

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

KLAUDIA SEKURA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

L.A. TAN ENTERPRISES, INC., an Illinois
corporation,

Defendant.

Case No. 2015-CH-16694

Judge: Hon. Rodolfo Garcia

**FIRST AMENDED CLASS ACTION COMPLAINT
AND DEMAND FOR JURY TRIAL**

Plaintiff Klaudia Sekura brings this First Amended Class Action Complaint and Demand for Jury Trial (“Complaint”) against Defendant L.A. Tan Enterprises, Inc. to put a stop to its unlawful collection, use, storage, and disclosure of Plaintiff’s and the proposed Class’s sensitive biometric data. Plaintiff alleges as follows upon personal knowledge as to herself and her own acts and experiences and, as to all other matters, upon information and belief, including investigation conducted by her attorneys.

NATURE OF THE ACTION

1. Defendant L.A. Tan operates (both directly and through a network of franchisees) hundreds of tanning salons located throughout the United States, including dozens located in Illinois.

2. When a consumer first purchases services at an L.A. Tan location, the consumer is enrolled in L.A. Tan’s national membership database. According to L.A. Tan’s website, this allows customers to use their memberships at any of its locations.¹

¹ *About L.A. Tan*, L.A. Tan Enterprises, Inc., <http://www.latan.com/about/> (last visited Apr.

3. While most membership management programs use conventional methods for verifying customers (like key fobs or identification cards), L.A. Tan customers are required to have their fingerprints scanned.

4. Unlike key fobs or identification cards—which can be changed or replaced if stolen or compromised—fingerprints are unique, permanent biometric identifiers associated with the consumer. This exposes consumers to serious and irreversible privacy risks. For example, if a fingerprint database is hacked, breached, or otherwise exposed, consumers have no means by which to prevent identity theft and unauthorized tracking.

5. Recognizing the need to protect its citizens from situations like these, Illinois enacted the Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (“BIPA”), specifically to regulate companies that collect and store Illinois consumers’ biometrics, such as fingerprints.

6. Despite this law, L.A. Tan disregards its customers’ statutorily protected privacy rights and unlawfully collects, stores, and uses their biometric data in violation of the BIPA. Specifically, L.A. Tan has violated (and continues to violate) the BIPA because it did not (and continues not to):

- Properly inform Plaintiff or the Class in writing of the specific purpose and length of time for which their fingerprints were being collected, stored, and used, as required by the BIPA;
- Provide a publicly available retention schedule and guidelines for permanently destroying Plaintiff’s and the Class’s fingerprints, as required by the BIPA; and
- Receive a written release from Plaintiff or the members of the Class to collect, capture, or otherwise obtain their fingerprints, as required by the BIPA.

7. Worse, L.A. Tan salons violate the BIPA by disclosing customer fingerprint data

to an out-of-state third party vendor, SunLync.

8. On information and belief, Defendant L.A. Tan Enterprises, Inc., is directly liable for, and had actual knowledge of, the BIPA violations alleged herein.

9. In the alternative, Defendant L.A. Tan Enterprises, Inc., a franchisor, did not have actual knowledge of the alleged BIPA violations committed by its franchisee salons but is nevertheless vicariously liable for those violations.²

10. Accordingly, this Complaint seeks an Order: (i) declaring that L.A. Tan's conduct violates the BIPA; (ii) requiring L.A. Tan to cease the unlawful activities discussed herein; and (iii) awarding statutory damages to Plaintiff and the proposed Class.

PARTIES

11. Plaintiff Klaudia Sekura is a natural person and resident and citizen of the State of Illinois.

12. Defendant L.A. Tan Enterprises, Inc. is a corporation existing under the laws of the State of Illinois, with its headquarters and principal place of business located at 3775 West Arthur Avenue, Lincolnwood, Illinois 60712. L.A. Tan conducts business throughout this County, the State of Illinois, and the United States.

