



**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

SAMCO FINANCIAL SERVICES CORP.	)	Case No. 25-CV-116524
	)	
Appellant,	)	JUDGE WILLIAM F. B. VODREY
	)	
v.	)	
	)	
	)	
OHIO DEPARTMENT OF COMMERCE DIVISION OF FINANCIAL INSTITUTIONS	)	<b><u>FINDINGS OF FACT</u></b>
	)	<b><u>AND</u></b>
Appellee.	)	<b><u>CONCLUSIONS OF LAW</u></b>
	)	

This matter is before the Court on appeal from the administrative order issued by Appellee, Ohio Department of Commerce’s Division of Financial Institutions (“Division”). The appeal was taken by Appellant SAMCO Financial Services Corp. (“SAMCO”). SAMCO contends that the Division’s order was not supported by reliable, probative and substantial evidence, and was not in accordance with the law. The Division contends its administrative decision was supported by reliable, probative and substantial evidence, and is in accordance with law.

**PROCEDURAL BACKGROUND**

The Division issued a Notice of Hearing and Intent to Suspend or Revoke License to SAMCO proposing a suspension of its check-cashing license for violations related to the operation of check-cashing kiosks. Pursuant to R.C. Chapter 119, the Division scheduled a hearing. Certified Record Item 1. The Notice cited violations for: 1) failure to obtain a license for all of SAMCO’s check cashing locations; 2) failure to conspicuously post fees; and 3) failure to properly keep a record of cashed government checks. Certified Record Item 1. A hearing was scheduled and conducted before a hearing officer on October 23 and 24, 2024. Certified Record

Item 14-Transcripts and Exhibits (a separate transcript volume was prepared for each day of the administrative hearing. The first day of hearing transcript will be referenced as “Day 1” and second day hearing transcript will be referenced as “Day 2”).

The hearing officer issued a report and recommendation. Certified Record Item 17. The Report and Recommendation affirmed the proposed action and made a recommendation of a one-year suspension, or potentially a shorter time if SAMCO could show compliance. Report & Recommendation, p. 34. SAMCO submitted its objections to the Report and Recommendation. The Division ultimately issued a final agency order that largely adopted the Report and Recommendation, and adopted the recommended sanction of a one-year suspension. Certified Record Item 20. SAMCO timely filed a Notice of Appeal. Certified Record Items 21, 22. This Court approved a stipulated stay of the agency order pending the outcome of this appeal. The parties have submitted written briefs, and oral argument was heard by the Court on January 29, 2026 at SAMCO’s request.

#### **STANDARD OF REVIEW**

On an appeal from an administrative action under R.C. 119.12, a reviewing Common Pleas judge looks at the entire record to determine if an agency order is supported by reliable, probative, and substantial evidence and is in accordance with law. *Cobb v. Ohio Dept. of Edn.*, 2016-Ohio-7396, ¶ 29 (8th Dist.), citing *Tsiperson v. Ohio Dept. of Commerce Div. of Fin. Insts.*, 2012-Ohio-1048, ¶ 22 (8th Dist.); *See also Watkins v. Ohio Bd. of Edn.*, 2023-Ohio-2595, ¶ 16 (10th Dist.).

Evidence is found to be reliable when it can be confidently trusted and has a reasonable probability of being true, probative when it tends to prove the issue in question and is relevant to determining the issue, and substantial when it has importance and value. *Our Place Inc. v. Ohio Liquor Control Comm.*, 63 Ohio St.3d 570, 571 (1992).

The Common Pleas court functions as an appellate court where the review of the administrative record is a hybrid review, which is neither a trial de novo nor an appeal on questions of law only. *Crumpler v. State Bd. of Edn.*, 71 Ohio App.3d 526, 528 (10th Dist. 1991). On questions of law the Common Pleas court conducts a de novo review. *Wells v. Ohio Dept. of Job and Family Servs.*, 2006-Ohio-4443, ¶ 18 (5th Dist.).

A reviewing trial court must give due deference to the agency's resolution of evidentiary conflicts. *Ascension Biomedical, L.L.C. v. Ohio Dept. of Commerce*, 2023-Ohio-469, ¶ 28 (8th Dist.), citing *Univ. of Cincinnati v. Conrad*, 63 Ohio St.2d 108, 111 (1980). The Supreme Court of Ohio has determined that the appropriate evidentiary standard for administrative cases is a preponderance of the evidence. *VFW Post 8586 v. Ohio Liquor Control Comm.*, 83 Ohio St.3d 79, 83 (1998).

#### **FINDINGS OF FACT**

1. The Court has thoroughly reviewed the record of the administrative hearing, including the transcripts of witness testimony, exhibits, pleadings, briefings of the parties, and the transcript of oral argument held before this Court.
2. The Division is part of the Ohio Department of Commerce, and is authorized and established pursuant to R.C. Chapter 1181.
3. The Division has demonstrated through reliable, probative and substantial evidence the following facts set forth below that support its administrative order.
4. On April 16, 2024, the Division issued a Notice of Hearing and Intent to Suspend or Revoke SAMCO Financial Services Corp (SAMCO's) check-cashing license. The Notice was issued in accordance with R.C. Chapter 119 and R.C. 1315.23(F). Division Hearing Exhibit 1.
5. The parties stipulated that the Notice was properly served upon SAMCO pursuant to R.C.

