

MEMORANDUM

FROM:

John Canegata, Republican Party of the Virgin Islands chairman.

To:

Territorial Committee members and other interested parties.

SUBJECT:

2016 Virgin Islands caucus.

DATE:

March 30, 2016.

By now, you have heard and read about the attempt by some newcomers to our party to undermine the well-established processes spelled out in the rules that govern the Virgin Islands caucus (held on March 10, 2016).

What is happening is unfortunate. Truly unfortunate.

As chairman, I have tried my best to stay above the fray by remaining neutral — not picking sides, but acting as an disinterested umpire.

I believe my commitment to strengthening our party is evident in the fact that every major candidate for the Republican presidential nomination — past and present — has sent senior campaign advisers to the Virgin Islands. This is a point I made on Tuesday, when I released a statement to the local news media on the U.S. interior secretary visiting the Virgin Islands for the first time — three years into her tenure and in the final months of the Obama administration. While Democrats ignore the Virgin Islands, I have worked tirelessly with all of you to grow our party, including our party's voice within the national GOP.

I wish I didn't have to write this memorandum. Unfortunately, it's come to this. While I reaffirm my commitment to being our party's cheerleader-in-chief, I must also enforce the *Rules of the Virgin Islands Republican Party GOP National Convention Caucus March 10, 2016*, which are just that: The rules. The rules aren't my rules. They're the rules.

So, let me clearly and succinctly explain just what has happened since the caucus as well as what will happen moving forward.

You may recall the Territorial Committee took action by e-mail, due to the geographical challenges of gathering everyone from across the multiple islands together, to approve the 2016 caucus rules in the fall of 2015. There were zero objections at the time of this action.

Subsequently, the approved rules were submitted to the Republican National Committee on time and in full compliance with national rules. That's when several members of the Territorial Committee called the Republican National Committee and insisted that since the Territorial Committee had not physically met to approve the 2016 rules they were null and void.

Nevertheless, this complication did little more than force our party to use the well-established rules of the 2012 caucus.

Unfortunately, a few voices objected and caused a controversy where a controversy need not exist. This is the same group that enjoys being obstructionist on virtually everything our party has tried to do over the last four years. These same voices are now cooperating with John Yob and a couple of other newcomers to circumvent the well-established processes spelled out in the rules, which we have operated under for over four years.

That's ironic because I don't know John Yob well at all. I haven't said one thing bad about him. I wish him well. I just wish we could all work together.

Dispute Subcommittee

Back in February you'll recall I appointed Krim Ballentine, George Blackhall, Robert Hendry and Frederick Espinosa as members of the Dispute Subcommittee. This was done in accordance

with Rule No. 10. I also appointed myself, as under the rules of our party the chairman is a voting member of all committees and subcommittees.

The Dispute Subcommittee is organized under Rule Nos. 9 and 10. It is charged with adjudicating "all disputes and challenges" arising out of the caucus. Under Rule No. 10, all rulings and determinations of fact issued by the Dispute Subcommittee are "final" and not subject to appeal.

While we all know about outside challenges to the eligibility of John Yob and other newcomers to participate in the caucus, these challenges are (for now, anyways) outside the jurisdiction of the Dispute Subcommittee and even the party. Because it's pending litigation we determined to wait and see what the courts ultimately decide.

As such, the Dispute Subcommittee determined it had "no business to conduct, act upon or otherwise report following the final tally" of the caucus results reported in the immediate aftermath of the caucus. A majority of the Dispute Subcommittee signed a resolution that memorialized its action in the immediate aftermath of the caucus. I have attached the resolution to this memorandum. This is the official record of the Dispute Subcommittee.

The March 27 opinion of one lone member of the Certification Subcommittee, James Oliver, is just that: The singular opinion of one member of the Certification Subcommittee, which itself doesn't even have the jurisdiction under Rule Nos. 9 and 10 to hear "disputes and challenges." Let me be clear, crystal clear: The sole jurisdiction for "all disputes and challenges" rests with the Dispute Subcommittee, not one member of the Certification Subcommittee.

Moreover, not only is James Oliver not a member of the Dispute Subcommittee, but he wasn't even physically present at the caucus. He didn't take or return any telephone calls nor did he participate in any way, shape or form in the deliberations of the Certification Subcommittee. This puts him in a dubious position to opine on the affairs of either the caucus itself or the Certification Subcommittee.