JURISDICTION AND VENUE

13. This Court has jurisdiction over Defendant pursuant to 735 ILCS 5/2-209 because Defendant conducts business transactions in Illinois, has committed tortious acts in Illinois, is

² L.A. Tan's CEO, Nick Patel, testified (in an affidavit attached to L.A. Tan Enterprises, Inc.'s motion to dismiss) that L.A. Tan Enterprises, Inc., does not maintain or host any computer server that stores any customer data, including any customer fingerprint data. Assuming Mr. Patel's claims are true, and even if the BIPA violations alleged herein were committed by L.A. Tan salons without the knowledge of L.A. Tan Enterprises, Inc., Defendant is still vicariously liable. Discovery will confirm the amount of control Defendant exercised over its franchisees and the extent to which salons had apparent authority to act as agents of Defendant.

registered to conduct business in Illinois, and is headquartered in Illinois. Additionally, this Court has jurisdiction over Plaintiff Sekura because she is a resident of the State of Illinois.

14. Venue is proper in Cook County because Defendant maintains its headquarters in Cook County, conducts business transactions in Cook County, entered into a contract with Plaintiff Sekura in Cook County, and the cause of action arose, in substantial part, in Cook County. Venue is additionally proper because Plaintiff Sekura resides in Cook County.

FACTUAL BACKGROUND

I. The Biometric Information Privacy Act.

15. In the early 2000's, major national corporations started using Chicago and other locations in Illinois to test "new [consumer] applications of biometric-facilitated financial transactions, including finger-scan technologies at grocery stores, gas stations, and school cafeterias." 740 ILCS 14/5(c). Given its relative infancy, an overwhelming portion of the public became weary of this then-growing, yet unregulated technology. *See* 740 ILCS 14/5.

16. In late 2007, a biometrics company called Pay by Touch, which provided major retailers throughout the State of Illinois with fingerprint scanners (to facilitate consumer transactions), filed for bankruptcy. That bankruptcy was alarming to the Illinois Legislature because suddenly there was a serious risk that millions of fingerprint records—which, like other unique biometric identifiers, can be linked to people's sensitive financial and personal data—could now be sold, distributed, or otherwise shared through the bankruptcy proceedings without adequate protections for Illinois citizens. The bankruptcy also highlighted the fact that most consumers who had used that company's fingerprint scanners were completely unaware that the scanners were not actually transmitting fingerprint data to the retailer who deployed the scanner, but rather to the now-bankrupt company, and that their unique biometric identifiers could now be

sold to unknown third parties.

17. Recognizing the “very serious need [for] protections for the citizens of Illinois when it [came to their] biometric information”, Illinois enacted the BIPA in 2008. *See* Illinois House Transcript, 2008 Reg. Sess. No. 276; 740 ILCS 14/5.

18. The BIPA is an informed consent statute which achieves its goal by making it unlawful for a company to, among other things, “collect, capture, purchase, receive through trade, or otherwise obtain a person’s or a customer’s biometric identifiers or biometric information, unless it first:

- (1) informs the subject . . . in writing that a biometric identifier or biometric information is being collected or stored;
- (2) informs the subject . . . in writing of the specific purpose and length of term for which a biometric identifier or biometric information is being collected, stored, and used; and
- (3) receives a written release executed by the subject of the biometric identifier or biometric information.”

740 ILCS 14/15(b).

19. Biometric identifiers include retina and iris scans, voiceprints, scans of hand and face geometry, and—most importantly here—fingerprints. *See* 740 ILCS 14/10. Biometric information is separately defined to include any information based on an individual’s biometric identifier that is used to identify an individual. *See id.*

20. The BIPA also establishes standards for how companies must handle Illinois consumers’ biometric identifiers and biometric information. *See, e.g.,* 740 ILCS 14/15(c)–(d). For example, the BIPA prohibits private entities from disclosing a person’s or customer’s biometric identifier or biometric information without first obtaining consent for that disclosure. *See* 740 ILCS 14/15(d)(1).

21. The BIPA also prohibits selling, leasing, trading, or otherwise profiting from a

person's biometric identifiers or biometric information, 740 ILCS 14/15(c), and requires companies to develop and comply with a written policy—made available to the public—establishing a retention schedule and guidelines for permanently destroying biometric identifiers and biometric information when the initial purpose for collecting such identifiers or information has been satisfied or within three years of the individual's last interaction with the company, whichever occurs first. 740 ILCS 14/15(a).

