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EXECUTIVE SUMMARY - ENFORCEMENT MATTER
DOCKET NO.: 2005-0825-PST-E TCEQ ID: RN101549178 CASE NO.: 25452
RESPONDENT NAME: GITA K. SAMADI DBA JOE'S COUNTRY STORE

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	

CASE TYPE:		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input checked="" type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION

SITE WHERE VIOLATION(S) OCCURRED: 7616 North Main Street, The Colony, Denton County

TYPE OF OPERATION: Convenience store with retail sales of gasoline

SMALL BUSINESS: Yes No

OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility

INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.

COMMENTS RECEIVED: The *Texas Register* comment period expired on June 8, 2007. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney: Ms. Kari L. Gilbreth, Litigation Division, MC 175, (512) 239-1320
 Ms. Jennifer Cook, Litigation Division, MC 175, (512) 239-1873

TCEQ Enforcement Coordinator: Mr. Michael Limos, Enforcement Division, Section III, MC 128, (512) 239-5839

TCEQ Regional Contact: Mr. Sam Barrett, DFW Regional Office, MC R- 4, (817) 588-5903

Respondent: Ms. Gita K. Samadi, President, Joe's Country Store, 7616 North Main Street, The Colony, Texas 75056

Respondent's Attorney: Mr. John A. Curtis, Attorney at Law, Law Offices of John A. Curtis, P.O. Box 7067,
 Dallas, TX 75209

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation:</p> <p><input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: August 4, 2003 and March 10, 2005</p> <p>Date(s) of NOV/NOE Relating to this Case: October 20, 2003 (NOV); March 17, 2005 (NOE)</p> <p>Background Facts: The EDRP was filed on November 21, 2005. This case was originally submitted as a Default Order and was remanded from the September 20, 2006 Agenda at the request of the Executive Director to assure proper notice because it was discovered that the EDRP was sent to an incorrect address. The EDFARP was filed on September 25, 2006. The Respondent signed the Agreed Order on April 13, 2007.</p> <p>PST</p> <p>Failed to demonstrate acceptable financial assurance for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of its petroleum underground storage tanks (USTs) [30 TEX. ADMIN. CODE § 37.815(a) and (b)].</p>	<p>Total Assessed: \$3,210</p> <p>Total Deferred: \$0</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid/Due to General Revenue: \$235/\$2,975</p> <p>The Respondent has paid \$235 of the administrative penalty. The remaining amount of \$2,975 of the administrative penalty shall be payable in 17 monthly payments of \$175 each.</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Action Taken:</p> <p>The Executive Director recognizes that the three underground storage tanks at the Facility were removed from the ground on February 3, 2006.</p>



DATES	Assigned	28-Mar-2005	Screening	06-May-2005	Priority Due	27-May-2005	EPA Due	
	PCW	24-Aug-2005						

RESPONDENT/FACILITY INFORMATION	
Respondent	Gita K. Samadi dba Joe's Country Store
Reg. Ent. Ref. No.	RN101549178
Facility/Site Region	04-Dallas/Ft Worth
Major/Minor Source	Minor Source

CASE INFORMATION			
Enf./Case ID No.	25452	No. of Violations	1
Docket No.	2005-0825-PST-E	Order Type	1660
Media Program(s)	Petroleum Storage Tank	Enf. Coordinator	Mike Limos
Multi-Media		EC's Team	Enforcement Team 8
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$3,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	7% Enhancement	Subtotals 2, 3, & 7	\$210
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Notes Enhancement for one NOV with the same or similar violations and one NOV for dissimilar violations.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes The respondent does not meet the culpability criteria.

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with a small x)

Notes The respondent does not meet the good faith criteria.

Economic Benefit	0% Enhancement	Subtotal 6	\$0
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Total EB Amounts	\$2,048	<i>*Capped at the Total EB \$ Amount</i>
Approx. Cost of Compliance	\$1,950	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$3,210
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OTHER FACTORS AS JUSTICE MAY REQUIRE		Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount	\$3,210
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STATUTORY LIMIT ADJUSTMENT		Final Assessed Penalty	\$3,210
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DEFERRAL	0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes No deferral is recommended because this is not an expedited settlement.