Subsequent to the caucus night action and determination by the Dispute Subcommittee, a letter of dispute was filed on March 12, 2006, by Valerie Stiles. Her dispute, which raised several issues, is still pending, but has no "practical differences" on the final tally of the caucus.

Certification Subcommittee

In the same manner as with the Dispute Subcommittee, I appointed Vincen Clendinen, James Oliver and Frederick Espinosa as members of the Certification Subcommittee, in accordance with Rule No. 11. I also appointed myself, as under the rules of our party the chairman is a voting member of all committees and subcommittees. Gwendolyn Brady was also appointed to the Certification Subcommittee, however, her candidacy for delegate rendered her ineligible to serve, pursuant to Rule No. 11.

Only the Certification Subcommittee is charged under Rule No. 11 with certifying the results of the caucus. Certification can only occur if action is taken by a majority of the members appointed and serving on the Certification Subcommittee.

James Oliver's opinion of March 27, 2016, is just that: The singular opinion of one member of the Certification Subcommittee. It's ironic, to say the least, for John Yob to publicly call me a "dictator" — ignoring the fact that I have only praised John Yob publicly and privately — when James Oliver is the only person who has engaged in dictator-like behavior. Issuing one's singular opinion as the official action of the entire Certification Subcommittee isn't just unprecedented — it's unlawful under the well-established rules governing the caucus.

Had James Oliver been present at caucus or participated by returning my telephone calls, he would have known that the Certification Subcommittee took action in accordance with Rules No. 8 and 11.

Specifically, there were no disputes or other challenges in the immediate aftermath of the caucus that could have resulted in "practical differences" in the results as reported in the final tally. As a

result, the Certification Subcommittee certified the final tally in the immediate aftermath of the caucus, pursuant to Rule No. 8.

A majority of the Certification Subcommittee signed a resolution last week that memorialized its action in the immediate aftermath of the caucus. I have attached the resolution. This is the official record of the Certification Subcommittee.

Upon certification, the duly elected delegates and alternate delegates were notified by me (the chairman) of their election, pursuant to Rule No. 11. These persons were (in order of votes received):

- I. John Yob, Delegate.
- II. Gwen Brady, Delegate.
- III. Warren Bruce Cole, Delegate.
- IV. Erica Yob, Delegate.
- V. George Logan, Delegate.
- VI. Lindsey Eilon, Delegate.
- VII. David Johnson, Alternate delegate.
- VIII. Valerie Stiles, Alternate delegate.
 - IX. Andrea Lee Moeekel, Alternate delegate.
 - X. Humberto O'Neal, Alternate delegate.
 - XI. Steven Hardy, Alternate delegate.
- XII. Max Schanfarber, Alternate delegate.

Following certification notice of the caucus results, I received supporting comments of our party's administration and operation of the caucus from National Committeeman Holland Redfield, Warren Bruce Cole and John Yob.

Holland Redfield sent me the following e-mail at 8:16 a.m. on March 11, 2016:

John Congratulating I know the many mouths of hard work you have put into this effort.

PAID FOR BY THE REPUBLICAN PARTY OF THE VIRGIN ISLANDS. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.

You have generate a new interest in the party with over 40 Republican running for these passions WOW and look at the turn out . To the winners we have an assume responsibility to the Virgin Islands . To those that did not make it thank you for running we are proud of you. To those who ran the poles on STT Leigh and Max outstanding and to the lady's at the board of election thank you so much . Now it is time to pull together after all we must put the people of the Virgin Islands first . Let's go up to the convention as one

John Yob sent me the following e-mail at 8:16 a.m. on March 11, 2016:

You should get a lot of credit for the growth in the GOP.

John Yob also sent me the following e-mail at 7:12 a.m. on March 11, 2016:

The results showed tremendous increase in the number of Republicans participating in the caucuses and the USVI GOP should be very proud of their efforts to grow the party."

Warren Bruce Cole sent me the following e-mail at 8:36 a.m. on March 11, 2016:

I realize that our relationship is not one of strawberries and ice cream. I expect that we will have disagreements in the future. However, I want to personally congratulate and thank you for the manner in which the caucus was conducted.