II. L.A. Tan Violates the Biometric Information Privacy Act.

22. By the time the BIPA passed through the Illinois Legislature in mid-2008, most retailers who had experimented using consumers' biometric data stopped doing so. That is because Pay By Touch's bankruptcy, described in Section I above, was widely publicized and brought attention to consumers' discomfort with the use of their biometric data in these situations.³

23. Unfortunately, L.A. Tan failed to take note of the industry-wide shift in Illinois norms (and, worse, Illinois Law) governing the collection and use of biometric data. As a result, L.A. Tan continues to collect, store, and use its customers' biometric data in violation of the BIPA.

24. Specifically, when consumers first purchase services at one of L.A. Tan's locations, they are required to have their fingerprints scanned to enroll them in L.A. Tan's national membership database. According to L.A. Tan's website, this allows customers to subsequently "check-in" at other locations using their fingerprints.

25. L.A. Tan also fails to inform its customers that it discloses their fingerprint data to

³ See, e.g., Meg Marco, *Creepy Fingerprint Pay Processing Company Shuts Down*, CONSUMERIST (April 14, 2008), <http://consumerist.com/2008/04/14/creepy-fingerprint-pay-processing-company-shuts-down/> (last visited Apr. 4, 2016).

an out-of-state third party vendor (SunLync), fails to inform its customers of the purposes for which it collects their sensitive biometric data, and fails to obtain written releases from customers before collecting their fingerprints.

26. Nor does L.A. Tan provide its customers with a written, publicly available policy identifying its retention schedule, nor guidelines for permanently destroying its customers' fingerprints when the initial purpose for collecting or obtaining their fingerprints is no longer relevant, as required by the BIPA.

27. The Pay by Touch bankruptcy that catalyzed the passage of the BIPA highlights why conduct such as L.A. Tan's—where consumers are aware that they are providing a fingerprint but are not aware of to whom or for what purposes they are doing so—is so dangerous. That bankruptcy spurred Illinois citizens and legislators into realizing that it is crucial for consumers to understand when providing biometric identifiers such as a fingerprint who exactly is collecting their biometric data, where it will be transmitted to, for what purposes, and for how long. But L.A. Tan disregards these obligations, and instead unlawfully collects, stores, and uses its customers' biometric identifiers and information, without ever receiving the individual informed written consent required by BIPA.

28. Alarming, according to one source, in 2013, more than 65% of L.A. Tan salons were in foreclosure.⁴ L.A. Tan customers are not told what might happen to their biometric data if and when their local salons go out of business—or, worse, if and when L.A. Tan's entire business folds.

29. Because L.A. Tan neither publishes a BIPA-mandated data retention policy nor discloses the purposes for its collection of biometric data, its customers have no idea whether

⁴ See <http://williambruce.org/2013/06/08/best-and-worst-franchises-listed-by-sba-loan-defaults/> (last accessed March 24, 2016).

L.A. Tan sells, discloses, re-discloses, or otherwise disseminates their biometric data. Nor are they told to whom L.A. Tan currently discloses their biometric data, or what might happen to their biometric data in the event of a merger or a bankruptcy.

30. By and through the actions detailed above, L.A. Tan not only disregards its customers' privacy rights, but it also violates the BIPA.

III. Plaintiff Klaudia Sekura's Experience.

31. Plaintiff Klaudia Sekura signed up for a membership with L.A. Tan in April 2015.

32. Sekura paid to L.A. Tan money for her membership.

33. When she signed up, L.A. Tan enrolled her in its corporate membership database and required that she provide it with a scan of her fingerprint.

34. L.A. Tan subsequently stored Sekura's fingerprint data in its databases.

35. Each time Sekura visited L.A. Tan, she was required to scan her fingerprint before using its services.

36. Sekura has never been informed of the specific purposes or length of time for which L.A. Tan collected, stored, or used her fingerprints.

