# STAFF REPORT FOR THE HISTORIC RESOURCES COMMISSION MEETING OF MAY 13, 2010

AGENDA ITEM: F-3

FILE NO: HRC-10-032

STAFF AUTHOR: Jennifer Pruitt, Principal Planner

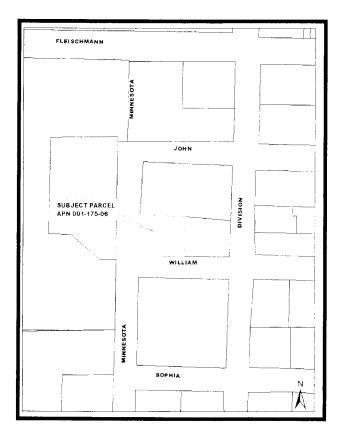
**REQUEST:** To allow the demolition of the existing 67 year old single family residence and the construction of a new single family residence with attached single car garage on property zoned Residential Office (RO).

APPLICANT: Casey Jones, Architect

OWNER: John E. and Brenda S. Frank

LOCATION/APN: 414 West William Street / 001-175-06

RECOMMENDED MOTION: It is recommended that the Historic Resources Commission "Move to approve HRC-10-032, a request from John F. and Brenda S. Frank, to allow the demolition of the existing 67+ year old single family residence and the construction of a new single family residence with an attached single car garage on property zoned Residential Office (RO), located at 414 West William Street, APN 001-175-06, subject to the conditions of approval contained in the staff report."



#### RECOMMENDED CONDITIONS OF APPROVAL:

- 1. All development shall be substantially in accordance with the attached site development plan.
- 2. All on and off-site improvements shall conform to City standards and requirements.
- 3. The use for which this permit is approved shall commence within 12 months of the date of final approval. An extension of time must be requested in writing to the Planning Division 30 days prior to the one year expiration date. Should this request not be initiated within one year and no extension granted, the request shall become null and void.
- 4. The applicant must sign and return the Notice of Decision within 10 days of receipt of notification. If the Notice of Decision is not signed and returned within 10 days, then the item will be rescheduled for the next Historic Resources Commission meeting for further considerations.
- 5. The applicant shall submit a copy of the signed Notice of Decision and conditions of approval with the building permit application.
- 6. Demolition of a historic place or cultural resource may begin only after approval by the HRC and issuance of other necessary approvals for a replacement building or site improvement.
- 7. The applicant will be required to provide detailed photographic documentation of the existing structure to the Planning Division for proper documentation of the structure proposed for demolition.
- 8. Sidewalk that meets City standards must be constructed across the property on the north side of W. William Street.
- 9. Driveway approach must be 50 feet away from the driveway to the east measured from the center of driveways. See section 12 of the Carson City Development Standards. Since this is where the existing driveway is, we may be able to work something out.
- 10. A probable fault line runs along the east side of this property, and this must be addressed.
- 11. Since the water and sewer services are probably very old, you will likely be required to replace them to the mains in the street.
- 12. Project requires application for a Building Permit, issued through the Carson City Building Division. This will necessitate a complete review of the project to verify

compliance with all adopted construction codes and municipal ordinances applicable to the scope of the project.

- 13. The plans submitted for review shall comply with the prescriptive requirements found in the Carson City Building Division handout titled: RESIDENTIAL PLAN SUBMITTAL REQUIREMENTS: One & Two Family Dwellings and Accessory Structures This handout may also be found online at: <a href="https://www.carsoncity.nv.us/Index.aspx?page=1024">www.carsoncity.nv.us/Index.aspx?page=1024</a>
- 14. Please submit the demolition plans as a part of the submittal for the new single family dwelling.

**LEGAL REQUIREMENTS**: CCMC 18.05.015 (Procedure for Proposed Project) and 18.05.075 (Demolition of a Historic Place or Cultural Resource in the Historic District).

MASTER PLAN DESIGNATION: Mixed Use Residential

**ZONING:** Residential Office

## DISCUSSION:

Per the information provided in the survey completed in 1998 by Anita Ernst Watson, the one-story vernacular structure was purchased by the Frank family in 1926 and initially constructed in c1875. The current owners John E. and Brenda S. Frank, have provided photographic documentation of the current structure including interior and exterior documentation, in addition to written documentation of the single family dwelling's history from 1926 to current day. The current property owner and his family resided in the home from 1926 through 1936. The structure was a rental from 1937 through the 1940's. The dwelling was extensively renovated and or completely rebuilt in 1944. In 1953 Mr. Frank completed an addition to the kitchen. The current property owners have resided in the single family dwelling unit since 1986.

The existing single family dwelling unit architectural materials include Asbestos siding. Asbestos siding was very commonly used in buildings and homes from around the 1920s until the 1970s, and can still be found in many older homes in the US and Canada. Asbestos siding (also called asbestos cement siding) was typically made by adding asbestos (which is a natural fibrous mineral) to Portland cement, which was then pressed into siding shingles that came in a wide variety of sizes, profiles, and textures. The structure also has a compositions roof and aluminum windows throughout the structure. In addition to an aluminum screen door.

The applicant is proposing to demolish the existing single family residence of 987 square feet and construct a single story 1,345 square foot single family residence with an attached single car garage of 378 square feet. The existing shed in the northeastern portion of the site will remain in addition to the existing five foot wood fencing on the perimeter of the site.

The demolition of a Historic Place or Cultural Resource in the Historic District is subject to the following criteria, noted in the Carson City Municipal Code 18.06.075:

- 1. Any application for demolition or removal of a cultural resource located in a Historic District shall be approved when the HRC finds that one (1) or more of the following conditions exist:
  - a. The cultural resource is a hazard to public health or safety and repairs and stabilization are not feasible as determined by a professional with demonstrated experience in historic preservation rehabilitation projects; or

The applicant has noted that the safety of the structure is a concern. They have evaluated the plumbing and electrical of the existing dwelling. The contractor and architect of the proposed project will be on hand to address this issue.

b. The cultural resource does not meet National Register significance criteria.

To be eligible for listing in the National Register, a resource must meet at least one of the following criteria:

 Is associated with events that have made a significant contribution to the broad patterns of our history (Criterion A).

The existing single family dwelling unit is not associated or made a significant contribution.

Is associated with the lives of persons significant in our past (Criterion B).

The structure was evaluated in 1998 and the previous ownership was noted. The ownership is not associated with the lives of persons significant to Carson City or Nevada's past.

 Embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction (Criterion C).

The existing structure does not represent the work of a master, or possesses high artistic values, or represents a significant and

distinguishable entity. The property owner has noted that the structure was extensively renovated and or completely rebuilt in 1944. The owner also noted the work completed on the structure from 1926 to today has been completed primarily by the property owner.

 Has yielded, or may be likely to yield, information important in history or prehistory (Criterion D).

The existing structure has been in the Frank Family for over 84 years. Mr. Frank has provided a history of the structure to his best recollection.

2. A site development plan has been submitted to, and approved by, the HRC. HRC shall recommend approval or shall endeavor to arrange a sale of the property, removal or some other alternative to demolition.

The applicant has provided a site development plan on April 26, 2010, for the review and approval for the HRC on May 13, 2010.

 Demolition of a historic place or cultural resource may begin only after approval by the HRC and issuance of other necessary approvals for a replacement building or site improvement.

A condition of approval has been included in this staff report, noting the above requirement. The Planning Division staff will be required the applicant to obtain the demolition permit/building permit for the new structure concurrently.

4. Unless time is extended with the consent of the applicant, an application for demolition or removal shall be deemed recommended for approval if the HRC has failed to take action within sixty (60) days after official receipt by Planning and Community Development.

