Staff Report

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Appeals Hearing Officer

From: Amy Thompson, amy.thompson@slcgov.com or 801-535-7281

Date: March 10, 2022

Re: PLNAPP2021-01165 – Appeal of an Administrative Decision to Deny a Permit to Raise the Height of a Billboard – *Building Permit BLD2021-07175*

Appeal of Administrative Decision

PROPERTY ADDRESS: Approximately 533 South 400 West
PARCEL ID: 15-01-378-027
PARCEL DISTRICT: CG (General Commercial)
ZONING ORDINANCE SECTIONS:

- 21A.46.160 Billboards
- 21A.16 Appeals of Administrative Decisions

APPELLANT: Reagan Outdoor Advertising, represented by Joshua Peterman

APPEAL ISSUE:
Salt Lake City made an administrative decision to deny a request by Reagan Outdoor Advertising to raise the height of an existing billboard at approximately 533 South 400 West.

ATTACHMENTS:

A. Appeal Application & Information
B. Salt Lake City Response to Appeal

ATTACHMENT A: APPEAL APPLICATION & INFORMATION

Appeal of a Decision

SALT LAKE CITY PLANNING

OFFICE USE ONLY		
Petition #:	Received By:	Date Received:
Appealed decision made by: ☐ Planning Commission ☐ Administrative Decision ☐ Historic Landmark Commission		
Appeal will be forwarded to: ☐ Planning Commission ☐ Appeal Hearing Officer ☐ Historic Landmark Commission		
Petition Name and # Being Appealed:		

PLEASE PROVIDE THE FOLLOWING INFORMATION	
Decision Appealed:	
Address of Subject Property:	
Name of Appellant:	Phone:
Address of Appellant:	
E-mail of Appellant:	Cell/Fax:
Name of Property Owner (if different from appellant):	
E-mail of Property Owner:	Phone:
Appellant’s Interest in Subject Property:	

AVAILABLE CONSULTATION

Please email zoning@slcgov.com if you have any questions regarding the requirements of this application.

APPEAL PERIODS

- An appeal shall be submitted within ten (10) days of the decision.
- The Applicant of an HLC decision being appealed can submit within thirty (30) days of the decision.

REQUIRED FEE

- Filing fee of **$269,** plus additional fees for required public notices and multiple hearings.
- Filing fees must be submitted within the required appeal period. Noticing fees will be assessed after application is submitted

SIGNATURE

If applicable, a notarized statement of consent authorizing applicant to act as an agent will be required.

Signature of Owner or Agent:	Date:

Updated 8/16/2021

SUBMITTAL REQUIREMENT

☐ ☐ A written description of the alleged error and the reason for this appeal.

WHERE TO FILE THE COMPLETE APPLICATION

Apply online through the **Citizen Access Portal**. There is a **step-by-step guide** to learn how to submit online.

INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED

______ I acknowledge that Salt Lake City requires the items above to be submitted before my application can be processed. I understand that Planning will not accept my application unless all of the following items are included in the submittal package.

Additional Guidelines for Those Appealing a Planning Commission or Landmarks Commission Decision Section 21A.16 of the City Ordinance

A person who challenges a decision by the Planning Commission or the Landmarks Commission bears the burden of showing that the decision made by the commission was in error.

The hearing officer, according to state statute, must assume that the decision is correct and only reverse it if it is illegal or not supported by substantial evidence in the record.

“Substantial evidence” means information that is relevant to the decision and credible. Substantial evidence does not include public clamor and emotion. It involves facts and not mere speculation. A witness with particular expertise can provide substantial evidence, but conjecture and public opinion alone are not substantial evidence.

The “record” includes information, including the application by the person seeking approval, the staff report, the minutes of the meeting, and any information submitted to the commission by members of the public, the applicant or others, before the decision was made. It does not include facts or opinion, even expert opinion, expressed after the decision is made or which was not available to the commission at the time the decision was made.

A decision is “illegal” if it is contrary to local ordinance, state statute or case law, or federal law. An applicant is entitled to approval if the application complies with the law, so a person challenging a denial should show that the application complied with the law; a person challenging an approval should show that the application did not conform to the relevant law. Issues of legality are not restricted to the record of the decision, but the facts supporting or opposing the decision are limited to those in the record.