37. Sekura has never been informed of any biometric data retention policy developed by L.A. Tan, nor has she ever been informed of whether L.A. Tan will ever permanently delete her fingerprint data.

38. Sekura has never been provided with nor ever signed a written release allowing L.A. Tan to collect or store her fingerprints.

39. Sekura has never been provided with nor ever signed a written release allowing L.A. Tan to disclose her biometric data to SunLync (or any other third party).

40. Sekura has continuously and repeatedly been exposed to the risks and harmful

conditions created by L.A. Tan's violations of the BIPA alleged herein.

41. As a result of L.A. Tan's conduct, Sekura has suffered emotional upset, mental anguish, and mental injury. For example, Sekura experiences mental anguish and injury when thinking about what would happen to her biometric data if L.A. Tan went bankrupt, whether L.A. Tan will ever delete her biometric data, and whether (and to whom) L.A. Tan shares her biometric data.

CLASS ALLEGATIONS

42. **Class Definition:** Plaintiff Sekura brings this action pursuant to 735 ILCS 5/2-801 on behalf of herself and a class of similarly situated individuals, defined as follows:

All residents of the State of Illinois who had their fingerprints collected, captured, received, otherwise obtained, or disclosed by L.A. Tan while residing in Illinois.

The following people are excluded from the Class: (1) any Judge or Magistrate presiding over this action and members of their families; (2) Defendant, Defendant's subsidiaries, parents, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and its current or former employees, officers and directors; (3) persons who properly execute and file a timely request for exclusion from the Class; (4) persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; (5) Plaintiff's counsel and Defendant's counsel; and (6) the legal representatives, successors, and assigns of any such excluded persons.

43. **Numerosity:** The exact number of Class members is unknown to Plaintiff at this time, but it is clear that individual joinder is impracticable. Defendant has collected, captured, received, or otherwise obtained biometric identifiers or biometric information from thousands of consumers who fall into the definition of the Class. Ultimately, the Class members will be easily identified through Defendant's records.

44. **Commonality and Predominance:** There are many questions of law and fact common to the claims of Plaintiff and the Class, and those questions predominate over any questions that may affect individual members of the Class. Common questions for the Class include, but are not necessarily limited to the following:

- a) whether L.A. Tan collected, captured, or otherwise obtained Plaintiff's and the Class's biometric identifiers or biometric information;
- b) whether L.A. Tan properly informed Plaintiff and the Class of its purposes for collecting, using, and storing their biometric identifiers or biometric information;
- c) whether L.A. Tan obtained a written release (as defined in 740 ILCS 14/10) to collect, use, and store Plaintiff's and the Class's biometric identifiers or biometric information;
- d) whether L.A. Tan has disclosed or re-disclosed Plaintiff's and the Class's biometric identifiers or biometric information to any third parties;
- e) whether L.A. Tan has sold, leased, traded, or otherwise profited from Plaintiff's and the Class's biometric identifiers or biometric information;
- f) whether L.A. Tan developed a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying biometric identifiers and biometric information when the initial purpose for collecting or obtaining such identifiers or information has been satisfied or within three years of their last interaction, whichever occurs first;
- g) whether L.A. Tan complies with any such written policy (if one exists);
- h) whether L.A. Tan used Plaintiff's and the Class's fingerprints to identify them; and
- i) whether L.A. Tan's violations of the BIPA were committed negligently.

45. **Adequate Representation:** Plaintiff will fairly and adequately represent and protect the interests of the Class and has retained counsel competent and experienced in complex litigation and class actions. Plaintiff has no interests antagonistic to those of the Class, and Defendant has no defenses unique to Plaintiff. Plaintiff and her counsel are committed to vigorously prosecuting this action on behalf of the members of the Class, and have the financial

resources to do so. Neither Plaintiff nor her counsel has any interest adverse to those of the other members of the Class.