It is anticipated that action will be taken by the HRC on this item HRC-10-032 at the May 13, 2010 meeting.

# 5.27 Guidelines for New Construction

New construction which is appropriately designed is encouraged by the Carson City Historic Resources Commission (HRC). The Historic District should be an active and vital part of the city. New construction should look new and reflect the technology, building materials and design ideas of the present era. The design of new construction needs to be compatible and respectful of the historic building stock that surrounds it so that visual conflict and confusion are avoided. There is no formula that will guarantee "good design". There are specific elements of building design which can be identified, and therefore, addressed in a review process so that consistency can be achieved. The following elements shall be individually assessed for their degree of appropriateness for each project.

# 5.27.1 Scale and Massing

The overall size and height of the new building should be consistent with the surrounding buildings.

The proposed scale and massing of the new single family residence is consistent with the scale and massing of the existing single family residence. The surrounding buildings are a mix of rental units, commercial buildings and park facilities, which will create a similar situation as today, if the proposed new single family dwelling unit is approved.

#### 5.27.2 Shape

The overall shape of the building, particularly its roof type, height, and design emphasis (horizontal or vertical) should be consistent and harmonious with others in the environs

The overall shape of the proposed structure will be similar to the exiting structure on site which as noted above will be a similar situation as today.

#### 5.27.3 Setback

The front and side yard setbacks for the building should be approximately the same as others in the surrounding area and conform with CCMC Development Standards, Division 1, Land Use and Site Design.

The setbacks of the proposed dwelling unit will conform to the setbacks noted in the Development Standards. It is important to note, the existing singe family dwelling unit did not conform to the setback requirements of today.

#### 5.27.4 Site Elements

When at all possible avoid substantial site alteration by importing or exporting fill materials. Generally speaking vacant lots in the district were once occupied by a building. Attempt to place the new building as near as possible to the same grade as the original. Carefully consider the placement and relationship of the public sidewalk, side and front yard fences, driveway, gardens and accessory buildings when determining the location of the new building on the lot.

The proposed development will not adversely impact the relationship to the public sidewalk or the existing fencing on site. The proposed dwelling will, however, replace the existing gravel driveway with a concrete driveway to the proposed single car garage.

#### 5.27.5 Materials

Exterior siding should reflect the prevailing style of the neighborhood. A vertical or diagonal style siding should not be used when the dominant style is a horizontal drop or shiplap type. The exterior siding should blend in, not stand out.

The proposed materials are intended to blend into the surroundings and not stand out. The applicant has provided a detailed set of plans for HRC review that include the specific detail of all materials proposed for the new single family dwelling. The applicant will have the design team (architect and contractor) available at the HRC meeting to address the materials proposed.

#### 5.27.6 Windows and Doors

The rhythm and arrangement of the windows and doors should reflect the style of the building design and the predominant patterns found in existing buildings of the area. The ratio of the total surface area of openings to total wall surface area of new buildings should reflect that of historic buildings in the environs.

The ratio of the total surface area of openings to total wall surface is not excessive and very similar to the area of openings on the existing single family dwelling unit.

## 5.27.7 Details and Other Elements

Trim details are often the single most relevant design feature which can be utilized to give harmony and compatibility to a new building. If existing buildings have boxed eaves, do not leave rafter tails exposed. If windows and doors typically have fanciful trim, incorporate trim with architecturally equal weight. If trim work is typically simple, do not use "ginger bread". Seek to design the new building so that the trim and architectural details compliment the existing buildings in the area.

The existing structure is basic in its design. The architect has incorporated these basic design into the proposed single family dwelling unit.

#### 5.27.8 Floor Elevations

The elevation of the first floor in relation to the street and the finish grade of the lot can often be a critical design feature. For example, if surrounding buildings normally have steps leading from street level up to the first floor level, then the new building should have a similar entrance level.

The existing and proposed dwelling units have steps leading up to the floor level. The entrance of the existing and proposed dwelling units are also similar in design.

## PUBLIC COMMENTS:

Public notices were mailed to the adjacent property owners to the subject parcel in accordance with the provisions of NRS and CCMC 18.02.045. As of May 07, 2010, the applicant has provided support letters from adjacent properties. Any comments that are received after this report is completed will be submitted prior to or at the Historic Resources Commission meeting, depending on their submittal date to the Planning Division.

# **Engineering Division comments:**

- Sidewalk that meets City standards must be constructed across the property on the north side of W. William Street.
- 2. Driveway approach must be 50 feet away from the driveway to the east measured from the center of driveways. See section 12 of the Carson City Development Standards. Since this is where the existing driveway is, we may be able to work something out.
- 3. A probable fault line runs along the east side of this property, and this must be addressed.
- 4. Since the water and sewer services are probably very old, you will likely be required to replace them to the mains in the street.

Building Division comments:

Demolish existing SFD and construct new SFD

#### General

- 1. Project requires application for a Building Permit, issued through the Carson City Building Division. This will necessitate a complete review of the project to verify compliance with all adopted construction codes and municipal ordinances applicable to the scope of the project.
- 2. The plans submitted for review shall comply with the prescriptive requirements found in the Carson City Building Division handout titled: RESIDENTIAL PLAN SUBMITTAL REQUIREMENTS: One & Two Family Dwellings and Accessory Structures This handout may also be found online at: <a href="https://www.carsoncity.nv.us/Index.aspx?page=1024">www.carsoncity.nv.us/Index.aspx?page=1024</a>
- Please submit the demolition plans as a part of the submittal for the new single family dwelling.

With the recommended conditions of approval and based upon the project complying with the Carson City Historic District Guidelines, the Historic Resources Commission Policies, and that the plans as submitted are in general conformance, it is recommended that the Historic Resources Commission approve HRC-10-032 subject to the recommended conditions of approval within this staff report. Staff will encourage the HRC to assist the applicant with the selection of appropriate materials for the proposed new single family residence.

Respectfully Submitted,

PUBLIC WORKS DEPARTMENT, PLANNING DIVISION

# Jennifer Pruitt

Jennifer Pruitt, AICP, LEED AP Principal Planner

Attachments:

Application (HRC-10-032)
Building Division comments
Engineering Division comments

File # (Ex: MPR #07-111)	HRC-10-032	
Brief Description	New SFD	
Project Address or APN	APN #001-175-06	
Bldg Div Plans Examiner	Kevin Gattis	
Review Date	May 13, 2010	
Total Spent on Review		-

# **BUILDING DIVISION COMMENTS:**

NOTE: These comments <u>do not</u> constitute a complete plan review, but are merely observations based on the information provided.

# Scope of Application

Demolish existing SFD and construct new SFD

#### General

- 1. Project requires application for a Building Permit, issued through the Carson City Building Division. This will necessitate a complete review of the project to verify compliance with all adopted construction codes and municipal ordinances applicable to the scope of the project.
- 2. The plans submitted for review shall comply with the prescriptive requirements found in the Carson City Building Division handout titled: RESIDENTIAL PLAN SUBMITTAL REQUIREMENTS: One & Two Family Dwellings and Accessory Structures This handout may also be found online at: <a href="https://www.carson-city.nv.us/Index.aspx?page=1024">www.carson-city.nv.us/Index.aspx?page=1024</a>
- 3. Please submit the demolition plans as a part of the submittal for the new single family dwelling.

# Carson City Engineering Division Historic Resources Commission Report

414 W. William St. File Number HRC 10-032

TO: Historic Resources Commission

FROM: Rory Hogen, Asst. Engineer

**DATE:** April 28, 2010

# **SUBJECT TITLE:**

Review of Historic Resources Commission application for removing an old house and constructing a new home at 414 W. William St., APN 001-175-06.

