

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
- vs -)	PCB No. 05-28
)	(Enforcement - Air)
COLOR COMMUNICATIONS, INC., an Illinois)	
corporation,)	
)	
Respondent.)	

NOTICE OF FILING


TO: See Attached Service List
(VIA ELECTRONIC FILING)

PLEASE TAKE NOTICE that today I have filed with the Office of the Clerk of the Illinois Pollution Control Board by electronic filing the following Stipulation and Proposal for Settlement and Motion to Request Relief from Hearing Requirement, copies of which are attached and hereby served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General
State of Illinois

BY: 
PAULA BECKER WHEELER
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
Chicago, Illinois 60601
312-814-1511

DATE: September 16, 2005

THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST

Bradley Halloran
Hearing Officer
100 West Randolph Street
11th Floor
Chicago, IL. 60601

Mr. Karl Karg
Latham & Watkins
Sears Tower, Suite 5800
233 S. Wacker Drive
Chicago, IL 60606

Mr. William Seith
Attorney at Law
631 E. Butterfield Road
Suite 315
Lombard, IL 60148

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
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Complainant,)	
)	
vs.)	
)	PCB 05-28
COLOR COMMUNICATIONS, INC., an Illinois)	
corporation,)	(Enforcement - Air)
)	
Respondent.)	

MOTION TO REQUEST RELIEF FROM HEARING REQUIREMENT

NOW COMES the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, and requests relief from the hearing requirement in the above-captioned matter. In support thereof, the Complainant states as follows:

1. On August 13, 2004, a Complaint was filed with the Pollution Control Board ("Board") in this matter. On September 16, 2005, a Stipulation and Proposal for Settlement was filed with the Board.
2. Section 31(c)(2) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(c)(2), (2004), allows the parties in certain enforcement cases to request relief from the mandatory hearing requirement where the parties have submitted to the Board a stipulation and proposal for settlement. Section 31(c)(2) provides:

Notwithstanding the provisions of subdivision (1) of this subsection (c), whenever a complaint has been filed on behalf of the Agency or by the People of the State of Illinois, the parties may file with the Board a stipulation and proposal for settlement accompanied by a request for relief from the requirement of a hearing pursuant to subdivision (1). Unless the Board, in its discretion, concludes that a hearing will be held, the Board shall cause notice of the stipulation, proposal and request for relief to be published and sent in the same manner as is required for hearing pursuant to subdivision (1) of this subsection. The notice shall include a statement that any person may file a written demand for hearing within 21 days after receiving the notice. If any person files a timely written demand for hearing, the Board shall deny the request for relief from a hearing and shall hold a hearing in accordance with the provisions of subdivision (1).

3. No hearing is currently scheduled in the instant case.
4. The Complainant requests the relief conferred by Section 31(c)(2) of the Act.

WHEREFORE, the Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, requests relief from the requirement of a hearing pursuant to 415 ILCS 5/31(c)(2), (2004).

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

LISA MADIGAN
Attorney General of the State of Illinois

By: *Paula Becker Wheeler*

PAULA BECKER WHEELER
Assistant Attorney General

Environmental Bureau
188 W. Randolph St., 20th Fl.
Chicago, Illinois 60601
(312) 814-1511

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
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 Complainant,)
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) PCB 05-28
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 v.) (Enforcement - Air)
)
)
 COLOR COMMUNICATIONS, INC., an)
 Illinois corporation)
)
 Respondent.)

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by LISA MADIGAN, Attorney General of the State of Illinois, the Illinois Environmental Protection Agency ("Illinois EPA"), and COLOR COMMUNICATIONS, INC., ("Respondent" and/or "Color Communications"), have agreed to the making of this Stipulation and Proposal for Settlement ("Stipulation") and submit it to the Illinois Pollution Control Board ("Board") for approval. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a hearing were held. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and that neither the fact that a party has entered into this Stipulation, nor any of the facts stipulated herein, shall be introduced into evidence in any other proceeding regarding the claims asserted in the Complaint except as otherwise provided herein. If the Board

approves and enters this Stipulation, Respondent agrees to be bound by the Stipulation and Board Order and not to contest their validity in any subsequent proceeding to implement or enforce their terms.