Delegation to the Republican National Convention

Under Rule No. 11, the 12 delegates and alternate delegates named above had five days to confirm (1) their acceptance of election and (2) that they are "willing and able" to attend the Republican National Convention in Cleveland, Ohio. Please note that this rule does not apply to the chairman (me), national committeewoman (Lilliana Belardo de O'Neal) or national committeeman (Holland Redfield).

Notice was given to each of the delegates and alternate delegates "as soon as practicable" of their election, pursuant to Rule No. 11. In fact, I sent the final results and a corresponding press release to all candidates, Territorial Committee members and the Virgin Islands press corps.

For whatever reason, John Yob, Gwen Brady, Warren Bruce Cole, Erica Yob, Lindsey Eilon and George Logan each failed to comply with Rule No. 11 by providing the written confirmation in accordance with the applicable deadline. All of the other duly elected delegates and alternate

delegates complied with the requirements of Rule No. 11 by notifying me, as chairman, of their acceptance and willingness to serve in their office. Their deliberate failure to comply with the well-established rules left me with no choice but to take the following action, which is commanded upon me, as chairman, under Rule No. 11:

If any [d]elegate or [a]lternate fails to so confirm, his or her name shall be struck and the list of selected [d]elegates and [a]lternates adjusted accordingly. The [t]erritorial chairman shall the notify the Republican National Committee of the names of the [d]elegates and [a]lternates to the Republican National Convention.

That's exactly what I did. I followed Rule No. 11. I didn't act like a dictator, as John Yob so disturbingly accused me of doing. I followed the well-established rules, not because I wanted to, but because I had no choice.

Accordingly, John Yob, Gwen Brady, Warren Cole, Erica Yob, Lindsey Eilon and George Logan's names were stricken from the list of duly elected and serving delegates from the Virgin Islands to the Republican National Convention. I informed Republican National Committee chairman Reince Priebus of this in a letter dated March 21, 2016.

Under Rule No. 12, the six stricken delegates were replaced by the six alternate delegates. They are as follows (in order of votes received):

- I. David Johnson, Delegate.
- II. Valerie Stiles, Delegate.
- III. Andrea Lee Moeekel, Delegate.
- IV. Humberto O'Neal, Delegate.
- V. Steven Hardy, Delegate.
- VI. Max Schanfarber, Delegate.

The new alternate delegates are as follows (in order of votes received):

I. April Newland, Alternate delegate.

- II. Garfield Doran, Alternate delegate.
- III. Joshua Schanfarber, Alternate delegate.
- IV. Jevon Williams, Alternate delegate.
- V. Theresa Schanfarber, Alternate delegate.
- VI. Todd Hecht, Alternate delegate.

Pursuant to Rule No. I1, the newly named alternate delegates have five days henceforth to file written confirmation in compliance with said rule.

Court challenges

As you also know, there is ongoing litigation dealing with the eligibility of John Yob and other newcomers to have participated in the caucus of earlier this month. Specifically, the case is *John P. Yob v. Caroline Fawkes* (ST-16-CV-0000114) in the Superior Court of the Virgin Islands.

The supervisor of elections, who has always conducted free, fair and honest elections, disputed the eligibility of John and Erica Yob and Ethan and Lindsey Eilon as it pertained to their compliance with numerous legal and statutory requirements that must be fulfilled before one can participate electorally in the Virgin Islands.

It is important to also keep in mind Rule No. 3, which limits "participation ... to persons domiciled in and registered to vote in the United States Virgin Islands" in accordance with applicable territorial election laws, specifically those found in Title 18 of the Virgin Islands Code. Title 18 defines a residency requirement of 90 days, which has always been the intent and interpretation of our party. The status of this law has no impact on applicable party or caucus rules, both of which remain at the sole discretion of our party. In fact, the 90-day residency requirement of Title 18 has been incorporated into our party's rules, which fall outside the jurisdiction of the courts.

On all the other legal and statutory issues raised in the lawsuit, I have taken no positions, as it would be improper for me, as chairman, to intervene at this time for two reasons: (1) our party is

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not a named party to the lawsuit and (2) I have committed myself to remaining neutral. My only interest is to ensure a stronger party here in the Virgin Islands.

