



IMMI Developments

## Iron Mountain Mines, Inc.

P.O. Box 992867, Redding CA 96099  
Tel: (530) 275-4550 • Fax: (530) 275-4559

### To the Library of Congress

T.W. Arman, Chairman, President, and CEO of Iron Mountain Mines, Inc. wishes to thank the California Department of Mines and Geology, the University of California at Berkeley, the University of Nevada, the University of Wisconsin, and the U.S. Geological Survey for their interest and support provided during our 32 years of ownership of Iron Mountain Mines.

We also want to acknowledge the Library of Congress, which carries in it's permanent collection the comprehensive United States Geological Survey Professional Paper which is the most comprehensive geological description prepared to date of the valuable ore deposits at Iron Mountain Mines, as well as Volume 80, Number 8, December 1985 of *Economic Geology*, the bulletin of the Society of Economic Geologists, which is a special issue devoted to the massive sulfide ore bodies of the West Shasta District, California. All of the entities have contributed positively to the present and future beneficial development of Iron Mountain Mines.

We wish to thank all of the individuals who provided help, legal assistance and accounting, the mining engineers and consultants who have provided support, the stockholders of Essential Solutions, Inc. for their faith in the ultimate success of the venture, the Redding Searchlight and the L.A. Times for their media coverage, and all the companies that have come to the aid and assistance of Iron Mountain Mines, Inc. in its struggle against the oppression of the EPA and other U.S and State government agencies.

On behalf of the Company and the T.W. Arman Living Trust and the T.W. Arman Foundation that will ultimately administer the properties, Ted Arman wishes for everyone to know that any future proceeds that may be realized from the ongoing litigation are intended to be devoted to the numerous charitable and humanitarian projects to be identified to receive these bequests.

Ted Arman's mission, beyond the restoration of his company and their reputations, and vindication of responsibility for any alleged pollution from Iron Mountain Mines, is the construction of the 232 ft. Christ statue and the spiritual retreat on top of Iron Mountain for the worship of our Lord and His glory.

It is the purpose of this holy monument to promote faith in God and our Lord Jesus Christ, and it is hoped that it may become a destination for the faithful who may then have the opportunity to experience the exhilaration and breathtaking beauty that is the true nature of Iron Mountain, and by the grace and glory of compassion that faith has given us, so too may every visitor to Iron Mountain experience through the peaceful solitude and solemn majesty of God's green earth, the blessed serenity and solace that have carried us through the darkest hours of our federal and state persecution.

In the hope that each of our fellow citizens may come to believe and know the great comfort of God's embrace, we invite all who wish to join us in the quest for God's truth and wisdom at Iron Mountain.

God Bless everyone.  
Sincerely,

T.W. (Ted) Arman



IMMI Developments

# Iron Mountain Mines, Inc.

P.O. Box 992867, Redding CA 96099  
Tel: (530) 275-4550 Fax: (530) 275-4559

May 5, 2006

Honorable David F. Levi, U.S. District Judge  
U.S. District Court for the Eastern District of California  
501 I Street, Suite 4-200  
Sacramento, CA 95814

Re: *United States of America v. Iron Mountain Mines, Inc. and T.W. Arman*  
United States District Court, Eastern District of California,  
Nos. S-91-0768 DFL/JFM and S-91-1167 DFL/JFM

Dear Judge Levi:

This communication is a good-faith effort to bring to your attention some considerations that apparently have been obscured in the proceedings thus far in this case. This is not an official court document, which is why I have not formatted it as such. It is more in the form of a "friend-of-the-court brief," except, of course, that I am a defendant. Perhaps it is best characterized as a personal appeal for justice.

I continue to deny that I owe any cost-recovery money for the EPA's Superfund project at Iron Mountain Mines. It is clear from CERCLA and from EPA policy that all of the past owners and their successors are potentially fully responsible parties for all environmental costs at this site, and that, due to circumstances, Iron Mountain Mines, Inc. (IMMI) and T.W. Arman, in effect, currently are not actually responsible parties.