# **RECOMMENDATION:**

Development Engineering has no preference or objection to the request other than the following comments:

- 1. Sidewalk that meets City standards must be constructed across the property on the north side of W. William St
- 2. Driveway approach must be 50 feet away from the driveway to the east measured from the center of driveways. See section 12 of the Carson City Development Standards. Since this is where the existing driveway is, we may be able to work something out.
- 3. A probable fault line runs along the east side of this property, and this must be addressed.
- 4. Since the water and sewer services are probably very old, you will likely be required to replace them to the mains in the street.

# **DISCUSSION:**

The Engineering Division has reviewed the request within our areas of purview relative to adopted standards and practices.

# HETORICAL SURVEY CARSON CITY HISTORICAL DISTRICT CARSON CITY COMMUNITY DEVELOPMENT



NAME:

Moran House

ADDRESS:

414 W. William

LOCATION:

Northeast corner W. William and N. Minnesota

CONSTRUCTION DATE: 1948 (assessor); ca. 1878

# HISTORICAL BACKGROUND

Most of the parcels on this were sold numerous times as one unit between 1865 and 1873. Late that year lots 6 & 7, the parcels that comprise 414 W. William were sold separately. By 1875 T. O. S. Moran, a helper at the U.S. Mint in 1873, owned the property, a parcel at the very edge of town. Minnesota Street stopped at his corner, and there was no house on the parcel. In 1875, the year he bought the property, Moran had changed jobs and was working as a porter for the V & T Railroad.

By 1878 Moran was a laborer at the V & T depot, and was living in a house on his property. He was still there in 1883, but in 1887 Mary Moran sold the property to John Fulstone. It was sold several times, then bought by Alfred Johnson in 1891.

Johnson was living there in 1895. He sold that year to George Morrill.

George Morrill owned the property until 1909, but did rent it at least part of the time he was owner. In 1907 Mrs. Combs, who listed her occupation as nurse, lived there.

The house sold to Cora Ritchford in 1909. She owned the property until 1926. By that time she was Cora M. Coffin, married to Herbert Coffin, general manager of the V & T Railroad.

John Frank bought the house in 1926, and it was transferred to his son John H. Frank in 1953, who owns it and lives there currently.

# OTHER NAMES ASSOCIATED WITH PROPERTY:

1873, Thomas Sprague, James Scales; 1888, Marie Taylor; 1947, Chris Christofferson

# SOURCES:

Stewart Title; Carson City Directories

# HISTORIC RESOURCES COMMISSION APPLICATION SUBMITTAL PACKET

# **FOR**

PROPOSED NEW FRANK RESIDENCE 414 WEST WILLIAM STREET CARSON CITY, NV 89703

# PREPARED BY

CASEY M. JONES ARCHITECT, LTD.
777 EAST WILLIAM STREET, SUITE 106
CARSON CITY, NV 89701
775.887.1811
nv944@pyramid.net

**APRIL 23, 2010** 



APR **2** €

CARSON C PLANNING DIVE

<u> </u>	REC		
Carson City Planning Division 2621 Northgate Lane, Suite 62 · Carson City NV 89706 Phone: (775) 887-2180 · E-mail: plandept@ci.carson-city.nv.us	FOR OFFICE USE ONLY:  APR 2 6 2010  COMMISSION  RECEIVE		
FILE # HRC - 10 -	HISTORIC RESOURCES ARSON COMMISSION		
John E. & Brenda S. Frank	FEE: None		
PROPERTY OWNER 414 West William Street, Carson City, NV 89703	_ SUBMITTAL PACKET		
MAILING ADDRESS, CITY, STATE, ZIP 775-882-3385 775-882-4794	Application Form with signatures  12 Completed Application Packets-Application form,		
PHONE # FAX # jef-bsf@att.net	maps, supporting documentation  / (1 Original + 11 Copies)  ☑ CD containing application data (pdf format)		
E-MAIL ADDRESS  Name of Person to Whom All Correspondence Should Be Sent  Casey M. Jones Architect, Ltd. 775-887-1811	Application Reviewed and Received By:		
APPLICANT/AGENT PHONE # 777 East William St., Suite 106, Carson City, NV 89701  MAILING ADDRESS, CITY, STATE ZIP	Submittal Deadline: See attached HRC application submittal schedule.		
775-887-1811 775-887-1877 PHONE # FAX #	_		
nv944@pyramid.net  E-MAIL ADDRESS	_		
Project's Assessor Parcel Number(s): Street Address	ZIP Code		
001-175-06 District 1.5 Roll #005912 414 West William Street, C			
Project's Master Plan Designation Project's Current Zoning RO	Nearest Major Cross Street(s) N. Division, N. Minnesota		
Briefly describe the work to be performed requiring HRC review and approval. In a additional page(s) to show a more detailed summary of your project and propos Guidelines, as well as Policy Statements, are available in the Planning Division to sheets.	sal. NOTE: "The Historic District Ordinance and Historic District Design or aid applicants in preparing their plans. If necessary, attach additional		
Demolition of existing 67 year old house and construction of new elevations for new home and attached photos of existing house to			
construction by Rankin Construction Co., NV License #18897.	ble demonstred. Frans by Casey W. Jones Architect,		
construction by Rankin Construction Co., NV License #18897.			

To review for compliance with Historic Resources Con	
Will the project involve demolition or relocation of any structure with	nin or into the Historic District? ■Yes □ No If Yes, please describe:
Demolition of existing 67 year old house.	
Reason for project: Owners wish to have a newer, safer home with moder	n plumbing and wiring and future adaptability to Fair Housing Act
standards.	
SUPPORTI	ING DOCUMENTATION
on the subject project which requires HRC approval. Ba	nches, of quality site plan and drawings showing work to be performe asically, this is any work which will affect the exterior of any structur ajor landscaping. The name of the person responsible for preparatio
ot be included in <u>all</u> projects. The list is intended to give	and architectural drawings. It is understood that all checklist items we the applicant an idea of the breadth of review by the Commission. Photographs can be used for illustration and discussion, but are no
Owner's Signature	Applicant's/Agent's Signature
ohn E. Frank	Casey M. Jones Architect, Ltd.
Owner's Printed Name	Applicant's/Agent's Printed Name

SUBJECT: History of House @ Lots 6 & 7

My father, John Frank, Sr. bought the lot and house in 1926.

At the time, I was two years old and lived in the house with my mother, father and two sisters until the death of my mother in 1936, at which time we moved out of the house. My father who was a carpenter went to work at Stewart as an instructor teaching carpentry at the Indian School. As far as I know, my father rented put the house in this time period and did some renovation on the house, of which I do not have any recollection.

