

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission

Public Meeting
1415th Meeting Session (15th of 2015)

6:03 p.m. to 6:27 p.m.
Monday, September 10, 2015

Jerrily R. Kress Memorial Hearing Room
441 4th Street, N.W., Suite 220 South
Washington, D.C. 20001

1 Board Members:

2 ANTHONY HOOD, Chairperson

3 ROBERT MILLER, Commissioner

4 PETER MAY, Commissioner

5 MR. TURNBULL, Commissioner

6

7 Office of Zoning:

8 SHARON SCHELLIN, Secretary

9

10 Office of Planning:

11 JENNIFER STEINGASSER

12 JOEL LAWSON

13 MAXINE BROWN-ROBERTS

14

15

16 OTHER:

17 ALAN BERGSTEIN, OAG

18 JACOB RITTING, OAG

19

20

21

22

23

24

25

P R O C E E D I N G S

1
2 CHAIRPERSON HOOD: This meeting would please
3 come to order. Good evening ladies and gentlemen. I
4 want to welcome everyone back. The Zoning Commission
5 has been on vacation for the month of August. Hope
6 everyone had a great 30 days or so off and is ready
7 for us to get back down to business.

8 This is a public meeting of the Zoning
9 Commission for the District of Columbia. My name is
10 Anthony Hood. Joining me are Commissioner Miller,
11 Commissioner May, and Commissioner Turnbull. We're
12 also joined by the Office of Zoning staff, Ms. Sharon
13 Schellin, the Office of Attorney General staff, Mr.
14 Bergstein and Mr. Ritting, the Office of Planning,
15 Ms. Brown-Roberts.

16 This is a special public meeting. Copies of
17 today's meeting agenda are available to you and are
18 located in a bin near the door. We do not take any
19 public testimony unless we ask someone to please come
20 forward.

21 Please be mindful that we are being webcast
22 live. Accordingly we ask you to refrain from any
23 disruptive noises or actions in the hearing room.
24 Please turn off all beepers and cell phones.

25 We've also been joined by Mr. Lawson from

1 the Office of Planning.

2 Does the staff have any preliminary matters?

3 MS. SCHELLIN: No, sir.

4 CHAIRPERSON HOOD: If not, let's move right
5 along with our agenda for this evening. Consent
6 calendar item Zoning Commission Case 05-28N. This is
7 a request for a minor modification to a PUD at Square
8 504. Ms. Schellin.

9 MS. SCHELLIN: Yes, sir. In this case the
10 applicant is asking that the Commission -- they're
11 asking for a modification, rather, to condition 11,
12 Oder No. 05-28A, and that they're asking for an
13 extension of time of six months in order to go
14 forward with the building permit for Block C, the
15 townhomes in Block C, and would ask the Commission --
16 actually, there's an OP report at Exhibit 4 in
17 support of this -- would ask the Commission to
18 consider final action this evening.

19 CHAIRPERSON HOOD: Okay, colleagues, it's
20 already been teed up by Ms. Schellin. We do have an
21 Office of Planning report which I thought really
22 spelled out exactly what's being asked for in
23 addition. Let me open up. Any questions or comments
24 on this?

25 MR. TURNBULL: Mr. Chair.

1 CHAIRPERSON HOOD: Mr. Turnbull.

2 MR. TURNBULL: I don't have any problems
3 with the extra six months.

4 CHAIRPERSON HOOD: Okay. Any other
5 comments? Well, Mr. Turnbull, would you like to make
6 a motion, get us started?

7 MR. TURNBULL: Oh, sure. Wow, the first one
8 of the fall. Yes, Mr. Chair, I would propose that we
9 approve the consent item, the request for the minor
10 modification for Zoning Case No. 05-28N, K. Hovanian
11 Parkside Holdings, LLC. to PUD at Square 5041, and
12 look for a second.

13 MR. MILLER: Second.

14 CHAIRPERSON HOOD: Okay. It's been moved
15 and properly seconded. Any further discussion?

16 [Vote taken.]

17 CHAIRPERSON HOOD: Not hearing any
18 opposition of those present, Ms. Schellin, would you
19 record the vote?

20 MS. SCHELLIN: Yes, sir. Staff records the
21 vote four to zero to one to approve final action in
22 Zoning Commission Case No. 05-28N, Commissioner
23 Turnbull moving, Commissioner Miller seconding,
24 Commissioners May and Hood in support, Commissioner
25 Cohen not present, not voting.