With regard to the factual information and evidence that supports a decision, the person bringing the appeal, according to a long line of decisions handed down by the Utah State Supreme Court and the Court of Appeals, has a burden to “marshal the evidence” and then to demonstrate that the evidence which has been marshaled is not sufficient to support the decision.

The appellant is therefore to:

1. Identify the alleged facts which are the basis for the decision, and any information available to the commission when the decision is made that supports the decision. Spell it out. For example, your statement might begin with: “The following information and evidence may have been relied upon by the Commission to support their decision . . .”
2. Show why that basis, including facts and opinion expressed to the commission is either irrelevant or not credible. Your next statement might begin with: “The information and evidence which may have been relied upon cannot sustain the decision because . . .”

If the evidence supporting the decision is not marshaled and responded to, the hearing officer cannot grant your appeal. It may be wise to seek the advice of an attorney experienced in local land use regulation to assist you.

Updated 8/16/2021

Reasons for Appeal:

By letter dated November 1, 2021, the City denied Reagan Outdoor Advertising's ("ROA") application to increase the height of a billboard located at the corner of 500 South and 400 West, Salt Lake City, UT (BLD2021-07175). *See* letter attached hereto as Exhibit A

The City asserted four reasons for the denial, each of which is illegal and contrary to law.

1. Utah Code section 72-7-510.5 Applies.

The City's first basis for denial is a cursory statement that "the provision does not apply to the area at issue in this case." Although the support for this statement is not entirely clear, ROA assumes that the City is arguing that the road on which the billboard is located is not covered by Utah Code section 72-7-510.5, which is incorrect. As shown on the map attached hereto as Exhibit B, 500 South is part of the Utah National Highway System. Utah Code 72-7-510.5 expressly applies to outdoor advertising signs along a "national highway systems highway." *See* Utah Code Ann §72-7-510.5 (1).

2. The Statute is Not Limited to Obstructions Resulting from Road Widening.

The City's second basis for denial is that 72-7-510.5 was enacted "for the general purpose of providing a remedy for obstructions that resulted from the widening of I-15." Nowhere does the statute contain this artificial limitation. To the contrary, the plain language of the statute allows ROA to adjust the height of the billboard due to an obstruction caused by:

> noise abatement or safety measure, grade change, construction, directional sign, highway widening, or aesthetic improvement made by an agency of this state, along an interstate, federal aid primary highway existing as of June 1, 1991, national highway systems highway, or state highway or by an improvement created on real property subsequent to the department's disposal of the property…

Utah Code Ann §72-7-510.5 (1).

The billboard is obstructed by a UDOT sign that was installed on a road that falls under the scope of the statute, as previously discussed. *See* photograph attached hereto as Exhibit C. The statute is not limited to obstructions only resulting from the widening of I-15. If that were the purpose of the statute, the legislature could have easily worded it as such. Instead, the plain language of the statute is much broader and covers a variety of obstructions on roads throughout the State. "Where the statutory language is plain and unambiguous, we do not look beyond the language's plain meaning to divine legislative intent." *Horton v. Royal Ord. of Sun*, 821 P.2d 1167, 1168 (Utah 1991) (citation omitted).

3. The UDOT Sign Obstructs the Billboard.

The City's third asserted basis for denial is that ROA's sign is not obstructed. As support for this assertion, the City argues that because the UDOT sign has been in place for "at least twelve years," it cannot be deemed an obstruction. This statement is contrary to law as the applicable statutes do not reference any particular time limitation for a billboard owner to overcome an obstruction. Again, if the legislature intended to require a billboard owner to apply for a height adjustment within a specific period of time, the statute would have been worded accordingly. The statute contains no such limitation and it must be presumed that the omission was purposeful. *See e.g. Marion Energy, Inc. v. KFJ Ranch P'ship,* 2011 UT 50, ¶ 14, 267 P.3d 863, 866 (courts "give effect to omissions in statutory language by presuming all omissions to be purposeful")

The passage of time does not make the obstruction go away and ROA's ability to adjust the height of the billboard is not precluded. The UDOT sign clearly obstructs the billboard and ROA is entitled to a height adjustment pursuant to the plain language of the statute.

