COMMONWEALTH OF MASSACHUSETTS

APPELLATE TAX BOARD

320 FALL RIVER, LLC	**v.**	**BOARD OF ASSESSORS OF THE TOWN OF SEEKONK**
Docket No. F329470		Promulgated: December 13, 2019

This is an appeal heard under the formal procedure pursuant to G.L. c. 58A, § 7 and G.L. c. 59, §§ 64 and 65, from the refusal of the Board of Assessors of the Town of Seekonk ("appellee" or "assessors") to abate a tax on a certain parcel of real estate located in Seekonk, owned by and assessed to 320 Fall River, LLC ("appellant") for fiscal year 2016 ("fiscal year at issue").

Commissioner Elliott heard this appeal. Chairman Hammond and Commissioners Scharaffa, Rose, and Good joined him in the decision for the appellee.

These findings of fact and report are made pursuant to a request by the appellant under G.L. c. 58A, § 13 and 831 CMR 1.32.

Edmund A. Allcock, Esq. and *Norman Orban*, Esq. for the appellant.

Matthew J. Thomas, Esq. for the appellee.

FINDINGS OF FACT AND REPORT

On the basis of testimony and exhibits offered into evidence at the hearing of this appeal, the Appellate Tax Board ("Board") made the following findings of fact.

As of January 1, 2015, the relevant assessment date for the fiscal year at issue, the appellant was the assessed owner of a 53.965-acre parcel of land with an address of 320 Fall River Avenue in Seekonk, known as the Firefly Country Club ("subject property").[1] The subject property, which is part of a condominium project known as the Firefly CCRC Condominium, is improved with an eighteen-hole public golf course, 3,527 yards in length, known as the Firefly Golf Course ("subject golf course"). The subject property is further improved with a 2,700-square-foot, wood-frame office/clubhouse; a practice putting area; a driving range; and a parking lot for approximately 100 cars. The subject golf course is situated on level-to-gently-rolling terrain. Irrigation is provided by an underground sprinkler system with manually operated spigots. The subject property is in a Wetlands Protection District.

Relevant jurisdictional facts are summarized in the following table:

[1] The condominium documents report a total area of 54.465 acres for the Firefly Country Club. However, that figure includes a 0.5-acre parcel improved with a 1,250-square-foot maintenance building, which is identified and assessed separately on Map 14 as Parcel 78.2. The parties agreed that this parcel is not part of the valuation of the subject property.

Fiscal Year	Assessed Value	Tax Amount Tax Rate	Taxes Timely Paid (Y/N)	Abatement Application Filed	Date of Denial	Date Petition Filed With Board
2016	$1,085,400	$29,761.67[2] $27.42	Y	01/19/2016	02/23/2016	05/06/2016

Based on these facts, the Board found and ruled that it had jurisdiction over the instant appeal.

A portion of the subject property - the eighteen acres that comprise the subject golf course and the 33.965 acres of excess land - is classified as recreational land under G.L. c. 61B ("Chapter 61B") and is therefore assessed at a discounted valuation. The remaining two acres of the subject property are classified as two one-acre prime (buildable) lots. The assessors did not classify these two one-acre prime lots and the office/clubhouse as recreational land, and these are thus assessed at their full fair market value.

The parties differed in their application of Chapter 61B to the subject property, and they dispute the underlying fair cash valuation of the subject property.

1. The Appellant's Valuation Case

The appellant presented the testimony and appraisal report of Stephen M. Dylag, an appraiser whom the Board qualified as an

[2] This amount does not include the 1.25 percent Community Preservation Act surcharge.

expert in the area of commercial real estate valuation ("appellant's appraiser").

In his valuation analyses, the appellant's appraiser treated the entire subject property as a golf-course property rather than as property consisting of separate components.[3] He opined that the presence of wetlands would impede development of the subject property, and he therefore determined that the highest and best use of the entire subject property was as a golf-course property.