PAYABLE PENALTY	\$3,210
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Screening Date 06-May-2005

Docket No. 2005-0825-PST-E

PCW

Respondent Gita K. Samadi dba Joe's Country Store

Policy Revision 2 (September 2002)

Case ID No. 25452

PCW Revision May 03, 2005

Reg. Ent. Reference No. RN101549178

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Mike Limos

Compliance History Worksheet

>> **Compliance History Site Enhancement (Subtotal 2)**

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action <i>(number of NOVs meeting criteria)</i>	1	5%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability <i>(number of orders meeting criteria)</i>	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government <i>(number of judgements or consent decrees meeting criteria)</i>	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government <i>(number of counts)</i>	0	0%
Emissions	Chronic excessive emissions events <i>(number of events)</i>	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 <i>(number of audits for which notices were disclosed)</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 <i>(number of audits for which violations were disclosed)</i>	0	0%
Other	<i>Please Enter Yes or No</i>		
	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 7%

>> **Repeat Violator (Subtotal 3)**

No

Adjustment Percentage (Subtotal 3) 0%

>> **Compliance History Person Classification (Subtotal 7)**

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> **Compliance History Summary**

Compliance History Notes

Enhancement for one NOV with the same or similar violations and one NOV for dissimilar violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 7%

Screening Date 06-May-2005 **Docket No.** 2005-0825-PST-E **PCW**
Respondent Gita K. Samadi dba Joe's Country Store *Policy Revision 2 (September 2002)*
Case ID No. 25452 *PCW Revision May 03, 2005*
Reg. Ent. Reference No. RN101549178
Media [Statute] Petroleum Storage Tank
Enf. Coordinator Mike Limos

Violation Number
Primary Rule Cite(s) 30 TAC § 37.815(a) and (b)
Secondary Rule Cite(s)
Violation Description Failure to provide acceptable financial assurance for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases from the operation of petroleum USTs.
Base Penalty

>> Environmental, Property and Human Health Matrix

		Harm			
Release		Major	Moderate	Minor	
Actual	OR	<input type="text"/>	<input type="text"/>	<input type="text"/>	Percent <input type="text"/>
Potential		<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	
<input type="text"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text" value="10%"/>
Matrix Notes 100% of the rule requirement was not met.				

Adjustment
Base Penalty Subtotal

>> Violation Events

Number of Violation Events
mark only one use a small x

daily	<input type="text"/>
monthly	<input type="text"/>
quarterly	<input type="text"/>
semiannual	<input type="text"/>
annual	<input type="text"/>
single event	<input checked="" type="checkbox"/>

Violation Base Penalty

Three single events are recommended for the three tanks at the facility based upon a record review conducted on March 10, 2005.

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount **Violation Final Penalty Total**
This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent: Gita K. Samadi dba Joe's Country Store
Case ID No: 25452
Reg. Ent. Reference No: RN101549178
Media [Statute]: Petroleum Storage Tank
Violation No: 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs							

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	\$1,950	04-Aug-2002	04-Aug-2003	1.0	\$98	\$1,950	\$2,048
Other (as needed)				0.0	\$0	\$0	\$0
Notes for AVOIDED costs Estimated cost to provide financial assurance for three petroleum UST's (\$650 per tank). Date required (08/04/2002) is one year prior to the request to submit proof of financial assurance on 08/04/2003							

Approx. Cost of Compliance \$1,950

TOTAL \$2,048

Compliance History

Customer/Respondent/Owner-Operator: CN600816821 SAMADI, GITA K Classification: AVERAGE Rating: 5.00
 Regulated Entity: RN101549178 JOE'S COUNTRY STORE Classification: AVERAGE Site Rating: 5.00
 ID Number(s):
 Location: 7616 MAIN ST, THE COLONY, TX, 75056 Rating Date: September 01 04 Repeat Violator: NO
 TCEQ Region: REGION 04 - DFW METROPLEX
 Date Compliance History Prepared: May 05, 2005
 Agency Decision Requiring Compliance History: Enforcement
 Compliance Period: May 05, 2000 to May 05, 2005

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Mike Limos Phone: 512.239.5839

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? N/A
5. When did the change(s) in ownership occur? N/A

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

- 1 05/26/2000 (46795)
- 2 06/12/2000 (148518)
- 3 06/29/2000 (46793)
- 4 10/20/2003 (280639)
- 5 03/17/2005 (373776)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 06/12/2000 (148518)

Self Report? NO Classification: Major

Citation: 30 TAC Chapter 334, SubChapter C 334.50(b)(1)(A)

Description: Failure to provide proper release detection for UST system.