This is clearly demonstrated, and is a conclusion demanded, by the two documents of which copies are attached to this letter: the February 4, 1977 inter-office memo to Stauffer Chemical Company's geology department staff from Tom Kent, their real estate director, and the letter to Stauffer Chemical Company, date-stamped 20 Sep 1989, from Jeff Zelikson of the EPA, at that time the Director of the Hazardous Waste Management Division for Region IX. Heretofore, these crucial documents, and their critical importance in this case, have been brushed aside by all the attorneys involved—the governments' (Federal and State) and IMMI's. So they perhaps have never even come to your attention.

The Zelikson letter confirms IMMI's inability to finance the remedial cleanup, and it definitively assigns this responsibility to Stauffer, with whose successors it still lies, in that the circumstances which led to the letter have not changed. How could it be any clearer than this that IMMI will have no financial responsibility in the matter unless and until it has the means to pay (which it still does not), and even then, only if IMMI is actually liable.

Iron Mountain Mines, Inc.

Honorable David Levi

May 5, 2006

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This brings the February 4, 1977 Kent memo into focus. It strongly supports the "innocent landowner" defense, in that it is absolute proof of Stauffer Chemical Company's conspiratorial and successful plot to conceal from me the environmental problems of their property prior to and even after my purchase of it in October of 1976. It clearly states, with emphasis, that the Stauffer staff all had agreed, "...nor would you give up any correspondence, reports, etc. relating to environmental issues at Iron Mountain."

I am extremely frustrated by the fact that, despite this "smoking gun", the EPA was nevertheless awarded a partial summary judgment, denying the innocent landowner defense and two others, primarily on the basis of the perjured testimony of Jim Pedri, head of the California Regional Water Board Office in Redding, given in deposition, that he warned me of the environmental problems, when in actuality he did no such thing.

Pedri's testimony, the falsity of it, and the historical context in which it occurred is discussed in detail as follows:

The Stauffer Chemical Company failed to disclose all of the facts concerning the environmental and pollution problem at the Iron Mountain Mine site to the prospective new owner, Ted Arman, of Iron Mountain Mines, Inc., prior to the execution of the purchase agreement for the land. There were eleven months of negotiations and due diligence prior to the agreement, and yet in all this time Stauffer would not reveal any of the problems or let IMMI and its consultants look in their geological and real estate files. Their intent was to deceive the buyer about their pollution problem so that the purchase agreement would be signed by October 22, 1976.

All of the information concerning the past history of the environmental concerns was withheld, and the failure to supply it should be considered fraud. A lawsuit will be brought against all parties who knew about this deceit and the withholding of pollution information from IMMI prior to the signing of the purchase agreement and who did not advise Ted Arman and IMMI that buying this property from Stauffer could cost millions of dollars in the near future, as has currently developed. No one, including the State Water Board, would disclose this financial problem to the prospective new owners. They all kept quiet, knowing that this transaction between Stauffer and IMMI could be fraudulent.

Iron Mountain Mines, Inc.  
Honorable David Levi  
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Even after buying Iron Mountain Mines on October 21, 1976 the only geological information I received from Stauffer pertained to the approximately one million tons of pyrite ore exposed in the open pit at Brick Flat, where the EPA is now dumping lime sludge and burying more than \$100,000,000 worth of mineable mineral products so that IMMI cannot get at them to mine them. The existence and whereabouts of the remainder of the fourteen million tons of massive sulfide ore now known to be present was not disclosed or explained during the eleven months of due diligence and investigation by our mining and engineering consultant, who knew Stauffer quite well.

Because of my interest in the property, I visited Stauffer Chemical Company's Geology Department in Richmond, California in 1977 and spent two days there looking over all their mining records to see where any mineable ore might be other than the one million tons already disclosed by Stauffer. The attached February 4, 1977 inter-office memorandum to various Geology Department personnel from Tom Kent, Stauffer's Real Estate Director, was intended to ensure that they would not disclose to me any information concerning any environmental problems, a cover-up and deceit that continues to this day.

Twenty-five years later, as the EPA and the State persisted in their fraudulent and spurious cost-recovery claim litigation against T.W.Arman and Iron Mountain Mines, Inc., in Federal Court action the Court objected to IMMI's "innocent land owner" defense because the Court believed Jim Pedri, of the Water Board, who falsely claimed in Court testimony that he told Ted Arman of the pollution but never mentioned that it was going to cost millions to fix it. None of this was disclosed during the eleven months of due diligence.

