



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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OFFICE OF THE  
SECRETARY

April 4, 2007 (4:15pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

MEMORANDUM TO FILE

FROM: Emile L. Julian *Emile L. Julian*  
Assistant for Rulemakings  
and Adjudications

SUBJECT: FORM COMMENTS SUBMITTED IN RESPONSE TO REQUEST  
FOR COMMENTS ON PRM-51-10 (71FR 64169)

Attached is a representative sample of 1,602 identical e-mails submitted in response to the Federal Register Notice on PRM-51-10, the petition for rulemaking submitted by the Attorney General of Massachusetts to modify or revoke regulations concerning the storage of spent nuclear fuel in high-density fuel storage pools. Also attached is a list of persons who submitted identical e-mails.

Attachments: As stated

**From:** David Yao <davidc.yao@comcast.net>  
**To:** <secy@nrc.gov>  
**Date:** Thu, Mar 15, 2007 5:26 PM  
**Subject:** Massachusetts Attorney General Petition for Rulemaking, Docket No. PRM-51-10

Attn: Rulemakings and Adjudications

I am writing in full support of the Massachusetts Attorney General Petition for Rulemaking (Docket No. PRM-51-10), which requests that the NRC evaluate the environmental impacts of severe accidents and intentional attacks on spent fuel storage in its licensing decisions. The NRC must also consider measures for mitigating these impacts.

The densely-packed spent fuel pools found at every reactor site are vulnerable to terrorist attack and severe accidents that could result in large radioactive releases and the contamination of vast areas. Recent studies make it clear that NRC's claim that a spent fuel fire is "highly remote" is simply incorrect. A 2006 study by the National Academies found that a terrorist attack could cause "considerable physical damage to a spent fuel storage facility" and that even the partial loss of water in a spent fuel pool could lead to a fire and the release radioactivity to the environment.

The Ninth Circuit Court decision in *San Luis Obispo Mothers for Peace v. NRC* concluded that the NRC must evaluate the environmental impacts of a terrorist attack on spent fuel storage in its licensing decisions. I am dismayed that the NRC would choose to ignore this decision outside of the Ninth Circuit. Not only did the court's decision clearly dismiss the NRC's claims that these impacts do not have to be considered in environmental reviews, the Supreme Court refused to hear the appeal. When faced with the same decision, the Department of Energy (DOE) properly decided to apply the decision across the entire country. The NRC must follow the DOE's lead and apply the Ninth Circuit decision to all of its licensing decisions across the country.

Sincerely,

David Yao  
1538 N 128 St  
Seattle, WA 98133

**Mail Envelope Properties** (45F9BA08.948 : 16 : 22856)

**Subject:** Massachusetts Attorney General Petition for Rulemaking, Docket No. PRM-51-10  
**Creation Date** Thu, Mar 15, 2007 5:26 PM  
**From:** David Yao <davidc.yao@comcast.net>  
**Created By:** davidc.yao@comcast.net

**Recipients**

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MESSAGE	1782	Thursday, March 15, 2007 5:26 PM
Mime.822	2998	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

**Junk Mail settings when this message was delivered**

Junk Mail handling disabled by User  
Junk Mail handling disabled by Administrator  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled

<b>PRM-51-10</b>	<b>71FR64169</b>	<b>Total: 1,602</b>
David Yao 1538 N 128 St Seattle, WA 98133	Linda Kobler 1100 Manhattan Denton, TX 76209	Amanda Carter 239 Saint James Place Brooklyn, NY 11238
Mary Ann Wilson 10433 Wilshire Blvd. #902 Los Angeles, CA 90024	Rachael Stern 3318 Nundy Road Tampa, FL 33618	Ken Fogel 338 Vallley Lake Dr. Stone Mtn., GA 30087
Margaret Welke 410 Clemons Avenue Madison, WI 53704	Barbara Fried 1510 Dogwood Drive Alexandria, VA 22302	Timothy McGettigan 316 Harrison Street Pueblo, CO 81004
Jerry Atkins 333 Chalfont Drive Athens, GA 30606	David L. Smith 4242 Janick Circle North Stevens Point, WI 54481	Douglas McNeill 33T Ridge Road Greenbelt, MD 20770
Mark Reback 10305 1/2 Ilona Ave Los Angeles, CA 90064	Gail Vaughn 61033 County Road C Ferryville, WI 54628	Jessica Manganello 43 Everett Street Arlington, MA 02474
Gerryl E. Puelle 540 East 20th Street Apt. 9B New York, NY 10009	Arran Thomson 4613 NE 19th Ave Portland, OR 97211	D. Meier 924 West 12th street Cedar Falls, IA 50613
Tia Triplett 4073 Bledsoe Avenue Los Angeles, CA 90066	Jessie Lovano-Kerr 3142 Ortega Drive Tallahassee, FL 32312	Catherine Valentine 1690 Plymouth Avenue San Francisco, CA 94127
Jo Alwood 52 E. Cardigan St. Louis, MO 63135	Randy Sailer 1018 cherry lane beulah, ND 58523	Don Cicchelli 1329 Pierce Street, #4 San Francisco, CA 94115
Doug Shohan 95 Via Maria Lee, MA 01238	Jennifer Hill-Hart 26 S Davis St Helena, MT 59601	Keith Myers 4259B Burkhart East Drive Indianapolis, IN 46227
Joseph Cox 25885 Trabuco Rd. #242 Lake Forest, CA 92630	Rick Gordon 910 Marengo Ln. Nashville, TN 37204	Mindy Mayers 33 crystal lake lane the woodlands, TX 77380

George Stadnik 24-66 44th Street Long Island City, NY 111	Karine Tchakerian 329 Old Mill Ave. Felton, CA 95018	John L. Keiser 410 East 6 St., Apt. 17B New York, NY 10009
Cody Dolnick 4852 Santa Cruz Ave #5 San Diego, CA 92107	Edward Schaechtel 514 S.Bond St. P.O.Box38131 Baltimore, MD 21231	Diane Weinstein 24116 SE 45th Place Issaquah, WA 98029
Peter Bradfield 2345-6 Henderson Mill Road NE Atlanta, GA 30345	Judith Moore 1414 Brett Pl #328 SAn Pedro, CA 90732	Adriana Faria 17747 93rd Ave E Puyallup, WA 98375
David Lawhon 4211 Lafayette St. Apt. 635 Dallas, TX 75204	Dave Searles American Heritage Service, Inc 607 E. 2md Avenue Brodhead, WI 53545	Joan Sage 914 Kimball Street Philadelphia, PA 19147
George Canada 6102 N. Meridian Ave., #108 Oklahoma City, OK 7311	Suzanne Kristan 19295-1 E Marsh Station Rd Vail, AZ 85641	Roger Peirce 1127 Eagle Way Lyons, CO 80540
Leslie Scott P.O. Box 3918 Palmer, AK 99645	Mary Frances Gebhard St. Bede Monastery 1190 Priory R Eau Claire , WI 54701	Evalyn F. Segal 6655 McCallum St. Philadelphia, PA 19119
Allfred S. Fuller 2712 Sol Y Luz Loop Santa Fe, NM 87505	Jayasri Subramanian 1650 Cedarwood Dr Longmont, CO 80501	Andrew Bertuglia 90 Cedar De. Durham, CT 06422
David Saperia 901 10th St # 207 Santa Monica, CA 90403	Kim Tietje 1490 east 8425 south Sandy, UT 84093	Kimberly Peterson 127 Railroad Ave 17 Cloverdale, CA 95425
Elizabeth Guthrie 525 French Road Apt. 5 Rochester, NY 14618	Donald Elias 766 Newmans Lane Martinsville, NJ 08836	Sebastian Pernice 641 HUDson St. 5D NYC, NY 10014
Susan Peterson 101 Edl Lane Ridgeway, WI 53582	Joan MacDowell 14 Whisper Way East Ledfewood, NJ 07852	Perry Levin 11923 Parklawn Dr. Rockville, MD 20852

Tomás Herndon 4716 Pershing Ave. S.E. Albuquerque, NM 87108	Dinda Evans P O B 178695 San Diego, CA 92117	Celeste Winkle 608 W 51st St Austin, TX 78751
Mailie La Zarr 2805 Yosemite Blvd. #178 Modesto, CA 95354	Rohan Sabnis 156 Sequoia Ct. Claremont, CA 91711	Susan Bendickson 2919 Knox Ave N Minneapolis, MN 55411
Sarah Hafer 223 Marilyn St NE Albany, OR 97322	Amy Knight 1572 Jefferson Rd Jefferson , PA 15344	Christina Lin 935 Main Street, Unit 206 El Segundo, CA 90245
Rev. Marlena Mallner 501 West 110th street New York, NY 10025	K DANOWSKI 9254 FOREST LANE #1104 DALLAS, TX 75243-	Debra Rehn 5130 SE 30th Av. #9 Portland, OR 97202
Roger Peirce 1127 Eagle Way Lyons, CO 80540	Pearl Caldwell 10687 Minette Pl Cupertino, CA 95014	Navin Shankar 734 Bode Circle, Apt 106 Hoffman Estates, IL 60169
Neil Freson 26 Bitternell Lane Henrietta, NY 14467	Melissa Matthews 946 EAsT State St, #9 Athens, OH 45701	Louise Calabro Two Bay Club Drive Apt. 1-G Bayside, NY 11360
Michael Kauffman 846 Granada Dr. Greenwood, IN 46143	Phoebe Blanchford 148 Madison Ave Decatur, GA 30030	Karen Rice p.o.box 6419 Eureka, CA 95549
Eric Daniels 555W 1050S Clinton, IN 47842	Amanda Scuder 117 W. 58th St., Apt. 9H New York, NY 10019	Martha Clark 903 S Elm St Denton, TX 76201
John Schmittauer P.O. Box 193 Chauncey, OH 45719	Jimmie Smith 2821 Dove Meadow Drive Garland, TX 75043	Michael Toto 22 Great Pasture Road Redding, CT 06896
Amalia Vidas 1910 East Coronado Road Phoenix, AZ 85006	Richard Heaning 12 Seneca Dr Massapequa, NY 11758	Victoria Hall 254 Meetinghouse Rd. Gilmanton, NH 03237
Peter Flaherty 2728 E st Lincoln, NE 68510	Barry Smith 796 East 19th Street Brooklyn, NY 11230	Kevin McVan 13524 Feather Sound Cir W # 1507 Clearwater, FL 33762

D Rice 2104 Decatur, IL 62521	D Fassman 372 Post Westbury, NY 11590	Deb Fritzler 1489 Lowesville Road Amherst, VA 24521
Albert Amodeo P.O. Box 131 Howells, NY 10932	James Thomas 5900 Hathaway Lane Chapel Hill, NC 27514	Wayne B. Peters 4340 S. 68th St. Greenfield, WI 53220
Robert Rickun 8898 Norma Place West hollywood,, CA 90069	Zachary Kopp Ogden Denver, CO 80218	Mark Salamon 18 Shore Drive Harwich, MA 02645
Andy Tomsky PO Box 82673 San Diego, CA 92138	Dee Randolph 12059 Andy Mtn. Rd. Yankee Hill, CA 95965	Robert Granse 1641 El Camino de Vida Hollister, CA 95023
Dori Grasso 12207 Happy Hollow Road Cockeysville, MD 21030	Audrianna Reddick 2412 22nd Avenue San Francisco, CA 94116	David Jury 2476 Sand Run Parkway Fairlawn, OH 44333
Judith Misale 22210 Cloud Trail Kirkville, MO 63501	Harold Piggott 211 N. Meridian Rd. Glen Carbon, IL 62034	B. L. Melton 2332 Godwin Circle Orange, TX 77630
Tim Rehahn 2840 N Monroe St, 103A Monroe, MI 48162	Lori Albee 9470 Pollock Lane Salinas, CA 93907	John Butler 2084 Clearwater Way Elgin, IL 60123
Fred Koster 200 East 81st Street New York, NY 10028	Ann Roberts 757 LeGrande Hwy Horse Cave, KY 42749	Carol Newton 3020 Griffith Park Blvd Los Angeles, CA 90027
Bernadette Newburg 3626 NW 22 Terrace Cape Coral, FL 33993	David Roth 1303 S Walter Reed Drive #201 Arlington, VA 22204	Jeff Miller 37 Columbia Road Waterville, ME 04901
Lee Johnson 964 Park Place Macon, GA 31201	Ronald Monson 2201 SE Maple Valley Hwy #59 Renton, WA 98057	Linda Schermer 500 Mtn Lilac Dr Sedona, AZ 86336
Shannon Wilkerson 1718 Leisure Ln Hideaway, TX 75771	Maria Rosen 704 Honey Run Road Ambler, PA 19002	Patricia George 706 S Sgt Woodall Lane Camp Verde, AZ 86322

Vivian Valtri 4184 Route 100 Granville, VT 05747	Lawrence LaVerdure 71 Lakewood Street, #2R Worcester, MA 01603	Marjorie Williams 3440 Vail Ave. SE #B Albuquerque, NM 87106
James Wilhelmi 109 Kevin Circle Bellevue, NE 68005	Sherry Lewis POB 625 Woodstock, GA 30188	Jim Stewart 526 Barnett Dr Cedar Falls, IA 50613
Eric Bottomly 713 Caine Socorro, NM 87801	Jim Thompson 1766 Ninevah Rd Knox, PA 16232	Keith A. Scarmato PO Box 2627 Seattle, WA 98111
Larry Lambeth 2635 W. Alta Springfield, MO 65810	William White 338 Okaloosa Road Fort Walton Beach, FL 32548	Melissa Judge 1711 W. Aileen St. Tampa, FL 33607
Keith Houser 4223 163rd Ave SE Bellevue, WA 98006	Debbie Lackowitz 3066 Radcliffe Drive Yorktown Hgts, NY 10598	Peter Caton 1730 Rural St, Apt 1E Rockford, IL 61107
Thomas Schaible 77 West 7th Street Bayonne, NJ 07002	Karen Wiesner 800 Shiloh Canyon Santa Rosa, CA 95403	Julie Harris 3964 SW Dillely Road Forest Grove, OR 97116
David B. Chandler 6 Georgian Circle Newark, DE 19711	Tim Duda 340 Queen Anne Court San Antonio, TX 78209	Debbie Slack 418 Jefferson DR Lynchburg, VA 24502
Kent Johnson 1047 Terracewood Circle Ballwin, MO 63011	Alicia deHerrera 9 Saint Jude Dr Los Lunas, NM 87031	Dorothy Decker 147 Crocker St. Ashland, OR 97520
Peter Stone 924 Laurel DR Bethlehem, PA 18017	Daniel Schlosky 2369 S. Beverly Glen Blvd. #306 Los Angeles, CA 90064	Erin James 913 Ontario Oak Park, IL 6030
Melinda Broadwater 4217 SE 15th ave Portland, OR 97202	Nicholas Hartman 5112 E 23rd Tulsa, OK 74114	M Wahosi 246 Bremerton Blvd Bremerton, WA 98312
Judith Martinez 1209 Eastwood Court St Augustine, FL 32086	Penny Clifton 780 Hayes St #303 san Francisco, CA 94102	David Hayes 17 Rowell Street #1 Dorchester, MA 2125