The appellant's appraiser then performed a sales-comparison approach and an income-capitalization approach to value the subject property. Key details of those analyses are summarized below.

a. Sales-comparison approach to value

The appellant's appraiser developed his sales-comparison approach by analyzing the sales of eight purportedly comparable golf-course properties. These sales took place between February of 2012 and August of 2014 and ranged in price from $550,000 to $2,500,000. Most of the properties were reasonably proximate to the subject property, with only Sale 1, the most recent sale, located in outlying Rowley, a community with demographic characteristics superior to those of Seekonk. Half of the sales were eighteen-hole golf courses like the subject golf course, and

[3] As will be explained, the assessor individually valued the separate components of the subject property.

the remaining half were nine-hole golf courses. However, the eighteen-hole golf courses had course lengths that were much longer than the subject golf course. All but Sale 2 had significantly larger buildings than the subject golf course's office/clubhouse. The sales were primarily "short sales" (*i.e.*, sales in which the sale proceeds were less than the amount required to pay the mortgage owed by the seller) or pre- or post-foreclosure sales, and Sale 6 was for a course that had not been in operation since 2005.

The appellant's appraiser applied adjustments to his purportedly comparable sales for the following characteristics: conditions that yielded non-arm's-length sales; property rights[4]; location; improvements and facilities; and operating status. After adjustments, his purportedly comparable sales yielded the following units of comparison: $13,000 per acre; $280 per yard of course length; and $75,000 per hole. The appellant's appraiser opined that, under his comparable-sales analysis, a price-per-hole unit was not an accurate measurement of comparison, admitting that half of his comparable sales were for nine-hole golf courses while the subject golf course was an eighteen-hole golf course. Placing a primary emphasis on price per acre as the most consistent unit of comparison with a secondary emphasis on price per yard of course

[4] Sale 7 involved a sale of a leasehold property interest, as opposed to a fee simple property interest.

length, and considering the condition of the subject property as well as prospects for the growth of the local golf industry, the appellant's appraiser determined that the most reasonable value for the subject property was $14,687 per acre, which yielded a rounded value of $800,000.

The appellant's appraiser thus arrived at $800,000 as the fair market value for the subject property under the sales-comparison approach.

b. Income-capitalization approach

The appellant's appraiser projected income for the subject property based upon limited financial information provided by the appellant as well as a survey of five purportedly comparable, eighteen-hole public golf courses located in Plainville, North Attleboro, and neighboring Rehoboth. The appellant's appraiser projected an annual 16,000 rounds of golf at $19.00 per round, which was far lower than the average fees of $31.00 weekday and $38.00 weekend for his surveyed golf courses. The appellant's appraiser next added cart rental fees for 4,800 rounds, at $13.00 per round, which again was less than the average of $16.00 per round for his surveyed golf courses. The resulting projected gross income was $366,400.

The appellant's appraiser next projected operating expenses. He based his projection on the historical performance of the subject golf course as well as golf-course industry averages. He

projected total expenses of $263,320. The resulting net income was $103,080.

For his capitalization rate, the appellant's appraiser consulted the rates reported by *RealtyRates.com* for golf courses as well as commercial real estate capitalization-rate trends. He selected a rate of 12 percent, to which he added a tax factor of 2.697 percent for an overall capitalization rate of 14.697 percent. Applying the overall capitalization rate to the net income yielded a rounded indicated value of $700,000.

The appellant's appraiser thus arrived at $700,000 as the value for the subject property under the income-capitalization approach.

Subsequent to the hearing, the appellant, per the Board's request, submitted its actual tax returns for calendar years 2013, 2014, and 2015. These tax returns indicated: a loss of $9,944 for calendar year 2013; a profit of $4,038 for calendar year 2014; and a loss of $869 for calendar year 2015.

c. Final opinion of value

The appellant's appraiser reconciled the values he obtained from his sales-comparison and income-capitalization approaches, weighing the values equally to arrive at an opinion of fair market value of $750,000.

Next, the appellant's appraiser applied the provisions of Chapter 61B. Pursuant to § 2 of Chapter 61B, recreational land is

to be valued at its present use but in no event at more than 25 percent of its fair cash value as determined under G.L. c. 59 by considering its highest and best use. The appellant's appraiser applied the 75-percent discount factor to his opinion of the subject property's fair market value as a golf-course property, which he considered to be its single highest and best use. The appellant's appraiser applied the discount factor to the value of the subject property's real estate but not to the value of its personal property. Based on information from the appraisal guide *Marshall Valuation Service*, the appellant's appraiser estimated that about $82,500 of the subject property's total fair market value was attributable to its personal property, leaving a real estate value of $667,500. Twenty-five percent of this real estate value resulted in a Chapter 61B value of $166,875 for the subject property's real estate. The appellant's appraiser then added back the $82,500 personal property value.