I. JURISDICTION

The Board has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 et seq. (2002).

II. AUTHORIZATION

The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it.

III. STATEMENT OF FACTS

A. Parties

1. On August 13, 2004, a Complaint was filed on behalf of the People of the State of Illinois by Lisa Madigan, Attorney General of the State of Illinois, on her own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31(2002), against the Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2002).

3. At all times relevant to the Complaint, Respondent was and is an Illinois corporation that is authorized to transact business in the State of Illinois.

B. Site Description

1. At all times relevant to the Complaint, Respondent owned and operated two facilities located at 4000 W. Fillmore and 4242 W. Fillmore, Chicago, Cook County, Illinois ("Site").

2. The 4000 W. Fillmore facility and the 4242 W. Fillmore facility are adjacent to one another and are considered to be a single source of air emissions for the purposes of the Clean Air Act Permit Program ("CAAPP") administered and enforced by Illinois EPA.

3. Color Communications is engaged in the manufacture of customized color display systems such as color books and cards, color selection books, and swatch cards and showroom books for the automotive, decorative fabric, furniture, paint, paper, plastic laminate, textile, wall covering, and window treatment industries.

4. Operation of the air emission sources and control equipment at the 4000 W. Fillmore and 4242 W. Fillmore facilities was and is authorized pursuant to CAAPP permit 95090040 issued to Color Communications by Illinois EPA on November 1, 1999 and revised on June 25, 2001 ("CAAPP Permit 95090040").

C. Allegations of Non-Compliance

1. Allegations alleged in the Complaint

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

- Count I: FAILURE TO MAINTAIN AND OPERATE PERMANENT TOTAL ENCLOSURE AND ACHIEVE REQUIRED CONTROL EFFICIENCY ON COATING LINE #3, in violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2002) and Section 218.207(b) (1) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 218.207(b) (1);
- Count II: FAILURE TO REPORT NONCOMPLIANCE ON COATING LINE #3, in violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2002) and Section 218.211(e) (3) (A) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 218.211(e) (3) (A);
- Count III: FAILURE TO PROVIDE AN ERMS ACCOUNT OFFICER AND CERTIFY ERMS SUBMITTALS, in violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2002) and Section 205.620(a) of the Board's Air Pollution Regulations, 35 Ill. Adm. Code 205.620(a);
- Count IV: VIOLATIONS OF THE CAAPP PERMIT RELATING TO THE FLEXOGRAPHIC PRINTING LINES, in violation of Section 39.5(6) (a) of the Act, 415 ILCS 5/39.5(6) (a) (2002) and Conditions 7.3.6 and 7.3.10(b) of CAAPP permit 95090040 issued to Color Communications, effective November 1, 1999, and revised, effective June 25, 2001;
- Count V: VIOLATIONS OF THE CAAPP PERMIT RELATING TO COATING LINE #3, REPORTING, AND THE ERMS ACCOUNT OFFICER, in violation of Section 39.5(6) (a) of the Act, 415 ILCS 5/39.5(6) (a) (2002), and Conditions 7.1.3(c), 7.1.5(b), (c), (e), 7.1.6(f), 7.1.10(a), 8.6.1, 9.8 and 6.4(c) of CAAPP permit 95090040.