Harold T. Hodes 202 First Street Ithaca, NY 14850-	John Cochrane 243 Metz Avenue Akron, OH 44303	Colby Shank 0419 Cr 63 Hamilton, IN 46742
Janet Rock 146 Estall Rd rochester, NY 14616	Susan Hathaway 5107 Passons Boulevard #313 Pico Rivera, CA 90660	Patty Diana 4937 W Myrtle Glendale, AZ 85301
B Thiele 2031 Wagner Rd. Glenview, IL 60025	Regina Cappelletti Mulberry Bank Canton, MI 48188	Jill Gleeson 401 5th St. Philipsburg, PA 16866
Steve Latsch PO Box 351084 Toledo, OH 43635	Marcella Hammond 4181 Utah St. San Diego, CA 92104	Sidney Goldstein 201 W Evergreen Ave, #503 Philadelphia, PA 19118
Ellen Blanchard 2727 Hidden Lake Drive Grapevine, TX 76051	Bob Stanley 1307 Hickey St. Hobart, IN 46342	Roseanne Hartman 5112 E 23rd Tulsa, OK 74114
Tammy Ambler 16259 Lone Star Ranch Dr. Conroe, TX 77302	Kate Paradis 2295 Glenwood Dr. Boulder, CO 80304	Lori March P. O. Box 874 Sterling, IL 61081
Michael Moeller 415 N. Sycamore Ave. #103 Los Angeles , CA 90036	John Hartman 5112 E 23rd Tulsa, OK 74114	Alan Muller Box 69 one Stewart Street Port Penn, DE 1973
Jon Fox 3082 Nelson Dr. Lakewood, CO 80215	Stephanie Harper 1490 Rue Riviera Bonne Terre, MO 636	Mark Heald P.O. Box 284 Pleasant Hill, TN 38578
Susan Blatt 3 Portland, OR 97201	Kelly Riley 615 Hill Church Road Hummelstown, PA 17036	Eesha Williams 111 Dutton Farm Rd Brattleboro, VT 05301
David Gustafson 3419 50 Street Moline, IL 61265	Laura Herndon 125 N. Brighton St. #231 Burbank, CA 91506	Donald Judd 311 Webster Pittsburg, KS 66762
H Schaktman 22 Bridge Street Shelburne Falls, MA 01370	Dot Sulock 18 Beaverdam Knoll Asheville, NC 28804	Chip Phillips 41-35 45 St., 5A Sunnyside, NY 11104

Ronald Bogin 2605 Edwards Ave El Cerrito, CA 94530	W Miller P O Box 65 Bethpage, NY 11714	Karl Smith 1045 Wadsworth ave. North Chicago, IL 60064
Mildred Martin 4930 Swallows Creek Rd. Hiawassee, GA 30546	Audrey J. Anderson 122 Hillview Avenue Los Altos, CA 94022	Chip Henneman 1197 Wild Tree Cir Draper, UT 84020
Erin Edwards 1857 County Rte 10 Ancram, NY 12502	KL Matlock 895 E. Jackson St. San Jose, CA 95112	Jason O'Neill 14040 NE San Rafael St Portland, OR 97230
Trisa Perry-Bio 5400 Hwy 29 Lilburn, GA 30047	Roger Levin 558 Capp St. San Francisco, CA 94110	Ira Rothenberg 30 St. James Dr Northborough, MA 01532
Andrew Cohen 95 North Evergreen Memphis, TN 38104	Art Hanson 1815 Briarwood Dr. Lansing, MI 48917	Andrew Cohen 95 North Evergreen Memphis, TN 38104
John A Beavers 2144 W Moffat #2 Chicago, IL 60647	Warren G Jones 911 Maple Ave Grafton, WV 26354	Glen Carroll 6455 S. 127th Pl. Seattle, WA 98178-
Floyd Howell 1308 E. Inwood Arlington, TX 76010	Rodney DeGreenia 36 Washington Street Gorham, NH 03581	Dean Monroe 1104 25th St #4 Des Moines, IA 50311
Elaine Fischer 2710 L Holly Hall Houston, TX 77054	Holly Henderson 60 Dudley St, #317 Chelsea, MA 02150	Dena Garcia 4805 Citrus Oak Lane Saint Cloud, FL 34771
David Young 2733 Franklin Avenue East Seattle, WA 98102	Phyllis Swank 8607 Dodsons Crossroads Chapel Hill, NC 27516	Thurman Williams Jr. 7018 S. 38th Street Bellevue, NE 68147
William Kennedy 5935 W. Cargo Circle Kearns, UT 84118	Nayeem Aslam 135 Elk Trail # 334 Carol Stream, IL 60188	Natasha Shpillar 5601 N Sheridan Chicago, IL 60660
John W. Appleman 27519 Bray Hollow Rd. McArthur, OH 45651	Sheri Archey 2375 Myrtle Ave. NE Salem, OR 97301	Julie Hagan Bloch R.D.1, Box 9a Hurleyville, NY 12747

Carlos Nunez 4475 Rosewood Avenue Apt 206 Los Angeles, CA 9000	Gabriel Goldberg 3401 Silver Maple Place Falls Church, VA 22042	Brian Lynch 6695 Mayflower Hill Waterville, ME 04901
Lydia Garvey 429 S 24th st Clinton, OK 73601	Mark Burwinkel 4686 Hamilton Ave #1 Cincinnati, OH 45223	Alice Bartholomew 415 Wall Street Elmira, NY 14905
Lisa Vandermay 16203 se 175th pl Renton, WA 98058	James Mulder 28 Sachson Pl Wappingers Falls, NY 12590	Hermine Marshall 27 Norwood Ave Kensington, CA 94707
Harriet Hirsch 1903 Memory CT. Vienna, VA 22182	Rebecca Koo 529 Taylor Ct #22 Mountain View, CA 94043	Charles Davis 316 Dice Street Hoopeston, IL 60942
John Ray 311 W. Adams St. Fayetteville, AR 72701	Howard Urbach 223 Nansemond St. Petersburg, VA 23803	Erika Goldman 182 Warren St Brooklyn, NY 11201
Joseph Ribaudo 31 Spectacle Lake Drive Nesconset, NY 11176	Carolyn Douglas 5300 Sherman Ct Richmond, VA 23234	Jim Eldon 18265 County Road 70 Brooks, CA 95606
S. Lightner 1635 W. Roger Tucson, AZ 85705	Ricardo Sowell PO Box 326 Portage, MI 49024	Patrick Cameron 12970 Hwy 8 Business #81 El Cajon, CA 92021
Steve Downing 2316 Edgewater Way Santa Barbara, CA 93109	Susan Clemens 80 Vista Terrace New Haven, CT 06515	Charles Hernandez 1922 Blodgett Street, #1B Houston, TX 77004
Gayle Hande 45 Northrop Rd West Haven, CT 06516	Lisa Hulett 3860 Gary Road Arnold, MO 63010	Jennifer Quigley 1069 Hickory Street Toms River, NJ 08755
Steve Schatzberg 329 Contra Costa Ave. Ventura, CA 93004	Lacey S. Cannon 1331 E. 1140 N. Shelley, ID 83274	Pat Nix 852 E. Cedar Sr. Sequim, WA 98382
Kathryn Owen 861 Torchwood Road Carthage, NC 28327	Carol Curro 130 Cherry St Katonah, NY 10536	Brian Thorbjornsen 518 4th St. #20 Cloquet, MN 55720

Eugene Haberman 3676 Via Dolce Marina del Rey, CA 90292	Barbara Burkett 3004 Courtland Drive Shelby, NC 28152	Robert Sabo 45730 Lakeview Ct. Apt 15201 Novi, MI 48377
Brian Napier 11 Beacon Street , Apt. # 4 Concord, NH 03301	Joanna Roy 549 W 123 NY, NY 10027	Noreen Wheller 125 Avalon Circle Smithtown, NY 11787
Gerald Comisar 20350 Stevens Creek Blvd. Apt. 109 Cupertino, CA 95014	Mark Fleming 3909 27th Ave S Seattle, WA 98108	Karen Eble 58 Lee Lynn HV, PA 19006
Theodore Radamaker 3837 Shelter Grove Drive Claremont, CA 91711	Marie Sophia Vassilakidis 407 Avondale Houston, TX 77006	Kathy Riggle 2405 La Rochelle Seabrook, TX 77586
Michael Murphy 6430 N. Claremont ave. Chicago, IL 60645	Sherley Redding 20 Executive Drive Newport News, VA 23606	Elise Aronov 19 Dodd st Montclair, NJ 07042
Rachelle Ward 9630 South Big Thunder Vail, AZ 85641	Dorothy Gillberg 22249 Berry Dr. Cleveland, OH 44116	Nancy Longo 218 Dell Park Ave Dayton, OH 45419
Thomas Maufer 350 Sharon Park Dr. Menlo Park, CA 94025	Roberta Bunsick 131 East 29th st #2 New York , NY 10016	Margaret Muniz 20 Leslie Street Cranston, RI 02910
Kim Claflin 7250 Stephens Center Line, MI 48015	Michael Stocker 100 Riverside NY, NY 10024	Conor Soraghan 4366 Saratoga Ave San Diego, CA 92107
Sylvia Lambert 62 Wheeler Hill Road Phillips, ME 04966	Janet Williams 1200 Don Gaspar Santa Fe, NM 87505	Shannon Funkhouser 78 Menotomy Rd. Arlington, MA 02476
Jeffrey Schultz P. O. Box 151 Gualala, CA 95445	Louis Breitbach 228 Delaware Avenue Massapequa, NY 11758	Keve Sankman 12671 N. Slepig Coyote Dr. Oro Valley, AZ 85755

Cornelia Hatland 8941 Forestview Rd. Evanston, IL 60203	Sydney Allrud 8815 Burke Av N Seattle, WA 98103	Hilda Spagna 262 South Paseo Quinta Apt B Green Valley, AZ 85614
Valerie Blackmore 34177 East Kappler Rd. St. Helens, OR 97051	Lee Lorentzen 9800 Bianco Terrace Des Plaines, IL 60016	John Carter 22118 W. Spruce Dr. Antioch, IL 60002
Skip Londos 7033 Edmond Ave Waco, TX 76710	Raquel Zaputil 1032 W 5th St. Waterloo, IA 50702	Sandra Cutter 2399 Skyline Way, Unit 102 Anacortes, WA 9822
Patricia Orlinski 10511 W. Kingswood Cir. Sun City, AZ 85351	Diane Reed 1598 NW Galveston Ave Bend, OR 97701	Vero Brentjens 138 Bayview Tr. Edenton, NC 27932
Joe Swierkosz 633 N Maple Ave Palatine, IL 60067	Janie Moore 2323 S.W. Park Portland, OR 97205	James Gilland 3980 W. Linda Vista Blvd. Apt. 9 Tucson, AZ 85742
Glenn Gardiner 5077 Camel Heights Rd#H Evergreen, CO 80439	Frank White 499 Frontenac Ave. Windsor, ON N9E 1L	Jeremy Schneider 15 Donna Street New City, NY 10956
Daniel Lippman 2967 Division Street Great Barrington, MA 01230	Gaston Gingues 454 Winnacunnet Road Hampton, NH 03842	Robert Phelps 576 Woodlark Galesburg, MI 49053
Stephen Schon 982 Strawberry Creek St Chula Vista, CA 91913	Ralph Rucker 21426 N Palm Desert Dr Sun City West, AZ 85375	Laura DePreta 211 Gary Rd Stamford, CT 06903
Lucy McCrone 501 East 32nd St Chicago, IL 60616	Cymone Simmons 7817 W Caldwell Ct Milwaukee, WI 53218	Sharon Gillespie 1103 Enfield Austin, TX 78703
Frances Patch 7112 Sycamore Ave Takoma Park, MD 20912	Lori Mulvey 1084 10 Mile Rd NE Comstock Park, MI 49321	Thomas Turner 20829 12th Ave. West Lynnwood, WA 98036
Sharon McMenamin 10-43 48th Avenue #2 Long Island City, NY 11101	Kerr Mahnke 2344 NE 38th Ave Portland, OR 97212	Cheri Carlson 20505 64th Dr NE Arlington, WA 98223

Mary Munn 498 County Road 8 Holyoke, MN 55749	Carol Jean Thatcher 300 Legion Avenue Chico, CA 95926	Diane Beatty 390 Landing St. Lumberton, NJ 08048
Wendy Bowman 1217 Thomas Ave. N. Minneapolis, MN 55411	George Robinson 116 Pinehurst Avenue Apt. K-12 New York, NY 10033	Ronald J. Galiati 5174 Long Branch Ave San Diego, CA 92107
Lorraine Dubois 28 Wallingford Road Brighton, MA 02135	Joyce Hammack 5406 Clover Court Fort Worth, TX 76132	Michael Tomczyszyn 555 Arguello Blvd #205 San Francisco, CA 94118
Guy Zahller 146 Creek Drive, #C Aptos, CA 95003	Pamela Dehmer 928 Bergen Ct Bel Air, MD 21014	Michael Balsai 107 North Mole Street Philadelphia, PA 19102
Sara Schmidt 2034 Hilltop Drive Arnold, MO 63010	Matthew Wormuth 673 Sheep Pen Rd. Unadilla, NY 13849	Derek Smith 3115 Yosemite Avenue, # 6 El Cerrito, CA 94530
James & Mrs. Cynthia Enlow 1460 NW Ashley Dr. Albany, OR 97217	Teresa Jaeger 851 Lincoln Parkway Oviedo, FL 32765	Jack McClain 3933 Lutheran Circle Sacramento, CA 95826
Robert Strebeck 509 Aransas Eules, TX 76039	Steven Braun 20452 Pine Drive Chandler, TX 75758	William Hallinan 6570 N. Montezuma Dr Tucson, AZ 85718
Shearle Furnish 4507 West 2nd Avenue Amarillo, TX 79106	Marilyn Risnes P O Box 437 Clarissa, MN 56440	Alice Brown 25777 Hartley Rd Beloit, OH 44609
Sherry Marsh 5030 Alicante Way Oceanside, CA 92056	Mary Lou Finley 3080 Arbodar Road San Diego, CA 92154	Katherine Sturtz 2951 County Rd. 110 Garden City, TX 79739
Regina Walther 5 Abode Road New Lebanon, NY 12125	Mario Rivera 1528 Ave L NW Winter Haven, FL 33881	Steve Adler 2015 berwyn chicago, IL 60625
Kerryr & Beth Ramsey 16087 Heatherwood CT Strongsville, OH 44149	Toni Garmon 103 Honeysuckle Trl Dawsonville, GA 30534	Marilyn Hood 93 Fred Lane Urbana, IL 61802

Mary Walsh 889 South Rd Harwinton, CT 06791	Alan Stout 2309 Grey Avenue Evanston, IL 60201	Jenny Hok 2900 Bunny Run Austin, TX 78746
Daniel Fewster 4 Saddletop Court, Apt. D Cockeysville, MD 21030	Jessica VanHook 1853 Kenny Rd Apt B Columbus, OH 43212	Donna Nina 139 W Englewood Ave Apt 6B Teaneck, NJ 07666
JoAnn Mattie 685 Fortrose Drive Winter Springs, FL 32708	Philip Gallo 745 F. Ave. Coronado, CA 92118	Mike Cremer 34510 N.E. 74th Ave. La Center, WA 98629
Mary Burnley 88708 Gentry Eugene, OR 97402	Walter Lee IV 304 Ruskin Drive Altoona, PA 16602	Ronda Snider 13805 Easy Street Kp N Gig Harbor, WA 98329
Kevin Crisler 2545 Crestwell Place Kettering, OH 45420	Ray & Betty Morris 7319 Pembroke Ave. Bakersfield, CA 93308	Cynthia & George Glentzes 2150 Hunter Creek Drive Charleston, SC 29414
Shearle Furnish 4507 West 2nd Avenue Amarillo, TX 79106	Samuel E Meredith 34683 SW 188 Way Florida City, FL 3303	Lori Blauwet 1216 9th Ave NW Rochester, MN 55901
Linda Lee McEachron Taylor 2521 W Vereda de Las Flores Tucson, AZ 85746	Sharon Ewton 1245 Cypress Dr. VISTA, CA 92084	Maria Crandall 3115 Hurley Way Sacramento, CA 95864
Isabel Sena 34-28-85th Street Jackson Heights, NY 11372	Amber Tidwell 2420 1/2 N. Beachwood Dr Los Angeles, CA 90068	Mary Steckbeck 3446 Birkenhead Drive Lexington, KY 40503
Gregory Clifton 3317 48th avenue Moline, IL 61265	Allen Brooks 204 Westhaven Austin, TX 78746	Robert B. Kaplan P. O. Box 577 Port Angeles, WA 98362
Barbara Macdonald P.O. Box 701 Woodacre, CA 94973	Noralie VanSon 301 County Route 27 Ancram, NY 12502	Robert A. Mertz 1205 Mulberry Ridge Road Spencer, WV 25276-
Joanne Groshardt 302 Trailridge Dr Richardson, TX 75081	Mike O'Connor Masse 2572 N Rd 1 East Chino Valley, AZ 86323	Michael Galuska 19505 Morden Blush Dr Lutz, FL 33558