4. ROA is Entitled to Raise the Billboard.

The City's fourth asserted basis for denial is that ROA should lower, rather than raise the billboard. This argument is without merit as the statute clearly contemplates raising a billboard to avoid the obstruction. This is evident from Utah Code section 72-7-510.5(3) that requires the City to allow the height adjustment by special exception to its zoning ordinance. Further, subsection (4) of this same statute exempts an obstructed sign from the maximum height limits set forth in Utah Code section 72-7-505.

Therefore, the only reasonable reading of the statute is that the billboard owner may raise the height to avoid the obstruction. The value of a billboard is based on its visibility. Requiring a billboard owner to lower a sign, which would diminish its value in this case, would constitute a taking that would require compensation.

ROA acknowledges that raising the billboard to the requested height (65 feet) will not entirely eliminate the obstruction. However, the requested height mostly eliminates the obstruction and satisfies ROA's concerns about marketability of the sign. If the City's position is that the statute requires ROA's plans to completely eliminate all obstruction whatsoever within the "visibility area" as that term is defined in Utah Code section §72-7-502(1), ROA will amend its application to raise the height. The City should be aware that if its argument (that the obstruction must be completely eliminated) is accepted, the new billboard height will likely be in excess of eighty feet. ROA assumes that the City is not intending to advocate for a higher sign but welcomes clarity on the issue.

ERIN MENDENHALL
Mayor

DEPARTMENT of **COMMUNITY**
and **NEIGHBORHOODS**
PLANNING DIVISION

November 1, 2021

VIA Email to: Victoria@reaganusa.com

Reagan Outdoor Advertising
1775 North Warm Springs Road
Salt Lake City, Utah 84116
Attn: Victoria Lara

Re: BLD2021-07175 – Request to Increase Height of Billboard at 533 South 400 West.

Dear Victoria Lara,

We are in receipt of Reagan Outdoor Advertising's ("Reagan") application filed pursuant to Utah Code Section 72-7-510.5 to raise the height of a billboard located at 533 South 400 West. The City respectfully disagrees with Reagan's assertion that it qualifies to raise the height of this sign under Utah Code § 72-7-510.5. First, the provision does not apply to the area at issue in this case. Second, the statute was enacted in May 2000 for the general purpose of providing a remedy for obstructions that resulted from the widening of I-15. The UDOT sign Reagan relies on is not the result of those improvements.