2. Additional Alleged Violations

a. On October 27, 2004, the Illinois EPA issued a Violation Notice letter to the Respondent informing it of reporting and record-keeping violations of the CAAPP permit and Board regulations. The letter advised Respondent that it was in apparent violation of the following environmental statutes and regulations:

i. Sections 9(a) and 39.5(6)(a) of the Act: violations of CAAPP Permit No. 95090040, Condition 6.6(a);

ii. Sections 9(a) and 39.5(6)(a) of the Act and 35 Ill. Adm. Code 205.300(b): violations of CAAPP Permit No. 95090040, Condition 6.7(a);

iii. Sections 9(a) and 39.5(6)(a) of the Act and 35 Ill. Adm. Code 205.150(c) : violations of CAAPP Permit No. 95090040, Condition 6.3(a); and

iv. Sections 9(a) and 39.5(6)(a) of the Act: violations of CAAPP Permit No. 95090040 Conditions 7.1.9(b), 7.2.12, 7.4.9, 8.6.1, and 9.2.1;

b. It is the parties' intent that all of these alleged violations of the Act, the Board's Air Pollution regulations, 35 Ill. Adm. Code Subtitle B, and the Respondent's CAAPP Permit No. 95090040 be resolved through this Stipulation and Proposal for Settlement.

D. Admission of Violations

The Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested

litigation. By entering into this Stipulation and complying with its terms, the Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section III.C herein, and this Stipulation shall not be interpreted as including such admission.

IV. APPLICABILITY

This Stipulation shall apply to and be binding upon the Complainant and the Respondent, and any officer, director, agent, or employee of the Respondent, as well as any successors or assigns of the Respondent. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation.

V. COMPLIANCE WITH OTHER LAWS AND REGULATIONS

This Stipulation in no way affects the responsibilities of the Respondent to comply with any other federal, state or local laws or regulations including, but not limited to, the Act and the Board regulations, 35 Ill. Adm. Code, Subtitles A through H.

VI. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2002), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the parties state the following:

1. Complainant contends and Respondent denies that human health and the environment were threatened and the Illinois EPA's information gathering responsibilities were hindered by the Respondent's alleged violations.

2. The manufacturing facilities that are the subject of the Complaint have social and economic value.

3. The manufacturing facilities that are the subject of the Complaint are suitable to the areas in which they are located.

4. Compliance with the requirements of the Act, the Board Air Pollution Regulations and the CAAPP Permit 95090040 is both technically practicable and economically reasonable for the Respondent.

5. Complainant states that Respondent has subsequently complied with the Act, the Board Regulations, and its CAAPP Permit 95090040.

VII. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (eff. 01/01/2004), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;

6. whether the respondent voluntarily self-disclosed, in accordance with subsection I of this Section, the non-compliance to the Agency; and
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform.

In response to these factors, the parties state as follows:

1. The violations that are the subject of the Complaint are alleged by Complainant to have occurred over various time frames, the longest being approximately 5 years. Respondent maintains that the longest time frame for any of the alleged violations was no more than 2 months. The parties agree that all alleged violations were resolved by the Respondent within a short time of being notified by the Complainant.

2. Respondent was diligent in attempting to come back into compliance with the Act, Board regulations and its applicable CAAPP permit, once the Illinois EPA notified it of its noncompliance.

3. The Respondent may have accrued a nominal economic benefit by avoiding timely repair of equipment, the timely appointment of the ERMS Officer, and the failure to demonstrate compliance with all air emission requirements. The parties stipulate that the payment amount agreed to herein is greater than the total economic benefit arising from delayed and/or avoided costs.

4. Complainant has determined, based upon the specific facts of this matter, that a payment of \$90,000 will serve to deter future violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Respondent has one prior case which was settled with a Consent Order in 2002, which included violations for failing to obtain operating permits, failing to comply with emission limitations, and failing to comply with reporting, certification and record-keeping requirements. The case number for the above Consent Order is 99 C 4489, and the case was filed in the United States District Court, for the Northern District of Illinois, Eastern Division.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

VIII. TERMS OF SETTLEMENT

A. Monetary Payment

1. The Respondent shall pay the sum of Ninety Thousand Dollars (\$90,000.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation. The Respondent stipulates that payment has been tendered to Respondent's attorney of record in this matter in a form acceptable to that attorney. Further, Respondent stipulates that said attorney has been directed to make the penalty payment on behalf of

