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Jonathan Stenson, Deputy General Manager
Guadalupe-Blanco River Authority (GBRA)
Via Email: jstinson@gbra.org

Re: Class Claims of Property Owners on the Guadalupe River from Lake Dunlap
through Lake Wood Against the Guadalupe-Blanco River Authority ("GBRA")

Gentlemen:

Please be advised that I represent several individuals who are property owners on the Guadalupe River/Lake McQueeney and who are similarly situated with all other property owners who own improved real estate adjacent to the Guadalupe River with regard to the referenced matter. On June 17, 2019, I wrote a letter to the Board Members of the Friends of Lake McQueeney ("FOLM"), providing copies to you and several elected representatives with regard to the current problems being experienced along the Guadalupe River from Lake Dunlap to Lake Wood.

JUNE 8, 2019 FOLM ANNUAL MEETING

During FOLM's annual meeting held on Saturday, June 8, 2019, the property owners were

informed by Jonathan Stenson, Deputy General Manager of GBRA, that the failure of the McQueeney levee/dam is “imminent,” as are the failures of all of the remaining three, intact levees (the levees on Lakes Wood and Dunlap having already failed). FOLM invited not only Mr. Stenson to speak to the property owners, but also County Judge Kyle Kutscher and State Representative John Kuempel to inform the property owners “what is being done” with regard to the “imminent” threat of failures of the Lake McQueeney levee and the other three levees. The bottom line from all three individuals’ presentations was basically, nothing.

Representative Kuempel repeated on three occasions the rhetorical questions: “where were we, where are we, where are we going” and “we have to pull together in the same direction.” The property owners already know where they have been and where they are. Unfortunately, Representative Kuempel gave no answer as to where the property owners “are going” or what they are “pulling toward.”

County Judge Kutscher informed the property owners that the reduction in real property values along the Guadalupe River will be at least fifty percent (50%) when the remaining levees fail but with regard to Lake McQueeney, that only represents some \$400,000 in *ad valorem* tax losses to the County which is not enough for the County to do anything about the problem. Obviously, such a precipitous decline in property values, which has already begun, will also adversely affect the Navarro Independent School District, the largest recipient of *ad valorem* taxes in the area in the amount of millions of dollars, for which the Texas taxpayers will have to foot.

GBRA Deputy General Manager, Jonathan Stenson, told the group that GBRA has owned the six Guadalupe River hydroelectric dams/levees since 1963 when it purchased them “at the end of their useful lives” for less than \$4 million, has earned substantial amounts of income from both the hydroelectric power and the water rights and has made a conscious decision not to maintain those assets’ infrastructures other than to occasionally repair or replace dam doors/gates. Now that these almost 100 year old assets have been intentionally left to deteriorate and their failures are now “imminent,” Mr. Stenson said that GBRA is offering to sell the McQueeney levee to FOLM for \$1 and that GBRA would “give FOLM the \$1” for the consideration. Mr. Stenson said that he had a “serious” talk “with his boss” about this. However, Mr. Stenson was quick to add that GBRA would *not* sell its water or hydroelectric rights which produce millions of dollars in income for that governmental agency. GBRA recently authorized spending over \$7 million obtained from that income for the purchase of a lot and the construction thereon of its new office building and facilities in New Braunfels. Apparently, the existing facilities in Seguin are not worthy of the GBRA and its directors.

THE GUADALUPE-BLANCO RIVER AUTHORITY

Purposes of GBRA:

As you are aware, the GBRA was created by the Texas Legislature in 1933 to “develop, conserve and protect the water of the Guadalupe and Blanco Rivers ... [and] is authorized to conduct broad ranges of activities, *including building and operating reservoirs*; engaging in flood control; selling raw and treated water; conducting waste water treatment; *acquiring property by*

imminent domain; building and managing parklands; and, generating electricity. In fiscal year 2017, GBRA collected almost \$56 million in revenues primarily from water and wastewater sales making up 65% of its revenue. Power sales made up 7%, water quality contracts made up 6%, debt service income made up 16% and various other sources provided the remaining 6%. GBRA employs over 172 staff members, of which 70% of them are currently located at GBRA's headquarters in Seguin, Texas. Each year, GBRA spends 38% of its income on its staff and administration, \$16 million for staff salaries and benefits and \$5,566,285 on administration expenses. The remaining 62% was spent on water quality, maintenance and repairs, "legal and professional" and debt service. However, not one dime has been spent to repair or replace the actual infrastructures of the six levees since GBRA purchased them some 57 years ago.