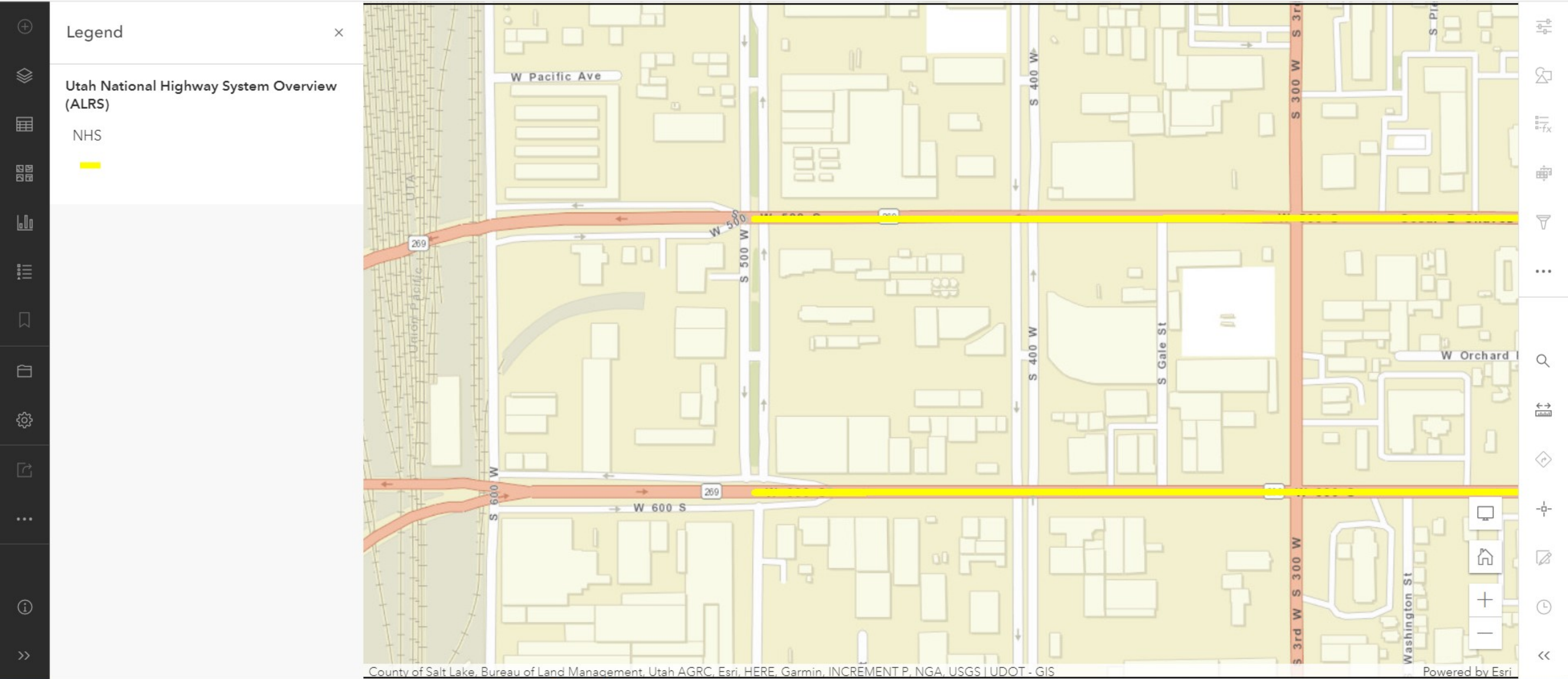
Third, the City respectfully disagrees that Reagan's billboard is indeed obstructed by any UDOT sign or improvement. Indeed, the UDOT sign Reagan relies on has existed for at least twelve years without issue, demonstrating it does not obstruct the view and readability of the sign. Fourth, the obstruction claimed by Reagan exists (if at all) for a fraction of a second from a limited area of the roadway. Raising the height of the sign will not eliminate this claimed obstruction. It will simply occur at a different spot in the roadway. To the contrary, lowering the sign may eliminate the fractional obstruction you claim. Utah Code § 72-7-510.5 provides for "height adjust[ments]," both raising and lowering, to "make the entire advertising content of the sign clearly visible." Utah Code § 72-7-510.5(4). The City would be happy to consider a new application requesting a "height adjustment" to lower the height of the sign.

Sincerely,

Joel G. Paterson

Joel Paterson, AICP
Zoning Administrator

EAST
15 SOUTH
I-215 8 MIN
10600 S 12 MIN
500 S
500 S
Gale St
Google


Utah National Highway System
https://www.arcgis.com/apps/mapviewer/index.html?webmap=106b9bb38fdc4111a245a68e6ebefcd2
Apps
Assessor | Salt Lake...
Child Support Calcu...
Exchange
GreenFiling
https://le.utah.gov/...
Westlaw
Utah Court Rules -...
Utah Business Searc...
Salt Lake County Re...
Reading list
Utah National Highway System
Open in Map Viewer Classic
Sign In
Legend
Utah National Highway System Overview (ALRS)
NHS
W Pacific Ave
S 400 W
S 300 W
S 500 W
S Gale St
W Orchard
W 600 S
S 600 W
S 3rd W
Washington St
269
County of Salt Lake, Bureau of Land Management, Utah AGRC, Esri, HERE, Garmin, INCREMENT P, NGA, USGS | UDOT - GIS
Powered by Esri
Type here to search
45°F Raining now
11:14 AM
11/9/2021

ATTACHMENT B: SALT LAKE CITY RESPONSE TO APPEAL

ADMINISTRATIVE HEARING OF A LAND USE APPEAL
(Case Nos. BLD2021-07175 and PLNAPP-2021-01165)

(March 3, 2022)

Appellant:	Reagan Outdoor Advertising
Decision Making Entity:	Zoning Administrator
Request:	Appealing the City's denial of a request to raise the height of a billboard at 533 South 400 West
Brief Prepared by:	Samantha Slark, Senior City Attorney

Reagan submitted a request pursuant to Utah Code § 72-7-510.5 for a permit to raise the height of a billboard that is located on a parcel with a street address of 533 South 400 West, Salt Lake City.[1] Reagan contends the view and readability of its billboard is obstructed by a directional sign. The directional sign and billboard have existed in their respective locations for more than a decade.[2] The City denied the application because it does not meet the requirements of the statute. Reagan appeals that decision.