The appellant's appraiser thus arrived at a total valuation of $249,375 for the subject property.

2. The Appellee's Valuation Case

The appellee presented its case through the testimony of Theodora Gabriel, an assessor for the appellee ("assessor"), and the submission of exhibits, including the requisite jurisdictional documents.

The assessor explained that the subject property's assessment was based on separate evaluations of its several individual components: (1) the eighteen acres that comprised the subject golf course; (2) the two one-acre prime lots; (3) the 33.965 acres of excess land; and (4) the office/clubhouse.

The assessor assumed that the highest and best uses of the subject golf course, the excess land, and the office/clubhouse to be their current uses as golf-course and accessory properties. However, the assessor determined that the two one-acre prime lots each had a separate highest and best use as a buildable lot.

The assessor then explained how the individual components of the subject property were valued. For the one-acre prime lots, the appellee applied a value of $4.56 per square foot. For the excess land, the assessor applied a value of $20,000 per acre but then applied a 25-percent discount to account for the presence of wetlands.

To value the subject golf course, the assessor performed an income-capitalization approach. In determining an income stream, the assessor reviewed the operations of the same local golf courses that the appellant's appraiser had surveyed, which were within the subject property's market area. As previously stated, these five purportedly comparable local golf courses yielded an average of $31.00 per round for weekdays, $38.00 per round for weekends, and $16.00 per round cart fee. The assessor selected 23,500 rounds of

golf at an average of $24.00 per round, and 4,800 golf-cart rounds at an average of $16.00 per round. Her projections were well within the averages of the surveyed golf courses. The assessor's gross potential income was therefore higher than the appellant's appraiser's figure. The assessor adopted the appellant's appraiser's operating expenses and capitalization rate. Her figures resulted in a rounded valuation of $2,500,000. Therefore, the difference between the assessor's income-approach valuation of $700,000 and the appellant's appraiser's valuation of $2,500,000 resulted from the income stream each had developed.

Finally, the appellee assessed the office/clubhouse at $160,300. As explained previously, the appellant's appraiser admitted that he separately valued only the subject golf course's personal property, which he determined to be $82,500.

The assessor next considered the application of Chapter 61B to the subject property. Unlike the appellant's appraiser, who applied the Chapter 61B discount to the entire value of the subject property minus its personal property, the assessor applied Chapter 61B only to specific components - the subject golf course and the excess land. The assessor added the discounted values of the subject golf course and the excess land and the full values of the two one-acre prime lots and the office/clubhouse to reach the total assessed value of $1,085,400.

3. The Board's Conclusions

The Board agreed with the assessor that the various components of the subject property should be separately valued and that Chapter 61B applied only to the subject golf course and to the excess land. By contrast, the appellant's appraiser valued the entire subject property as a single parcel that was entitled to treatment as recreational land under Chapter 61B. The appellant failed to demonstrate that the remaining portions of the subject property beyond the subject golf course and the excess land qualified for classification under Chapter 61B. In particular, the appellant's appraiser offered no evidence to demonstrate that the two one-acre prime lots, which were not part of the subject golf course, qualified as recreational land pursuant to Chapter 61B. The Board thus found that these prime lots did not qualify for Chapter 61B classification and taxation. Furthermore, as will be explained in the Opinion, Chapter 61B classification does not extend to the value of buildings. Therefore, the Board further found that the office/clubhouse was not entitled to discounted valuation pursuant to Chapter 61B.

Next, the Board found significant flaws in the appellant's appraiser's valuation methodology. First, the appellant's appraiser found a single highest and best use for the entire subject property - its use as a golf course. However, the appellant failed to prove that its use as a golf course was the highest and

best use of the eighteen-acre parcel. Based on its own tax returns, the subject golf course was either losing money or making minimal gain in each of the tax years at issue in this appeal. The Board found and ruled that the appellant failed to prove that its unprofitable use as a golf course was the highest and best use of the subject golf course.

Second, the method used by the appellant's appraiser failed to account for the highest and best use of each component of the subject property. The assessor parceled out the two one-acre prime lots and assessed these as buildable lots. While the appellant's appraiser referred to a general presence of wetlands at the subject property, he otherwise offered no evidence to challenge the highest and best use for the two one-acre prime lots as buildable lots. The Board thus found and ruled that the appellant failed to meet its burden of proving that the assessors improperly assessed the two one-acre prime lots as buildable lots.