GBRA holds rights to almost 290,000 acre-feet of water, which represents 65% of all water permitted for consumption use in the Guadalupe River Basin, and a large portion of those rights are in the Canyon Reservoir (Canyon Dam), wherein GBRA and the United States Army Corps of Engineers have a joint project to provide flood protection and water supply to the area. GBRA operates the six hydroelectric plants along the Guadalupe River and the seventh and largest, at the Canyon Reservoir (Dam). Luckily for all downstream property owners and citizens in the Guadalupe River Basin, the Corps of Engineers, not GBRA, maintains the integrity of the Canyon Dam infrastructure. GBRA sells water to a variety of municipalities in the State of Texas, including Kyle, Buda, San Antonio and Port O'Connor. It also serves more than 350,000 individuals on a daily basis with water.

Texas Sunset Advisory Commission Report – 1994:

Due to problems with the management of GBRA prior to 1994, the Texas Legislature identified concerns with that management and placed the GBRA under the Texas Sunset Advisory Commission (the first water authority to come under such scrutiny) which has the authority to recommend the abolition of GBRA and/or to make recommendations to correct the Authority's deficiencies. As best that can be determined from historical documents, GBRA took little or no action with regard to the Commission's 1994 recommendations regarding better management of its assets.

Texas Sunset Advisory Commission Report – 2018-2019:

Recently, the Sunset Advisory Commission issued a report making blistering findings and recommendations with regard to GBRA's operations, primarily including its wholesale failure to tend to and repair its "aging infrastructure and inadequate asset management" with regard to the six dams/levees on the Guadalupe River which are almost 100 years old, including Dunlap, McQueeney, Placid, Meadow, Wood and Green. More specifically, the Sunset Advisory Commission found the following:

- GBRA has *not* implemented a comprehensive asset management process to ensure *timely repair and replacement of its significant assets (the levees)*, leading to failed infrastructure and potential service disruptions for its customers;

- GBRA has failed to properly repair the 15 spill gates that broke irreparably in 2016;
- gates in all of the system operated and maintained by GBRA lack significant maintenance;
- GBRA has no formal system for identifying long-term infrastructure needs of the levees, and setting priorities and budgeting for repairs or *replacement*;
- *dozens of GBRA's needs have been looming for years* which recently resulted in the Authority's new leadership having to "scramble to address problems that have been '*imminent*'" and known to GBRA for years;
- GBRA's failures affect many aspects of the lives and businesses of the residents along the Guadalupe River, including but not limited to quality of life, *tax and property values on lakefront properties, property repair issues for dock and boat owners* and recreational and other income to the community;
- the lack of coordination with regard to GBRA's procurement practices;
- GBRA's failure to clarify and manage its relationships with non-profit organizations such as the Guadalupe-Blanco River Trust, the San Antonio Bay Foundation, the Gorge Preservation Society and the Guadalupe River Foundation to which GBRA has donated millions of dollars over the years while neglecting its own assets; and,
- GBRA has failed to communicate with property owners, taxpayers and residents along the Guadalupe River with regard to its actions and inactions, completely failing to provide any transparency.

***GBRA's May 8, 2018 Response to the Sunset
Advisory Commission's Report:***

In typical fashion, on May 8, 2018, the GBRA provided a brief, two page response to the 31 pages of the Sunset Advisory Commission's findings, conclusions and recommendations with regard to GBRA's manifest deficiencies as well as its selfish and wrong-headed policies. GBRA's response was half-hearted and conclusory in nature, generally stating that "[A]ll of GBRA's operations were developed in response to population growth and the demand for utilities" without any explanations as to how it will respond to the damning (excuse the pun) findings made by the Sunset Advisory Commission.

GBRA's Flippant Response to the Problems and Its Self-Centered Interests Concerning Expenditures of Money:

As noted above, GBRA's Deputy General Manager, Jonathan Stenson, recently advised a large group of FOLM members that since GBRA has intentionally decided to allow its assets to deteriorate to the extent that failures of those assets (levees) are "imminent," GBRA is offering to sell the McQueeney levee to FOLM for \$1 and that GBRA would "give FOLM the \$1" for the consideration. Of course, GBRA will *not* sell any of its water, wastewater or hydroelectric rights to FOLM or to any other property owners' organizations. In other words, now that GBRA has intentionally committed willful acts of gross neglect with regard to its assets and has damaged the market values of the property owners' lake front investments and have endangered public safety, it wants to dump those assets on the property owners to take care of but to keep for itself the income-generating assets. The Governor of Texas and the Commission should not allow such malfeasance to continue.

On or about June 20, 2019, a GBRA representative again met with the board members of FOLM, directors of the Lake McQueeney Preservation Association and several Guadalupe County Judges. As reported by FOLM's President, Bob Spalten, "it became very clear that GBRA is looking to the lake associations" to take control of and to resolve the problems with the levees, thereby completely abandoning its chartered duties and responsibilities. Such manifest omissions should spell the doom of this state agency.