This perjured testimony was repeated in Pedri's interview by the Los Angeles Times, published March 10, 2005, and reported as follows:

"But, in a Court declaration, a state official said Arman was warned about pollution problems. 'I told him whoever buys the mine will be responsible for cleaning the pollution,' Jim Pedri, head of the Regional Water Board Office here said in an interview. 'He said, 'I will fix the whole problem, trust me.'"

These two statements made by Jim Pedri to the L.A. Times are direct, flat-out lies. The only concern Pedri expressed at the one brief meeting I had with him was, "Are you going to operate the copper precipitation plant on Boulder Creek?" Since this small copper plant was already there and being operated by Stauffer Chemical Company, and was being offered to IMMI (including two operating employees and a supply of the scrap iron needed to make it work) as an

Iron Mountain Mines, Inc.  
Honorable David Levi  
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inducement for IMMI to buy the property from Stauffer, in that the sale of the output would supposedly make the property payments, I naturally said IMMI would continue to operate it. Operating this small plant was intended to reduce the amount of copper in the naturally flowing mine water taken directly from the Richmond mine and directed to this small plant by stainless steel open flumes over a distance of about three miles. This was Pedri's only concern, and nothing else.

And his further statement that I said I would fix the whole problem is a preposterous total fabrication. I never said any such thing, and would have had no occasion to do so in this very limited discussion. Later, after I had purchased the property, he raised many issues. But before I signed the purchase agreement he did not want to discourage this sale, since Stauffer Chemical Company's management had already made up their minds to sell this property to avoid any further ownership, because of their environmental problems with the State—of which IMMI was not told by Stauffer or the Water Board.

In light of the foregoing, I have asked my attorney, "What I want to know is: With you representing me, why was the EPA allowed to get that summary judgment so easily, apparently even drafting the order themselves for Judge Levi's approval? Why wasn't this Kent memo stressed, and why wasn't Pedri's deposition challenged? Why wasn't he put on the stand and cross-examined, and why wasn't I called as a witness to refute his fabrications with my own first-person testimony?" My attorney has not yet responded.

In view of these deficiencies in the Court proceedings, it is my good faith belief that the matter of the innocent land-owner defense should be revisited, the Court's decision reversed, and the EPA's partial summary judgment overturned.

Moreover, especially in view of the Jelikson letter, and in view of the Court's December 8, 2000 Consent Decree, which settles the matter with respect to all parties, including third parties, and in which I was promised by federal attorneys that I was included, and in consideration of this I was therefore induced to drop my \$10 million cross-complaint against another party and to concur in the settlement, and which provides via the AIG Insurance Company funding mechanism for the EPA's and the State's recovery of all costs, past, present, and future, it is my good faith belief that the governments should be denied an unethical and morally indefensible, if not illegal, double recovery of their costs, and that the governments' entire case against Iron Mountain Mines, Inc. and T.W. Arman should be summarily dismissed forthwith.

Iron Mountain Mines, Inc.  
Honorable David Levi  
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Thank you very much, Your Honor, for your very kind consideration of some of my concerns about this case.

Sincerely,



T. W. Arman,  
President, CEO, and Chairman of the Board  
Iron Mountain Mines, Inc.  
Essential Solutions, Inc.

**Attachments:**

Stauffer memo by Tom Kent  
EPA letter to Stauffer by Jeff Zelikson

**Cc:** Honorable John F. Moulds, Magistrate, U.S. District Court  
Honorable J. Lawrence Irving, Magistrate, U.S. District Court  
Honorable Wally Herger, United States Congressman  
Barry Breen, Deputy Asst. Admin., Ofc. of Solid Waste Emergency Response  
United States Environmental Protection Agency  
Ms. Elizabeth Adams, Chief, Site Cleanup Branch, Superfund Division  
United States Environmental Protection Agency, Region IX  
Jerry D. Hall, Esq., IMMI Corporate Attorney  
William A. Logan, Jr., Esq.



INTER-OFFICE CORRESPONDENCE

San Francisco

TO (LOCATION) Richmond

FROM T. J. Kent

February 4, 1977

ATTENTION L. E. Marnion

SUBJECT: Iron Mountain — Geology Data

COPY TO  
R. P. Bond  
E. L. Conant  
H. O. Thomas  
F. S. Weiss  
J. V. Wiseman

Earlier this week, you were contacted by an Iron Mountain Mines representative to see if he could visit you today and obtain the remaining geological data in your office about Iron Mountain. As we discussed and agreed yesterday by phone, you will turn over all pertinent material to IMM — both originals and primary copies — without attempting to tabulate what's passed on.