1 CHAIRPERSON HOOD: Okay. Thank you. Next,
2 let's move to final action in Zoning Commission Case
3 No. 14-11. This is Office of Planning request for
4 technical corrections to amendments, to Regulation
5 330, 336, and 3202. Ms. Schellin.

6 MS. SCHELLIN: Yes, sir. In this case the
7 emergency and proposed rulemaking was published in
8 the D.C. Register on July 31st. No comments were
9 received and we'd ask the Commission to consider
10 final action this evening.

11 CHAIRPERSON HOOD: Okay. Thank you.
12 Commissioners, as noted in the submission given to us
13 we have three technical corrections. Any comments on
14 any one of those three corrections. Somebody like to
15 make a motion?

16 MR. TURNBULL: Well I just, I guess, wanted
17 to comment. I guess part of this came up because I
18 know we had a case on the BZA where there was a
19 question whether that the grandfathering cases in
20 that were for permit, and there was a question
21 whether or not that actually applied to cases that
22 were before the BZA for the deadline that were to be
23 considered for action. So I think that's where some
24 of this is coming from. It's to clarify that it's
25 not only for the permit in May of -- Mr. Bergstein

1 was here. It was also for things that were in the
2 pipeline before the BZA for approval. So I think
3 that was one of the big clarifications for this.

4 CHAIRPERSON HOOD: Right.

5 MR. TURNBULL: It was both.

6 CHAIRPERSON HOOD: I think, you know, any
7 time we do a new reg sometimes there is some
8 uncertainty. I think sometimes we miss, like the
9 residential, non-residential issue. And I think this
10 just captured it. This is basically nothing new to
11 this Commission as far as -- I mean, with any
12 regulatory body sometimes you miss things and need to
13 clarify. And, Mr. Turnbull, I think your point is
14 well taken.

15 Any other comments? Do we need any other
16 comments, Mr. Bergstein?

17 MR. BERGSTEIN: No, sir.

18 CHAIRPERSON HOOD: Okay.

19 MR. BERGSTEIN: No.

20 CHAIRPERSON HOOD: Okay. Good.

21 MR. BERGSTEIN: It just reminded me that
22 there was some additional revisions that we have
23 suggested and so if you want that additional text in
24 you should indicate that in your motion of approval.

25 CHAIRPERSON HOOD: Okay. I think also with

1 the amendments that the Office of Attorney General
2 recommended, we will also include that in the motion
3 unless there are any objections.

4 Okay. Somebody like to make a motion? I
5 miss the Vice Chair because she would have made one
6 by now.

7 MS. SCHELLIN: She actually provided
8 absentee ballots for --

9 CHAIRPERSON HOOD: Did she make a motion
10 from where she is?

11 MS. SCHELLIN: She didn't make a motion but
12 she provided an absentee ballot.

13 CHAIRPERSON HOOD: I shouldn't do that. She
14 may watch this. Okay. I would move that we approve
15 Zoning Commission Case No. 14-11, to approve 14-11
16 with the additional OAG revisions and ask for a
17 second.

18 MR. MAY: Second.

19 CHAIRPERSON HOOD: It's been moved and
20 properly seconded. Any further discussion?

21 [Vote taken.]

22 CHAIRPERSON HOOD: Any opposition? Not
23 hearing any, Ms. Schellin, would you record the vote?

24 MS. SCHELLIN: Yes. Staff records the vote
25 five to zero to zero to approve final action in

1 Zoning Commission Case No. 14-11 with the additional
2 comments from OAG, Commissioner Hood moving,
3 Commissioner May seconding, Commissioners Miller and
4 Turnbull in support. Commissioner Cohen in support
5 by absentee ballot.

6 CHAIRPERSON HOOD: Okay. Last I think on
7 our agenda for the night is Zoning Commission Case
8 No. 14-18, Mid-City Financial Corporation, First
9 Stage PUD and Related Map Amendment, Square 3953, et
10 cetera. Again, this is up for final action. Ms.
11 Schellin.