At the same time, GBRA recently authorized spending over \$1 million to purchase real estate in New Braunfels and over \$6 million to build a new office building and facilities on that parcel of land.

The days of GBRA getting away with only answering to itself and to a few politicians in Austin is about to come to an abrupt end.

Public Safety and the Potential for Loss of Life:

Should the "imminent" failures of the levees occur, and especially after a heavy rain event (and should one occur during a weekend or during a holiday week), the potential loss of life on the Guadalupe River could be substantial in nature. In such an event, both GBRA and its directors would be responsible for same.

Demands:

Based upon the foregoing, the property owners whom I represent demand the following:

- a. GBRA immediately cease and terminate all plans for the expenditure of \$7+ million for the purchase of real estate in New Braunfels and for the construction of a new office building and facilities on that land, and that those funds be spent on engineering studies and temporary repairs to the six dams/levees located on the Guadalupe River;

- b. GBRA immediately assume (probably for the first time) its chartered responsibilities and obligations to “repair, replace, build and operate the levees;
- c. GBRA meet all of the recommended changes made by the Sunset Advisory Commission in its 2018-2019 Report; and,
- d. GBRA produce the following:
 - (1) all of its financial statements for the years 2010 through the present;
 - (2) documents evidencing all expenditures made by the GBRA from 2010 through the present;
 - (3) documents evidencing all expenditures made by GBRA for and on behalf of its employees, administrators, representatives and administrative costs from 2010 through the present;
 - (4) documents evidencing money spent on lobbyists, “political,” administrative and “business” purposes from 2010 to the present;
 - (5) documents evidencing all funds spent on professionals, including but not limited to, engineers, architects, consultants and lawyers from 2010 to the present;
 - (6) all plans for and documents evidencing the purchase of real property in New Braunfels and the construction of the new office building and facilities including, but not limited to, expenditures of money associated therewith, resolutions authorizing same, the identifies of the directors who approved same and documents evidencing the extent by which those plans have already been implemented;
 - (7) documents and plans for the restoration and repair of all six levees on the Guadalupe River from 2000 to the present;
 - (8) documents evidencing GBRA’s decision(s) to sell particular assets consisting of the six levees to private owners, the Guadalupe Valley Electric Coop and/or to any other entity/person;

- (9) documents evidencing money paid by GBRA to “associated non-profits” from 2000 to the present and the reasons therefore;
- (10) documents from any professionals or consultants regarding the conditions of the six levees and their “imminent” failures from 1993 to the present; and,
- (11) studies and/or reports evidencing the conditions of the infrastructures of the six levees from 1993 to the present.

Notice of Class Action Suit:

Currently, we are reviewing all of the property owners’ state and federal constitutional rights which have been violated by GBRA with regard to the deficiencies noted by the Texas Sunset Advisory Commission’s 2018-2019 Report. Thus far, we have determined that the GBRA has violated the property owners’ right to keep and enjoy private property pursuant to the United States Constitution.

We shall also move to enjoin GBRA from expending any money with regard to the purchase of any real estate in New Braunfels, the construction of a new building(s) on that real estate and to mandatorily enjoin GBRA to spend that \$7+ million on engineering studies and temporary repairs of the six levees.

The property owners also have various causes of action against GBRA based upon Chapter 2007, Tex. Govt. Code. Section 2007.002 of Chapter 2007 defines “Governmental Entity” as “a board, commission, counsel, department, or other *agency* in the executive branch of state government that is created by constitution or statute;” “Owner” as a “person with legal or equitable title to affected private real property at the time a taking occurs;” “Market Value” as “the price a willing buyer would pay a willing seller after considering *all* factors in the marketplace that influence the price of private real property;” and, “Private Real Property” as “an interest in real property recognized by common law, including a groundwater or surface water right of any kind, that is not owned by the federal government, this state, or a political subdivision of this state.” GBRA is a “Governmental Entity,” the property owners are “Owners,” and the property owners’ real properties located along the Guadalupe River are “private real property” all as defined by the Texas Government Code. This Code also provides for private causes of action to be maintained against the GBRA.