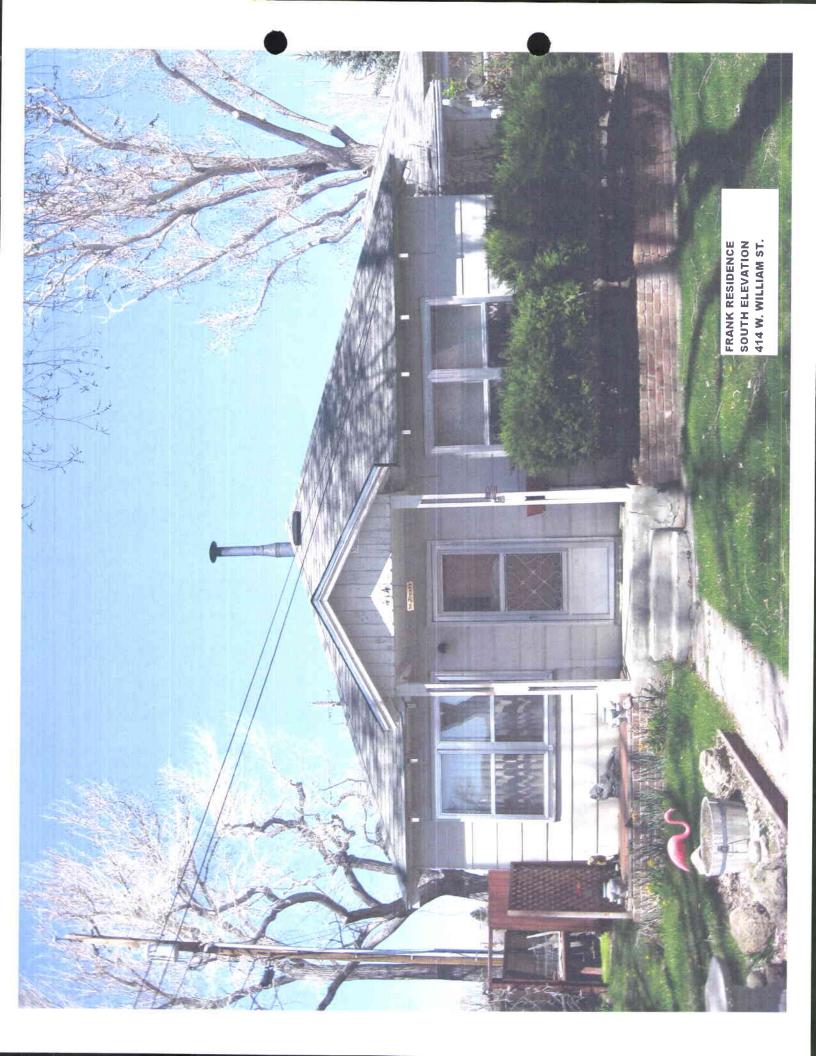
I was drafted in the Army in 1942 and was discharged in December 1945. Sometime during 1943 and 1944 my father extensively renovated or completely rebuild the house as it appears today with the exception of the kitchen which I added on in 1953.

In 1953 my father deeded the house to me and my first wife, Leatrice, who died in 1979. I married my present wife, Brenda, in 1983 and on November 18, 1986 my children filed a Quit Claim

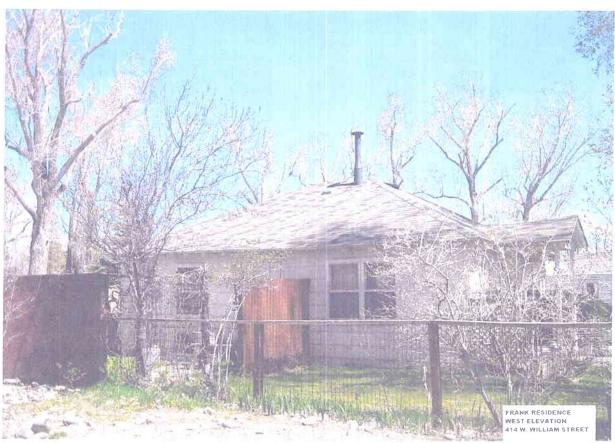
Deed releasing their title to the house. Also on November 18, 1986 did a Grant Bargain Sale Deed to myself and Brenda and we have lived in the house to the present time.

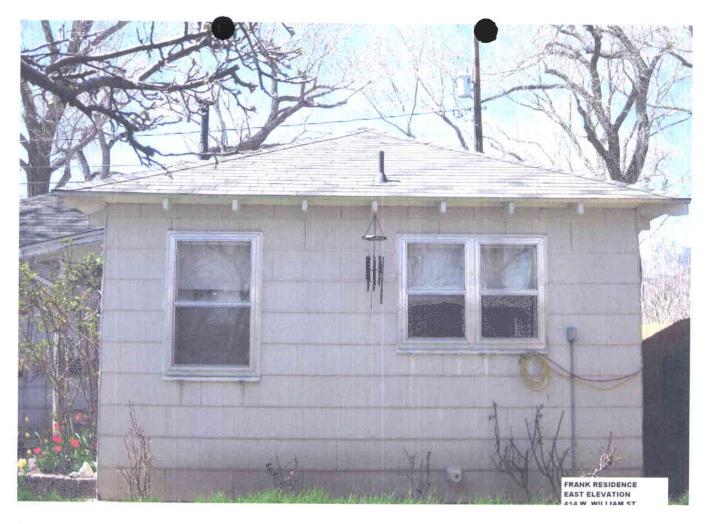
# **REASON FOR REQUEST**

The house was extensively renovated or completely rebuilt in the early forties/fifties. The original plumbing and electrical is still in the house. We are afraid that the wiring may go bad and cause a fire or the plumbing will start breaking. It would cost more to gut the house and do all new electrical and dig up and replace all the plumbing, and whatever else would have to be done. We request permission to demolish the existing house and start from ground up for safety reasons.