12 MS. SCHELLIN: Yes, sir. There were a
13 couple additional filings received in this case at
14 Exhibits 111, 112, and 114 through 115A. We have the
15 applicant's response pursuant to 2403.15 through 21
16 and also they provided a response to some questions
17 raised by the Commission at proposed action. Then at
18 Exhibit 113 we have an NCPC report which said that --
19 or advised that there were no -- that the project was
20 not inconsistent with the comp plan for the National
21 Capital. And then at Exhibit 116 we have the
22 opposition party's response to the applicant's July
23 13th submission. We'd ask the Commission to consider
24 final action this evening.

25 CHAIRPERSON HOOD: Okay. Let me ask. Ms.

1 Schellin, you said the opposition was 116, correct?

2 MS. SCHELLIN: Yes, sir.

3 CHAIRPERSON HOOD: Okay. Just wanted to
4 make sure I have the right one. Okay. Someone like
5 to get us started on this?

6 Let the record reflect we have also been
7 joined by Ms. Steingasser, from the Office of
8 Planning.

9 MR. MAY: Mr. Chairman.

10 CHAIRPERSON HOOD: Yes.

11 MR. MAY: You know, I had raised a concern
12 at proposed with regard to the timing and you know,
13 we received the explanation from the applicant about
14 the -- why they need the eight years before the final
15 Stage 2 application is submitted, which means that
16 this is potentially on a timeline of completion that
17 could be 12 years out. And while I don't really like
18 the idea that it's going to take that long, I guess I
19 can understand that and I'm willing to accept the
20 timeline that they are proposing.

21 CHAIRPERSON HOOD: Okay. Any other issues
22 or concerns? Commissioner May, you may have. Did
23 you -- okay. Commissioner Turnbull.

24 MR. TURNBULL: Yeah, I just had one question
25 I wanted to -- on the draft, OAG draft order, it was

1 page 55, we talk about affordable housing. We talk
2 about Section 8 and whether it's in, whether it's
3 out. And on page 55 we talk about if it's abolished;
4 said if it's abolished the applicant will be
5 providing 329 multi-family units, 20 percent are to
6 be set aside at 60 percent of AMI, but then the
7 caveat on that is that provided the change in
8 underwriting standards is approved, some form of
9 property tax relief is granted for those units on the
10 D.C. Housing trust funds are provided.

11 And then it says, "In the event that any of
12 these do not occur the applicant will reserve 20
13 percent of the multi-family units for persons making
14 the minimum income levels prescribed in the
15 inclusionary zoning program," which means it would
16 be, I believe, at 80 percent. Is that --

17 MR. BERGSTEIN: I think it's actually 80 and
18 50 based upon what they actually proffered for the IZ
19 units they're requiring, they're providing. They're
20 providing 11 units and they said it's subject to IZ
21 and six of those units are going to be at 50 percent
22 and five of those units are going to be at 80
23 percent, and the total is 10 percent. So I surmise
24 they're within the zones that would require that
25 split. So I'm --

1 MR. TURNBULL: But the 329, it sounds like
2 here it would --

3 MR. BERGSTEIN: Oh, I see what you're
4 saying.

5 MR. TURNBULL: -- be at 80 percent. Is this
6 going to be then, at 80 percent and not 60?

7 MR. BERGSTEIN: If they're saying that the
8 IZ pricing controls would apply, and I'm assuming
9 from what their order stated that they believe that
10 the IZ provisions that require a split, 50 percent at
11 80 percent, 50 percent at -- 50 percent moderate, 50
12 percent low income would apply. But that's
13 something, if you want, we can get clarification from
14 the applicant and revise the final order to clarify
15 exactly what they're talking about.

16 MR. TURNBULL: I would like that. I'm not
17 sure about my colleagues, but I would --

18 CHAIRPERSON HOOD: Would you like to get
19 that now? Can we do that now? Are you all ready to
20 get it to us now?

21 MR. MILLER: Mr. Chairman, I just wanted to
22 note that Exhibit 115A, which has the table --

23 MR. TURNBULL: Yeah.

24 MR. MILLER: -- of the housing units revised
25 in the event that Section 8 rentings in effect --

1 that it's abolished, it's listed at 60 percent. The
2 329 are listed at 60 percent or less AMI, according
3 to that chart that they submitted.