The intentional actions on the part of GBRA since at least 1993 have resulted in a “taking” of the property owners’ real properties. GBRA has *intentionally* determined *not* to repair or maintain the infrastructures of all of the levees situated along the Guadalupe River, instead, electing to continue to take actions only necessary to ensure the lucrative income that it makes from the sale of water, waste water and other sources of income for other “public good” *and* for itself and its directors. Recently, the First Court of Appeals in Houston, Texas ruled in *San Jacinto River Authority v. Burney*, 570 S.W.3d 820 (Tex. App.—Houston [1st Dist.] 2018) that the Chapter

2007 constitutional taking does indeed afford a private cause of action to the property owners. Already, GBRA's announcement that the failures of all of the remaining, intact Guadalupe River levees are "imminent" has created a "market value reduction" in lake-front properties by at least 50% as Representative Kuempel has confirmed. Evidence already indicates that numerous potential buyers have and are continuing to "back out" of Earnest Money Contracts for the purchases of properties along the Guadalupe River upon learning of GBRA's prognostications of asset failures based upon its grossly negligent and intentional acts and omissions of not maintaining its assets. GBRA "intentionally, knowingly, affirmatively and consciously" decided not to repair or rebuild the levees wherein it knew that failures of those levees were "imminent," deciding rather, to effectively take specific assets for other public use, to wit: the sale of water and wastewater as well as other uses including those for its own, selfish uses. There is no doubt that the GBRA was aware of its failures and its decisions to act in consideration of other alleged "public interests" as early as 1993 but has hidden that from the property owners. GBRA was informed of same by the Sunset Advisory Commission in both 1994 and 2018. Moreover, GBRA knew and continues to know which properties will substantially lose value as a result of its deliberate and considered inactions, policies and decisions.

"A taking occurs when the government physically appropriates or invades private property or unreasonably interferes with the property owners' right to use and enjoy it" which have "proximately caused damages to the properties." *Burney*, 570 S.W.3d at 827. GBRA was clearly faced with a choice: to utilize funds to repair the levees in question or to continue to spend money on itself and for what it perceived as other "public uses."

The First Court of Appeals has recognized property owners' contentions that a River Authority's "actions affected their private real property by restricting or limiting their rights to their property, and that such actions were the producing [proximate] cause of a reduction of at least 25% in the market value of the affected properties ... and the diminution in value as a result of the ... *stigma*. ... is sufficient to "establish statutory takings claims." *Burney*, 570 S.W.3d at 829. (Emphasis supplied.)

Pursuant to Chapter 2007, Tex. Govt. Code, the property owners will be entitled to (1) remuneration for the "market-value reductions" for their properties as the proximate result of the unlawful "taking" by GBRA and (2) a mandatory, permanent injunction requiring GBRA to repair the six dams/levees that it owns.

Since GBRA maintains the power of imminent domain, its deliberate actions also constitute the inverse condemnations of the property owners' real properties. *Burney*, 570 S.W.3d at 825.

The property owners will easily establish the requirements of a "class" since the members are so numerous that joinder of all members is impractical, there are questions of law or fact common to the class, the claims or defenses of the representative parties are typical of the claims or defenses of the class and the representative parties will fairly and adequately protect the interests of the class.

Already, several property owners have volunteered to be class representatives in the

contemplated Class Action. We have no doubt that either pursuant to Rule 23, Fed. R. Civ. P. and the "Lusardi Approach" as enumerated in *Lusardi v. Xerox Corp.*, 118 F.R.D. 351-54 (D.N.J. 1987) and *Shushan v. Univ. of Colo. at Boulder*, 132 F.R.D. 263 (D. Colo. 1990) or Rule 42, Tex. R. Civ. P., a class will be certified. Since the GBRA has violated both federal and state laws, the property owners will *not* be limited in their choice of forum, either a state district court sitting in Guadalupe County, Texas or a federal district court sitting in the Western District of Texas, San Antonio Division. We have complete confidence that a jury of the property owners' peers will rule in their favor with regard to the class action claims.

Conclusion:

The GBRA has already deeply involved itself in the taking of the property owners' real properties and exposing the public to loss of life and limb. It is far too late for GBRA to avoid its exposures to liabilities for such wrong-doings by attempting to dump on the property owners the assets that it knowingly and intentionally allowed to deteriorate to the point of "imminent" failures.

To restate, the Class Action Suit will request the following:

- a. GBRA be immediately enjoined from spending the \$7+ million on its planned, new offices/facilities in New Braunfels and real estate, and that money be spent on engineering for and replacement and/or repair of the six levees;
- b. GBRA be mandatorily and permanently enjoined to exercise its chartered and legal responsibilities to "replace, rebuild and operate" the six levees;
- c. GBRA be mandatorily and permanently enjoined to implement the recommendations of the Sunset Advisory Committee in its 2018-2019 Report;
- d. GBRA compensate the property owners the fair market value of the effective taking of their properties and/or for the inverse condemnations of same; and,
- e. GBRA pay reasonable and necessary attorney's fees and costs.

We require that within 10 days, GBRA advise if it will meet the reasonable demands made herein. We would much rather resolve these issues on an amicable basis either directly by the parties and their counsel or during a mediated process. If that is not possible or fruitful, the property owners will proceed as noticed.

Awaiting your prompt advices,

Yours Very Truly,

J. Douglas Sutter

JDS/mak

cc:

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