However, we agreed that you would not provide IMM with any geological or technical information not pertinent to the 1900 acres sold last year to IMM nor would you give up any correspondence, reports, etc. relating to environmental issues at Iron Mountain.

Transmittal of data in this fashion is in accord with the Agreement for Sale and Purchase of Property which we executed jointly with IMM on October 22, 1976. Safekeeping of all the data passed on to IMM must be its responsibility henceforth.

*TJK*  
T. J. Kent

TJK/ph

RECEIVED  
FEB 7 1977  
REMOVED FROM THE  
PROPERTY DEPT.

SAFEGUARD COMPANY INFORMATION

FORM 0022-000-004

OOP\_0948



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105-3901

8.

Stauffer Chemical Co., a Division of Rhone-Polenc, Inc.  
c/o Prentice Hall Corp. Systems, Inc.  
229 South State St.  
Dover, DE 19001

20 SEP 1990

RE: Iron Mountain Mine  
Determination under Paragraph V of Order no. 89-18

Dear Sir or Madam:

This notice is being sent to all Respondents to the above-referenced order pursuant to Paragraph V of that Order. John Varnum, counsel for T. W. Arman and Iron Mountain Mines, Inc. (IMMI), informed the Environmental Protection Agency on August 10, 1989, that neither Mr. Arman nor IMMI have the financial resources to undertake the tasks required by the Order. Accordingly, the Environmental Protection Agency ("EPA") has determined that Mr. Arman and IMMI are unable to comply with the Order in a timely fashion. Under Paragraph V of the Order, Stauffer Chemical Co., a Division of Rhone-Poulenc, Inc., ("Stauffer") is now also required to comply with the activities required by this Order. On September 7, 1990, ICI Americas, Inc. ("ICI"), acting for Stauffer, informed EPA of its intent to comply with this Order.

This notice does not excuse either Mr. Arman or IMMI from any responsibilities under the order. EPA expects that Mr. Arman and IMMI will continue to cooperate with Stauffer, and their representatives, ICI, in their efforts under the Order.

If you have any questions regarding this determination, please contact Rick Sugarek of my staff at (415) 974-9312, or have your attorney contact Michael Hingerty of the Office of Regional Counsel at (415) 974-9671.

Sincerely,

Jeff Zelikson  
Director  
Hazardous Waste Management Division

cc: T. W. Arman  
John Varnum, Esq.  
Patrick Finley, Esq.  
Samual Malovrh, Esq.  
RWQCB - J. Pedri  
DHS - J. Astheng  
Fish and Game - Harry Rectenwald  
Mike Smith



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94106-3901

4

October 2, 1992

Mr. T.W. Arman  
President, Iron Mountain Mines, Inc.  
1900 Point West Way, Suite 102  
Sacramento, CA 95815

RE: Iron Mountain Mine - EPA Administrative Order 92-26

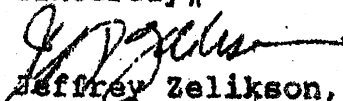
Dear Mr. Arman:

This letter notifies you that Rhone-Poulenc Basic Chemicals Co. has notified EPA that it will comply with EPA's Administrative Order 92-26, issued on September 2, 1992, are in violation of that Order. The Respondents to the Order include Iron Mountain Mines, Inc. (IMMI), yourself as President and owner of IMMI, and Rhone-Poulenc Basic Chemicals Co.

EPA encourages you to continue to provide your cooperation and support to these important activities. The operation of the emergency treatment plant this winter is a necessary activity to minimize the release of acid mine drainage until we are able to install the full-scale treatment plant selected in the Record of Decision of September 30, 1992.

If you wish to discuss this matter further or if you have specific questions regarding implementation of the order, please contact Mr. Rick Sugarek at (415) 744-2226 or have your attorney contact Mr. Michael Hingerty at (415) 744-1315.

Sincerely,

  
Jeffrey Zelikson, Director  
Hazardous Waste Management Division

CC: Mr. S. A. La Rocca  
Rhone-Poulenc Basic Chemicals Co.