4 MR. TURNBULL: Right. But I guess what
5 threw me here is this caveat. It says, "In the event
6 that any of these events do not occur the applicants
7 will reserve 20 percent of the multi-family for
8 persons prescribed in the inclusionary zoning
9 program, which means that it might not be 60 percent
10 and so I was confused as to where that was really
11 going to end up. And we hadn't really talked about
12 that in the hearing. I don't think that really came
13 out as far as what would be the solution that if that
14 didn't happen.

15 So it's not a big issue but I'm just worried
16 that if everything jumps to 80 percent that's not
17 really what we were looking at. So I'm just a little
18 bit confused by this little caveat here.

19 CHAIRPERSON HOOD: Okay. I too am looking
20 at these two pages that Commissioner Miller was just
21 talking about. Can we get clarification? Could
22 somebody -- if not we're going to -- I just asked if
23 somebody from the applicant can clarify. If you can
24 come forward? We don't need everybody, but if one
25 person could come forward and clarify it, and it's

1 satisfactory to Mr. Turnbull, I think we're good. I
2 just didn't want to have a whole other hearing. If
3 not, this may be a reason to delay. Okay.

4 (Mr. Caruso speaking off mic.)

5 CHAIRPERSON HOOD: Well, it depends on your
6 answer. If you could turn it on and identify
7 yourself?

8 MS. SCHELLIN: The mics are off.

9 CHAIRPERSON HOOD: And then we need to
10 memorialize it.

11 MR. CARUSO: They're apparently off.

12 CHAIRPERSON HOOD: Oh, it wasn't me. I
13 hadn't been here in a while. Now they're on.

14 MR. CARUSO: Good evening, George Caruso,
15 Mid-City Financial Corporation. Let me take a second
16 to set up the context and then I'll give you the
17 answer. It relates to a question that Commissioner
18 Miller raised in the earlier conversations on this.

19 We don't believe that it's very likely that
20 Congress is going to discontinue the Section 8
21 project based program. They're routinely renewed it
22 every year since 1968 and we believe it will be
23 renewed.

24 In the very unlikely event that they did,
25 pursuant to our conversations with Mr. Miller in one

1 of the earlier hearings, I don't remember the date
2 but I can look it up and supply it for the record,
3 the question was posed, would you be willing to go at
4 100 percent of the 373 units that are currently under
5 contract at 60 percent of area median income rather
6 than splitting them at 50 and 80. And the answer is
7 we would be willing to go at 60 percent. And that's
8 in response to a question that was raised by
9 Commissioner Miller and there may have --
10 Commissioner Schellin might have also raised that
11 issue.

12 Yeah, that's for 20 percent of the units by
13 the way. We're currently at 23 percent of the units
14 and it would be for 20 percent of the units.

15 CHAIRPERSON HOOD: Okay. And I think they
16 do have that memorialized, Mr. Turnbull, unless I'm
17 missing it, in the submission. Is it --

18 MR. CARUSO: I'm pretty sure we do. I
19 didn't bring the submission with me, Mr. Chairman,
20 but I wrote that for -- I ghosted that for our
21 attorney.

22 MR. TURNBULL: Right. Well, I mean, I guess
23 I see the 60 percent that's down there. I'm just
24 concerned about the red when it says, "In the event
25 of any of these events not occurring the applicant

1 will reserve 20 percent of the multi-family units for
2 persons making the minimum income levels prescribed
3 in the inclusionary program." And I'm thinking,
4 that's not 60 percent. Or is it as it relates -- do
5 we need --

6 MR. MILLER: I would agree that that needs
7 clarification in the draft order.

8 MR. BERGSTEIN: Yes, we can talk to -- I
9 mean, the only issue -- I read this to mean that 20
10 percent of the affordable units being proffered will
11 be reserved for persons at the income levels required
12 by IZ.

13 And the only issue I have -- and so I think
14 it does lower the number to 20 percent. That's how I
15 read this and I think that's how you're reading this.
16 And the only issue is, there's two variables in IZ.
17 Either all would be reserved for moderate income
18 households, which is 80 percent of the AMI down to
19 51, or there's a split where 50 percent of the units
20 are reserved for moderate income, and the other 50
21 percent are reserved for low income. And that's the
22 only thing I don't know, whether or not the 20
23 percent would be 10 percent, 50 percent, and 10
24 percent, 80 percent or all 20 percent would be 80
25 percent. That's the only issue I have and I don't

1 know the answer to that question.

