

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

DOCKET NO.: 2007-1037-MSW-E **TCEQ ID:** RN102784535 **CASE NO.:** 34148

RESPONDENT NAME: R. C. Smith Companies, Ltd.

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 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 checked="" type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Unauthorized Waste Site, 1594 Farm-to-Market 1795, Willis, San Jacinto County</p> <p>TYPE OF OPERATION: Transporting business</p> <p>SMALL BUSINESS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: One complaint was received on April 3, 2007, alleging that several 18-wheelers were observed hauling vegetative debris, from the Texas Department of Transportation highway construction project, to a neighboring property for disposal. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: A complaint was received but the complainant has not expressed the desire to protest this action or speak at Agenda.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on November 12, 2007. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Ms. Cynthia McKaughan, Enforcement Division, Enforcement Team 7, MC 128, (512) 239-0735; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171 Respondent: Mr. Gene Smith, Owner, R. C. Smith Companies, Ltd., P.O. Box 691, Conroe, Texas 77305 Mr. Jeff Smith, Vice President, R. C. Smith Companies, Ltd., P.O. Box 691, Conroe, Texas 77305 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED <small>(000) X</small>
<p>Type of Investigation: <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date of Complaint Relating to this Case: April 3, 2007</p> <p>Date of Investigation Relating to this Case: April 5, 2007</p> <p>Date of NOE Relating to this Case: June 5, 2007 (NOE)</p> <p>Background Facts: This was a complaint investigation concerning the unauthorized disposal of municipal solid waste. One significant violation was observed.</p> <p>WASTE</p> <p>Failure to prevent the transportation of municipal solid waste (MSW) for disposal at an unauthorized facility. Specifically, the Respondent hauled approximately 5,600 cubic yards of MSW from March 25, 2007 through April 5, 2007, to an unauthorized disposal site, located at 1594 Farm-to-Market Road 1795, in Willis, San Jacinto County, Texas [30 TEX. ADMIN. CODE § 330.15(c)].</p>	<p>Total Assessed: \$2,250</p> <p>Total Deferred: \$450 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$1,800</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input 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 Actions Taken:</p> <p>The Executive Director recognizes that on July 16, 2007, the Respondent implemented corrective procedures by directing their truck drivers that MSW must be disposed at a facility authorized by the TCEQ and posting the relevant TCEQ rules in their transport truck.</p>

Additional ID No(s): None



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision June 26, 2007

DATES	Assigned	11-Jun-2007	Screening	3-Jul-2007	EPA Due	
	PCW	11-Jul-2007				

RESPONDENT/FACILITY INFORMATION			
Respondent	R. C. Smith Companies, Ltd.		
Reg. Ent. Ref. No.	RN102784535		
Facility/Site Region	10-Beaumont	Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	34148	No. of Violations	1
Docket No.	2007-1037-MSW-E	Order Type	1660
Media Program(s)	Municipal Solid Waste	Enf. Coordinator	Cynthia McKaughan
Multi-Media		EC's Team	Enforcement Team 7
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) *Subtotal 1* **\$2,500**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History 0% Enhancement *Subtotals 2, 3, & 7* **\$0**

Notes: There were no previous NOV's for the same or similar violations.

Culpability No 0% Enhancement *Subtotal 4* **\$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply 10% Reduction *Subtotal 5* **\$250**

	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with x)

Notes: The Respondent came into compliance on July 16, 2007.

Total EB Amounts \$7 **0% Enhancement*** *Subtotal 6* **\$0**
 *Capped at the Total EB \$ Amount
Approx. Cost of Compliance \$500

SUM OF SUBTOTALS 1-7 *Final Subtotal* **\$2,250**

OTHER FACTORS AS JUSTICE MAY REQUIRE *Adjustment* **\$0**

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

Final Penalty Amount **\$2,250**

STATUTORY LIMIT ADJUSTMENT *Final Assessed Penalty* **\$2,250**

DEFERRAL 20% Reduction *Adjustment* **-\$450**

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **\$1,800**

Screening Date	3-Jul-2007	Docket No.	2007-1037-MSW-E	PCW
Respondent	R. C. Smith Companies, Ltd.	<i>Policy Revision 2 (September 2002)</i>		
Case ID No.	34148	<i>PCW Revision June 26, 2007</i>		
Reg. Ent. Reference No.	RN102784535			
Media [Statute]	Municipal Solid Waste			
Enf. Coordinator	Cynthia McKaughan			