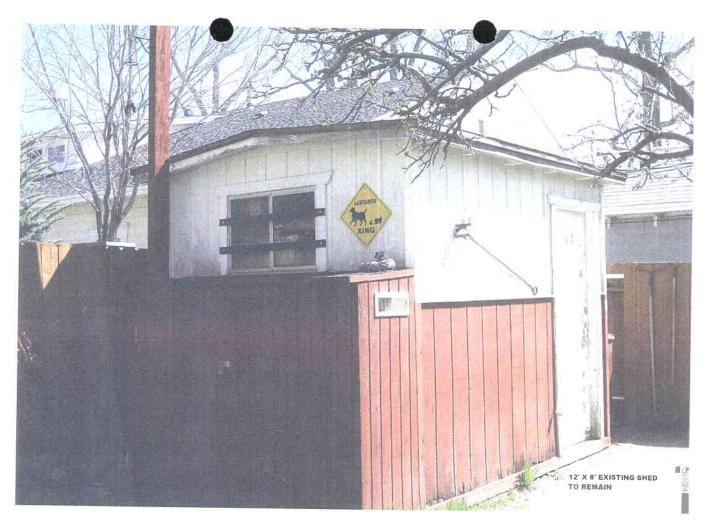






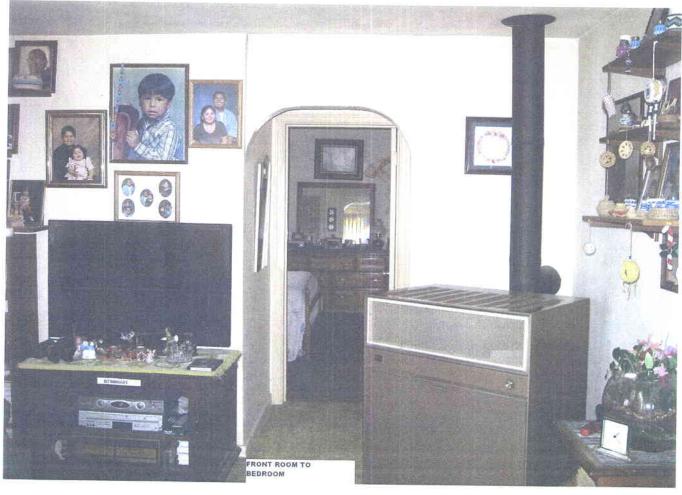


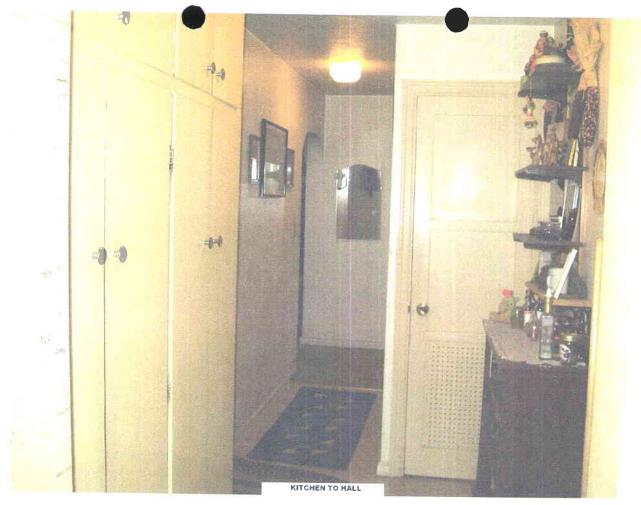












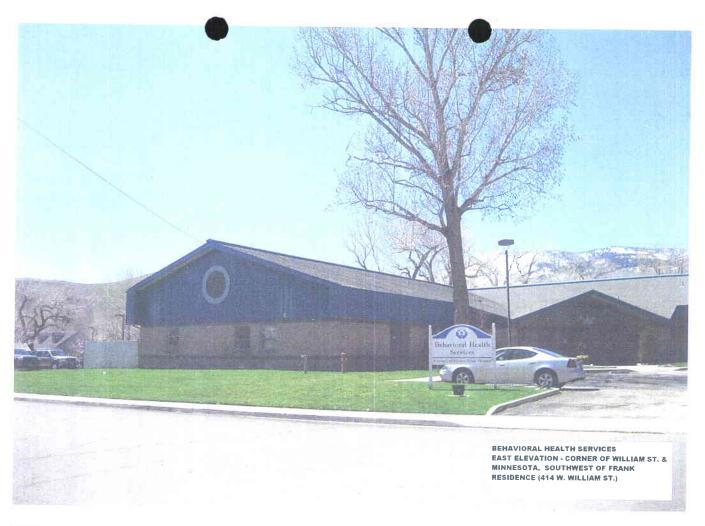
















John and Brenda Frank 414 West William Street Carson city, Nevada 89703 Phone: (775)882-3385

Fax: (115) 882-4794

April 15, 2010

Dr. Richard Long 1000 N. Division Street Carson City, NV 89703

Dear Sirs:

Our names are John and Brenda Frank. We live at 414 West William Street (corner of William & Minnesota). We would like to demolish our existing home and build a new home on our lot. Due to our being in the Historic District of Carson City we are asking for your approval for us to do this project as per the Historic Resource Commission protocol.

We would appreciate your support and thank you.

Please sign below.

If you	approve:	Richard D long	(1,000 N.	Division
If you	disapprove:			
Reason	why:			

John E. Frank, owner

Brenda S. Frank, owner

John and Brenda Frank 414 West William Street Carson city, Nevada 89703 Phone: (775)882-3385

Fax: (775) 882-4794

April 15, 2010

Mr. Doug Fenton 1010 N. Division Street Carson City, NV 89703

Dear Doug:

Our names are John and Brenda Frank. We live at 414 West William Street (corner of William & Minnesota). We would like to demolish our existing home and build a new home on our lot. Due to our being in the Historic District of Carson City we are asking for your approval for us to do this project as per the Historic Resource Commission protocol.

We would appreciate your support and thank you.

Please sign below.

Ιf	you	approve:	Douglas Fenton 4/16/10
Ιf	you	disapprove:	
Rea	son	why:	

John E. Frank, owner

Brenda S. Frank, owner

John and Branda Frank 414 West William Street Carson city, Nevada 89703 Phone: (775)882-3385

(115) 882-4794 Fax:

April 15, 2010

Carson Tahoe Behavioral Health Services William and Minnesota Streets Carson City, NV 89703

Dear Sirs:

Our names are John and Brenda Frank. We live at 414 West William Street (corner of William & Minnesota). We would like to demolish our existing home and build a new home on our lot. Due to our being in the Historic District of Carson City we are asking for your approval for us to do this project as per the Historic Resource Commission protocol.

We would appreciate your support and thank you.

Please sign below. If you approve: If you disapprove: Reason why:

John and Brenda Frank 414 West William Street Carson city, Nevada 89703 Phone: (775)882-3385 Fax: (775)882-4794

April 15, 2010

Center for Advanced Eyecare Dr. Matti Vazeen 1104 N. Division Street Carson City, NV 89703

Dear Sirs:

Our names are John and Brenda Frank. We live at 414 West William Street (corner of William & Minnesota). We would like to demolish our existing home and build a new home on our lot. Due to our being in the Historic District of Carson City we are asking for your approval for us to do this project as per the Historic Resource Commission protocol.

We would appreciate your support and thank you.

If you approve:

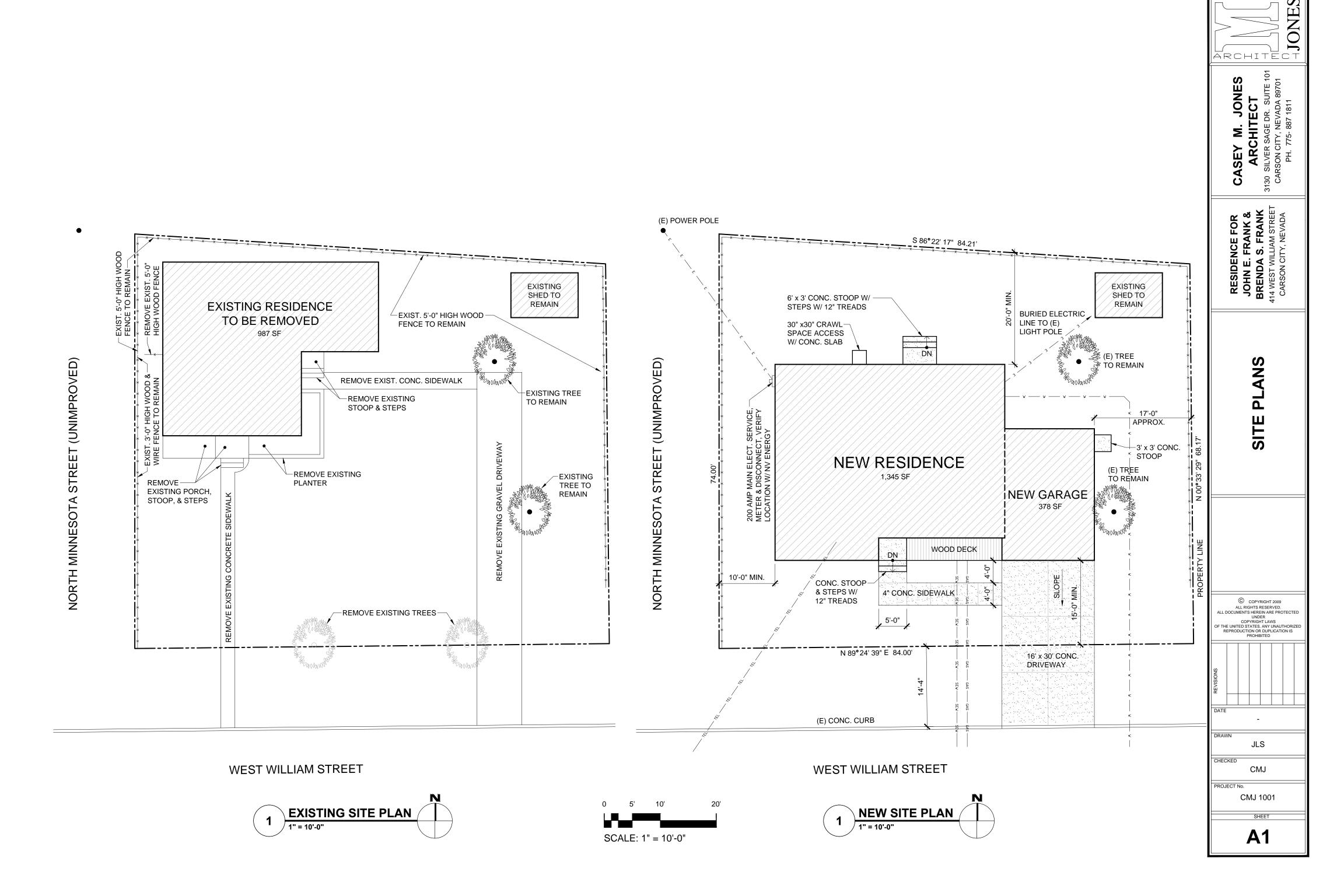
If you disapprove:

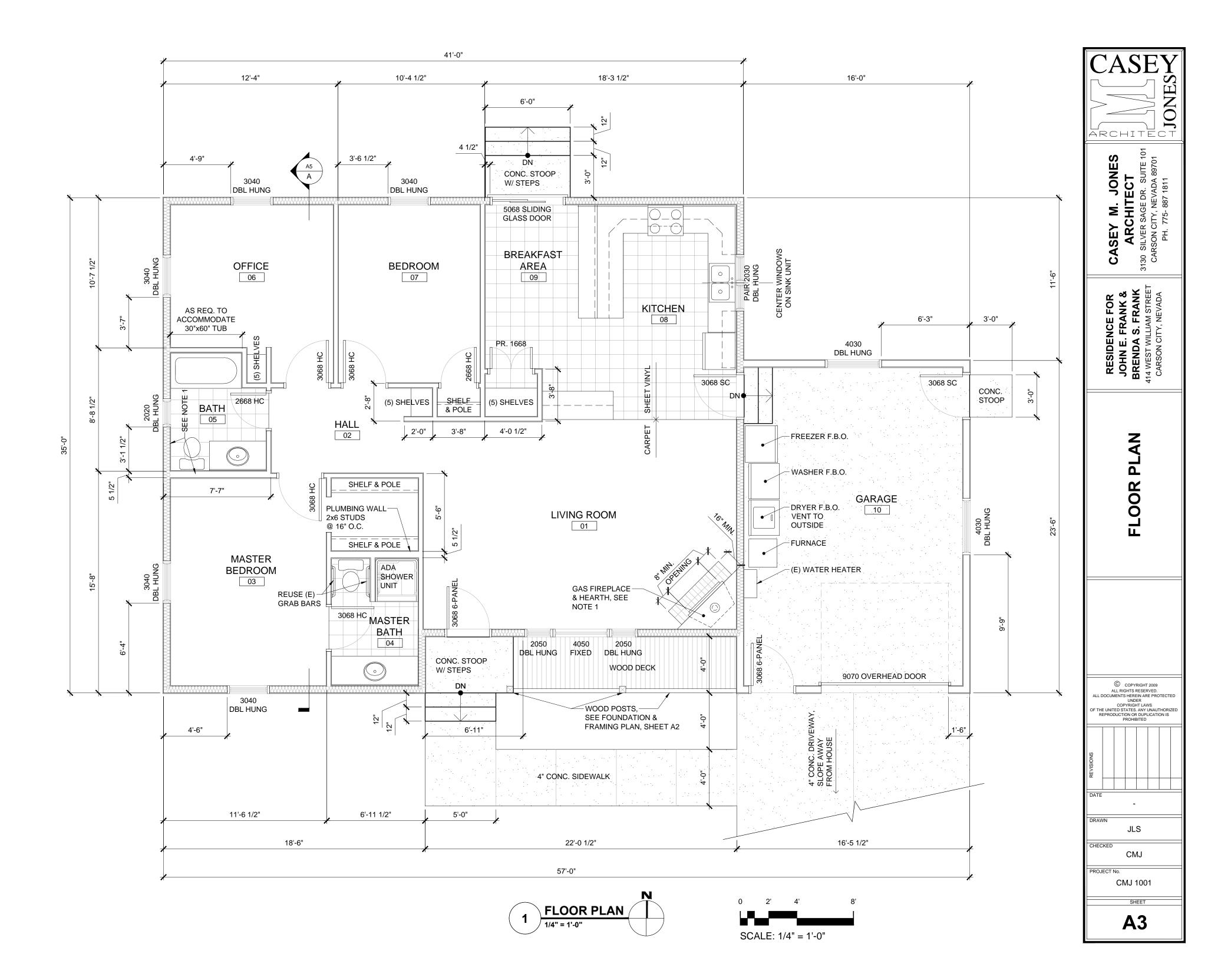
Reason why:

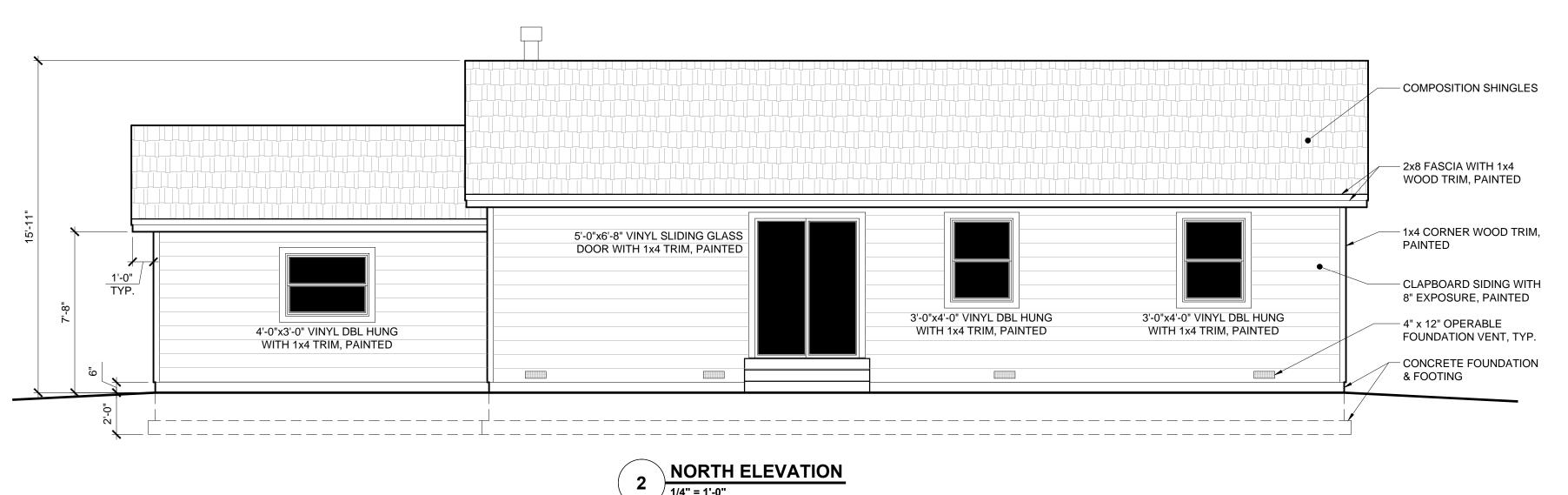
John E. Frank, cwner

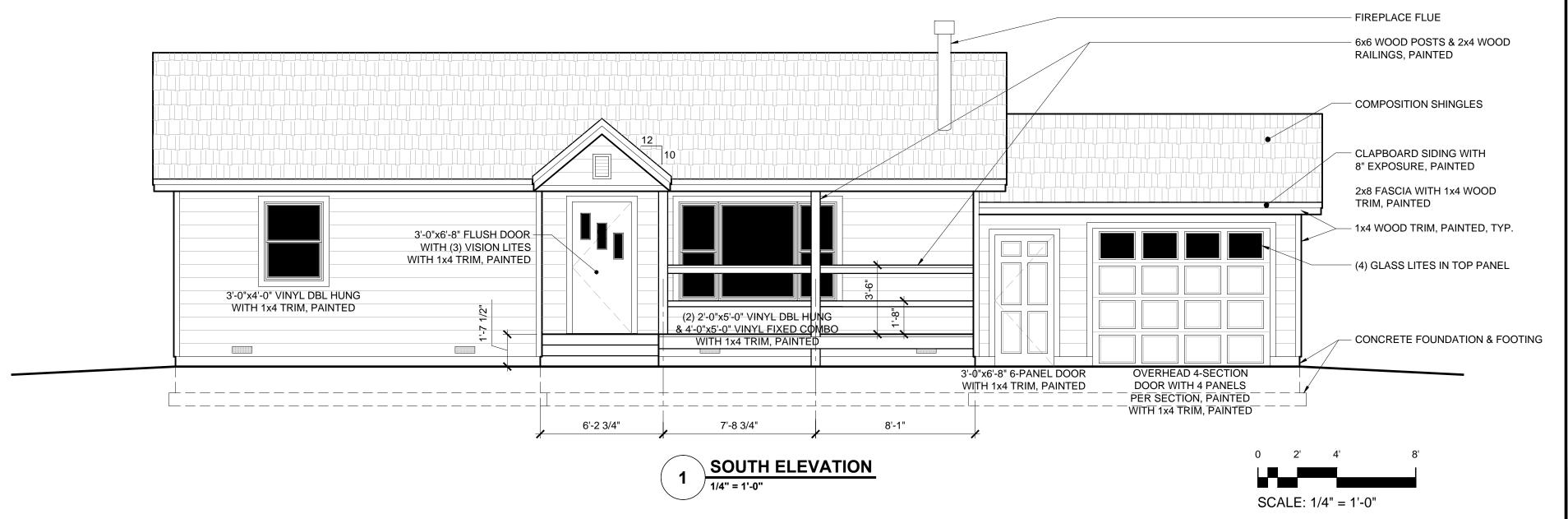
Reason below.