The Board next found flaws in the valuation approaches used by the appellant's appraiser. For his sales-comparison approach, the appellants' appraiser selected sales of either eighteen-hole golf courses that were 6,000 or more yards in length or nine-hole golf courses, and therefore they were not comparable to the 3,527-yard, eighteen-hole subject golf course. Moreover, the appellant's appraiser utilized several short sales and pre- and post-foreclosure sales, which were not shown to be arm's length and

were therefore not reliable evidence of the subject property's fair market value. The Board thus found that the sales-comparison approach used by the appellant's appraiser was inherently unreliable.

With respect to the income-capitalization approach, the Board found that the appellant's appraiser projected an income stream that was based on golf fees of $19.00, far lower than the $31.00 weekday and $38.00 weekend averages of the local golf courses in the subject golf course's market area. The Board found that the appellant's appraiser's income figures did not reflect market income. Accordingly, the income-capitalization approach used by the appellant's appraiser was inherently unreliable.

For the foregoing reasons, the Board found and ruled that the appellant failed to meet its burden of proving a fair market value for the subject property that was less than its assessed value for the fiscal year at issue. Accordingly, the Board issued a decision for the appellee in this appeal.

OPINION

In the instant appeal, the parties disagreed on the portions of the subject property that qualified for classification as recreational land under Chapter 61B, and they also disagreed on the underlying valuation of the subject property.

1. Applicability of Chapter 61B to Each Component of the Subject Property

The requirements for classification as recreational land are detailed in § 1 of Chapter 61B, which recognizes two categories of recreational land. First, the section provides that

> [l]and not less than five acres in area shall be deemed to be recreational land if it is retained in substantially a natural, wild, or open condition or in a landscaped or pasture condition or in a managed forest condition under a certified forest management plan.

G.L. c. 61B, § 1. Second, the section provides that

> [l]and not less than five acres in area shall also be deemed to be recreational land which is devoted primarily to recreational use and which does not materially interfere with the environmental benefits which are derived from said land, and is available to the general public . . .
>
> For the purpose of this chapter, the term recreational use shall be limited to the following: . . . ***golfing*** . . .

Id. (emphasis added).

The parties agreed that the subject golf course and the excess land qualified as recreational land pursuant to Chapter 61B. The excess land qualified under the first prong of § 1 as recreational land held in a "natural, wild, or open condition," and the subject golf course qualified under the second prong of § 1 as land held specifically for "golfing." The Board found and ruled that the characterizations of these parcels as recreational land under Chapter 61B was correct.

However, the appellant's appraiser also treated the remaining portions of the subject property as qualifying for discount as recreational land, specifically the two one-acre prime lots and the office/clubhouse. The Board did not agree.

With respect to the two one-acre prime lots, these parcels were not part of the subject golf course. In addition, the appellant offered no evidence that these parcels otherwise qualified as recreational land under either prong of § 1. The Board thus found that the two one-acre prime lots did not qualify as recreational land pursuant to Chapter 61B and that the appellant failed to meet its burden of proving that the two one-acre prime lots were unfairly assessed at their full fair market value.

With respect to the office/clubhouse, buildings on Chapter 61B land are explicitly excluded from the favorable tax treatment afforded under Chapter 61B. G.L. c. 61B, § 10. By separately valuing the subject property's personal property, the appellant's appraiser appeared to understand that non-land portions of a property do not qualify for classification as recreational land. However, the appellant's appraiser did not exclude the full value of the office/clubhouse, merely the value of the subject golf course's personal property. The Board found and ruled that the appellant's appraiser erred by failing to exclude the full value of the office/clubhouse from application of the Chapter 61B discount.

2. Valuation of the Subject Property

Section 2 of Chapter 61B addresses the valuation of land that qualifies as recreational land. Section 2 provides as follows:

> The value of land classified under the provisions of this chapter shall be determined under section thirty-eight of chapter fifty-nine solely on the basis of its use. The board of assessors shall assess such land at valuations based upon the guidelines established under the provisions of chapter fifty-eight, but in no event shall such valuation exceed twenty-five per cent of its fair cash value as determined pursuant to chapter fifty-nine.