Lori Peniche 12660 Hillcrest Dallas, TX 75230	William Dillinger 2 Carter Ct Rockville, MD 20852	Larry Bulling 2321 NW Mulkey Ave. Corvallis, OR 97330
Kent Ferguson Box 563 Wayne, IL 60184	Nancy Ellingham 14601 SE 55th St Bellevue, WA 98006	Dawn Kosec 1895 Innwood Drive Austintown, OH 44515
Luane Todd 620 N. Rowland Harrison, AR 72601	Gary Best 1197 Bay Road Sharon, MA 02067	Pam Scoville 1554 Greenwood Lake Tpke Hewitt, NJ 07421
Stuart Knappmiller 1112 Orange Ave East St Paul, MN 55106	Eileen Massey 5924 Herzog St. Oakland, CA 94608	Donn L Black P.O. Box 663 St. Helena, CA 94574
Matt Levin 123 Elm St. Hatfield, MA 01038	Joan Hackel 120 Mark Trail South Wetumpka, AL 36093	RoseMaria Root 2001 mt Carmel Rd Parkton, MD 21120
Scott Baker 511 S. 159th Circle Omaha, NE 68118	Fred Patterson 2055 S. Rsvlt. Rd. 10 Portales, NM 88130	Kevin Zellmer 2975 N Prospect Ave. Milwaukee, WI 53211
Gene Zug 23 Morninglory Ln. Manheim, PR 17545	Shelly Young Box 176 Carson, WA 98610	Geraldine Brylski 7859 Alva Lake Rd Lake Tomahawk, WI 54539
Mathew Metcalf Resident of Olympia, WA 98501	T Metreger 7545 Kice Pinckney, MI 48169	Ben Goodin Box 176 Carson, WA 98610
Samantha Heatherly 2239 Carfax Ave. Long Beach, CA 90815	Paul Szymanowski 22185 W. State Route 579 Curtice, OH 43412	Helen Kopp 12521 Indian Hollow Rd. Grafton, OH 44044
JB Kahler 219 North J Lakeview, OR 97630	Robin Gorges 216 Main St Montpelier, VT 05602	Bruce Cohen 7 Ware St worcester, MA 01602
Justin Bilyj 27399 detroit rd k4 Westlake, OH 44145	Karen Gonzales 690 Thornbird Dr Fallon, NV 89406	Sarah Barrs 517 Hickory St San Francisco, CA 94102



Bruce Deal 165 West 66th Street New York, NY 10023	Jessica Cresseveur 2834 Charlestown Rd., Apt. 6 New Albany, IN 47150	Jeffrey Bove 14 Elmbrook Dr Pittsford, NY 14534
Brian K. Sutton 34 Kennedy Avenue Bardstown, KY 40004	Julia Glahn 405 S. Webber St. Urbana, IL 61801	Bob Bousquet P.O. Box #101 Bryantville, MA 02378
Barbara Tetro 1955 1st Ave.#404 New York, NY 10029	Charles Wieland 206A Compton Circle San Ramon, CA 94583	Lenore Kinzenbaw 4702 4th St #121 Lubbock, TX 79416
Shelley Lund 3009 Pine Valley Rd. Gardnerville, WA 89410	Lee T. Neidow 4679 Burton St SE Kentwood, MI 49546	Gary Wright 78231 Snauer Lane Cottage Grove, OR 97424
Roni Love 19904 Christina circle Cerritos, CA 90703-	Melissa McCool 753 Hexon RD Selah, WA 98942	Ron Hansel 307 N Astell Ave West Covina, CA 91790
Karen Glauber 117 Rock Vestal, NY 1385	Susan Moski 124 Higganum Rd Durham, CT 06422	Lauren Kramer 1353 Walnut Lane Macungie, PA 18062
Carol Collins 1935 Nault Road Dover, DE 19904	Jina Juiliano 519 Mercedes Bartlesville, OK 74003	Richard Coveny 5828 Bantam Ave New Port Richey, FL 34652
Dorothy Dotson 833 Highland New Whiteland, IN 46184	Randi Saslow 71 East Gate Lane Hamden, CT 06514	Claire Mikalson East 302 Washington Farmington, WA 99128
Jim and Virginia Wagner 4897 E Walnut St Westerville, OH 43081	Eva Brunner 2120 N Pacific Ave, #53 Santa Cruz, CA 95060	Todd Walker 517 Rawson Ct. South Milwaukee, WI 53172
John Cevasco 596 Millers Falls Rd.,P.O.Box 78 Northfield, MA 0130-	Gloriana Sewell P.O. Box 199 Milford Square, PA 18935	Michelle Jordan 3913 Castro Valley Blvd. #41 Castro Valley, CA 94546
Ronald Goodman 432 Bitterbrush Ave. Nampa, ID 83686	Roxanne Cramer 4300 Sideburn Rd. Fairfax, VA 22030	Alice Labay 475 Rinconada Court Benicia, CA 94510

Vaughn Currier 1537 Cameron Crescent Dr., Apt. 22 Reston, VA 20190	Mara Goodman 432 Bitterbrush Ave. Nampa, ID 83686	Charles Walker 6387 New Market Way Raleigh, NC 27615
Pam Mikols 18897 W Sheridan Ave Lake Villa, IL 60046	Libby J. Goldstein 331 Queen St Phila, PA 19147	Ardith Arrington 505 Boylston Ave E, #304 Seattle, WA 98102
Ava Thiesen 60465 Cascadel So. North Fork, CA 93643	Craig Holme 802 West 12th street Silver City, NM 88061	Jean Keller 11800 Edgewater Lakewood, OH 44107
Jan Kochmeister 12587 W. Dakota Ave. #1-111 Lakewood, CO 80228	Susan Hallowell 8100 N. Romero Avenue Tucson, AZ 85704	Lori Lorant 3329 189th PI SE Bothell, WA 98012
Bruce Blacknight 1160 High Rock Mtn. Rd. Marshall, NC 28753	Lemond Dye West 13130 County Road J Deerbrook, WI 54424	Linnis Cook P.O. Box 276 Bridgton, ME 04009
Richard Coanda 1811 Tamarind # 209 Los Angeles, CA 90028	Barbara Arlen 958 NW Sycamore Ave. Apt. 2 Corvallis, OR 97330	Simon Teolis 5 South Stargazer Santa Fe, NM 87506
Janice Rocke Dome House, Palo Colorado Cyn Carmel, CA 93923	Danny DeTora 7747 Greenback Ln Apt 513 Citrus Heights, CA 95610	Thomas Schlegel 731 Barrcrest Lane Lancaster, PA 17603
Gloria Morrison 1709 West Jackson Blv. Pecos, TX 79772	David Hoxworth 7502 Winter Glen Houston, TX 77072	Mary Sue Rose 12340 Alameda Trace Circle Apt. 1802 Austin, TX 78727
Dorri and Florence Raskin 18350 Los Alimos St Northridge, CA 91326	Ross Spiegel 122 Popes Island Rd Miford, CT 06461	Jane Engelsiepen 385 Toro Canyon Road Carpinteria, CA 93013
Carrie Santulli Schudda 510 Ash St. Oregon, WI 53575	MaryAnna Foskett 101 Brantwood Road Arlington, MA 02476	Dennis Fassman 372 Post Westbury, NY 11590
Rev. Gordon Huber 3556 Wallace Drive Pittsburgh, PA 15227	Jim Crowle 27319 126th PI SE Kent, WA 98030	David Lauder 322 Hambletonian Drive Oak Brook, IL 60523

A Bonvouloir PO Box 70185 Sunnyvale, CA 94086	Sal Mangiagli 54 Old Turnpike Road Haddam, CT 06438	J.M. Wornum 4356 So. Oakenwald Chicago, IL 60653
Ruth Bescrypt 8882 E. Maxwell Dr Tucson, AZ 85747	Morley Schloss 14125 North Road Loxahatchee, FL 33470	Mary Wigerman 252 Kellett Rd. Gray Court, SC 29645
Joan W. Seidel 1142 Ash Avenue Cottage Grove, OR 97424	Patti Constantino 17249 Helen K Dr Spring Hill, FL 34610	Terrie Westfall 35 S. Groesbeck Hwy. Apt. 147 Mount Clemens, MI 48043
William Scherr 1727 S Hanford St Seattle, WA 98144	Lorne Beatty 573 N. Maxfield Road Brighton, MI 48114	Carolynn Griffith 83 Nawiliwili St Honolulu, HI 96825
Richard Ulrich 44974 Tamarack River Rd Hinckley, MN 55037	Carolann Cepuchowski 143 O'connell Ave Buffalo, NY 14204	William O'Brien 5858 Francis Street Kalamazoo, MI 49048
Lorraine D. Johnson 4858 S. Kenny St. Seattle, WA 98118	Steve Linnerooth 16236 308th. St. Center City, MN 55012	Thomas Knott Sr 1009 State Route 307 Springbrook Township, PA 18444
Lenosre Bassett 206 Tinker Mountain Drive Daleville, VA 24083	Anthony Burns Ph.D. 1110 Vandalia Bremerton,, WA 98310	Patricia Daniels 3525 Country Club Drive Los Angeles, CA 90019
Jessie Casteel 10825 Greenwillow #11 Houston, TX 77035	B K Biery 903 N 188th St Shoreline, WA 98133	Gerald Houlihan 1533 Jefferson Avenue, Apt. 2 Rahway, NJ 07650
Ron Rattner 1998 Broadway #1204 San Francisco, CA 94109	John Patsis 700 Edelweiss Mt Airy, GA 30563	Joseph Pryber 1011 New Hope St., Apt 46A Norristown, PA 19401
Stephen Arbour 319 Tulpehocken Avenue Elkins Park, PA 19027	Heather Orn 1557 Marcia Drive Rantoul, IL 61866	Elizabeth Patsis 700 Edelweiss Mt Airy, GA 30563
Elena Day 151 Buckingham Circle Charlottesville, VA 22903	Norma Eagles, MS, OTL 10729 Evening Wind Court Columbia, MD 21044	James Schmitt 142 W. Mombasha Rd. Monroe, NY 10950

Cathy Nieman 312 Ivy Hill Road Weaverville, NC 28787	Michael Wichman 1001 Arbor Lake Drive #407 Naples, FL 34110	Nancy Patumanoan 4014 West Street Emeryville, CA 94608
Homer Faucett II 310 W 5th Veedersburg, IN 47987	Amber Vann 10008 161st Rd Live Oak, FL 32060	Sharon Fortunak 7120 Ivystone Ave So Cottage Grove , MN 55016-
Carol Reid-Grandfield 2791 Hills Market Rd. Felton, DE 19943	Elena Day 151 Buckingham Circle Charlottesville, VA 22903	Carole Schaefer 1014 Edsel Dr Marshall, MO 65340
Nancy Watson 131 Buckhorn Rd. Sequim, WA 98382	Rosemarie Sawdon 1201 Harvest Ridge Lane Blacksburg, VA 24060	Lois Jordan 9161 E. Walnut Tree Dr. Tucson, AZ 85749
Jeanne Lamar 543 Crawford Dr. Sunnyvale, CA 94087	Sandra Hermes 848 North Hill Lane Cincinnati, OH 45224	James H Jorgensen 4207 Westbrook Drive Ames, IA 50014
Nancy Hayward 371 Flat Shoals Rd Salem, SC 29676	Karl Knutsen 2616 West River Parkway Minneapolis, MN 55406	Joshua Angelus 67 Hillside Avenue Waterbury, CT 06710
Jane Sunshine 16 Woodstock Mdws, #B8 Woodstock, NY 12498-	Shirley Crenshaw 1411 Willow Brook Cove #10 St. Louis, MO 63146	Michelle Flowers 13107 E Button Rd Elk, WA 99009
Rachel Sonnenblick 912 Windham St Santa Cruz, CA 95062	Bill Copeland 207 S Somerset Ct Sanford, FL 32773	Hillary Banachowski 6534 Rimrock RD. New Market, MD 21774
Charlotte Rose 75 Waterman St. box 3446 Providence, RI 02912	Baker Smith 11416 10th Ave South Seattle, WA 98168	Mary Ann Kirsling P. O. Box 3063 Pasco, WA 99302
Jennifer DeNetz N2559 Woodland Circle Waupaca, WI 54981	Poosakey Poosakey 960 Division St. Bandon, OR 97411	Heather McFarland 31514 25th Lane South APT# E101 Federal Way, WA 98003
Barry Hart 244 Mass. Ave. Arlington, MA 02474	J. Capozzelli 315 W. 90 St. New York, NY 10024	Sherrill Futrell 151 Inner Circle Davis, CA 95618

Cynthia Stewart 156 Longmeadow Dr Apt 203 Holbrook, MA 02343	Jacqueline Carter 1207 Mackie Carrollton, TX 75007	Nicholas Frederick 13828 Alexander Rd Abbeville, LA 70510
Patrick Bosold 202 N. 5th St. Fairfield, IA 52556	Roger Sauer 14 Ashland Terr Chester, NJ 07930	Lee Hutchings 1803 Gray St., #401 Palacios, TX 77465
Carl Otten 9607 Dry Run Road Kingston, OH 45644	Steve Berman 1155 Elm Ave #13 Glendale, CA 91201	Maria L. Gomez 144 Northpointe Drive Mountain Home, AR 72653
Wendy Sands 61 Jane Street, Apt. 3J NYC, NY 10014	Wendy Lohman 1370 Veteran Ave. Los Angeles, CA 90024	Judith Allen 7360 Concord Road Beaumont, TX 77708
David H Jones 4007 Densmore Ave N Seattle, WA 98103	Emily Bragonier 358 45th St Pittsburgh, PA 15201	Daniel Tiarks 816 N. Hayworth Avenue #1 Los Angeles, CA 90046
Shirley Espeland 2250 Luther Place St. Paul, MN 55108	Tracey Ahring 512 Tracewood Drive Dennard, AR 72629	Holly Cohen 408 Sheffield Court Brewster, NY 10509
Sunny Tabino 70056 Sanderson Road Summerville, OR 97876	Kevin Smith 56 K St., Apt. # 1 Turners Falls, MA 01376	Brent Rocks 1518 SW Upper Hall St Portland, OR 97201
Penelope Garcia 11137 W.76th Terr.#20 Shawnee, KS 66214	Rebecca Marshall 596 Mentone Ave Grover Beach, CO 93433	Patricia Snowden 5145 Westbard Ave. Bethesda, MD 20816
Kathleen Mello-Nelson 2575 South Pagosa St Aurora, CO 80013	Jeanne Watts 27 Prout Street Quincy, MA 02169-	Robert Lappo 10237 Fernglen Ave., Apt. #203 Tujunga, CA 91042
Peter Lee 7 Mystic Lane Saratoga Springs, NY 12866	Christopher Galton 106 Black River Road Myrtle Beach, SC 29588	Steve Underwood P O Box 10108 Daytons Beach, FL 32120
Elizabeth Enright 6222 E. Avalon Dr Scottsdale,, AZ 85251	Anthony Aviles 110-35 72 Road Forest Hills, NY 11375	Nancy Ashley 220 W. 83rd St New York, NY 10024