Sanda Jank



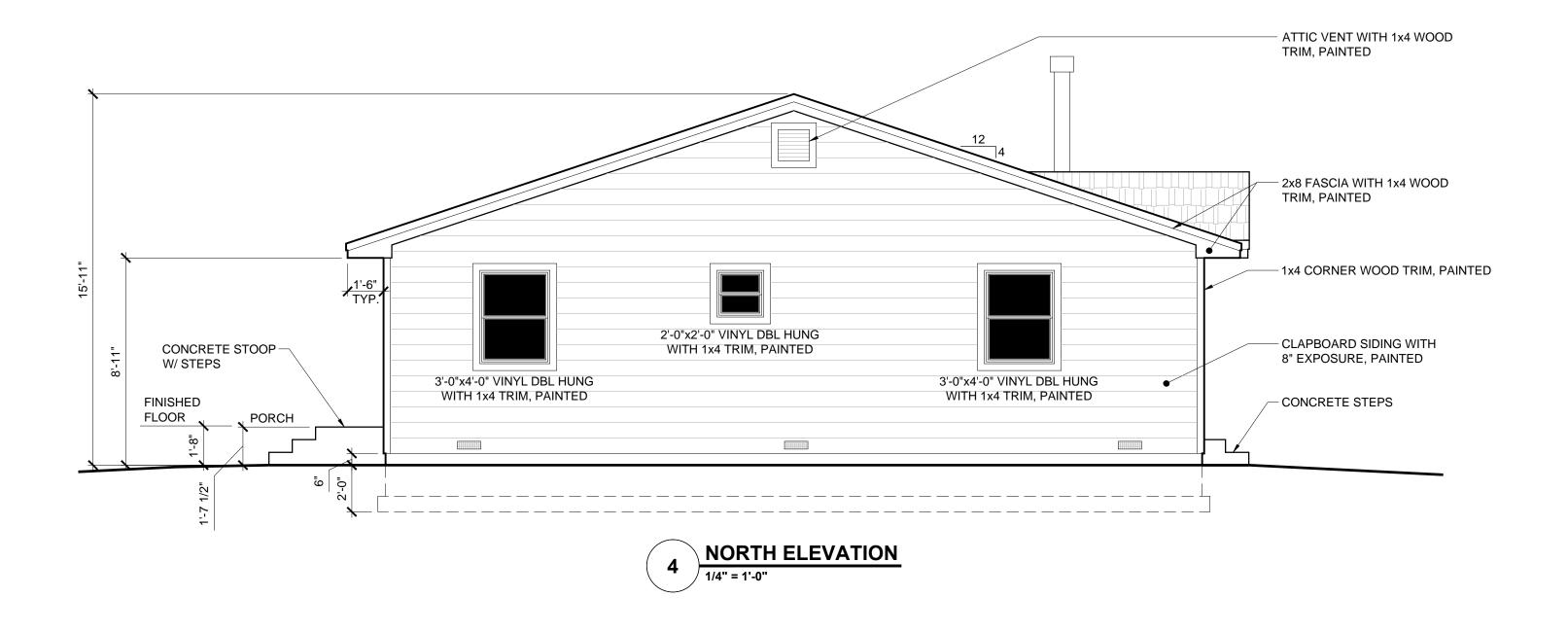


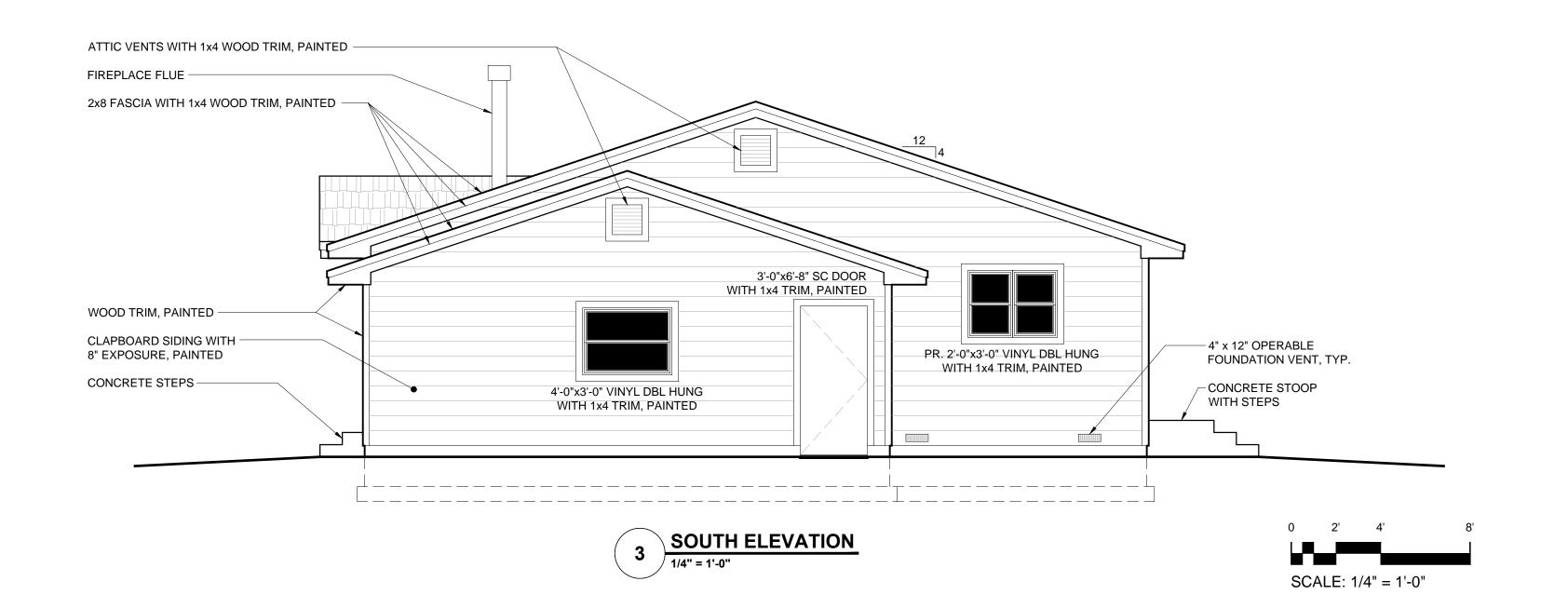


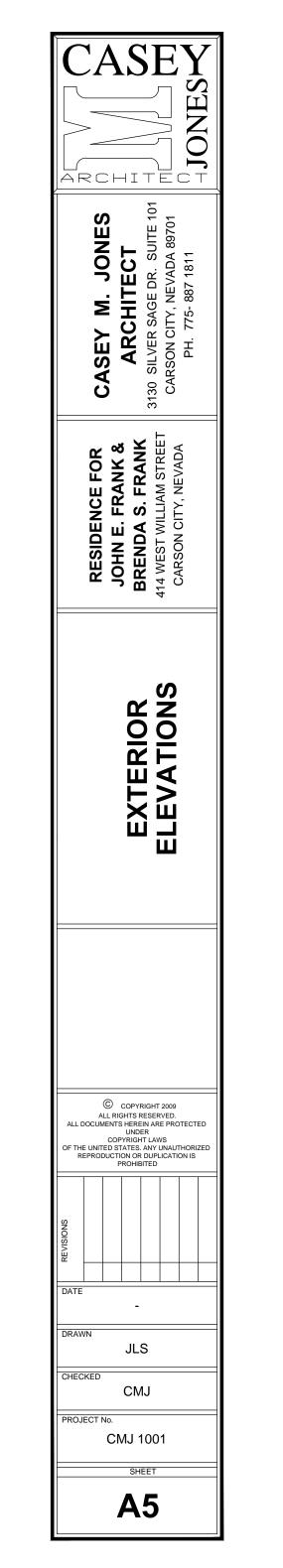


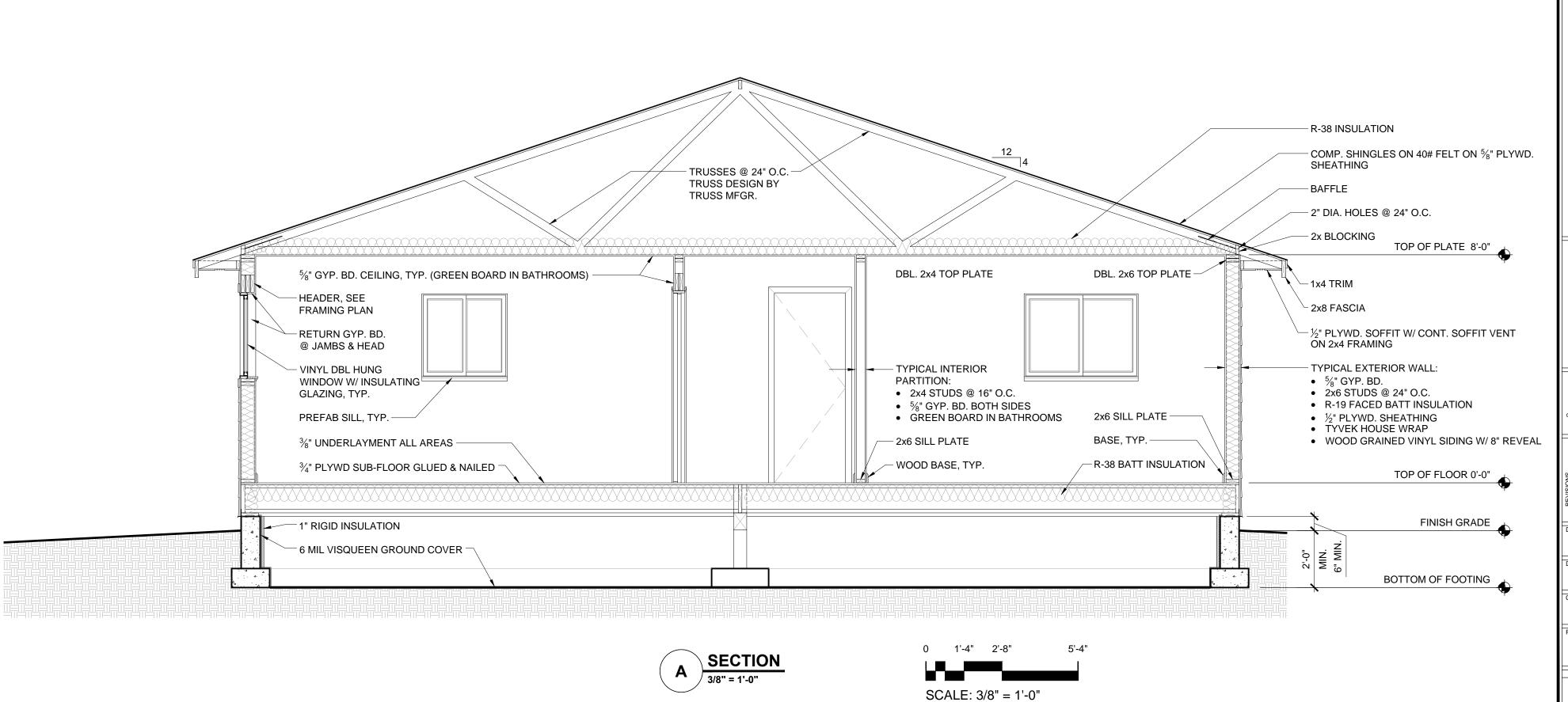


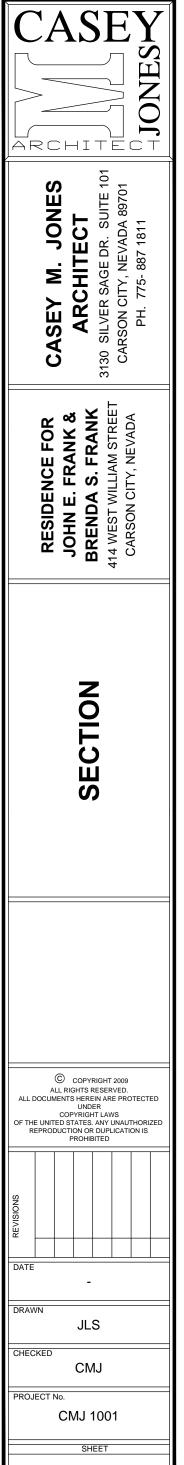
**A4** 











**A6**