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>	0	0%
	Other written NOVs	0	0%
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 submitted)</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%
<i>Please Enter Yes or No</i>			
Other	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) 0%

>> Repeat Violator (Subtotal 3)

N/A	Adjustment Percentage (Subtotal 3) 0%
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>> Compliance History Person Classification (Subtotal 7)

N/A	Adjustment Percentage (Subtotal 7) 0%
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>> Compliance History Summary

Compliance History Notes	There were no previous NOVs for the same or similar violations.
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Total Adjustment Percentage (Subtotals 2, 3, & 7) 0%

Screening Date 3-Jul-2007 **Docket No.** 2007-1037-MSW-E **PCW**
Respondent R. C. Smith Companies, Ltd. *Policy Revision 2 (September 2002)*
Case ID No. 34148 *PCW Revision June 26, 2007*
Reg. Ent. Reference No. RN102784535
Media [Statute] Municipal Solid Waste
Enf. Coordinator Cynthia McKaughan

Violation Number
Rule Cite(s)
Violation Description

Base Penalty

>> Environmental, Property and Human Health Matrix

OR

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input checked="" type="text" value="X"/>	<input type="text"/>	<input type="text" value="25%"/>
Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0%"/>

Matrix Notes

Adjustment

Violation Events

Number of Violation Events Number of violation days

mark only one with an x

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

Violation Base Penalty

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount <input type="text" value="\$7"/>	Violation Final Penalty Total <input type="text" value="\$2,250"/>
This violation Final Assessed Penalty (adjusted for limits) <input type="text" value="\$2,250"/>	

Economic Benefit Worksheet

Respondent R. C. Smith Companies, Ltd.
Case ID No. 34148
Reg. Ent. Reference No. RN102784535
Media Municipal Solid Waste
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)	\$500	5-Apr-2007	16-Jul-2007	0.3	\$7	n/a	\$7

Notes for DELAYED costs

Estimated cost to develop and implement procedures to ensure that all wastes are transported to authorized facilities. The Date Required is the investigation date and the Final Date is the date of compliance.

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]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$500

TOTAL

\$7

Compliance History

Customer/Respondent/Owner-Operator:	CN603213604 R. C. Smith Companies, Ltd.	Classification:	Rating:
Regulated Entity:	RN102784535 SMITH & COMPANY	Classification:	Site Rating:
ID Number(s):	_____		
Location:	FM 1485, CONROE, TX, 77305		
TCEQ Region:	REGION 12 - HOUSTON		
Date Compliance History Prepared:	July 19, 2007		
Agency Decision Requiring Compliance History:	Enforcement		
Compliance Period:	July 19, 2002 to July 19, 2007		
TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History			
Name:	Cynthia McKaughan	Phone:	(512) 239-0735

Site Compliance History Components

- | | |
|--|-----|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | No |
| 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 06/05/2007 (559065)
 - E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
 - 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

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
R. C. SMITH COMPANIES, LTD.
RN102784535**

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**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2007-1037-MSW-E**

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding R. C. Smith Companies, Ltd. ("Smith & Company") under the authority of TEX. HEALTH & SAFETY CODE ch. 361 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and Smith & Company appear before the Commission and together stipulate that:

1. Smith & Company owns and operates a transporting business at Farm-to-Market (FM) Road 1485 in Conroe, Montgomery County, Texas (the "Operation"), which transported municipal solid waste from Highway 150, near Coldspring, San Jacinto County, Texas to an unauthorized site located at 1594 FM 1795, in Willis, San Jacinto County, Texas.
2. The Operation involves or involved the management of municipal solid waste as defined in TEX. HEALTH & SAFETY CODE ch. 361.
3. The Commission and Smith & Company agree that the Commission has jurisdiction to enter this Agreed Order, and that Smith & Company is subject to the Commission's jurisdiction.
4. Smith & Company received notice of the violations alleged in Section II ("Allegations") on or about June 10, 2007.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Smith & Company of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Two Thousand Two Hundred Fifty Dollars (\$2,250) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations").