Self Report? NO Classification: Major

Citation: 30 TAC Chapter 334, SubChapter C 334.50(b)(2)(A)[G]

Description: Failure to provide proper release detection for the pressurized piping associated with UST systems.

Self Report? NO Classification: Major

Citation: 30 TAC Chapter 334, SubChapter A 334.7(d)(3)

Description: Failure to provide amended registration for change in ownership of UST

Self Report? NO Classification: Major

Citation: 30 TAC Chapter 334, SubChapter B 334.22(a)

Description: Failure to pay annual facility fees for UST's.

Self Report? NO Classification: Major

Citation: 2D TWC Chapter 26, SubChapter A 26.121[G]

Description: Allowing a discharge of waste into or adjacent to the waters in the State.

Date: 10/20/2003 (280639)

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 37, SubChapter I 37.815(a)[G]

Description: 30 TAC Chapter 37, SubChapter I 37.815(b)[G]
Failure to provide acceptable financial assurance.

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING GITA K. SAMADI
DBA JOE'S COUNTRY STORE;
RN101549178

§
§
§
§
§

BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

AGREED ORDER
DOCKET NO. 2005-0825-PST-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Gita K. Samadi dba Joe's Country Store ("Ms. Samadi") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, represented by the Litigation Division, and Ms. Samadi, represented by John A. Curtis of the Law Office of John Allen Curtis, appear before the Commission and together stipulate that:

1. Ms. Samadi owns a convenience store located at 7616 North Main Street, The Colony, Denton County, Texas (the "Facility"). The Facility had retail sales of gasoline at the time of the violation.
2. This Agreed Order is entered into pursuant to TEX. WATER CODE §§ 7.051 and 7.070. The Commission has jurisdiction of this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. WATER CODE ch. 26 and TCEQ rules.
3. The Commission and Ms. Samadi agree that the Commission has jurisdiction to enter this Agreed Order, and that Ms. Samadi is subject to the Commission's jurisdiction.
4. Ms. Samadi received notice of the violations alleged in Section II ("Allegations") on or about March 22, 2005.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Ms. Samadi of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of three thousand two hundred ten dollars (\$3,210.00) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Ms. Samadi has paid two hundred thirty-five dollars (\$235.00) of the

administrative penalty. The remaining amount of two thousand nine hundred seventy-five dollars (\$2,975.00) of the administrative penalty shall be payable in seventeen monthly payments of one hundred seventy-five dollars (\$175.00) each. The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If Ms. Samadi fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, including the payment schedule, the Executive Director may, at his option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, the failure of Ms. Samadi to meet the payment schedule of this Agreed Order constitutes the failure by Ms. Samadi to timely and satisfactorily comply with all of the terms of this Agreed Order.

7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Ms. Samadi have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that the three underground storage tanks at the Facility were removed from the ground on February 3, 2006.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Ms. Samadi has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

Ms. Samadi is alleged to have violated 30 TEX. ADMIN. CODE § 37.815(a) and (b) by failing to demonstrate acceptable financial assurance for taking corrective action and for compensating third parties for bodily injury and property damage caused by accidental releases arising from the operation of its petroleum underground storage tanks ("UST"s), as documented in a record review conducted on August 4, 2003.

III. DENIALS

Ms. Samadi generally denies each allegation in Section II ("Allegations").

IV. ORDER

1. It is, therefore, ordered by the TCEQ that Ms. Samadi pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Ms. Samadi's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from considering or requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "Texas Commission on Environmental Quality" and shall be sent with the notation "Re: Gita K. Samadi dba Joe's Country Store, Docket No. 2005-0825-PST-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon Ms. Samadi. Ms. Samadi is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Ms. Samadi in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Order to Ms. Samadi, or three days after the date on which the Commission mails notice of the Order to Ms. Samadi, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

Gita K. Samadi dba Joe's Country Store
TCEQ Docket No. 2005-082S-PST-E
Page 4

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Shreevan Reddy

For the Executive Director

6/20/07

Date

I, the undersigned, have read and understand the attached Agreed Order. I represent that I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Gita K Samadi

Signature

4-13-07

Date

GITA KIANI SAMADI

Name (Printed or typed)

PRESIDENT

Title

Authorized representative of

Gita K. Samadi dba Joe's Country Store