46. **Appropriateness:** This class action is appropriate for certification because class proceedings are superior to all other available methods for the fair and efficient adjudication of this controversy and joinder of all members of the Class is impracticable. The damages suffered by the individual members of the Class are likely to have been small relative to the burden and expense of individual prosecution of the complex litigation necessitated by Defendant's wrongful conduct. Thus, it would be virtually impossible for the individual members of the Class to obtain effective relief from Defendant's misconduct. Even if members of the Class could sustain such individual litigation, it would not be preferable to a class action because individual litigation would increase the delay and expense to all parties due to the complex legal and factual controversies presented in this Complaint. By contrast, a class action presents far fewer management difficulties and provides the benefits of single adjudication, economies of scale, and comprehensive supervision by a single court. Economies of time, effort, and expense will be fostered and uniformity of decisions will be ensured.

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FIRST CAUSE OF ACTION
Violation of 740 ILCS 14/1, *et seq.*
(On Behalf of Plaintiff and the Class)

47. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

48. The BIPA requires companies to obtain informed written consent from consumers before acquiring their biometric data. Specifically, the BIPA makes it unlawful for any private entity to “collect, capture, purchase, receive through trade, or otherwise obtain a person’s or a customer’s biometric identifiers or biometric information, unless [the entity] first: (1) informs the subject . . . in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the subject . . . in writing of the specific purpose and length of term for which

a biometric identifier or biometric information is being collected, stored, and used; *and* (3) receives a written release executed by the subject of the biometric identifier or biometric information....” 740 ILCS 14/15(b) (emphasis added).

49. The BIPA also prohibits private entities from disclosing a person’s or customer’s biometric identifier or biometric information without first obtaining consent for that disclosure. *See* 740 ILCS 14/15(d)(1).

50. The BIPA also mandates that companies in possession of biometric data establish and maintain a satisfactory biometric data retention (and—importantly—deletion) policy. Specifically, those companies must: (i) make publicly available a written policy establishing a retention schedule and guidelines for permanent deletion of biometric data (at most three years after the company’s last interaction with the consumer); and (ii) actually adhere to that retention schedule and actually delete the biometric information. *See* 740 ILCS 14/15(a).

51. Unfortunately, L.A. Tan fails to comply with these BIPA mandates.

52. L.A. Tan is an Illinois corporation and thus qualifies as a “private entity” under the BIPA. *See* 740 ILCS 14/10.

53. Plaintiff and the Class are individuals who had their “biometric identifiers” collected by L.A. Tan (in the form of their fingerprints), as explained in detail in Section II. *See* 740 ILCS 14/10.

54. Plaintiff’s and the Class’s biometric identifiers were used to identify them, and therefore constitute “biometric information” as defined by the BIPA. *See* 740 ILCS 14/10.

55. L.A. Tan systematically and automatically collected, used, stored, and disclosed their biometric identifiers or biometric information without first obtaining the written release required by 740 ILCS 14/15(b)(3).

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56. Specifically, L.A. Tan salons systematically disclosed Plaintiff’s and the Class’s biometric identifiers and biometric information to SunLync, an out-of-state third party vendor.

57. L.A. Tan did not properly inform Plaintiff or the Class in writing that their biometric identifiers or biometric information were being collected and stored, nor did it inform them in writing of the specific purpose and length of term for which their biometric identifiers or biometric information was being collected, stored, and used as required by 740 ILCS 14/15(b)(1)–(2).

58. L.A. Tan does not provide a publicly available retention schedule or guidelines for permanently destroying its customers’ biometric identifiers and biometric information as specified by the BIPA. *See* 740 ILCS 14/15(a).

59. By collecting, storing, and using Plaintiff’s and the Class’s biometric identifiers and biometric information as described herein, L.A. Tan violated Plaintiff’s and the Class’s rights to privacy in their biometric identifiers or biometric information as set forth in the BIPA, 740 ILCS 14/1, *et seq.*

60. On behalf of herself and the Class, Plaintiff seeks: (1) injunctive and equitable relief as is necessary to protect the interests of Plaintiff and the Class by requiring L.A. Tan to comply with the BIPA’s requirements for the collection, storage, and use of biometric identifiers and biometric information as described herein; (2) statutory damages of \$1,000 for the negligent violation of the BIPA pursuant to 740 ILCS 14/20(1); and (3) reasonable attorneys’ fees and costs and other litigation expenses pursuant to 740 ILCS 14/20(3).