Willie Dubas 136-67th-st./ PO Box 452 South Haven, MI 49090	Daniel Puetz 990 N. Cove Drive Palatine, IL 60067	Paola Maino 955 Oak Chase Drive Orlando, FL 32828
Barbara Moss 5324 Willow Point Pkwy Marietta, GA 30068	Sumner Peirce 1501 NW 42nd Street Fort Lauderdale, FL 33309	Paul Corogin P O Box 15363 Gainesville, FL 32604
Stephen E Robinson Jr 3311 Omaha Ave Apt A Nederland, TX 77627	Steve Rosenberg 12890 Nimes Dr St .Louis, MO 63141	Arthur & Mrs. Victoria Eichner 1101 St. Andrews Rd. Hollywood, FL. 33021, FL 33021
T Miller Box 143572 Coral Gables, FL 33114	Cheri Langlois PPO Box 1286 Mendocino, CA 95460	Phil and Susie Kaplan 1 N St. Soquel, CA 95073
James Roberts 215 S Ellis St Palouse, WA 99161	Edith Sartin 33 Cortland Avenue #4 San Francisco, CA 94110	Patricia Cleckley 331 Bobby Jones Rd Sarasota, FL 34232
Emily Bellamy 1920 Mitchell Pl St. Louis, MO 63139	G. T. Gerrard Rd Box 119 North Main St. Rd. Black River, NY 13612	Pamela Sims 5162 Lakesprings Ct. Dunwoody, GA 30338
Robert DeJonckheere P.O. Box 90527 San Diego, CA 92169	Anne DeMers 620 Summit Ave. Crookston, MN 56716	Anne Henry 1 Moorbriar Ct St. Peters, MO 63376
Lily Adlin 10812 Longacre Lane Stevenson, MD 21153	Gladys Schmitz 170 Good Counsel Drive Mankato, MN 5600	Cynthia Mac Farland 6514 Rising Sun Ave Philadelphia, PA 19111
Alex Weiland 11 Lantern Ln Arlington, MA 02474	Howard Palmer 295 Shadowlawn Drive Inkster, MI 48141	Joan Gugerty 13907 Manor Road Baldwin, MD 21013
Richard Ledger 608 Silver Birch Howard City, MI 49329	Molly Woo 1022 Canter Rd Atlanta, GA 30324	K Hewitt 624 Mariposa Ave Oakland, CA 94610
Marla Butterworth 1906 G Street Bellingham, WA 98225	Peter Newton 901 E Van Buren St, Apt. 2087 Phoenix, AZ 85006	Louise Clark 6 Blackthorn Rd Lafayette, CA 94549

Dave Spieler 2357 Finlaw Ave. Pennsauken, NJ 08109	Adrien Auger 1117 Pipestem Place Potomac, MD 20854	Anita Lock 40 Colony Dr. Oberlin, OH 44074
Joyce Bass 1708 Corvallis Trail Arlington, TX 76006	Natalie Houghton 775 Angelita Dr Prescott, AZ 86303	Alan Wojtalik 3723 Green Oak Ct Parkville, MD 21234
Ronald Ford 12603 Dawnridge Ct. Midlothian, VA 23114	Kevin P Brown 7057 RFD Mundelein, IL 60060	Brian & Rita Cohen 3852 E Alamos Ave Apt 125 Fresno, CA 93726
William J. Cleary Jr. 3624 Rosewood Avenue Los Angeles, CA 90066	Jesse Bayker 640 Ditmas Ave 12A Brooklyn, NY 11218	Marshall Sorkin 2920 W. Sherwin Ave. Chicago, IL 60645
Joanna Kelly 1154 N. Poinsettia Pl., apt. 5 West Hollywood, CA 90046	David Melvin 21 Cromwell Drive Chester, NJ 07930	Tom Devaney PO Box 3475 Santa Barbara, CA 93130-
G. Konecky 350 Plaza Road North Fair Lawn, NJ 07410	Fred and Betty Krueger 301 S. Court St. Fairfield, IA 52556	B Davidson 1813 S maplewood Tulsa, OK 74112
Andrew Jones 5399 Chaison Road Gladstone, MI 49837	Mary Detrick 8115 37th Avenue North St. Petersburg, FL 33710	Richard & Carolyn Rosenstein 2194 Century Hill Los Angeles, CA 90067
Darrel Bruck Jr. 2943 Chippewa Dr. Bourbonnais, IL 60914	Joan Sadowski 11 Wilton Dr. Wilmington, MA 01887	Gary Reese 440 Camino Flora Vista San Clemente, CA 92673
Norma Rung 349 Lakeside Blvd Hopatcong, NJ 07843	Brigid Geroux 5203 Deerfield Road Eau Claire, WI 54701	Allan Heneson 7438 Park Heights Avenue Baltimore, MD 21208
Art Hanson 1815 Briarwood Dr. Lansing, MI 48917	Dona van Bloemen 1117 3rd. Street Apt. 5 Santa Monica, CA 90403	Barbara A. Lindsey 5217 West St. #A Oakland, CA 94608
Barbara and Jim Dale 909 Vernon St. Decorah, IA 52101	Jose Miranda 5923 Myrtle Ave Long Beach, CA 90805	Michael Bayouth 636 Eastern #101 Wichita, KS 67207

Don Kelley 12637 Merritt-Estes Rd. Deadwood, SD 57732	Chris McGinn 336 W 95 St Apt 53 New York, NY 10025	Audra Ark, 3rd 1301 Rorer Ave. B-4 Roanoke, VA 24016
Faye Krause 19 Bel Dere Dr. Fairview Heights, IL 62208	Harriet McCleary 2440 Stevens Ave. #2 Minneapolis, MN 55404	Frank Colletto 4207 Gertrude St Simi Valley, CA 93063
Susan Richards 2726 Caminito San Pablo Del Mar, CA 92014	Ken-Donna Bubb 7450 S. Eastern Ave. Apt. 2094 Las Vegas, NV 89123	Robert Pancner 7936 Redondo Ct. Darien , IL 60561
Patricia Jerrells 30 SE Nighthawk Place Shelton, WA 98584	Carrie Lynn Moylan 5335 Daisy St. #125 Springfield, OR 97478	Nicole Dishong 2078 Placita de Quedo Santa Fe, NM 87505
Roberta Richardson P O Box 1304 Melbourne, FL 32902	Donna Knipp 60 Seaman Ave., #2E New York, NY 10034	David Neral 444 Island View Cir St. Augustine, FL 32095
Joe Anshien 7212 Idylwood Ct Falls Church, VA 22043	Randy Tashjian 1031 Trafalger Drive Glendale, CA 91207	Deborah Cohen 3943 Fairview Av St. Louis, MO 63116
Arlene Encell 2535 Armacost Ave. Los Angeles, CA 90064	Beki Lischalk 5062 Willamette Port Townsend, WA 98368	Brittany Smith 502 Magnolia Place Novato, CA 94945
Gordon Thompson 9849 Towner Rd. Portland, MI 48875	Bobbie Nagel 22 Reeve Circle Miooburn, NJ 07041	Brian Reynolds P.O. Box 1123 Pomona, NJ 08240
Roy Wilson 183 W 10th St., Apt. 4 New York, NY 10014-	Sarah White 61 Avon Lane Staten Island, NY 10314	James Button 3195 Redstone Lane Boulder, CO 80305
Max Kaehn 234 N Murphy Ave Sunnyvale, CA 94086	Melissa Bishop 645 14th Ave. Vero Beach, FL 32962	Felicity Hohenshelt 11326 Carlsburg Ct. Jacksonville, FL 32246
Kathryn Melton 3209 Brookmeade Deer Park, TX 77536	Timothy Caldwell 2020 S. Mission, #135 Mount Pleasant, MI 48858	Jon Swalles 3366 E 1st St Long Beach, CA 90803



Henry Bosch 1406 Hubner Ave Baltimore, MD 21228	Margaret Haas 443 West 24 Street New York, NY 10011	Carl Abrahamson 608 S 4th Ave Rock Rapids, IA 51246
Lisa D'Antonio 3300 Port Royale Dr N, # 108 Fort Lauderdale, FL 33308	Anita Das 9522 49th Ave NE Seattle, WA 98115	Barbara Menkes 173 Sullivan St New York, NY 10012
Robin Mayerat 2949 Cloverbank Rd. Hamburg, NY 14075	Gary Vesperman 3133 La Mesa Drive Henderson, NV 89014	Dassi McCurdy 635 Cheshire ave. Eugene, OR 97402
Angela West 4116 Oregon St #2 San Diego, CA 92104	John Papandrea 110 West 90th St New York, NY 10024	JoAnn Witt 9237 Wyandotte St. Kansas City, MO 64114
Stu Winnie 6431 South Clement Tacoma, WA 98409	Christina Jones 506 W 142nd St Apt 1 New York, NY 10031	Karen Riggat 7338 Salem Trail Ravenna, OH 44266
Thomas Mac Krell 3116 Peach St. #2 Erie, PA 16508	Jane August P. O. Box 666 Topanga, CA 90290	Joyce Rinehart 4071 SW 30th Street Ocala, FL 34474
Steven Brewer 14 Woodruff Pl Auburn, NY 13021	Andrew Wolniak P.O. Box 3421 New Haven, CT 06515	Chrissie Johnson Po Bx 129 Elgin, OK 73538
Francis Scalzi 7800 E. Lincoln Drive, Unit 1055 Scottsdale, AZ 85250	Kerry Dietz 126 Wiltshire Road Claymont, DE 19703	Linda Gazzola 500 High Cliffe Lane Tarrytown, NY 10591
Karen Gray 5074 Nottingham Court Greenwood, IN 46143	Christa Dailey 3630 Burdean Dr Paducah, KY 42001	Mark Hayduke Grenard 1350 W. Van Buren #3055 Phoenix, Yuck, Sprawl, AZ 85007
E M Romero-Crampton 1754 Wildwood LN Crescent City, CA 95531	Lowell Terry 804 Tree Farm Rd. High Hill, MO 63350	Alice Armstrong 201 Butternut St Dingmans Ferry, PA 18328
Bob Nace Pleasant Valley Drive Pleasant Hill, CA 94523	Patty Jay 11213 Clear Oak Circle New Port Richey, FL 34654	Dorene Eisentrager 7501 Whitestone Dr Lincoln, NE 68506

Dan Bristol 1630 Prince Street Berkeley, CA 94703	Laura McGuire P. O. Box 1034 Palos Verdes Estates, CA 90274	Evelyn J. Dymkowski 2113 Roosevelt St. Clinton, IA 52732
Denise Pierce 208 South Battin Wichita, KS 67218	Patty Langford 1445 N Hill Street Tatum, TX 75691	Bernie & Marcia Altman 1000 North 20 Avenue Kelso, WA 98626
Robin Butler 4501 Fritchey Street Harrisburg, PA 17109	Natalie Hanson 1815 Briarwood Dr. Lansing, MI 48917	Anthony Martin Dambrosi 19 Broad St Middletown, NY 10940
Michael Rubin 100 Bayo Vista Way # 15 San Rafael, CA 94901	Ginny and Bob Freeman 2650 Portland Street Eugene, OR 97405	Lauren McDonnell 25 Cawdor Burn Road Brookfield, CT 06803
Stephen Gliva 4641 N Malden, #3 Chicago, IL 60640	Jeannette Mistretta 506-8 Harding Rd Freehold, NJ 07728	Maryellen Redish 671 S. Riverside Dr. #6 Palm Springs, CA 92264
Jane du Brin 109 Ridge Circle Fort Pierce, FL 34982	Bonnie Faith-Smith 290A Washington Street Cambridge, MA 02139	John Kosek 420 Rt. 82 Hopewell Jct., NY 12533
Peggy Detmers 13488 Shelter Dr Rapid City, SD 57702	J. Marin 3804 -18th Ave NW Rochester, MN 55901	Paul Miller 10306 Kerrigan Street Santee, CA 92071
Marc Gregory P.O.Box 16171 Beverly Hills, CA 90209	Robert Van Norman Whitford 230 Roosevelt Ave Hasbrouck Heights, NJ 07604	Darrell Neft 3132 Madeira Av Costa Mesa, CA 92626
Helen Goldenberg 7739 Southampton Terr Apt G 107 Tamarac, FL 33321	Mike Bonar 120 W 3rd San Mateo, CA 94402	Robert Wedemeyer 2683 Saxon Dr. L.A., CA 90065
William Welsch 11 Lockhart Ranch Road P.O.246 Lewisotn, CA 96052	Debbie Elholm 3545 Nakoma Rd Madison, WI 53711	Andrew Knapp 1133 Porlier St. Green Bay, WI 54301
Gerry Milliken PO Box 1880 Oroville, WA 98844	Alan Shapiro 1505 Eastern Ave. Baltimore, MD 21231	Peter Leon PO Box 127 Arivaca, AZ 85601

Elke Hoppenbrouwers 152 Allison Way East Haven , CT 06512	Nandi Devam 1745 9th St. Berkeley, CA 94710	Janice Dlugosz 409 Compass Ave Beachwood, NJ 08722
Gerard Weber 3304 E. Santa Ana Ave Fresno, CA 93726	Julie Meek- Bryant 7020 Fairwood Drive Indianapolis, IN 46256	Alex Won 41 Sutter St, Apt 1454 San Francisco, CA 94104
Terry Azzarello 302 Kemman Avenue La Grange park, IL 60526	Barry Kesselman 45 Crocker Rd Medford, MA 02155	Dianne Moore 4260 So. Victoria Cir. New Berlin, WI 53151
John H. Anderson 4042 Albatross, Apt 38 San Diego, CA 92103-	Harrison Heitman 1523 Pineview Lane Conyers, GA 30012	Phil Rockey 547 Del Rio Circle Oakdale, CA 95361
Samuel Inabinet 601 Cardamon Drive Virginia Beach, VA 23464	Delton Johnson 14 McKeveett Heights Santa Paula, CA 93060	Tom Jackson 1124 S King St denver, CO 80219
John Templeton 20 Tamarack Drive Amherst, MA 01002	Teresa Parcell 530 Little Sandy Road Elkview, WV 25071	Marguerite Winkel 2012 W 3rd Spokane, WA 99201
James Kirks 11 Hemming Lane Chico, CA 95973	Norman Reuter 555 Eagle Drive PO Box 5253 Incline Village, NV 89451	Marleen Quint P.O. Box 5445 Richmond, CA 94805
Sharon Nolting 348 E. 9th St. #13 New York, NY 10003	Linda Steele P.O. Box 1110 Olathe, CO 81425	Mark Rush 9020 E. Nassau Ave. Denver, CO 80237
Bobbie Flowers 418 West 17th Street, Apt 22A New York, NY 10011	Judith Alter 11260 Overland Ave. 22D Culver City, CA 90230	Paula Zerzan P.O. Box 994 Glen Ellen, CA 95442
Eric Gregory 5030 La Calandria Way Los Angeles, CA 90032	Doris Cassidy 3000 Catalina Dr. 129 Yuma, AZ 85364	John Alexander 3718 Hickory Way Oceanside, CA 92057
Corey Bobco 9006 Ashridge Park Dr Spring, TX 77379	Jeff Horne 424 S. Genesee Ave. Los Angeles, CA 90036	Patricia Chang 1133 Stockton St. Indianapolois, IN 46260