Respondent, Respondent shall pay within thirty (30) days from the date the Board adopts and accepts this Stipulation, in a manner prescribed below. The payment described in this Stipulation shall be made by certified check, money order or electronic funds transfer payable to the Illinois EPA, designated to the Illinois Environmental Protection Trust Fund and submitted to:

Illinois Environmental Protection Agency
Fiscal Services Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

The name and number of the case and Respondent's Federal Employer Identification Number (FEIN), shall appear on the check. A copy of the certified check, money order or record of electronic funds transfer and any transmittal letter shall be sent to:

Paula Becker Wheeler
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
Chicago, Illinois 60601

Robb Layman
Assistant Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

2. Pursuant to Section 42(g) of the Act, 415 ILCS 5/42(g) (2002), interest shall accrue on any payment not paid within the time period prescribed above at the maximum rate allowable under Section 1003(a) of the Illinois Income Tax Act, 35 ILCS 5/1003 (2002). Interest on any unpaid payment shall begin to accrue

from the date the payment is due and continue to accrue until the date payment is received. When partial payment(s) are made, such partial payment shall be first applied to any interest on unpaid payment then due and owing. All interest on payment owed shall be paid by certified check, money order or electronic funds transfer, payable to the Illinois EPA, designated to the Illinois Environmental Protection Trust Fund and delivered to the address and in the manner described above.

3. For purposes of payment and collection, Respondent may be reached at the following address:

Steve Winter
President
Color Communications, Inc.
4000 West Fillmore Street
Chicago, IL 60624-3905

4. In the event of default of this Section VIII.A, the Complainant shall be entitled to all available relief including, but not limited to, reasonable costs of collection and reasonable attorney's fees.

B. Payments Not Deductible

The Parties agree that any payments made pursuant to this Stipulation shall not be tax deductible, and the Defendant agrees that it shall make no claim of deductibility in filing any tax return.

C. Future Use

Notwithstanding any other language in this Stipulation to the contrary, and in consideration of the mutual promises and conditions contained in this Stipulation, including the Release from Liability contained in Section VIII.E, below, the Respondent hereby agrees that this Stipulation may be used against the Respondent in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations promulgated thereunder for all violations alleged in the Complaint in this matter, for purposes of Section 39(a) and (I) and/or 42(h) of the Act, 415 ILCS 5/39(a) and(I) and/or 5/42(h) (2002). Further, Respondent agrees to waive any rights to contest, in any subsequent enforcement action or permit proceeding, any allegations that these alleged violations were adjudicated.

D. Cease and Desist

The Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint as outlined in Section III.C ("Allegations of Non-Compliance") of this Stipulation.

E. Release from Liability

In consideration of the Respondent's payment of the \$90,000.00 and any costs and accrued interest specified in Section VIII.A, to Cease and Desist as contained in Section

VIII.D and upon the Pollution Control Board's acceptance and approval of the terms of this Stipulation and Proposal for Settlement, the Complainant releases, waives and discharges the Respondent from any further liability or penalties for violations of the Act and Board Regulations that were the subject matter of the Complaint herein and as alleged in Section III.C of this Stipulation. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on August 13, 2004, and those additional matters alleged in Section III.C of this Stipulation. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or

future, in law or in equity, which the State of Illinois or the Illinois EPA may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315 (2002), or entity other than the Respondent, its employees, officers and directors.

F. Right of Entry

In addition to any other authority, the Illinois EPA, its employees and representatives, and the Attorney General, her agents and representatives, shall have the right of entry into and upon the Respondent's facility which is the subject of this Stipulation, at all reasonable times for the purposes of carrying out inspections. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, her employees and representatives may take photographs, samples, and collect information, as they deem necessary.