Unfortunately, John Yob has made deeply offensive statements disparaging my character, as well as the character of National Committeewoman Lilliana Bellardo de O'Neal, to national press corps. He is also running a radio advertisement with false attacks against me personally and professionally. Worse yet, his advertisement, which hit airwaves Tuesday, disparages our party even as he professes loyalty and commitment to our party. Nevertheless, I will not allow myself to be dragged into the legal and statutory matter, which at this time is properly before the courts.

The bottom line: John Yob, Gwen Brady, Warren Cole, Erica Yob, Lindsey Eilon and George Logan each failed to comply with Rule No. 11. John Yob, Erica Yob and Lindsey Eilon also each failed to comply with Rule No. 3. Therefore, they were replaced as delegates with duly elected and serving alternate delegates.

I apologize for having to involve all of you in this controversy, which is not of our party's making. It is, however, critical to set the record straight and give each of you a full and honest explanation of the situation.

All of us want to grow and strengthen our party, but there's a right way to do it and there's a wrong way to do it. Coming in and gaming the system — to say nothing of bragging about the "chaos" one hopes to create in the process we use to nominate our party's presidential candidate — just isn't right. It's not the Virgin Island way and it's not the Republican way.

Attachments

Chairman's Notification of Caucus Results

Letter to RNC Chairman

Dispute Subcommittee Resolution

Certification Subcommittee Resolution

Letter from Supervisor of Elections

Virgin Islands Caucus Rules

Republican Party of the Virgin Islands Rules

DRAFT OF RELEASE ON DELEGATE RACES

For Immediate Release: March 11, 2016

Contact: John Canegata, State Chairman for the Republican Party of the US Virgin Islands

(340) 377-6149, johncanegata@gmail.com, http://usvigop.org/

Delegates Elected in Caucus of the Republican Party of the US Virgin Islands

The Republican Party of the U.S. Virgin Islands held its caucuses yesterday to elect delegates to the Republican National Convention in July. As detailed at USVIGOP.org, registered Republicans were able to vote for up to six delegates at one of two locations: one each on the islands of St. Thomas and St. Croix, with voting from 12 noon to six pm. Voters were also able to vote by absentee

The results of the caucuses are as follows

Delegates (Winner in green, alternatives in yellow)	Votes	Affiliation
John Canegata	RNC	Uncommitted Automatic RNC Member
Holland Redfiedl II	RNC	Uncommitted Automatic RNC Member
illiana Belardo de O'Neal	RNC	Uncommitted Automatic RNC Member
ohn P. Yob	131	Uncommitted
Swen Brady	129	Uncommitted
Varren B. Cole	124	Uncommitted
rica L. Yob	123	Uncommitted
George Logan	120	Uncommitted
indsey Eilon	117	Uncommitted
David Johnson	82	Uncommitted
/alerie L.Stiles	72	Marco Rubio
ndrea Lee Moeekel	67	Uncommitted
lumberto O'Neal	63	Marco Rubio

Steven K. Hardy	52	Donald Trump
Robert Max Schanfarber	47	Ted Cruz
April M. Newland	47	Uncommitted
Garfield E. Doran	40	Uncommitted
Joshua A. Schanfarber	38	Ted Cruz
Jevon O. A. Williams	34	Ben Carson
Theresa A. H. Schanfarber	27	Ted Cruz
Todd D. Hecht	27	Ted Cruz

"I want to congratulate my fellow Virgin Island Republicans who were elected to the National Convention," said Virgin Island Republican Chairman John Canegata. "For the first time in a long time, representatives from seven presidential campaigns actually made efforts on the Islands and it paid off. Campaigns and their surrogates hosted meet & greets, did interviews with our local press and put together campaign organizations."

"This year we had over 300 voters casting ballots for delegates, as opposed to fewer than 100 voters in 2012," continued Canegata. "The Republican Party in the Virgin Islands is growing and is proud of the efforts by all the candidates and local volunteers."

For more information, please contact John Canegata at (340) 377-6149, or johncanegata@gmail.com.

END



CHAIRMAN'S OFFICE

Mr. Reince Priebus, Chairman
Republican National Committee
310 First Street S.E.
Washington, D.C. 20003
Delivered via U.S.P.S. mail and electronic mail

Dear Mr. Priebus:

Pursuant to the rules adopted by the Virgin Islands Republican Party, I am notifying you of the outcome in the Virgin Islands caucus held on March 10, 2016.