Joseph Szabo 8511 Reading Ave. Los Angeles, CA 90045	Lee Eisenberg 1010 SW Mitchell St Portland, OR 97239	Gail Lack 1417 Shawnee Way Salinas, CA 93906
Thomas & Mrs. Lorina Hall 1348 Sudden Valley Bellingham, WA 98229	Probyn Gregory 1766 Las Palmas LA, CA 90028	James Evans P.O. Box 994 Clearlake Oaks, CA 95423
Madeline Graham 3488 Mandeville Canyon Rd. Los Angeles, CA 90049	Cynthia Adams 15 Beulah Park Drive Santa Cruz, CA 95060	Barbara Bennigson 2339 Ramona Street Palo Alto, CA 94301
Courtney Sulak-Zahid 13190 FM 972 Granger, TX 76530	Victor Stanley 1214 Agnes Ave Joliet, IL 60435	Gloria Knotts 6264 Burnhurst Ln. Denver, NC 28037
Mary Ann Smale 37 Dyers Bay Rd. Steuben, ME 04680	Marianne Panzica 1301 Union Morris, IL 60450	Vincent Dee 2153 Pleasant Grove Rd. Encinitas, CA 92024
Rachelle Greene 13042 Clarewood Drive Houston, TX 77072	Charles White 9704 Jacqueline Dr. Ft. Washington,, MD 20744	S. Rothschild 1229 Providence Terrace McLean, VA 22101
Alan Somers 5821 Hawthorn Ln. Williamsburg, VA 23185	Herbert Nelson 1922 N. Cleveland Ave., Apt. 3 Chicago, IL 60614	Michael W Evans 12325 Charnock Rd. Los Angeles, CA 90066
Johnnie Prosperie 851 Cr 4191 Nacogdoches, TX 75961-	Roger Nelson 300 S Washington Av, Lot 257 Fort Meade, FL 33841	Bonnie kosofer 150 Front St. Schenectady, NY 12305
Joyce Fournier 14 Holstein Ave. Londonderry, NH 03053	Wilbur Rhodes 75 Norton Road Kittery, ME 03904	Lou Brown POB 329 Harpswell, ME 04079
Richard and Roberta Baldwin 1052 Creekside Lane RFD Jersey Shore, PA 17740	Wendy Miller 2310 38th St Allegan, MI 49010	G. Stephen Chrsitopher 203 10th Street Troy, NY 12189
Alice Groner 10 Raubsville Rd. Easton, PA 18042	Darrell House P.O. Box 387 Wilkinson, IN 46186	CJ Sanbourn 3670 Presidents Rd. Scottsville, VA 24590

Anita Wasserman 44 Strawberry Hill Ave Stamford, CT 06902	Lori English 6101 River Rock Court Raleigh, NC 27604	Robert Graver 860 Sooy Place Road Vincentown, NJ 08088
Joy Cingman 246 19 Ave SE St. Petersburg, FL 33705	Kristin Huntoon 157 Park St Buffalo, NY 14201	James McGuire 911 Tam O' Shanter Dr. Kansas City, MO 64145
P D 3 Fort Lauderdale, FL 33332	Wayne Williams PO Box 3852 Cary, NC 27519	Douglas Orians 256 1/2 Windsor St. Marion, OH 43302
Phyl Morello 984 Harrison Ferry White Pine, TN 37890	Barbara Stamp 18218 Ginavale Lane Eden Prairie, MN 55346-	Marilyn Anderson 132 Naskeag Brooklin, ME 04616
Carol Morrison 957 Miller Rd. E. Dummerston, VT 05346	Mary Shelton 3586 Rominger Road Banner Elk, NC 28604	Darlene Sarver 1004 E. Crescentville Rd Cincinnati, OH 45246
Bob Kurtz 8046 Cantura Mills Converse, TX 78109	Kristen Gottuso 3873 Mandarin Woods Dr N Jacksonville, FL 32223	Frank X. Kleshinski 209 North Drive Jeannette, PA 15644
Ruth Carter 3336 Foxford Court NE Atlanta, GA 30340	Elisabeth Hebert 34 Woodcrest Ln Burlington, VT 05401	Laura McKee 9582 Tortoise Lane Micco, FL 32976
Robert Haigh 300 Far View Drive, #8 Estes Park, CO 80517	Pat Jones 64338 Penny Rd. Coos Bay, OR 97420	Bianca Constance 384 W Hudson Ave Englewood, NJ 07631
A Freeman 123 Any St Cheyenne, WY 82003	Robert Janusko 43 Upsala Path West Milford, NJ 07480	Kimberly Wysong 220 5th Ave Huntington, WV 25701
Gary Kinnaman 5360 Kerger Road Ellicott City, MD 21043	Eleanor Katzman 4025 Via Marina, Apt. E-210 Marina del Rey, CA 90292	Carolyn Foster 215 Martin Point Road Friendship, ME 04547
Judith Hazelton 1617 US Rt 7 Bennington, VT 05201	Kathleen Morris 181 E. Beechwold Blvd. Columbus, OH 43214	Michael Bordenave 951 N Adoline Fresno, CA 93728

Stephen Urciuoli 91 Kings Hwy S Westport, CT 06880	Laura Baldwin 21 Seward Avenue, #2 Toms River, NJ 08753	Steven Patterson 220 N. Second Street Sunbury, PA 17801
Patrick Bair, Esq. 1431 Appletree Rd. Harrisburg, PA 17110	Norman Friday 186 North Main Street Marlborough, CT 06447	Al Perreault PO Box 5123 Framingham, MA 01701
D. Rex Miller 268 Appalachian Drive Boone, NC 28607	Carol Roberto 168 Asbury Road Cincinnati, OH 45255	Patricia Phillips 487 Wolcott Ave Kent, OH 44240
Cora Nathanson 268 S Washington Bergenfield, NJ 07621	Steven Handwerker 6465 Via Benita Boca Raton, FL 33433	Raymond Faria 151 Cushing Road Friendship, ME 04547
Carol Frechette 1511 W. 6th Ave. Shakopee, MN 55379	Zelma S. Taylor 319 High Street Petersburg, VA 23803	Herbert Mitson 26 Brune Drive Bedford, OH 44146
Joan Reese-Finnen 929 Main Street Hellertown, PA 18055	Amanda Jasso 3901 Locust Walk, Box 45 Philadelphia, PA 19104	Tom Hudyma 38 1/2 Wasson Pl. Pittsburgh, PA 15216
Michael Iannone Jr 306 Bluemont Drive West Mifflin, PA 15122	Marguerite Cambria 16 Pebble Avenue Winthrop, MA 02152	Benito Rojas 516 E Blair St West Chicago, IL 60185
Marylou Clark 190 South Main Street Cohasset, MA 02025	Matt Jorgensen 5611 Emile Omaha, NE 68106	Thomas Hooppaw 6964 N Sheridan Rd Apt 1B Chicago, IL 60626
Ralph LoCascio 191 Gettysburg Way Lincoln Park, NJ 07035	Fred Consorti 1221 Des Moines, IA 50311	Dennis Yurich 23628 Woodhill Dr Brook Park, OH 44142
Benzi Kluger 1411 NW 31st DR Gainesville, FL 32605	Stacy Billingsley 70200 Dillon Desert Hot Springs, CA 92241	Doreen Sasso 6016 Kenneth Road Fort Myers, FL 33919
Dr. Dorothy K. Cinquemani 400 Lake Ave NE, S210 Largo, AL 33771	Kerry Oravec 606 Hazen Ave. Ravenna, OH 44266	David Chastain 208 Arlo Todd Rd Toccoa, GA 30577

Terry Johnson 1784 Peltier Lake Drive Centerville, MN 55038	Donna Hodsdon-Trips P.O.Box 518 New Plymouth, ID 83655	Rosemary Hobson 1060 Main St Coventry, RI 02816
Lynn Jorgensen Rd 3 Box 270 Endicott, NY 13760	Adrian Hofstetter 2645 Bardstown Road St. Catharine, KY 40061	Casey Phillips 4607 Congdon Road Williamson, NY 14589
Gayle Shisler 420 Belmont Avenue Doylestown, PA 18901	Joseph Werzinski 208 Deerfield Court New Hope, PA 18938	Kripa Sundar 37 Woodbury Rd Southboro, MA 01772
Joe Edwards 1232 High Peak Ln Shipman, VA 22971	Joseph Dangelo 6 Kenilworth Dr East Northport, NY 11731	Virgina Harden 1031 Oak View Circle Middletown, PA 17057
Barbara Laxon 1778 SW 85 Ave Miramar, FL 33025	Carol Peterson 1016 Success Ave Lakeland, FL 33803	Lisa Priebe 8466 Rainbow Bridge Ln. Springfield, VA 22153
Charlene Cheek 21372 Hillside Ave. Nokomis, IL 62075	Sandra Moskovitz 9 Hamilton Avenue Princeton, NJ 08542	John Anderson 5536 Myrtle Ave Long Beach, CA 90805
Steve Traynor 411 42nd Ave South Minneapolis, MN 55406	Riana Good 56 Wood Street #3 Providence, RI 02909	Dorothy Dankanyin 85 Sherman Rd Enfield, CT 06082
Janice Foss 622 Richmond St. El Cerrito, CA 94530	Gary Boelling 1067 W Street Port Townsend, WA 98368	Jonathan Nash 500 East 83rd Street, #10B New York, NY 10028
Barbara Fitzpatrick 2500 W. Valley Dr. Fayetteville, AR 72703	Jenae Neiderhiser P.O. Box 555 Middleburg, VA 20118	Jean Stubbs 205 Stubbs Rd Magee, MS 39111-
Linda Fitz 1713 Clover Lane York, PA 17403	David Atwood 10641 S Hale Ave Chicago, IL 60643	Judy Allen 24 Seifert Lane Putnam Valley, NY 10579
Mary Galgan 2910 Barkley Avenue Bronx, NY 10465	Elaine Howes 3705 Perdew Dr. Land O' Lakes, FL 34638	Patricia Davis 29 Barteau Avenue Blue Point, NY 11715

Dana Riell 2124 Ferguson Street Schenectady, NY 12303	Susan L. Arday 7640 Woodstream Way Laurel, MD 20723	Jami Duggan-Fry 851 Rundell St. Iowa City, IA 52245
Jessie Carr 80-82 St. Mark's Ave. 4A Brooklyn, NY 11217	Lyn Henri 18321 E. 9th St. Spokane Vly, WA 90016	Stephan Donovan 4851 North Bernard Street Chicago, IL 60625
Rich Smith 329 Race St. Cincinnati, OH 45202	Nicole Berkheimer 4219 Lamour Road Knoxville, TN 37909	Dale Riehart 86 South Park St San Francisco, CA 94107
Brenda Williams 1211 Pawnee Terrace Indian Harbour Beach, FL 32937-	Kimberly Clemens 439 S. Wyomissing Avenue Shillington, PA 19607	Michael Studnicka 43 Oak Creek Lane Pontiac, MI 48340
Michael Quirk 10112 S Utica Evergreen Park, IL 60805	Jeremy Start 1403 Grand Ave Kalamazoo, MI 49006	Mitch Triplett 29570 S. Beaver Creek Rd Mulino, OR 97042
Joanna Grinberg-Ayala 212-08 75th ave Oakland Gardens, NY 11364	Aviv Goldsmith 6147 Hickory Ridge Rd Spotsylvania, VA 2255	Catherine Critz 122 Avalon Creve Coeur, IL 61610
Gary Bradon 5010 Frontier Rd Garland, TX 75043	Bettemae Johnson 6250 Indian School Rd NE, Apt A105 Albuquerque, NM 87110	Sani Golriz 8450 Whale Watch Way La Jolla, CA 92037
Kai Hally-Rosendahl 8450 Whale Watch Way La Jolla, CA 92037	Alan Carlson 2301 Long Avenue Saint Paul, MN 55114	Rita Surdi 920 7th St Las Vegas, NM 87701
Mark Lundholm 2014 N. Old Hicks Road Palatine, IL 60074	Theresa Galvin 304 Carroll Street Brooklyn, NY 11231	Wilson Bagwell P O Box 512 Earleton , FL 32601
Joseph Quirk 147 Avenue A #2r New York, NY 10009	Richard Fairfield 27125 Edenbridge Court Bonita Springs, FL 34135	Christopher Mason 8592 Eagles Walk Lane Cincinnati, OH 45255



Audrey Burns 87 Kendall Blvd Oaklyn, NJ 08107	Lawrence Conway P.O. Box 158 12 River St. Conway, MA 01341	Ann Turk 912 W Idlewild Ave Tampa, FL 33604
Audrey Burns 87 Kendall Blvd Oaklyn, NJ 08107	Lesa Sowell 35 Scenic Loop Rd. Boerne, TX 78006	Noreen Acee 22503 Bucktrout Lane Katy, TX 77449
Marcia Hoodwin 8236 Shadow Pine Way Sarasota, FL 34238	Rayleen Nunez 725 Tremont St. #413 Boston, MA 02118	Siamak Vossoughi 544 Funston Ave San Francisco, CA 94118
Kleomichele Leeds 31177 US 19 N Palm Harbor, FL 34684	Nancy Danielsen 807 E Normal St Springfield, MO 65807	Carlene Petty 780 Highway #44 West, Lot #50 Shepherdsville, KY 40165
Sandra Blackburn 346 N. Sunset Ave , Spc 141 La Puente, CA 91744	Dennis J. Landi 328 E. Jacaranda Ave. Orange, CA 92867	James Mittl 142 Nero Road Golden, CO 80403
Reba Stone 640 Oak Street St. Simons Island, GA 31522	Gus Tombros 4312 234th St NE Arlington, WA 98223	Chadwick Cox 2241 Ravenwood Ln Norman, OK 73071
John Gilpin 818 W Columbia Champaign, IL 61820	Dorena G Snowberry Cr West Sacramento, CA 95691	Mary Joyce Moeller P.O. Box 266 Kermit, WV 25674
Mary Donovan 2683 Saxon Drive Los Angeles, CA 90065	E Smith 61 Fayette Oakdale, PA 15071	Suzan Bekiroglu 3470 Tidewater Dr Spring Hill, FL 34607
Cynthia Kolivas 714 Governor Road Valparaiso, IN 46385	Ellen Smith 1310 Delmont Avenue Havertown, PA 19083	Betsy Brotman 23 Greenbrook Rd Berkeley Hts, NJ 07922
Bob Thomas 2001 Weaver Rd. Myrtle Creek, OR 97457	Barbara Wood 1926 SE Richmond Lane Port Orchard, WA 98367	Steven Branch 88 Edgehill Rd Providence, RI 02906
Marian Demcisak 225 E. Monument Ave. Hatboro, PA 19040	Fred Pomerantz 205 Rote Hill Road Sheffield, MA 01257	Mary Buchwald 220 Berkeley Pl, 2h Brooklyn, NY 11217