2 MR. TURNBULL: Okay. Well, I think that's
3 my concern is that there's enough uncertainty in this
4 last paragraph, this last sentence, that said to
5 me -- I mean, I almost could read it could be at 80
6 percent, which is not what we really think we were
7 talking about when we were discussing.

8 MR. MAY: So, and that's a question for Mr.
9 Caruso then, right?

10 MR. TURNBULL: Right.

11 MR. MAY: Because I mean, the most likely
12 scenario is that Section 8 continues and this is not
13 an issue. The secondary possibility is that 20
14 percent of the units are set aside at 60 percent of
15 AMI. Provided these other conditions are met,
16 changes in underwriting standard is approved. Some
17 port of property tax relief is granted for those
18 units that the D.C. Housing Trust funds are provided.

19 So if those things happen then they'll do 20
20 percent of the units and 60 percent AMI.

21 MR. TURNBULL: Right. Yeah.

22 MR. MAY: If those things don't happen then
23 20 percent of the units will be set aside for IZ at
24 80 percent?

25 MR. CARUSO: At 80 and 50.

1 MR. MAY: Eighty and 50.

2 MR. CARUSO: Eighty and 50.

3 MR. MAY: So 50/50. Okay. So I think if
4 that's clarified in the language here, that 20
5 percent will be reserved with half at 50 percent and
6 half at 80 percent.

7 MR. BERGSTEIN: That's the proffer, then
8 we'll make that change. I mean, if that's --

9 MR. MAY: I mean, that's what we just heard
10 the proffer to be.

11 MR. BERGSTEIN: Okay. Very fine. Okay. So
12 and if that's the case, is that satisfactory, Mr.
13 Turnbull?

14 MR. TURNBULL: That's fine. That's all I
15 wanted is a clarification as to what that is,
16 otherwise I was worried that it could be 100 percent
17 at 80 percent.

18 CHAIRPERSON HOOD: Okay. All right. Thank
19 you very much. We appreciate it.

20 MR. CARUSO: You're welcome, Mr. Chairman.

21 CHAIRPERSON HOOD: And, Mr. Turnbull, you're
22 fine, right? As Commissioner --

23 MR. TURNBULL: I'm okay. Mr. Miller, are
24 you okay?

25 MR. MILLER: Yes, I'm okay. I think this is

1 a transformational project --

2 MR. TURNBULL: Yeah.

3 MR. MILLER: -- for this site and for this
4 neighborhood and with an extraordinary level of
5 preservation of affordable housing and allowing
6 tenants the right to return and all the mixed income,
7 mixed use proposals that are part of the project.

8 I did have one question as long as I --

9 CHAIRPERSON HOOD: Let me make sure --

10 MR. MILLER: Okay.

11 CHAIRPERSON HOOD: -- Mr. Turnbull, are you
12 finished?

13 MR. TURNBULL: Yeah, Mr. Chair, I'm fine now
14 with everything.

15 CHAIRPERSON HOOD: Okay. Commissioner
16 Miller.

17 MR. MILLER: Oh, so I did have one question
18 on the -- this may be for Mr. Bergstein. Or my
19 fellow commissioners. I thought that in the -- when
20 we get to the conclusions of law section, or the
21 decision section, on page 55, which discusses the
22 programs that will be operated by -- in the second
23 stage we're asking for more information on the
24 programs that are designed for children and seniors
25 that live in the community.

OLENDER REPORTING, INC.

1100 Connecticut Avenue NW, #810, Washington, DC 20036

Washington: 202-898-1108 • Baltimore: 410-752-3376

Toll Free: 888-445-3376

1 I just thought somewhere in the decision
2 that we should have -- and this is under the public
3 benefits subcategory I guess. I guess we should have
4 some specific reference to findings of fact that are
5 in this draft order elsewhere that require the
6 playground, that require the one acre centrally
7 located community green and the pedestrian walk. I
8 just thought that in maybe paragraph five on page 55
9 that I have, or some other place in this decision
10 part of the order, that there should be some specific
11 reference to what has been proffered by the
12 applicant, partly in response -- well, part of it was
13 originally part of the application itself, which was
14 the centrally located community green. But during
15 the hearing process and as referenced in the findings
16 of fact section earlier in the draft order, that they
17 will provide a playground and the pedestrian walk
18 that connects the community green to Rhode Island
19 Avenue. I just thought that those amenities and
20 benefits should be referenced in the decision part if
21 that can just be incorporated within the motion to
22 approve when we get to that point, Mr. Chairman.