In said caucus, the following 12 persons were elected as delegates and alternate delegates to the 2016 Republican National Convention:

- I. John P. Yob, Delegate.
- II. Gwen Brady, Delegate.
- III. Warren B. Cole, Delegate.
- IV. Erica L. Yob, Delegate.
- V. George Logan, Delegate.
- VI. Lindsey Eilon, Delegate.
- VII. David Johnson, Alternate Delegate.
- VIII. Valerie Stiles, Alternate Delegate.
- IX. Andrea Lee Moeekel, Alternate Delegate.
- X. Humberto O'Neal, Alternate Delegate.
- Xi. Steven K. Hardy, Alternate Delegate.
- XII. Robert Max Schanfarber, Alternate Delegate.

Additionally, the following three persons are delegates by virtue of their party office:

- I. John Canegata, State Chairman.
- II. Lilliana Belardo de O'Neal, National Committeewoman.
- III. Holland Redfield II, National Committeeman.

¹ The Office of the Supervisor of Elections disputed the eligibility of Mr. Yob, Mrs. Yob, Mrs. Eilon and unsuccessful delegate candidate Ethan Eilon to participate in the caucus, claiming they were not in compliance with territorial residency requirements. The matter is pending as *John P. Yob v. Caroline Fawkes* (ST-16-CV-0000114) in the Superior Court of the Virgin Islands.

Mr. Reince Priebus Page 2 March 21, 2016

In accordance with Rule 11 of the Rules of the Virgin Islands Republican Party GOP National Convention Caucus, the six delegates and six alternate delegates were notified "as soon as practicable" of their election. Under said rule, each duly elected delegate and alternate delegate had five days to (1) "confirm, in writing, that he or she accepts election" and (2) that they are "willing and able" to attend the 2016 Republican National Convention to be held in Cleveland, Ohio.

Mr. Yob, Ms. Brady, Mr. Cole, Ms. Yob, Ms. Eilon and Mr. Logan each failed to comply with Rule 11 by providing written confirmation of their election as delegates within five days. As territorial chairman I am commanded to take the following action, pursuant to said rule:

If any [d]elegate or [a]lternate fails to so confirm, his or her name shall be struck and the list of selected [d]elegates and [a]lternates adjusted accordingly. The [t]erritorial [c]hairman shall then notify the Republican National Committee of the names of the [d]elegates and [a]lternates to the Republican National Convention.

Accordingly, Mr. Yob, Ms. Brady, Mr. Cole, Ms. Yob, Ms. Eilon and Mr. Logan are stricken from the list of duly elected and serving delegates from the Virgin Islands to the Republican National Convention. Pursuant to Rule 12, they shall be replaced with the aforementioned six duly elected alternates, all of whom have provided written confirmation in compliance with the rules.

In a subsequent communication, in compliance with territorial and national rules, I will transmit to the Republican National Committee the complete contact information for each member of the delegation from the Virgin Islands.

Yours sincerely,

John Canegata

State Chairman, Republican Party of the U.S. Virgin Islands

cc: Office of the Supervisor of Elections, Elections System of the Virgin Islands
Republican National Convention Delegates and Alternate Delegates

Resolution of the Dispute Subcommittee

WHEREAS, the Dispute Subcommittee (herein "the Subcommittee") and its members are constituted under Rule Nos. 9 and 10 of the Rules of the Virgin Islands Republican Party GOP National Convention Caucus March 10, 2016 (herein "Rules"); and

WHEREAS, the Subcommittee was charged by said Rules with adjudicating "all disputes and challenges" arising out of the caucus held on March 10, 2016, for the sole purpose of electing delegates and alternate delegates from the United States Virgin Islands to the Republican National Convention; and

WHEREAS, any and all decisions issued by the Subcommittee are final under Rule No. 10 of said Rules; and

WHEREAS, the Subcommittee was aware of pending litigation and other possible challenges outside the present jurisdiction of the Subcommittee concerning the eligibility of several persons to (1) vole in the caucus and (2) stand for election in the caucus as candidates for delegate to the Republican National Convention, and

WHEREAS, there were no disputes or challenges under the jurisdiction of the Subcommittee in the immediate aftermath of the caucus that impacted the final tally of the caucus; and

WHEREAS, the Subcommittee had no business to conduct, act upon or otherwise report following the final tally of the caucus.