Smith & Company has paid One Thousand Eight Hundred Dollars (\$1,800) of the administrative penalty and Four Hundred Fifty Dollars (\$450) is deferred contingent upon Smith & Company's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Smith & Company fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Smith & Company to pay all or part of the deferred penalty.

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 Smith & Company 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 on July 16, 2007, Smith & Company implemented corrective procedures by directing their truck drivers that municipal solid waste must be disposed at a facility authorized by the TCEQ and posting the relevant TCEQ rules in their transport trucks.
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 Smith & Company 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

As owner of the Operation, Smith & Company is alleged to have failed to prevent the transportation of municipal solid waste for disposal at an unauthorized facility in violation of 30 TEX. ADMIN. CODE § 330.15(c), as documented during an investigation conducted on April 5, 2007. Specifically, Smith & Company hauled approximately 5,600 cubic yards of municipal solid waste from March 25, 2007 through April 5, 2007, to an unauthorized disposal site, located at 1594 FM 1795, in Willis, San Jacinto County, Texas.

III. DENIALS

Smith & Company generally denies each allegation in Section II ("Allegations").

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the success of any business and for the protection of the interests of all stakeholders involved. The document outlines the various methods and tools that can be used to ensure the accuracy and reliability of financial data.

In addition, the document highlights the need for transparency and accountability in financial reporting. It stresses that clear and concise communication of financial information is crucial for building trust and confidence among investors, creditors, and other interested parties. The document provides guidance on how to structure financial reports and how to present the data in a way that is easy to understand and interpret.

Furthermore, the document discusses the role of internal controls in ensuring the integrity of financial data. It explains that internal controls are a set of policies and procedures designed to prevent and detect errors and fraud. The document provides a detailed overview of the various types of internal controls that can be implemented, such as segregation of duties, authorization requirements, and regular reconciliations.

Finally, the document concludes by emphasizing the importance of ongoing monitoring and evaluation of financial reporting processes. It notes that the financial reporting environment is constantly evolving, and businesses must stay up-to-date on the latest developments and best practices. The document encourages businesses to regularly review and update their financial reporting policies and procedures to ensure they remain effective and relevant.

The document also includes a section on the importance of data security and privacy. It discusses the various risks associated with data breaches and the steps that can be taken to minimize these risks. The document provides a comprehensive overview of data security best practices, including the use of encryption, access controls, and regular security audits.

In conclusion, the document provides a thorough and practical guide to financial reporting and internal controls. It covers all the key aspects of financial reporting, from record-keeping to transparency, internal controls, and data security. The document is a valuable resource for any business looking to improve its financial reporting practices and ensure the accuracy and integrity of its financial data.

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Smith & Company pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Smith & Company'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 requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: R. C. Smith Companies, Ltd., Docket No. 2007-1037-MSW-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 Smith & Company. Smith & Company 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 Smith & Company 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), the effective date is the date of hand-delivery of the Order to Smith & Company, or three days after the date on which the Commission mails notice of the Order to Smith & Company, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director


Date 11/16/2007

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity 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 failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- 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;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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



Signature

Date 9-7-07

JEFF SMITH
Name (Printed or typed)
Authorized Representative of
R. C. Smith Companies, Ltd.

Vice President
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

Handwritten text at the top of the page, possibly a header or title, which is mostly illegible due to fading.

Second section of handwritten text, appearing as several lines of a letter or document.

Third section of handwritten text, continuing the main body of the document.

Fourth section of handwritten text, located in the lower middle part of the page.

Fifth section of handwritten text at the bottom of the page, possibly a signature or closing.