G. Correspondence, Reports and Other Documents

Any and all correspondence, reports and any other documents required under this Stipulation, except for payments pursuant to Section VIII.A ("Monetary Payment") of this Stipulation shall be submitted as follows:

As to the Complainant

Paula Becker Wheeler
Assistant Attorney General
Environmental Bureau
188 W. Randolph St., 20th Floor
Chicago, Illinois 60601

Robb Layman
Assistant Counsel

Illinois EPA
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Marcus Hatch
Illinois Air Inspector
Illinois EPA
9511 West Harrison
Des Plaines, IL 60016

As to the Respondent

Steve Winter
President
Color Communications, Inc.
4000 West Fillmore Street
Chicago, IL 60624-3905

H. Modification of Stipulation

The parties may, by mutual written consent, agree to extend any compliance dates or modify the terms of this Stipulation. A request for any modification shall be made in writing and submitted to the contact persons identified in Section VIII.G. Any such request shall be made by separate document, and shall not be submitted within any other report or submittal required by this Stipulation. Any such agreed modification shall be in writing, signed by authorized representatives of each party, and then accompany a joint motion to the Illinois Pollution Control Board seeking a modification of the prior order approving and accepting the Stipulation to approve and accept the Stipulation as amended.

I. Enforcement of Board Order

1. Upon the entry of the Board's Order approving and accepting this Stipulation and Proposal for Settlement, that Order is a binding and enforceable order of the Illinois Pollution Control Board and may be enforced as such through any and all available means.

2. Respondent agrees that notice of any subsequent proceeding to enforce the Board Order approving and accepting this Stipulation and Proposal for Settlement may be made by mail and waives any requirement of service of process.

3. The parties agree that, if the Board does not approve and accept this Stipulation and Proposal for Settlement, then neither party is bound by the terms herein.

4. It is the intent of the Complainant and Respondent that the provisions of this Stipulation and Proposal for Settlement and any Board Order accepting and approving such shall be severable, and should any provision be declared by a court of competent jurisdiction to be inconsistent with state or federal law, and therefore unenforceable, the remaining clauses shall remain in full force and effect.

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WHEREFORE, Complainant and Respondent request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN
Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

BY: _____
ROSEMARIE CAZEAU, Chief
Environmental Bureau
Assistant Attorney General

DATE: _____

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

BY: _____

Chief Legal Counsel

DATE: _____

COLOR COMMUNICATIONS, INC.

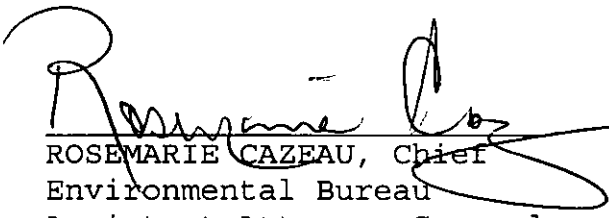
BY: Steve Winter
Name: Steve Winter
Title: President
FEIN: 36-2741846

DATE: August 17, 2005

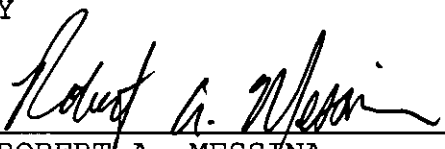
PEOPLE OF THE STATE OF ILLINOIS,

LISA MADIGAN
Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

BY:  DATE: 9/15/05
ROSEMARIE CAZEAU, Chief
Environmental Bureau
Assistant Attorney General

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

BY:  DATE: September 13, 2005
ROBERT A. MESSINA
Chief Legal Counsel

COLOR COMMUNICATIONS, INC.

BY: _____ DATE: _____
Name: _____
Title: _____
FEIN: _____

CERTIFICATE OF SERVICE

I, PAULA BECKER WHEELER, an attorney, do certify that I caused to be served this 16th day of September, 2005, the foregoing Notice of Filing, Stipulation and Proposal for Settlement, and Motion to Request Relief from Hearing Requirement upon the persons listed on said Notice, by U.S. MAIL.

A handwritten signature in cursive script, reading "Paula Becker Wheeler", is written over a horizontal line.

PAULA BECKER WHEELER