NOW, THEREFORE, BE IT RESOLVED by the Subcommittee that its previous decision in the immediate aftermath of the caucus was and remains its final decision.

ADOPTED on this the 23rd day of March in the year of our Lord two thousand and	sixteen.
John Canegata, Subcommittee Chairman	
Frederick Espinosa, Member and Director of Subcommittees	
Krim Ballentine, Member (1) (% (6) . Oyprver)	3/31/16_
George Blackhall, Member	

Robert Hendry, Member

Resolution of the Certification Subcommittee

WHEREAS, the Certification Subcommittee (herein "the Subcommittee") and its members are constituted under Rule No. 11 of the Rules of the Virgin Islands Republican Party GOP National Convention Caucus March 10, 2016 (herein "Rules"); and

WHEREAS, the Subcommittee was charged by said Rules with certifying the caucus held on March 10, 2016, for the sole purpose of electing delegates and alternate delegates from the United States Virgin Islands to the Republican National Convention; and

WHEREAS, the Subcommittee was aware of pending litigation and other possible challenges outside the present jurisdiction of the Subcommittee concerning the eligibility of several persons to (1) vote in the caucus and (2) stand for election in the caucus as candidates for delegate to the Republican National Convention; and

WHEREAS, the Subcommittee, chaired by John Canegata, in accordance with past practices and long-established customs of the Republican Party of the U.S. Virgin Islands surveyed the members of the Subcommittee in person and through linked telecommunication resources in the aftermath of the caucus; and

WHEREAS, the Subcommittee gave its final certification of the caucus upon determining that no unresolved "practical differences" existed in the final tally presented and released in the immediate aftermath of the caucus under Rule No. 8 of the Rules; and

WHEREAS, the duly elected delegates and alternates were notified by the Subcommittee chairman in accordance with Rule No. 11 of the Rules.

NOW, THEREFORE, BE IT RESOLVED by the Subcommittee that its previous issuance of final certification in the immediate aftermath of the caucus was and remains the final certification by the Subcommittee.

3/20116

ADOPTED on this the 23rd day of March in the year of our Lord two thousand and sixteen.

John Canegata, Subcommittee Chairman

Frederick Espinosa, Member and Director of Subcommittees

James Oliver, Member [Absent on Caucus Night]

Vincent Clendinen, Member

GOVERNMENT OF THE VIRGIN ISLANDS OF THE UNITED STATES

OFFICE OF THE SUPERVISOR OF ELECTIONS

P.O. Box 1499 • Kingshill • St. Croix • U.S. Virgin Islands 00851-1499 (340) 773-1021 Office • (340) 773-4523 (Fax)

P.O. Box 6038 • St. Thomas • U.S. Virgin Islands 00801-6038 (340) 774-3107 Office • (340) 776-2391 (Fax)

March 4, 2016

Mr. John Canegata
State Chairman for the Virgin Islands Republican Party
P.O. Box 295
Christiansted, VI 00821

Sent via email to johncanegata@gmail.com

Re: Voter's Registration Status Ineligible

Dear Chairman Canegata,

The following persons voting status has been changed to ineligible based on VIC 18, Chapter 13, Section 262, the residency requirement of 90 days, based on my investigation.

- a. Mrs. Erica L. Yob
- b. Mr. John P. Yob
- c. Mrs. Lindsey K. Eilon
- d. Mr. Ethan Eilon

Mr. Yob appeared at the St. John Elections Office in order to register to vote in early January. He was informed by the Elections Assistant, he has to reside in the Virgin Islands for ninety (90) days before he can register. He informed the Elections Assistant, he arrived on the island a week before, which made him ineligible. He then took the information gained and travelled to the St. Thomas Elections Office and provided a falsified date within the parameters to meet the requirement. We have also obtained a copy of Mr. Yob's Facebook page "which states they moved to St. John, USVI on December 28, 2015". Copy of their voter's card is attached with the dates they provided August, October and in one case just the year.

They will be eligible to register on March 27, 2016 and will be reinstated on this date.

For additional information, I can be reached via email <u>caroline.fawkes@vi.gov</u> or telephone 773-1021.

Sincerely,

Caroline & Jankes
Caroline F. Fawkes

Supervisor

Encls: Voters' Registration Cards (4 ea)