G.L. c. 61B, § 2. As discussed in ***Lanster Corp. v. Assessors of Lancaster***, Mass. ATB Findings of Fact and Reports 1998-714, 720-21, § 2 requires a four-step process: (1) determine the value of the parcel at its present use; (2) determine the value of the parcel at its highest and best use; (3) calculate 25 percent of the value of the parcel's highest and best use; (4) compare the values under step one and step three, with the parcel's value under Chapter 61B being the lesser of these two values.

Neither party presented evidence using the four-step analysis required under Chapter 61B. The parties both opined that the highest and best use of the subject golf course and the 33.965-acre excess land was its current use, despite the fact that the tax returns for the subject golf course showed little to no profit.

"Prior to valuing the subject property, its highest and best use must be ascertained, which has been defined as the use for which the property would bring the most." ***Tennessee Gas Pipeline***

Co. v. Assessors of Agawam, Mass. ATB Findings of Fact and Reports 2000-859, 875 (citing ***Conness v. Commonwealth***, 184 Mass. 541, 542-43 (1903); ***Irving Saunders Trust v. Assessors of Boston***, 26 Mass. App. Ct. 838, 843 (1989) and the cases cited therein). "[T]he phrase 'highest and best use' implies the selection of a single use for a single property." ***New England Telephone and Telegraph Co. v. Assessors of Framingham***, Mass. ATB Findings of Fact and Reports 1988-95, 150. In determining the property's highest and best use, consideration should be given to the purpose for which the property is adapted. *See* ***Leen v. Assessors of Boston***, 345 Mass. 494, 504 (1963); ***Boston Gas Co. v. Assessors of Boston***, 334 Mass. 549, 566 (1956). A property's highest and best use must be legally permissible, physically possible, financially feasible, and maximally productive. APPRAISAL INSTITUTE, THE APPRAISAL OF REAL ESTATE at 332 (14th ed., 2013); *see also* ***Skyline Homes, Inc. v. Commonwealth***, 362 Mass. 684, 687 (1972); ***DiBaise v. Town of Rowley***, 33 Mass. App. Ct. 928 (1992).

According to the appellant's own tax returns, the subject golf course either lost revenue or made minimal profit during the relevant time period of this appeal. The appellant thus failed to establish that its continued use as a golf course was the use that "would bring the most" to the parcel. The operation of a golf course generating a loss or minimal profit was not a "financially feasible," let alone a "maximally productive," use of the parcel.

Therefore, the Board found that the appellant failed to establish that continued use as a golf course was the highest and best use of the subject golf course.

The Board also found fault with the appellant's appraiser's assumption that the entire subject property shared a single highest and best use. The assessors characterized the two one-acre lots as prime lots. The appellant's appraiser provided no evidence to challenge that these lots were not buildable as of the relevant assessment date. "In determining fair market value, all uses to which the property was or could reasonably be adapted on the relevant assessment date should be considered." ***Newton Girl Scout Council, Inc. v. Massachusetts Turnpike Authority.***, 335 Mass. 189, 193 (1989). While the appellant's appraiser testified that, in his opinion, the wetlands would impede the development of the entire subject property for residential use, he provided no evidence to substantiate that claim. *Cf.* ***Kunz v. Assessors of Middleton***, Mass. ATB Findings of Fact and Reports 2006-211, 222 (ruling that the taxpayer met its burden of proving property was unbuildable by presenting evidence that the town's Conservation Commission and Building Inspector had turned down the taxpayer's efforts to develop the parcel). The Board thus found and ruled that the appellant failed to meet its burden of proving that the appellee's classification of the two one-acre lots as prime, buildable lots was improper.

The Board found further flaws with the appellant's appraiser's valuation approaches. The appellant has the burden of proving that the subject property's fair cash value was lower than its assessed value. "'The burden of proof is upon the petitioner to make out its right as [a] matter of law to [an] abatement of the tax.'" ***Schlaiker v. Assessors of Great Barrington***, 365 Mass. 243, 245 (1974) (quoting ***Judson Freight Forwarding Co. v. Commonwealth***, 242 Mass. 47, 55 (1922)).