SECOND CAUSE OF ACTION
Unjust Enrichment
(On Behalf of Plaintiff and the Class)

61. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

62. Plaintiff and the Class conferred benefits on L.A. Tan by paying L.A. Tan for tanning related services. As a result, L.A. Tan received and retained money belonging to Plaintiff and the Class.

63. L.A. Tan appreciated and has knowledge of such benefits.

64. Under the BIPA, Plaintiff and the Class were entitled to certain procedural safeguards concerning their fingerprint data.

65. Under principles of equity and good conscience, because L.A. Tan failed to comply with the BIPA, L.A. Tan should not be allowed to retain the full amount of money Plaintiff and the Class paid to L.A. Tan.

66. Accordingly, Plaintiff seeks an order declaring that L.A. Tan’s conduct constitutes unjust enrichment, and awarding Plaintiff and the Class restitution in an amount to be calculated at trial.

THIRD CAUSE OF ACTION
Negligence
(On Behalf of Plaintiff and the Class)

67. Plaintiff incorporates the foregoing allegations as is fully set forth herein.

68. L.A. Tan owed Plaintiff a duty of reasonable care. That duty required that L.A. Tan exercise reasonable care in the collection and use of Plaintiff’s biometric data.

69. Additionally, L.A. Tan owed Plaintiff a heightened duty—under which L.A. Tan assumed a duty to act carefully and not put Plaintiff at undue risk of harm—because of the business relationship of the parties.

70. L.A. Tan breached its duties by failing to implement reasonable procedural safeguards around the collection and use of Plaintiff’s biometric identifiers and biometric information.

71. Specifically, L.A. Tan breached its duties by failing to properly inform Plaintiff in writing of the specific purpose or length of time for which her fingerprints were being collected, stored, and used.

72. L.A. Tan also breached its duties by failing to provide a publicly available retention schedule and guidelines for permanently destroying Plaintiff’s fingerprint data.

73. L.A. Tan’s breach of its duties proximately caused and continues to cause Plaintiff mental anguish and mental injury. For example, Plaintiff experiences mental anguish when thinking about what would happen to her biometric data if L.A. Tan went bankrupt, whether L.A. Tan will ever delete her biometric information, and whether (and to whom) L.A. Tan shares her biometric data.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Klaudia Sekura, on behalf of herself and the Class, respectfully requests that this Court enter an Order:

- A. Certifying this case as a class action on behalf of the Class defined above, appointing Plaintiff Sekura as representative of the Class, and appointing her counsel as Class Counsel;
- B. Declaring that L.A. Tan’s actions, as set out above, violate the BIPA;
- C. Awarding statutory damages of \$1,000 for *each* of Defendant’s violations of the BIPA, pursuant to 740 ILCS 14/20(1);
- D. Awarding injunctive and other equitable relief as is necessary to protect the interests of the Class, including an Order requiring L.A. Tan to collect, store, and use biometric identifiers or biometric information in compliance with the BIPA;
- E. Declaring that L.A. Tan’s actions, as described above, constitute Negligence and

Unjust Enrichment;

F. Awarding Plaintiff and the Class their reasonable litigation expenses and attorneys' fees;

G. Awarding Plaintiff and the Class pre- and post-judgment interest, to the extent allowable; and

H. Awarding such other and further relief as equity and justice may require.

JURY TRIAL

Plaintiff demands a trial by jury for all issues so triable.

Respectfully submitted,

KLAUDIA SEKURA, individually and on behalf
of all others similarly situated,

By: 

One of Plaintiff's Attorneys

Dated: April 8, 2016

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*Admitted *Pro Hac Vice*.

CERTIFICATE OF SERVICE

I, Todd Logan, certify that I served copies of the foregoing *Plaintiff's First Amended Class Action Complaint* to the following counsel via electronic mail on April 8, 2016:

BAKERHOSTETLER

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Todd Logan

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