IMMI Developments

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## STATEMENT OF FACTS

1. EPA kept IMMI from developing its mining properties that would have produced income for the company since 1984, including employment and taxes to Shasta County.
2. California State Water Quality Control Board made false reports on their "hazardous ranking score" that put the Iron Mountain Mines property on the National Priority List (NPL) Superfund. This limited IMMI from operating. The Assistant Supervisor of the Water Quality Control Board at that time also falsely claimed to the court that IMMI was fully aware of the pollution problem.
3. The former owners, Stauffer Chemical Company, gave IMMI false information about the mine water problem. When their representative was asked if there were any environmental problems during IMMI's eleven months of negotiations prior to the purchase in 1976, he said that "there are not any environmental problems at this site." He later became a corporate officer with IMMI, but resigned to go back to his mining business as a mining engineer and geologist.
4. Stauffer and Rhone-Poulenc would not release the property deeds of trust until December 8, 2000. This kept IMMI from borrowing money to operate. Stauffer approved a \$30 million dam now completed on IMMI's private property that was not authorized by IMMI, including other EPA activities.
5. EPA knows that IMMI never mined the massive sulfide ore bodies at Iron Mountain that is the source of the AMD problem at this site. These ore bodies were mined prior to IMMI's ownership.
6. EPA and the State had a claim against IMMI for cost recovery of \$10 million. T. W. Arman and IMMI did not agree with this claim and filed a counterclaim against all parties in this case.
7. On December 8, 2000, the Consent Decree was signed and a settlement was made between EPA and Rhone-Poulenc for past mining problems and the environment. IMMI was included in this settlement of \$835 million with the understanding that no payment was due to EPA and the State. IMMI dropped their counter claim of \$10 million so that the case could go forward and so that IMMI would be included in the \$835 million settlement.
8. EPA lawyers Tom Bloomfield and David Glazer told IMMI lawyers that IMMI was included in the \$835 million settlement so that IMMI would not object when asked by the Court, "do you understand this settlement?" and IMMI said, "Yes," because this settlement was to cover all past, present, and future EPA costs. The EPA later denied that they made the above statement.
9. On May 7, 2000, or five months later, EPA filed an involuntary lien against IMMI's private property for past cost recovery. This lien was filed by a court order and judgment against IMMI even though these costs are to be paid by the \$835 million settlement agreed to by a federal mediation judge and two IMMI attorneys. (See attached letter dated January 2, 2001, from Brian Stone, Attorney)
10. T. W. Arman and IMMI are currently in a settlement with EPA as of July 12, 2002, concerning the cost recovery claimed by EPA, who now says that IMMI is not included in the settlement of the \$835 million for all costs by EPA and the State. IMMI will challenge EPA for this alleged claim.
11. The product and damage claims involving property and mineral resources to be filed against EPA and the State are approximately \$6 billion plus punitive damages.

Revised October 12, 2004

**STATEMENT OF FACTS**

12. IMMI owns the resources that can produce products over the next 15 to 20 years that will cover all past, current, and future cost recovery claims subject to regulatory approval of operations and financing the operations at this site.
13. IMMI owns 2,744 acres of mining and wildlife property in Shasta County, California, that is zoned for mining. All property for mining is on less than 200 acres. The remaining property is dedicated for wildlife preserve in perpetuity. This total IMMI property is in a private trust that can never be sold.
14. The entire alleged pollution problem in the Sacramento River was over the threat to the loss of salmon that was overstated by EPA and the State to make IMMI a Superfund Site, which is completely unjustified.

Revised October 12, 2004



IMMI Developments

**IRON MOUNTAIN MINES, INC., PROJECTS**  
Shasta County, California

**CONFIDENTIAL**  
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**DAMAGES AND TAKING CLAIMS**

**October 12, 2004**

Property and product damages plus punitive damages and taking claims will be filed against EPA and the State of California for unauthorized taking without just compensation, interference from business development, loss of income and enjoyment of this private property.

The millions of tons of ore-bodies, mineral resources, water rights on three streams, mine water, timber, roads, buildings, aerial tramway, power lines, and all commercial products at Iron Mountain Mines are owned by Iron Mountain Mines, Inc., since 1976. The figures herein are approximate current market values of the resources and products.