In appeals before the Board, taxpayers "'may present persuasive evidence of overvaluation either by exposing flaws or errors in the assessors' method of valuation, or by introducing affirmative evidence of value which undermines the assessors' valuation.'" ***General Electric Co. v. Assessors of Lynn***, 393 Mass. 591, 600 (1984) (quoting ***Donlon v. Assessors of Holliston***, 389 Mass. 848, 855 (1983)). "[T]he board is entitled to 'presume that the valuation made by the assessors [is] valid unless the taxpayers . . . prov[e] the contrary.'" ***General Electric Co.***, 393 Mass. at 598 (quoting ***Schlaiker***, 365 Mass. at 245).

The appellant's appraiser developed two different valuation approaches - a sales-comparison approach and an income-valuation approach. Both approaches, together with the cost approach developed by the assessor, are recognized by real estate valuation experts, the Massachusetts courts, and the Board. ***Correia v. New Bedford Redev. Authority***, 375 Mass. 360, 362 (1978). However, the

Board found serious flaws in the appellant's appraiser's application of these approaches.

In a sales-comparison analysis, evidence of sales may be considered "only if they are free and not under compulsion." ***Congregation of the Mission of St. Vincent dePaul v. Commonwealth***, 336 Mass. 357, 360 (1957). For his sales-comparison approach, the appellant's appraiser selected eight sales of purportedly comparable golf courses. However, several of his sales were short sales or pre- or post-foreclosure sales. Foreclosure sales and short sales inherently suggest compulsion on the part of the seller. ***DSM Realty, Inc. v. Assessors of Andover***, 391 Mass. 1014, 1014 (1984). Anyone wishing to offer evidence of these types of sales "must show circumstances rebutting the suggestion of compulsion." ***Id.*** The appellant failed to produce any evidence to rebut the presumption of compulsion attached to these sales. Moreover, the appellant's appraiser's sales consisted of either eighteen-hole golf courses that were over twice the size of the subject golf course or of nine-hole golf courses. These sales were not comparable to the subject golf course. *See* ***Lareau v. Assessors of Norwell***, Mass. ATB Findings of Fact and Reports 2010-879, 886, 894 (finding that the taxpayer's comparable-sales analysis "was of little value for determining the fair cash value of the subject property" where the offered sales "were simply not comparable to the subject property") (citing ***The Trustee of the Charles***

Cotesworth Pinckney Trust v. Assessors of West Tisbury, Mass. ATB Findings of Fact and Reports 2007-621, 630-31). Because of these serious defects, the Board found and ruled that the appellant's appraiser's sales-comparison analysis lacked credibility.

Both parties also developed an income-capitalization analysis to value the subject property. The income-capitalization method "is frequently applied with respect to income producing property." ***Taunton Redev. Assoc. v. Assessors of Taunton***, 393 Mass. 293, 295 (1984). In applying this method, the income stream must reflect market income as evidenced by the income generated by comparable properties. *See* ***Pepsi-Cola Bottling Co. v. Assessors of Boston***, 397 Mass. 447, 451 (1986); ***Alstores Realty Corp. v. Assessors of Peabody***, 391 Mass. 60, 68 (1984). It is the earning capacity of real estate, rather than its actual income, which is probative of fair market value. ***Assessors of Quincy v. Boston Consolidated Gas Co.***, 309 Mass. 60, 64 (1941).

For his income-capitalization approach, the appellant's appraiser developed an income stream using golf fees that were far lower than the average of golf fees charged by the local golf courses in the market area. The Board found that the appellant's appraiser's income stream did not reflect market value. The Board therefore found and ruled that, because his income figures were flawed, the appellant's appraiser's income-capitalization approach was unreliable. *See* ***Warila, Trustee of the Lancaster Realty Trust***

v. Assessors of Lancaster, Mass. ATB Findings of Fact and Reports 2007-72, 89 (ruling that, because both parties' witnesses "presented income-capitalization methodologies which failed to incorporate market evidence supporting the validity of the income used," their analyses "did not reliably reflect the value of the subject property").

Conclusion

The Board found and ruled that the appellant failed to meet its burden of proving a fair market value for the subject property that was less than its assessed value. The Board further found and ruled that the appellant failed to prove that the appellee incorrectly applied the provisions of Chapter 61B to the subject property.

Accordingly, the Board issued a decision for the appellee in this appeal.

THE APPELLATE TAX BOARD

By: _____
Thomas W. Hammond, Jr., Chairman

A true copy,

Attest: _____
Clerk of the Board