposed new structures) depicted in Figure 2 of the Application. These cedar trees act as a screen. Removal of the trees would result in an unsightly view from the driveway entrance while removing the natural visual barrier located on the Properties.

13. The trees Eversource says it will be removing are not tall and Eversource has not provided me or my mother with any information about why they pose any threat to the transmission line. The cedar trees have been located well within the original 50-foot zone of vegetation management for decades and Eversource has never deemed them problematic in the past. In addition, none of the trees slated for removal obstruct any access road and Eversource did not provide the National Electric Safety Codes clearance standards that require the removal of these trees.

14. I have recently communicated with Eversource to try to resolve our concerns about the removal of trees and the massive amount of vegetative clearing on the Properties. Eversource's representatives, however, have refused to change their plans, and have made it clear they intend to destroy the trees of concern and to move forward with the clearing. During those discussions, of which there were several, Eversource's representatives did not mention the filing of the Petition. When we learned that the Petition had been filed, we took steps to retain counsel and intervene in this proceeding as quickly as possible.

15. The removal of trees will result in loss in the value of the Properties, unreasonable interference with my and any future owners' present and future enjoyment of the Properties.

16. My mother and I would like to have the opportunity to contest the environmental impact on the Properties caused by this project, and Eversource's failure to propose reasonable steps to mitigate that impact. Because neither I nor my mother ever received notice of the filing of the Application, we were deprived of the opportunity to do so.



Devin McEwan

Sworn and subscribed to before me
this 22nd day of June, 2020.



Commissioner, Superior Court