A. The Hearing Officer Does Not Have Jurisdiction to Hear this Appeal.

The hearing officer does not have jurisdiction to hear this appeal because the question Reagan presents to the hearing officer is whether the City correctly interpreted a provision of Utah State Code. Salt Lake City Code makes clear, its hearing officers do not have authority to make determinations regarding the application of state statutes: "**The appeals hearing officer shall not hear and decide or make determinations regarding** . . . **Appeals alleging an error in the application, administration, enforcement or compliance with a provision of state** or federal **law**, **including but not limited to provisions of state** and federal **statutes**, state and federal constitutions and state and federal common law." Salt Lake City Code 21A.16.010B. Rather, such appeals "must be made directly to the district court." *Id.* Reagan's request for a permit to raise the height of its billboard to 65 feet relies wholly on rights its asserts it has under Utah Code 72-7-510.5. The City denied the application because it found Reagan's application did not meet the requirements of this state statute. Accordingly, the hearing officer does not have jurisdiction to hear this appeal and it should be dismissed.

B. The Application Does Not Meet the Requirements of Utah Code § 72-7-510.5.

In the event the hearing officer considers the merits of Reagan's appeal, Reagan's application does not satisfy the requirements of the statute for three reasons: (1) the sign is not a

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[1] The actual physical address of the billboard appears to be is 333 West 500 South.

[2] *Compare* Google Maps Image of Directional Sign, July 2007 and Sept 2011, **Exhibit A.**

"directional" sign; (2) the "view and readability" of the sign are not obstructed by the sign; and (3) lowering the height of the sign will remedy the particular obstruction claimed.[3]

1. The Sign Identified is not a Directional Sign.

Utah Code § 72-7-510.5 permits a "height adjustment" of a billboard if the "view and readability" of a sign are "obstructed" by a "a noise abatement or safety measure, grade change, construction, ***directional*** sign, highway widening, or aesthetic improvement made by an agency of this state."[4] Title 72 defines "directional sign" as "signs containing information about public places owned or operated by federal, state, or local governments or their agencies, publicly or privately owned natural phenomena, historic, cultural, scientific, educational, or religious sites, and areas of natural scenic beauty or naturally suited for outdoor recreation, that the department considers to be in the interest of the traveling public."[5] The sign Reagan identifies provides current travel times to certain destinations[6] and, as such, does not meet the statute's definition of a "directional" sign. Therefore, Reagan cannot meet the qualifying requirement of showing obstruction by a "directional" sign.

2. The "View and Readability" of the Billboard are not Obstructed by the Identified Sign.

Even if the sign did meet the definition of a "directional sign," the billboard is not "obstructed" by the identified sign because the billboard can be viewed without any obstructions from myriad points in the roadway. Several doctrines of statutory interpretation are applicable here. "When examining a statute, [courts] look first to its plain language as the best indicator of the legislature's intent and purpose in passing the statute."[7] "[I]f that language is ambiguous [courts] turn to a consideration of legislative history and relevant policy considerations."[8] Similarly, "[w]hen statutory language plausibly presents the court with two alternative readings, [a court should adopt] the reading that avoids absurd results."[9] Likewise, a court should not doggedly apply the plain language of a statute where doing so gives rise to absurd results,[10] and reference to legislative history and the stated purpose of the statute can direct the inquiry.[11]

Here, the word "obstruct" is not defined and provides ambiguity. The parties present the hearing officer with two alternative interpretations and readings of the statute. Specifically, Reagan contends the "view and readability" of its billboard is "obstructed" and meets the

[3] The location at issue is designated as State Route 269, which is a state highway, and the requirement that the claimed obstruction be on a state highway is met. Utah Code § 72-7-510.5(1) (limiting regulation to obstructions "along an interstate, federal aid primary highway existing as of June 1, 1991, national highway systems highway, or state highway or by an improvement created on real property subsequent to the department's disposal of the property under Section 72-5-111").