23 CHAIRPERSON HOOD: Okay. So you're saying -
24 - I think it's 56 on mine, but you said it was 55.
25 But number 5, right?

1 MR. MILLER: Right.

2 CHAIRPERSON HOOD: Okay.

3 MR. MILLER: Or wherever else appropriate in
4 this public benefits discussion that we include the
5 public benefit of the community, the centrally
6 located one acre community green, the playground that
7 they proffered as a result of some questions of OP
8 and some of us raised during the hearing process.
9 And the pedestrian walk that was always part of the
10 community green as well. So, yes, if that could be
11 incorporated -- specifically referenced in our
12 decision, the decision section, that would be I think
13 useful.

14 CHAIRPERSON HOOD: Yeah, I would agree. And
15 maybe that may be the appropriate place but we'll
16 leave that up to OAG. I would agree.

17 Anything else? I do have a quick comment,
18 indulge me. I did look at the findings of facts
19 again. Well, Exhibit -- and I want to do this for
20 the record, Exhibit 116, response from the party
21 opponent's, applicants. And as I read over -- excuse
22 me. As I read over this, some of their responses,
23 when I looked through this I think a lot of this has
24 been hashed out. A lot of the security measures
25 through the case have been mentioned by the

1 applicant. A number of things have been mentioned by
2 the applicant as opposed to with the party.

3 And as I read through this a lot of the
4 concerns were addressed in the hearing, so I'm not
5 sure if they're just reiterating for us to make sure
6 that we keep it on the front burner. But I can tell
7 you from what I've read in this record a lot of these
8 things have been taken care of. Especially when you
9 talk about the questions about the mixed use, the
10 units. In one particular one -- just indulge me.
11 Anyway, I read through all of it.

12 But anyway, I believe it gives me a comfort
13 level to move forward. I think this applicant has
14 been straight forward. Especially me talking about
15 the relocation and making sure people stay on the
16 property, and I think those kind of things came out,
17 were fleshed out, through the hearing, and I see they
18 were brought up again. So I don't think we need to
19 retry it. I think those were vetted and I think that
20 most of the stuff, the concerns that were in this
21 opponents response to the applicant were already
22 addressed for the most part. At least the way I read
23 it.

24 Okay. Anything else? Somebody like to make
25 a motion?

1 MR. MILLER: Mr. Chairman, I'd like to move
2 that the Zoning Commission take final action on
3 Zoning Commission Case No. 14-18, Mid-City Financial
4 Corporation, First Stage PUD and Related Map
5 Amendment at Square 3953, and with some of the tweaks
6 that we discussed here today.

7 CHAIRPERSON HOOD: So it's been moved, can
8 we get a second? I'll second that. Any further
9 discussion?

10 [Vote taken.]

11 CHAIRPERSON HOOD: Not hearing any
12 opposition of those present, Ms. Schellin, would you
13 record the vote?

14 MS. SCHELLIN: Yes, sir. Staff records the
15 vote five to zero to zero to approve final action in
16 Zoning Commission Case 14-18 as discussed,
17 Commissioner Miller moving, Commissioner Hood
18 seconding, Commissioners May and Turnbull in support,
19 Commissioner Cohen in support by absentee ballot.

20 CHAIRPERSON HOOD: Okay. And again, I want
21 to compliment this applicant. This applicant, as
22 I've stated 100 times, we notice who is in the
23 audience today, they have been here for many of our
24 other cases, they've heard some of the things that we
25 rigorously went through, and I just think that they

1 have covered their bases and they have heard and
2 listened to the community from what I think. And I
3 think the record reflects that. So I'm going to
4 commend them. Just make it happen.

5 Okay. Anything else?

6 MS. SCHELLIN: No, sir.

7 CHAIRPERSON HOOD: Okay. I want to thank
8 everyone for their participation tonight and this
9 special public meeting is adjourned.

10 [Hearing adjourned at 6:27 p.m.]

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25