Pat and John Beam 9262 Pigeonwing Place Columbia, MD 21045	Holly Cooper 15065 Pine Meadows Drive, #1 Ft. Myers, FL 33908	Steven LHeureux 17 Lowell Ave North Kingstow, RI 02852
Marilyn A. Waltasti 770 W. Flagstick Drive Oro Valley, AZ 85755	Terry Huey P.O. Box 22253 Lexington, KY 40522	Richard Sanders 2022 Driftstone Drive Glendora, CA 91740
Daniel Applebaum 61 Jane St. #12E New York, NY 10014	Kevin Rolfes 14006 N Green Hills Loop Austin, TX 78737	Richard Shubert 327 S. 11th St. # 6 Lincoln, NE 68508
James Fritsch 14205 S Canyon Dr Phoenix, AZ 85048	Melissa Lemke 533 Glen Street Glens Falls, NY 12801	Dwight Slocum 64 Porterbrook Ave E.HTFD, CT 06118
Susan Kierson 15 Maple Ave. Walkersville, MD 21793	Judith Pearson PO Box 647 Estancia, NM 87016	Barbara Hipps 1796 S Goodlett Memphis, TN 38111
Lynn Ledgerwood 2605 Otis St. SE Olympia, WA 98501	Geoffrey Paterson 811 Parkridge Drive Media, PA 19063	Ali Boraby 2085 S Kennison Drive Toledo, OH 43609
Susan Duffy 514 Woodland Circle Pendleton, SC 29670	Kris Pagenkopf 7625 SW 7th Place Gainesville, FL 32607	Ann Asnes 185 Bellevue Road Watertown, MA 02472
Michael Thomason 530 South 43rd Street Boulder, CO 80305	Ann Wilson P.O. Box 325 Canyonville, OR 97417	Noel Bednaz P.O. Box 709 Southwick, MA 01077
Michelle Lerner 66 River Rd. Flanders, NJ 07836	Yaney MacIver 5370 NW Lawrence Ave. Corvallis, OR 97330	LaVonne Otwell 2602 Twin Oaks Dr Marietta, GA 30064
Frances Mathews 1375 Riverside Dr. Fullerton, CA 02831	Ginny Jackson P O Box 9487 Raytown, MO 64133	Sharon Keys Holmes Run Parkway Alexandria, VA 22304
Frank Aaron 5801 Pisa Lane Frisco, TX 75034	Christiane Pistor 520 E 72 St, 16B New York, NY 10021	Sharon Dupree 154 June St. Worcester, MA 01602

Judy White 2467 Summit Street Columbus, OH 43202	Doug Hilborn P.O. Box 726 Yellowstone N.P., WY 82190	Etta Albright 429 Powell Avenue Cresson, PA 16630
James Fitzgerald 8421 Oak Bush Terrace Columbia, MD 21045	Stan Martin 5001 W Slippery Falls Rd Tishomingo, OK 73460	Rachael Harrison 340 SW 62nd Blvd Apt 7 Gainesville, FL 32607
Ravi Grover POB 802103 Chicago, IL 60680	Elizabeth Burns RR # 3 Box 221 Clinton, IL 61727	Barry Spielvogel 435 E. 79 St., Apt. 11-O New York, NY 10021
Anne Lewis 674 Sheridan Dr Lexington, KY 40503	JoAnn Lowry 109 N. Ironwood Drive South Bend, IN 46615	Lorraine Marrero 367 Rockaway Parkway Valley stream, NY 11580
Stephen Zerefos 1770 Beechwood St. NE Warren, OH 44483	Rose Peters 1608 Truman SE Albuquerque, NM 87108	Molly Johnson 230 South School Ave Fayetteville, AR 72701
Diane Crummett 12 Dogwood Soap Lake, WA 98851	Robert Monroe 53 Glad Farm Rd. St. George, ME 04860	Nancy Seats 410 S Geyer Rd Kirkwood, MO 63122
Daniel Shively 779 White Farm Road Indiana, PA 15701	Richard Blough 5446 S. Kimbark Ave. Chicago, IL 60615	E J Zeman 3005 Chianti Court #208 Sarasota, FL 34237
Jim Bush 803 Cantrell Waxahachie, TX 75165	NK Acevedo 33 Wave Ave Revere, MA 02151	Patricia Rhoda 432 N. Patrick Rd Stockton, CA 95215
Barbara Jepson 613 Roberson Rd. Sequim, WA 98382	Bonnie Glasgow 3308 Dartmouth Dallas, TX 75205	Lawrence Camp 215 Evans Street Morganton, NC 28655
Erin Marshall 3831 N. Fremont St., Apt. 303 Chicago, IL 60613	Robert French 83 Durfee St New Bedford, MA 02740	James Hurst 7207 Lunar Drive Austin, TX 78745
Tonia Jauch 5820 Encina Road, #2 Goleta, CA 93117	Stan Otton 400 Lovell ave. Mill Valley, CA 94941	Linda Bescrypt 8882 E. Maxwell Dr Tucson, AZ 85747

Karen Shovein 25527 Melody St. Taylor, MI 48180	Donald Schwartz 2414 Sugarcone Road Baltimore, MD 21209	Rita Gallin 935 Huntington Road East Lansing, MI 48823
Kat Stephens 2541 Thistle Creek St Santa Rosa, CA 95404	David Young 6875NW. 1 St. Margate, FL 33063	Roaney Giles 3302 Rosefinch Trail Austin, TX 78746
Ruth Bauer 10530 Renwick Drive Saint Louis, MO 63128	Christopher Fox 33 W. Bond St. Astoria, OR 97103	Kim Greenfield 1104 S. King Circle Anaheim, CA 92805
Michel Lee 265 Madison Rd Scarsdale, NY 10583	Rachel Wolf 403 Emeline Avenue Santa Cruz, CA 95060	Cheri d 69 Elton Ave. Yardville, NJ 08620
Robert Gosnell 7114 Laurel Valley Dr San Antonio, TX 78242	Sarah Staats 144 Woodland Ave. San Francisco, CA 94117	Robert Rutkowski 2527 Faxon Ct Topeka, KS 66605
Edward Bielaus 6912 Breezewood terr Rockville, MD 20852	Cliff Ward 204 1st St., box 264 Cordova, AK 99574	Derrick White 2467 Summit St. Columbus, OH 43202
Rebecca Thomas 11 E. Thacker St. Des Plaines, IL 60016	R P 47 Martingale Andover, MA 01810	Ralph Dring 1611 Indiana Street Bloomington, IL 61701
Erica Anthony-Benavides 315 W. Magnolia Ave Apt. 1 San Antonio, TX 78212	H Shukla 4040 Nelson Concord, CA 94520	Richard Mackey 3 Governors Drive Hendersonville, NC 28791
Ann Adams 2791 Cactus Ct. Cameron Park, CA 95682	Beverly Williams 141 N. Chestnut Ave. #301 Green Bay, WI 54303	Gary Childers 127 Fairfax Ave Asheville, NC 28806
Jean Thorsen 4 Bay View Avenue Old Saybrook, CT 06475-	Daniel Lutzker 24 Lake Celeste Drive Garrison, NY 10524	Patricia Dishman 914 Briarwood Crest Nashville, TN 37221
Janice Spielman 3513 N. Springbrook Rd. Newberg , OR 97132	Joan A. Hutchinson P.O. Box 1499 Kapaa, HI 96755-	Charlie McCullagh 311 River Rd Red Bank, NJ 07701

Rita Eccles 815 E Maryland Phoenix, AZ 85014	James Verry 1580 North Cheshire Drive Pueblo West, CO 81007	Patricia Reed 111 Devoe Road Chappaqua, NY 10514
David Cayford 912 west 8th st. Santa rosa, CA 95401	Mr.&Mrs. Bruce Revesz 103 The Fairway Cedar Grove, NJ 07009	Marjorie Vangsness 2025 East Fulton St. Grand Rapids, MI 49503
Elena Day 151 Buckingham Circle Charlottesville, VA, VA 22903	James Verry 1580 North Cheshire Drive Pueblo West, CO 81007	Sander Valyocsik P. O. Box 37 California Hot Springs, CA 93207
Mike Webb 1503 Southport Dr.#124 Austin, TX 78704	Stephen Kahn 26320 Scenic Road Carmel, CA 93923	Ti Harmony 108 W Poplar Ave. Carrboro, NC 27510
Alice Dugar 6800 Chestnut Rd. Independence, OH 44131	Michael Tabib 5120 Gravenstein Hwy. North Sebastopol, CA 95472	Gabriel Gardner 1615 Dodge Ave. Fort Wayne, IN 46805
Daniel Vice 2141 P St NW #203 Washington, DC 20037	Karen Schreiber 86 Packers Falls Rd Durham, NH 03824	Michael Quinn 207 N. Victory Blvd. Burbank, CA 91502
Russ Seekatz 651 John Wesley Dobbs Ave NE Atlanta, GA 30312	Jason Chinn 134 Douglas Fir Circle Cloverdale, CA 95425	Jennifer Rastegar 2940 Cindy Ct. Richmond, CA 94803
Errin Edlin 16220 E Rich Ave Cheney, WA 99216	Alex Balboa 1996 Waverly Drive Bel Air, MD 21015	Holly Berkowitz 612 Granada Court Iowa City, IA 52246
Curtis Inoue 925 Union Street Brooklyn, NY 11215	Constance Rodman 2305 1st Ave #225 Seattle, WA 98121	Inge Humbert 501 E 79 St New York, NY 10021
Jack Brown 335 E.6th St NMYC, NY 10003	Danuta Radko 66 Parker Ave Tewksbury, MA 01876	David Paul Xavier Burch 901 East Victoria Street South Bend, IN 46614
Joe Parrish, Ph.D. 300 E. 56th St. New York, NY 10022	Lynda LaSage 7146 La Salida Del Sol Lane Citrus Heights, CA 95610	Ernest Kight 1269 Dogwood Lane College Park, GA 30349

Barbara Arcure 4218 W Fountain Way Fresno, CA 93722	Doris Casella 344 W. 12th St. 5G New York, NY 10014	Esther Nelson 1311 Telfair Way Charleston, SC 29412
Seth Rutledge 110 Judons St. Syracuse, NY 13224	Ben Cody 2110 Humboldt Bellingham, WA 98225	Marcia Bailey 1153 Oakland Sq Blacksburg, VA 24060
Irene Hancock 1747 Old Brook Rd. Charlottesville, VA 22901	Judith Becker 6620 N 13th St Philadelphia, PA 19126	Gwen Clayton 306 Riverton Rd. Matthews, NC 28104
Dolores Adams 14602 E. 13th Circle Aurora, CO 80011	Jacqueline Miller 22602 Dorion St. St. Clair Shores, MI 48082	Kristen Zehner 118 Blue Spruce Marshall, WI 53559
Helen Greer 1170 W. Wabash St. Lot #32 Tucson, AZ 85705	Kevin Kaboly 3307 Wayne Dr. North Vancouver, BC v7n 4b	Kent Vollmar 5304 South Ridge Way Middleton, WI 53562
Pamela Slater 7 Kensington Rd. Scarsdale, NY 10583	Stacey Smith 3008 Shipway Long Beach, CA 90808	Sue Zada 59 Derby Avenue Seymour, CT 06483
Elizabeth Hammond 2927 Keswick Rd Baltimore, MD 21211	Vincent Malizio 332DrakeRd. Venice, FL 34293	Rose Ann Bergsman 25083 Pioneer Way NW Poulsbo, WA 98370
Stuart Skadden 14 Geronimo Hurley, NM 88043	Gregory Nerode 406 Cayuga Heights Road Ithaca, NY 14850	Leonard Gosule 135 Swanson Terrace Stoughton, MA 02072
Susan Heckler 178-30 Croydon Rd. Jamaica, NY 11432	Scott Bernstein 10 Jones St., Apt. 4H New York, NY 10014	Francheska Brooks P.O.Box 65 Morrisville, VT 05661
Anne Bryant 4491 Stones Crossing Road Greenwood, IN 46143	Christina Johns 27 Acorn Circle # 202 Baltimore, MD 21286	Mark Novotny 5413 6th Ave Countryside, IL 60525
Nancy S. Lovejoy 425 Mountain Road P.O. Box 158 Wilbraham, MA 01095	Peggy Larvey 776 Purdue Ct. Santa Clara, CA 95051	Kaitlyn McKee P.O. Box 2196 Kapaa, HI 96746

David Dunkleberger 1290 Almshouse Road, Apt. # 628 Doylestown, PA 18901	Patricia Dressler 473 West Julia Way Hanford, CA 93230	Ryan Danzinger 1536 N. Hickory Ave. Arlington Heights, IL 60004
Ralph Alvarez 6 Scenic Pond Drive Warwick, NY 10990	Carole Plourde 70 Cedar Street Amesbury, MA 01913	Laura Mazar 8627 Gibson Rd. Canfield, OH 44406-
Emily Dale P.O. Box 501 Franklin, NC 28744	Irvin Uphoff 2532 Alden Avenue Dallas, TX 75211	Bernard Haley Jr. 45 North Street, Apt. #5 Rutland, VT 05701
D Osisek 4605 Salem Dr Vestal, NY 13850	Ernest Scholz 1175 Chestnutst#101 San Francisco, CA 94109	E. C. Petruzzello 1200 SW 124th Terr., O-201 Pembroke Pines, FL 33027
John Taylor 1601 County Rd 461 Elgin, TX 78621	Lee Frank 14648 Tustin St. Sherman Oaks, CA 91403	Emily Lewis 795 Elk Mountain Rd Afton, VA 22920
Jane Everitt 6607 Cantore Place Sarasota, FL 34243	Allen Stone 1906 Friendly Acre Land Dover, FL 33527	Michael Johnson 424 Durham Drive Ruther Glen, VA 22546
Dorinda Kelley 8829 NE Davis Portland, OR 97220	Mark Cosgriff 1180 Andrews Aenue Lakewood, OH 44107	Lynda Leibowitz 57 Crows Nest Rd Apt 3 Tuxedo Park, NY 10987
David Strong 29 Snow St. Gardner, MA 01440	Patricia C. Riggins 4257 Bohm School Rd Edwardsville, IL 62025	Anna Price 15755 Annesley Road East Liverpool, OH 43920
Barbara Brodbeck 3942 Flag Drive Palm Beach Gardens, FL 33410	Karen R. Searle 22 Windsor Way Berkeley Heights, NJ 07922	Scottie Kenyon P.O.Box 787 Sparks, GA 31647
Brian Gibbons 9133 Edmonston Terrace Apt 304 Greenbelt, MD 20770	Paula Finneran 17A Rainbow Pond Drive Unit B-1 Walpole, MA 02081	Tim Martin 485 Mountain Home Road Woodside, CA 94062
Thomas Windberg 2416 Pace Bend Rd S Spicewood, TX 78669	Francine Brewer 372 Central Park West New York, NY 10025	George Merritt 607 Elk St Franklin, PA 16323