[4] Utah Code § 72-7-510.5(1)(emphasis added).

[5] Utah Code § 72-7-502(7).

[6] *See* **Exhibit A**.

[7] *Wilson v. Valley Mental Health*, 969 P.2d 416, 418 (Utah 1998).

[8] *Id*.

[9] *Encon Utah, LLC v. Fluor Ames Kraemer, LLC*, 2009 UT 7, ¶ 73, 210 P.3d 263.

[10] *State ex rel. Z.C.*, 2007 UT 54, ¶ 17, 165 P.3d 1206.

[11] *See e.g. id.* ¶¶ 21-22.

requirements of the Act because it has identified a partial obstruction that occurs at one point and angle to the right of the roadway. The City contends the view and readability of the billboard is not obstructed within the meaning of the Act because the view and readability of the billboard is unobstructed from myriad points in the roadway. Some examples are attached as **Exhibit B.** Moreover, the obstruction complained of only exists for a fraction of a second while travelling though one specific spot. Stated another way, Reagan contends identification of any obstruction, no matter how brief or attenuated the position, brings the billboard within the meaning of the statute. The City contends, the obstruction must be substantial and actually operate to impede the ability to view and read the billboard.

The hearing officer should adopt the reading presented by the City because Reagan's interpretation would result in the absurdity that almost any billboard could qualify for height adjustment under the statute, because an angle can be found (and an argument made) for virtually any billboard that a sign or some other qualifying object partially obstructs the face of a billboard for some fractional time from one angle. For example, as demonstrated by the images attached as **Exhibit C**, the face of this very same billboard is completely obstructed by the pole supporting the traffic signal at the intersection, if you stand directly in front of the pole. But as the photos reveal, you need only take one step to the left or one step to the right of the traffic signal pole and the billboard is free of any obstruction.

Reference to the purposes and intent of the statute also supports a conclusion that the obstruction must be new and substantial, not fleeting and attenuated. Specifically, Utah Code § 72-7-510.5 was introduced in 2000 and amended in 2002 to provide UDOT an alternative to paying just compensation for billboards that were "obstructed" as a result of the reconstruction of I-15 that occurred from 1997 to 2001, which it was estimated would cost the State between $7M and $14M.[12] The fact that the sign at issue in this case has existed for more than a decade[13] without Reagan seeking to alter the height of the sign also supports the conclusion that the "view and readability" of the billboard is not actually obstructed by the sign and it has not resulted in any negative business consequences for Reagan.

In short, Reagan has not shown the "view and readability" of the billboard is obstructed by a identified sign, as required to qualify for a height adjustment.

3. The Obstruction Reagan Complains of Can be Addressed by Decreasing the Height of the Billboard.

To the extent the partial obstruction Reagan complains of from one particular point in the roadway does qualify for a height-adjustment under the statute, that claimed obstruction can be addressed by lowering the height of the billboard. Specifically, Utah Code 72-7-510.5 permits a

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[12] *See e.g.* House Floor Day 38 and Senate Floor Day 39 for S.B. 98, 2002 Leg. Gen. Sess. (Utah 2002)) (discussing purpose of bill). Recordings of the referenced discussions are available here:
House Day 38: https://le.utah.gov/av/floorArchive.jsp?markerID=11333.
Senate Day 39: https://le.utah.gov/av/floorArchive.jsp?markerID=43704

[13] *Compare* Google Maps Image of Directional Sign, June 2008 and July 2011, **Exhibit A.**

"heigh-adjustment" to address obstructions to view and readability. Height-adjustments can be made by both raising or lowering a billboard sign. Nothing in the statute gives a billboard owner a right to adjust the height of a billboard sign upwards. To the contrary, one of the expressly stated purposes of Title 72 is to enact provisions that "preserve the natural scenic beauty of lands bordering on highways." Utah Code 72-7-501(1). It is well recognized that billboards, especially at great heights, are an aesthetic harm that municipalities are entitled to regulate.[14] Indeed, on passage of this bill one senator expressed concern that it would result the raising of the height of numerous billboards and was reassured it would not.[15]

In short, the statute does not give Reagan a right to demand an increase the height of its sign, where the particular obstruction complained of can be remedied by a reduction in height. Rather, Reagan is entitled to adjust the height, if it can meet the obstruction requirement. Thus, even if Reagan could show the partial obstruction from one angle that it relies on is sufficient, it is not entitled to raise the height of the billboard and the City has offered to consider an application that seeks to address the specific obstruction identified by lowering the height.