- |   |                        |
|---|------------------------|
| 1. Massive sulfide ore-bodies: Approximately 14,183,000 tons of proven ore reserves at \$75.96/ton (current value per ton) of copper, zinc, gold, silver, and iron, including approximately 10 million tons of probable new ore-bodies. The mining of the ore-bodies and clean up by IMMI would have eliminated all of EPA's remedial activities at this site.<br><i>Operations stopped by EPA.</i> | <b>\$1,077,340,680</b> |
| 2. Pyrite tailings stockpiled: 160,000 tons at \$30.00/ton.<br><i>Now covered by EPA.</i>   | <b>\$4,800,000</b>     |
| 3. Pyrite tailings from future mining: Approximately 13,000,000 tons at \$60.00/ton. Sulfur, iron, and zinc for fertilizers.<br><i>Operations stopped by EPA.</i>   | <b>\$780,000,000</b>   |
| 4. Hematite iron tailings: Approximately 200,000 tons at \$10.00/ton. Iron additive for making cement, pigments, and brick coloring.<br><i>Now covered by EPA.</i>  | <b>\$2,000,000</b>     |
| 5. Magnetite tailings: Approximately 2,000 tons at \$100.00/ton. Radiation shielding, cement additive, and ballast.<br><i>Now covered by EPA.</i>   | <b>\$200,000</b>       |
| 6. Gossan ore-bodies: Approximately 6,000,000 tons at \$39.00/ton.<br><i>Operations stopped by EPA.</i>   | <b>\$234,000,000</b>   |
| 7. Soft spinel ferrite: 20 years' production at \$12,000,000.00 per year. Studies completed by UNR.<br><i>Operations stopped by EPA.</i>  | <b>\$240,000,000</b>   |

October 12, 2004

<p>8. Ag-Gel product from 25 million gallons of natural liquid mineral resources flowing naturally out of the mines at \$6.30/gallon over 20 years of operation and production. <i>Operations stopped by EPA.</i></p>	<p>\$3,150,000,000</p>
<p>9. Hydroelectric power: IMMI has the riparian rights on its private property. Electric power for commercial and home based on studies and 40 years of power production. FERC license was applied for in 1984. <i>Operations stopped by EPA.</i></p>	<p>\$40,000,000</p>
<p>10. Sulfur ore in Brick Flat: 100,000 tons at \$100.00/ton. <i>Now covered by EPA.</i></p>	<p>\$10,000,000</p>
<p>11. EPA use of IMMI land of approximately 10 acres for the lime neutralization plant at \$3,000.00/acre for the past 12 years. <i>This use continues by EPA.</i></p>	<p>\$360,000.00</p>
<p>12. EPA unauthorized use of 19,396 square feet of steel buildings at approximately \$0.33/sq. ft. for 20.5 years, from March 1984 to October 2004. <i>This use continues by EPA.</i></p>	<p>\$1,574,567</p>
<p>13. EPA unauthorized landfill for storing lime sludge: Approximately 500,000 tons at \$24.00/ton storage is covering valuable ore worth approximately \$70 million. EPA continues to use this private property as a landfill without paying just compensation.</p>	<p>\$12,000,000</p>
<p><b>TOTAL DAMAGES TO DATE</b></p>	<p><u><b>\$5,557,275,247</b></u></p>

Extensive project reports, professional papers, studies, and thousands of pages of information are available, including photographs, videos, and a long list of references and business contacts made by IMMI on the above projects. The massive sulfide ore-bodies can be mined out over 15 to 20 years, and the acid mine drainage (AMD) problem will be eliminated, therefore saving millions of dollars for remedial activities at this site over the next 30 years.

A major lawsuit for economic loss by EPA's taking and product damages for billions of dollars will offset all EPA remedial cost recovery claims against T. W. Arman and IMMI. EPA was paid millions in cash paid by AIG Insurance Company for Rhone-Poulenc, successors to the former owner of this private property. There is \$835 million plus interest in EPA's trust account paid by AIG Insurance Company for the next 30 years for O and M and remedial cleanup for the Iron Mountain Mines Site. In 1983 EPA refused to accept IMMI's mining and cleanup proposal, which was offered by the largest engineering firm in the world at that time. That would have solved all environmental problems at this site and saved millions of dollars for the U.S. government and taxpayers.

Revised October 12, 2004