Barbara Pizzinin 15075 Stella Del Mar Lane Fort Myers,, FL 33908	Louis C. Pizzinin 15075 Stella Del Mar Lane Fort Myers,, FL 33908	Ian Cree 2169 Folsom Street San Francisco, CA 94110
Vicki Kruschwitz 114 Kingston Drive Waco, TX 76712	Elaine Perkins PO Box 1134 Skiatook, OK 74070	Gwyn Williams-Stanton 19489 Laurelbrook Court Sonoma, CA 95476
William Peirce 53 Rogers Road Kittery, ME 03904	Cheryl Miller 39501 Sunset Drive Oconomowoc, WI 53066	Stephen Bohac P.O. Box 1730 Twain Harte, CA 95383
Viki Christensen PO Box 64 Potsdam, NY 13676	Edwin Miller 20329 Madison Street Torrance, CA 90503	Carol Deyoung 160 S. Keeneland, #8 Richmond, KY 40475
Rosalie Hewitt 13 Brown St. Norwich, NY 13815	Victoria Pawlick 7770 Jay St. Williamson, NY 14589	Carl Selnes 1611 Evergreen St Walla Walla, WA 99362
Isaac Campos 7119 1/2 Aurora Ave. N Seattle, WA 98103	Luci Ungar 3 Seminole ave. Corte Madera, CA 94925	Nicholas Lawrus 1972 Lucille Lane Pleasant Hill, CA 94523
Elizabeth S. 327 NW Gina Way, Apt. #332 Beaverton, OR 97006	Erin Foley 7 Georgetown Lane Hazlet, NJ 07730	David Murray 229 Selby Ranch Road, #4 Sacramento, CA 95864
Helen Miller 2418 Delmer St. Oakland, CA 94602	Theresa Everett 500 High Cliffe Lane Tarrytown, NY 10591	Harriet Parsons Mason Ave. Ann Arbor, MI 48103
Angela Smith 13641 26th Pl S SeaTac, WA 98168	Bette Byers 4686 Blackstone Court Santa Maria, CA 98382	Colette Guay-Brezner 2727 189th Boulevard Fairfield, IA 52556
Pamela M. Unger, LPCC 800 Franklin Avenue Columbus, OH 43205	Julie Machado 22248 Main St Hayward, CA 94541	Stephen Brittle 6205 South 12th Street Phoenix, AZ 85042
Anthony Kerr 1710 Yorktown Dr. Carlottesville, VA 22901	Sean Magee 3331 NW Brandt Place Portland, OR 97229	Gloria L. Kllimczak 924 Springdale Dr Akron, OH 44310



Ronnel Corre 1976 Autumn Gold Dr San Jose, CA 95131	Carol Horowitz 1544 Granville Ave.,Apt. 201 Los Angeles, CA 90025	Erik McDarby 374 Rutt Road Bangor, PA 18013
Melinda Rankins 2185 NW 159th St #79 Clive, IA 50325	Seibert McCormick 462 Glenstone Dr. Mountain Home, AR 72653	Sally Simpson 326 Crooked Creek Garland, TX 75043
G. M. Malcomson 6817 Satinleaf RD S. Unit 204 Naples, FL 34109	Alice Slater 446 E 86 St NY, NY 10028	Larry Kaley 1162 Jennings Rd Ffld, CT 06824
Cheryl Frank 134 Greystone Ln, #16 Rochester, NY 14618	Caroline Carbone 225 Kate Lane Tolland, CT 06084	Jerry Tavel 3128 Schreiber Place Baldwin, NY 11510
Renata Dobryn 6 Spruce Ln. Montauk, NY 11954	Philip Simon Box 9473 San Rafael, CA 94912	Debra Eades 2254 Standing Springs Rd Greenville, SC 29605
F. Richard Leslie 6149 Greenbriar Terr Fayetteville, PA 17222	Randy McMillan 341 Deerfield Lane Lexington, KY 40511	Leslie Glendye 104 Crestview Avenue Somerset, MA 02725
Margaret Duke 661 Poplar Thicket Road Alexandra, KY 41001	Karen Lind 200 Paterson Plank Rd, Apt.409 Union City, NJ 07087	Laura Silverman 30 Rose Road West Nyack, NY 10994
Travis Harvey 909 Galbreath Avenue Boothwyn, PA 19061	Pamela Chipman 36320 Rd North Mancos, CO 81328	William C. Briggs, Jr. 46 - 20th Court Hermosa Beach , CA 90254
Renee Whitelock 1522 North J Street apt 3 Lake Worth , FL 33460	Carolyn Acuff 10103 Woodiron Dr. Duluth, GA 30097	Shelley Brady 845 Thomas Road Columbus, OH 43212
Ralf Alvarez PO Box 97 West Milford, NJ 07480	M. Addison 6305 Tocobega Dr Lakeland, FL 33813	Shelley Jesses 1006 Miles Terrace Union City, GA 30291
L S Lanham 3208 Thornwood Dr Pasadena, TX 77503	Wayne Brown 2935 N. Harrison Avenue Fresno, CA 93704	Erin O'Neal 2001 Noonan St. Crest Hill, IL 60403

Jacquelyn Hall 56 Maple Ave. Claremont, NH 03743	William Hall 10 Gretter RD Roslindale, MA 02131	Jeanne Wheeler HCR 65, Box 77 Ojo Sarco, NM 87521
Bruce Pringle 17037 12th PL SW Normandy Park, WA 98166	Elissa Menconi 1241 Adams St. Dorchester, MA 02124	Jack Ray 219 West Edgewater Way Newark, DE 19702-
Robert M. Apperson 5430 S. Immonen Rd. Lincoln City, OR 97367	Clover OBrien PO Box 663 Bristol, CT 06011	Jennifer DiMeo 209 23rd St, Apt 2R Brooklyn,, NY 11232
Victoria Potts 4001 Abbey Rd., Apt #4 Coeur d'Alene, ID 83815	Stephen Sleeper 24716 Carnoustie Ct. Bonita Springs, FL 34135	L Schrader 3 Fairfield, NJ 07004
David Tyler 215 Clause Lane Lafayette, LA 70507	Mary Williams 841 S. 500 E., #8 Salt Lake City,UT 84102-	Tracey Hennigar 5301 Dublin Ave., Apt. 103 Midland, MI 48640
Lawrence Ynesta 4885 NW 171st street miami, FL 33055	Barbara A. Stone 836 Stumpville Rd. Jefferson, OH 44047	Michael Rotcher 24542 Tarazona Mission Viejo, CA 92692
M. Jesse Ynclan 22043 Hillcrest Court Woodhaven, MI 48183	Carole January Erickson 8270 Camino Estrada Carmel, CA 93921	Polly Searfos 2620 Clubhouse Circle Powell, OH 43065
H. Eugene Wine 7940 SW 124 St. Pinecrest, FL 33156	Joan Royal 5501 sudley rd sudley springs, VA 20109	Mary Wylie 2409 S. Balsam St. Lakewood, CO 80227
Shena Kieval P.O. Box 1693 Soquel, CA 95073	Raymond Keeling 762 Panorama Milford, MI 48381	Paul Moss 1849 Whitaker St. White Bear Lake, MN 55110
Susan Schrader 1660 Bidwell Ave Chico, CA 95926	Anne Bassett POB 34 Jerome, AZ 86331	Martha Williams PO Box 13691 Roanoke, VA 24036
Steven Goldman 250 E. 63 st New York, NY 10021	Teresa Medlin 901 South Jones Robinson, IL 62454	Nancy McNamara 4634 Jessica Drive Los Angeles, CA 90065

Erin Yarrobino P.O. Box 267 Ozone Park, NY 11416	Dolores Hutter 7133 Veneto Dr Boynton Bch, FL 33437	Tim Durnell 3087 Daisy Mine Rd. Rice, WA 99167
Frank Chisholm 18 Plants Dam Rd. East Lyme, CT 06333	Seana Blake 114 W. 10th Ave. Ellensburg, WA 98926	Peter Sills 1010 Ennis Hill Road Marshfield, VT 05658`
Bert Greenberg 6166 Montgomery Place San Jose, CA 95135	Amy Lippert 210 Donegal Way Martinez, CA 94553	Wm Schultz 339 w 4th Whitefish, MT 59937
Stanley Schrero 602 Gregg Rd Northbrook, IL 60062	Gilbert Eidam 853-48th street Sacramento, CA 95819	Nancy Pepper 1302 S Tyler St. Tacoma, WA 98405
Ken Gilmour 173 Adeline Street Peterborough, ON K9J 5E	Krista Brewer 812 Springdale Rd. Atlanta, GA 30306	Jesse Williams 3853 Meade st Denver, CO 80211
Virginia Shanabarger 11067 Unity Rd. New Springfield, OH 44443	Barbara DelGiudice 11807 Ambaum Blvd SW Apt 2 Burien, WA 98146	Mike Mullarkey 71 East 13th Street #12 Tucson, AZ 85701
Rhee Howard 9 Liberty Heights Court Germantown, MD 20874	Laura Gerner 1674 SW Paddock St Port St. Lucie, FL 34987	Earl Rosenwinkel 1127 E. 6th St. Duluth, MN 55805
Dorothy Salant 500 Summit ave Mill Valley, CA 94941	Martha Bushnell 502 Ord Drive Boulder, CO 80303-	Elgin Lee Baker 5220 Webster Street Philadelphia, PA 19143
Bernadette Carey 2798 Ashley Park Dr Sparks NV 89434	Kirk Lumpkin 5505 Macdonald Ave. El Cerrito, CA 94530	Tanis Fletcher 62 Wild Harbor Rd North Falmouth, MA 02556
Megan Garrett 190 Arnold Gamble Circle Sacramento,CA 95835	Stephen and Robin Newberg 146 Granville Road North Granby, CT 06060	Brent Barnes 3616 N. Pine Grove #223 Chicago, IL 60613
Loretta Thompson 1782 Nisson Rd. #74 Tustin, CA 92780	Paul Netusil 9 Lachmund Court Old Tappan, NJ 07675	Frank Hajcak 4033 Kiawa Dr Orlando, FL 32837

Victoria Booth 373 92nd St. #B52 Brooklyn, NY 11209	Barbara Green 1708 Hall Rd Clatskanie, OR 97016	Karen Haralson 289 Madrona Rd. Felton, CA 95018
Michele Nihipali 54-074 A Kam Hwy Hauula, HI 96717	Elizabeth McCarthy 308 S Chandler Ave Denison, TX 75020	Balfour Gerber 115 Sargent St. San Francisco, CA 94132
Paula Dodson 246 River Hills Dr. Jacksonville, FL 32216	Stella M. Aleman de Gallardo 73-01 41 Ave # 5E Woodside, NY 11377	Loren Kramer 14 Oak St. Greenfield, MA 01301
Cathy Hazzard 6910 Country Rose San Antonio, TX 78240	Mary Francell-Sharfstein 3425 Marquess Moor Alpharetta, GA 30022	Bernice Frank 1 Plymouth Drive Whiting, NJ 08759
Julie Ford 16222 Monterey Lane #223 Huntington Beach, CA 92649	Karen Jenne 2012 La Fremontia South Pasadena, CA 91030	Sr. M. Amelie Hawxhurst 3508 Kavanaugh Blvd. Little Rock, AR 72205
Cath HAftings 1134 S 31 St #3 Omaha, NE 68105	Cathy O'leary Carey 17696 Cumana Terr San Diego, CA 92128	Georgia Locker 713 Duke Square Fort Collins, CO 80525
Joan Holenstein 13 Mountain Avenue Mendham, NJ 07945	Jean Hodgins 620 Cindy Ln Ballston Spa, NY 12020	Mary Vought 739 Compton Way Salinas, CA 93906
Barry Schwartz 5510 W. 78th Street Los Angeles, CA 90045	Rob Hemmick 2636 Keystone Ct N PO Box 47888 ST.Petersburg, FL 33743	Margery Carman 728W Dominick St Rome, NY 13440
Daniel Bachmann II 509 N 8th St Cambridge, OH 43725	Pamela Cox 1598 Canyon Rd. #A Ogden, UT 84404	Lucyann Jacqmain 1001 Forest Circle Dr Cassville, MO 65625-
Erika Parker 4372 Armand Dr. Concord, CA 94521	Mark E. Smith 1055 9th Ave #203 San Diego, CA 92101	Katherin Weiss 2101 Ladnier Rd. Lot 129 Gautier, MS 39553
Robert Wolf 1705 Gordon Dr Naples, FL 34102	Alek Williams 6 Palm Castle Port Orange, FL 32127	Eleanor Manire-Gatti 53 Iduna Lane Amherst, MA 01002

Rosemarie Overstreet 8803 El Rico Drive Indianapolis, IN 46240	Mary Pryde 3393 Dales Drive Norco, CA 92860	Marie Domenici 330 Oldfield Court Mattituck, NY 11952
Sharon Anderson 38238 Higginson Rd Zephyrhills, FL 33540	Don Sankovitch 5325 Tangerine Ave S Gulfport, FL 33707	J Aaron Gordon 145 Pine Knoll Ave. Chatham, MA 02633
Clarence Munson 137 County Route58 Oneonta, NY 13820	Aileen Eilert 499 Anthony Glen Ellyn, IL 60137	Edmund Good 640 Sandra Ave. Harrisburg, , PA 17109
Todd Witek 191 South Mt. Davidson Drive Driggs, ID 83422	Dennett Hutchcroft 1422 College St. Iowa City, IA 52245	William Rausch 6249 Marguerite Dr. Newark, CA 94560
Stefanie Collins 3210 Duval St Austin, TX 78705	Lou Ann Wildey 2566 Walton Blvd, Apt 433 Rochester Hills, MI 48309	Jacob Lyons 2606 W. Clark Av. Burbank, CA 91505
Liz Wally 5528 Victor Dallas, TX 75214	Jody Wolfe 3931 Warrendale Road South Euclid , OH 44118	Mitzi Coons 1811 Tamarind Ave. #212 Los Angeles, CA 90028
William Gonzalez Garcia 5 Slinn Ave.,Apt.B-6 Spring Valley, NY 10977	Dan Scarlett 516 Deerfield Place Santa Rosa, CA 95409	Gemma Geluz 2434 Ridgewood Circle Fairfield, CA 94534
Thomas Stennett 216 Lexington Ave Pittsburgh , PA 15215-	Ken Maloney 16222 Monterey Lane #223 Huntington Beach, CA 92649	Sarah Franklin 2851 S Xanadu Way Aurora, CO 80014
Teresa Durling 718A 34th Avenue San Francisco, CA 94121	Merry Loscalzo-Stumpf 3530 Manchester Dr Bettendorf, IA 52722	Juli Kring 12400 Brookglade Cr 42 Houston, TX 77099
Eric Weller 2707 Farwell Chicago, IL 60645	Joseph Lite 223 Northwood Drive Yellow Springs, OH 45387	Jill Armentrout 706 N. Main St. Lake Mills, WI 53551
Tom Boughan 213A Forgy St. Cowan, TN 37318	Donal Day 151 Buckingham Circle Charlottesville, VA 22903	Rory Schneider 2437 Delmar ave. Granite City, IL 62040

Leonard Bruckman 8595 Kingsgate Drive Granite Bay, CA 95746	Cynthia Molinero PO Box 2499 Colorado Springs, CO 80901	Robert Hicks 2999 E Ocean Blvd, #1740 Long Beach, CA 90803
Byron Brown 139 Ashbury Avenue El Cerrito, CA 94530	Ashwinee Sadanand 178 Hillcrest Ave., New Britain, CT 06053	John Thomson 584 Castro PMB 625 San Francisco, CA 94114
Zack Thomsen 484 Olive Ave Fremont, CA 94539	Lynne Banta 1443 N Ave 49 Los Angeles, CA 90042	Lisa Langcake 7268 Coddin Lane Fort Mill, SC 29715
Glenn Carroll 139 Kings Highway Decatur, GA 30030	Dini Schut 2355 Hempstead Toledo, OH 43606	Esther Cover 355 Sioux Sheridan, WY 82801
Billie Crossley 232 Orchard st Exeter, PA 18643	Nancy Woolley 121 Greenbrook Dr. Stoughton, MA 02072	Rachel Neff 84 Hickory Knob Rd Franklin, NC 28734
Gail Gordon 979 Colina Vista Ventura, CA 93003	Jackie O'Neil 1625 Henderson Ave C-8 Eugene, OR 97403	Julia Craig 2337 Parker St. #7 Berkeley, CA 94704
Curt Herman 154 Fairfield Coldwater, MI 49036	Pat Johnson 864 Lakefield Drive Galloway, OH 43119	Julie Hill 1620 Sw 12th St Miami, FL 33135
Adele Kushner 319 Wynn Lake Circle Alto, GA 30510	Wayne Sygman 28 Bunker Lane Hicksville, NY 11801	Kerri Saxer 245 Nokomis Parkway Cheektowaga, NY 14225
Erin Malmquist 1733 Chichester Ave Louisville, KY 40205	Marie Stein 418 SE Flamingo Ave Stuart, FL 349996	Jane Stowe 819 Peacock Rd. Richmond, IN 47374
Kerrie D'Ercole 170 Hersey St Hingham, MA 02043	Sean D. O'Toole 1325 Penna Ave Steubenville, OH 43952	Anthony Ivankovic 17 Jerome Place Wayne, NJ 07470
Wanda S. Ballentine 1359 Chatterton Rd. Eagan, MN 55123	Eliz Linser 124 Kahiko St Kapaa, HI 96746	Helen Cochran 1120 N 93rd St apt 402 Seattle, WA 98103