CONCLUSION

The hearing officer should dismiss this appeal because it does not have authority to consider appeals that allege errors in the application of state law. To the extent the hearing officer considers the merits of this appeal, Reagan has not identified an obstruction within the meaning of the Act and the statute does not give Reagan the right to elect an upward height adjustment when a downward height adjustment would address the claimed obstruction.

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[14] *See e.g. See, e.g., Metromedia, Inc. v. City of San Diego,* 453 U.S. 490, 510 (1981) (stating: "[i]t is not speculative to recognize that billboards by their very nature, wherever located and however constructed, can be perceived as an "esthetic harm."); *Int'l Outdoor, Inc. v. City of Livonia*, No. 325243, 2016 WL 3298229, at **7-9 (Mich. Ct. App. June 14, 2016) (recognizing aesthetic interests, enhancing property values, and minimizing traffic hazards related to billboards are legitimate and rational governmental interest sufficient to defeat equal protection claim.); *Prime Media, Inc. v. City of Brentwood*, 398 F.3d 814, 818-24 (6th Cir. 2005) (finding numerous cases "make it plain that billboard regulations, whatever other strengths and weaknesses they may have, advance a police power interest in curbing community blight and in promoting traffic safety.").

[15] *See* Senate Day 39: https://le.utah.gov/av/floorArchive.jsp?markerID=43704.

EXHIBIT A

333 500 S
Salt Lake City, Utah
Google
Street View - Sep 2011
80 EAST
15 SOUTH
I-215 11 MIN
10600 S 16 MIN
80 WEST
AIRPORT
A&Z PRODUCE CO. A&Z
500 S
University Blvd
500 S
Gale St
500 W
Google
Image capture: Sep 2011 © 2022 Google United States Terms Privacy Report a problem

322 500 S
Salt Lake City, Utah
Google
Street View - Jul 2007
Gale St
University Blvd
500 S
Gale St
500 W
Google
Image capture: Jul 2007 © 2022 Google United States Terms Privacy Report a problem

EXHIBIT B

320 5th S
Salt Lake City, Utah
Google
Street View - Jul 2018
Aug 2014
2007
2021
$1 MILLION IDEAS WANTE
500 S
500 W
Gale St
W 600 S
Google
Image capture: Jul 2018
© 2022 Google
United States
Terms
Privacy
Report a problem

333 500 S
Salt Lake City, Utah
Google
Street View - Jul 2021
80 EAST
15 SOUTH
80 WEST
SIEGFRIED & JENSEN
INJURY ATTORNEYS
CAR ACCIDENT?.... CALL US!
801-222-2222
500 S
500 S
W 600 S
Google
Image capture: Jul 2021 © 2022 Google United States Terms Privacy Report a problem

333 500 S
Salt Lake City, Utah
Google
Street View - Jul 2011
80 EAST
15 SOUTH
80 WEST
AIRPORT 5 MIN
Customize your Castle!
Candlelight Homes.com
A&Z PRODUCE CO.
500 S
University Blvd
500 S
500 W
Gale St
Google

320 5th S
Salt Lake City, Utah
Google
Street View - Jun 2016
Moving
Highest Quality
5th S
University Blvd
500 S
500 W
Gale St
W 600 S
Google

298 UT-269
Salt Lake City, Utah
Google
Street View - Jul 2021
DOUSE. STIR.
HECK. REPEAT.
FIRE SENSE
500 South
300 West
Cesar E. Chavez Blvd
500 S
500 W
Gale St
W 600 S
Google
Image capture: Jul 2021 © 2022 Google United States Terms Privacy Report a problem

EXHIBIT C

PUSH BUTTON
FOR

PUSH BUTTON
FOR