Jon Jordan 1075 Wynn Ln Williamston, NC 27892	Dario Fernandez 1380 N. Citrus Ave, Trlr A10 Covina, CA 91722	Susan Danielle Conroyd 1637 Spotswood Drive Bloomfield Hills, MI 48302
Walter Graue 205 Mosley Drive Lynn Haven, FL 32444	Nick Rodin 4141 Fairway Dr Soquel, CA 95073	Gerald Rubin 235 S. Walter Ave. Trenton, NJ 08629
Roy Henock 1214 G St Eureka, CA 95501	Arlen Kleinsasser 58 Belden Street Falls Village, CT 06031	Jerome Kirsling E4592 479th Avenue Menomonie, WI 54751
Mike Masley 20 N. Arlington St. Manville, NJ 08835	Lisa Russell 43 Highland Rock Drive Stoughton, MA 02072	Andrew Jenkins 431 S Dearborn St Chicago, IL 60605
Carla Holusha 233 US Highway 46 Budd Lake, NJ 07828	James Hoyt 1111 W. Huron St. Ann Arbor, MI 48103	Renee Dolney 2315 Orlando Place Pittsburgh, PA 15235
Marianne Szalega 27618 Shiawassee Farmington Hills, MI 48336	Ryan Little 3580 Brighton Rd. Pittsburgh, PA 15212	Cathy Bullotta 45 Mulberry Hill Rd. Washington, PA 15301
Susan Selbin 600 Alcalde Albuquerque, NM 87104	Jim Toczynski 1327 28th St. Manistee, MI 49660	Kathleen Dickerson 32 Oak St. Johnson City, NY 13790
James Hanson 1020 Via Merano Court Winter Park, FL 32789	Beth Hoke 39 Birchledge road Hollis, ME 04042	Denie English 216 Myrtle St. Uvalde, TX 78801
John Harper 527 Cambridge Circle South Daytona, FL 32119	Kim Kauffman 4037 Moclain Way #61 Carmichael, CA 95608	S. H. Costanza 35 Columbia St. Malden, MA 02148
Ray Cellura 2418 Cedar Springs S Abbeville, SC 29620	Jon Jenkins 0177 County Road 48 Howard, CO 81233	Chuck Rohrer 520 10th Ave E. #6 Seattle, WA 98102
Molly Hauck 4004 Dresden st. Kensington, MD 20895	Rick McDonald PO Box 4013 Wichita Falls, TX 76308	Amber Burrows PO Box 374 Mentone, TX 79754

Jo Hoge 3510 W. 59th Street Los Angeles, CA 90043	Caroline O'Brien PO Box 10038 Kansas City, MO 64171	Jackie Duba 1833 13th ave Greeley, CO 80461
Robert Apperson 1311 Lorimer road Raleigh, NC 27606	William Barychko 7033 N.W. 63rd Way Parkland, FL 33067	Phyllis Thomas 812 E. Sharpnack Street Philadelphia, PA 19119
Martha Bartter 2413 N. East St. Kirksville, MO 63501	Willis G. Farmer 1215 Ahrens Cheyenne, WY 28007	Carroll Arkema 221 Ringwood Ave - A3 Pompton Lakes, NJ 07442-
Janet McKinney 17858 Wood Rd. Bow, WA 98232	Lauren Pacheco-Theard 3693 S. Puma Drive Coeur d' Alene, ID 83814-	David Paul Xavier Burch 901 East Victoria Street South Bend, IN 46614
Drena LaPointe-Meyer 338 E Vaughn Avenue Gilbert, AZ 85234	Nancy Wiswell 3406 Washburn Avenue N Minneapolis, MN 55412	Bryce Smith 6379 S. Scenic Sault Ste. Marie, MI 49783
Wells Eddleman 811 Yancey Street Durham, NC 27701	Roger Santerre 10 Canaan Rd. New Paltz, NY 12561	Mary Markus 10462 Ramona Way Garden Grove, CA 92840
Angie Hughes 568 Edgehill Drive St. Albans, WV 25177	Barbara Viken 1750 Washington St. #4 San Francisco, CA 94109-	Cindy Borske 1029 1st St. NW Mason City, IA 50401
Seth Shulman 594 Shipbuilders Creek Rd Webster, NY 14580	Yvonne Allen 101 Bemont Terrace Mount Vernon, WA 98274	Jack Sparks 1312 El Camino Real Burlingame, CA 94010
Jared Cornelia 125 Denn Place Wilmington, DE 19804	Clare Szilagyi 30 Pinetree Audubon, PA 19403	Kris Muto 5 Carsdale Ct. Wilmington, DE 19808
Lynn Cardiff 2625 Englewood Ave NE Salem, OR 97301-	Melina Caniglia 11423 T Circle Omaha, NE 6837	Curt Naus 7810 Courtland Dr NE Rockford, MI 49341
Amre Klimchak 644 Driggs Ave #6 Brooklyn, NY 11211	Sayard Daniels 5124 Seaview Drive Blaine, WA 98230	Shirley Coon 313 East 56 Street New York, NY 10022



Judith Davidson 934 East West Rd E. Dummerston, VT 05346	Al McCullough 1413 High Point Terrace Birmingham, AL 35235	Christopher Lish PO Box 113 Olema, CA 94950
John Wells 515 52nd. Street Pittsburgh, PA 15201	Mercedes Smith 165 W Rampart Dr #704 San Antonio, TX 78216	Phyllis Hasty 1710 Winding Creek Circle Snellville, GA 30078
Melody Heart P.O. Box 3050 Sedona, AZ 86340	Mary Detrick 8115 37th Avenue North St. Petersburg, FL 33710	Brenda Hall Webster Close Essex, OT en9
Candy Bowman 2674 Woodridge Court # 1 Placerville, CA 95667	Dan Entous 3438 Clairton Ct. Encino, CA 91436	Hal Trufan 8869 Roberts Dr Atlanta, GA 30350
Susanna Orr 1311 Green Forest Dr. Austin, TX 78745	Elizabeth Ungar 101 West End Ave, 28B New York, NY 10023	Psuls S. Tytlar 481 Farmers Mills Road Kent Lakes, NY 10512
Shawn Wozniak 3937-F Hahns Lane Greensboro, NC 27401	Sally Tessicini 6915 Magellan Way Sarasota, FL 34243	Van and Lois Hamilton 1432 Mountain View Rd. Santa Barbara, CA 93109
Mel Soule Box 5191 Winter Park, FL 32791	Timothy Curry 369 Maryann Lane Pomona, CA 91767	Jeff Sloss 740 5th St. Juneau, AK 99801
Don McKelvey 18744 Abby Ave Euclid, OH 44119	David J. Lafond 70 Brown Avenue Holyoke, MA 01040	Adriane Biscia 118 Forty Acre Mtn Rd Danbury, CT 06811
Julia Camp 501 Rivergate Way #256 Sacramento, CA 95831	Jami Hatchell 300 Elizabeth Dr. Murrells Inlet, SC 29576	Joanne Bartlett 530 Longmeadow Road Amherst, NY 14226
Alexey Galiulin 442 The Fenway River Edge, NJ 07661	Edward Bender 137 Shepard St Rochester, NY 14620	Maureen G Kavanagh 4825 43 Street, Apt 2 J Woodside, NY 11377
Ruth Finnerty 5857 Ocean View Drive Oakland, CA 94618	Ronald Goodman 432 Bitterbrush Ave. Nampa, ID 83686	Paula S. Tytlar 481 Farmers Mills Road Kent Lakes, NY 10512

Laurelanne Koke 1144 N 198th St, E304 Shoreline, WA 98133	Elisse De Sio 662 - Third Avenue Redwood City, CA 94063	Sheila Rekdal 518 S Overton Independence, MO 64053
Kristin Hurley 13243 Aubrey St. Poway, CA 92064	S Flick 1041 November Cupertino, CA 95014	Dylan Thorbjornsen 518 4th St. #20 Cloquet, MN 55720
Jan Bueker 5239 SW West Drive Topeka, KS 66606	Janet Strouse P.O. Box 96 Wardensville, WV 26851	Sue Christiansen 41 Valley Iowa City, IA 52246
Margarit Dusek 6035 Crosswinds Dr. #8 Cudahy, WI 53110	Lee A. Bogear P. O. Box 1777 Winton, CA 95388	Brendan Hughes 316 Mesquite Ave Ridgecrest, CA 93555
Jane Kelsberg 1715 Hillcrest Ave. Antioch, CA 94509	TerryAnn Towers 141 Wellington Rindge, NH 03461	Sylvia Breakey 4116 Woodridge Lane Flagstaff, AZ 86004
Christina Rosier 425 S. 7th St. Springfield, IL 62701	Cynthia Neal 3592 Royal Arms Drive Memphis, TN 38115	Bernadette Clark 112a-4 Country Club Estates Thornhurst, PA 18424
Irene Pendze 308 E Thayer Street Philadelphia, PA 19134	Abha Harting 1819 N36th St, Apt 3 Seattle, WA 98103	Tomi McDonald 5728 Owens Dr., #103 Pleasanton, CA 94588
Eric Whitman 401 Willow Ave Piscataway, NJ 08854	Rosemarie K. Moore 13823 E. Langtry Lane Tucson, AZ 85747	Ricardo U. Berg 4020 Marathon Street Apt # 214 Los Angeles, CA 90029
Mary Lellouche 18510 66th Avenue Northeast Kenmore, WA 98028-	Cathryn Schiesser 2402 Dixie Farm Road Pearland, TX 77581	Fumiko Sakoda P.O. Box 104 Rosston, OK 73855
Charles Leiden 306 Coleridge Avenue Altoona, PA 16602	Linda Johnson 716 S Shadyglen dr Covina, CA 91724	Lynne Banta 1443 N Ave 49 Los Angeles, CA 90042
Jill Ransom 2161 Vale St Reno, NV 89509	Kimberly Medeiros 107 E. Pleasant Street, Apt. 5 Amherst, MA 01003	Kathryn Pennell 14811 N 37 <sup>th</sup> PL Phoenix, AZ 85032

Tammy Robinson 1588 Lake Counry Dr Ext Asheboro, NC 27205	Diana Dee 12814 Victory Bl North Hollywood, CA 91606	John Bromer 325 Silver Hill Rd. Easton, CT 06612
Michael Richardson 3907 W Cass St Tampa, FL 33609	Rebecca Savage 2444 9th Street Boulder, CO 80304	Jerry Wilson 4012 Maryland Ave Finleyville, PA 15332
Todd Hildebrandt P.O. BOX 189 Elmira, OR 97437	Kimberlee Manges 16112 Bridgewalk Dr. Lithia, FL 33547	Virginia Levasseur 357 New London Tpke. Norwich, CT 06360
Barbara Bates 907 W. Branch Street Lantana, FL 33462	Dennis Feichtinger 2711 Riverside Trenton, MI 48183	Harvey Levin 8 Huntington Beach, CA 92646
Russell Pirkot 26 Crescent Street Greenfield, MA 01301	Elaine Herzog 1477 Fordham Ave. Thousand Oaks, CA 91360	Jaclyn Green 1212 Whitehorse Hamilton Sq. Rd., Apt. 7 Hamilton, NJ 08690
Marc Rubin 77 Mark Twain Drive Hamilton Square, NJ 08690	Ruth Duty 5862 Colfax Ave. Alexandria, VA 2231	Heather Riede 17011 Kenyon Dr. Unit D Tustin, CA 92780
M J Perona 426 P O Box Cupertino, CA 95051	Christine Georgiou 3145 Sands Place Bronx, NY 10461	Donna Green 18416 NW Chemeketa Ln #938 Portland, OR 97229
Charlie Crocker 88 Rea Janet Drive #12 Colchester, VT 05446	Luiz Perez 35 Oyster Shores Rd. East Hampton, NY 11937	Zabrina Leith 526 Broad Street Beverly, NJ 08010
Elizabeth Utterback 388 Harborview LpSE Ocean Shores, WA 98569	K. Durkin 4083 Lanark Waterford, MI 48328	Cindy Risvold N7807 Lakeshore Drive Fond du Lac, WI 54937
Jim Head 2279 THOMAS Berkley, MI 48072	Kevin Corbin 2940 W. Fr. Rd. #164 Springfield, MO 65807	Genette Henderson 2116 Front St Durham, NC 27705
Deborah Maufer 350 Sharon Park Dr., #S-26 Menlo Park, CA 94025	Heath Ashli Taranowski 64404 NE 179th St Riverwood Park Gold Bar, WA 98251	Regina DeFalco Lippertq 210 Donegal Way Martinez, CA 94553

Gaile Carr 1821 Eddy Dr Mtshasta, CA 96067	Laura Anschicks 838 Edgewood Drive Sugar Grove, IL 60554f	Tim Campbell 4014 Cinnabar St. Antioch, CA 94509
Katherine Myskowski 1125_B Arnold Dr #271 Martinez, CA 94553	Susan Spengler 620 E. Kenilworth Ave. Palatine, IL 60074	Carol Carson 4404 6th ave, 1B Brooklyn, NY 11220
Gary Vedvik 40 Reitz Parkway Pittsford, NY 14534	Maynard Kent 440 Riverside DR New York, NY 10027	Carl Polley MSC 598 1711 East-West Road Honolulu, HI 96848
Julie Parisi Kirby 36 Purdy Hollow Road Woodstock, NY 12498	Kathleen E Kingdollar 1054 Bay St Rochester, NY 14609	Barry Kuhlik 773 Lee Ln Fincastle, VA 24090
John Jenkins 5406 Whitcomb Drive Madison, WI 53711	James Zitis P.O. Box 691351 Orlando, FL 32869	Gregory Pickett 529 N. Ardmore Ave., Apt. 2F Villa Park, IL 60181
Charmaine Weston 4545 Oxford Road Columbia, SC 29209	Joan Bauereiss 569 County Road 579 Hampton, NJ 08827	Joyce Raby 5624 Murdock Ave. Sarasota, FL 34231
Frances Samuelson 13130 Hwy 29 W. #18A Liberty Hill, TX 78642	Elizabeth Walters 1281 Oak Spring Road Libertyville, IL 60048	Lynne Banta 1443 N Ave 49 Los Angeles, CA 90042
Janice Oscarson 3 George Street Burlington, VT 05401-	Janice Oscarson 3 George Street Burlington, VT 05401	Regina Miller 3785 Bowen Ave. Memphis, TN 38122
Dave Fenimore 302 Bent Lane Newark, DE 19711	Monica Lehman 7540 Habersham Circle North Jacksonville, FL 32216	Joy Augenstern 883 Nantasket Ave Hull, MA 02045
Lynne Banta 1443 N Ave 49 Los Angeles, CA 90042	Mitchell Ewing 23 Jennings Lane, Box 193 Mimbres, NM 88049	Misti Jancosek 51832 Vance Vista Ct. South Bend, IN 46628