Chapter 119, and SAMCO stipulated to the authenticity and admissibility of Division Hearing Exhibit 2 which includes the Notice and scheduling orders issued in this matter. Day 1 transcript, p. 11.

6. SAMCO requested an administrative hearing, and the hearing was held on October 23, 2024, and October 24, 2024 before a hearing officer.
7. SAMCO has held a check-cashing license (number CC.700870.000) under the Ohio Check Cashing Act since April 12, 2019. Division Hearing Exhibit 3, p. 5. That license is associated with its main office located at 4853 Galaxy Parkway, Suite G, Warrensville Heights, Ohio. The license was renewed on January 30, 2024. SAMCO holds no other check cashing licenses. Day 1 transcript, p. 41-42, 80.
8. In a Nationwide Multistate Licensing System (NMLS) licensure document, SAMCO answered "yes" to the question, "Other than the main office does the entity conduct business with consumers through branch offices or other business locations?" Division Hearing Exhibit 3.
9. The Division learned of additional locations of SAMCO's multiple check-cashing kiosks and investigated them in April 2024. Day 1 transcript, p. 331, Division Hearing Exhibit 18.
10. There is no evidence that SAMCO reported these locations to the Division in its license application or 2024 renewal application. Day 1 transcript, pp. 39-42.
11. SAMCO is a check-casher because it engages in check-cashing activities such as compliance actions involving bank secrecy and combatting money laundering, endorses checks with its name and license number, deposits tendered checks into its bank accounts and refunds overcharges. Day 1 transcript, pp. 309-310; Division Hearing Exhibit 16, pp. 4-5.
12. Mr. Charles Kintner is the majority shareholder and President of SAMCO, and President of

- Simple Automated Money, Inc. ("SIMPLE"). Mr. Kintner and SAMCO understood that licenses were necessary for all the kiosk locations. Day 1 transcript, p. 46.
13. During a December 11, 2023 telephone conversation with Mr. Kenneth Haynie, Division Chief Examiner, Mr. Kintner informed the Division he would obtain licenses for the unlicensed check-cashing kiosk locations. Day 1 transcript, pp. 327-328.
  14. SAMCO applied for a check-cashing branch license for a kiosk location in Zanesville, Ohio. Division Hearing Exhibit 3. That branch application was submitted in January 2024 and was pending at the time of the administrative hearing. Day 1 transcript, pp. 42, 70.
  15. After several communications between SAMCO and the Division, Ms. Tashmina Butts, Division employee, informed SAMCO via an email dated April 22, 2024, that "The NMLS has been updated, and 2 license items remain. Per the Division's legal team, a letter of intent was issued to the company on April 16, 2024, and no new branch licenses can/will be issued until the company is in compliance." Respondent Hearing Exhibit G.
  16. Mr. Frederick Robertson, Division Consumer Finance Examiner, was assigned by Mr. Haynie to examine SAMCO, and the examination was opened on July 17, 2023. Day 1 transcript, pp. 80-82. An on-site examination at SAMCO's Warrensville Heights office took place a week later by Mr. Robertson which included a meeting with Mr. Kintner and a visit to SAMCO's office. Day 1 transcript, p. 81.
  17. SIMPLE shared office space with SAMCO at the Warrensville Heights address and at one time was the manufacturer and seller of kiosks that were assembled in the shared space. Day 2 transcript, pp. 13-15.
  18. SAMCO does not manufacture or sell the check-cashing kiosks. Day 2 transcript, pp. 117-118. The company that manufactures kiosks at SAMCO's Warrensville Heights office is

Sam Machine Company ("SAM"). Day 2 transcript, p. 15. Mr. Kintner is the 100% owner of SAM. Day 2 transcript, p. 123. He is not an owner or officer of any of the stores which bought kiosks from SAM. Day 2 transcript, pp. 120-121.

19. Neither SAMCO nor SAM leases space at locations where kiosks are delivered, and neither SAMCO nor SAM owns the real estate where the kiosks are located. Day 2 transcript p. 32.
20. During the on-site review at the Warrensville Heights facility, Mr. Robertson witnessed employees at computers who had the ability to see customers' transactions through a "live feed" while the customers were using kiosks at other locations to cash checks at the kiosks. Day 1 transcript, pp. 84, 188-189.
21. Mr. Robertson was able to see a customer at a kiosk inserting a check and "going through the motions of cashing a check." Day 1 transcript, p. 84. He could also see fees being displayed on the computer. The screen had itemized lines for government checks and regular checks. Day 1 transcript, pp. 84, 85, 127.
22. Mr. Kintner completed a "Check Cashing-Manager's Questionnaire" on August 1, 2023. Division Hearing Exhibit 10, p. 1. In the questionnaire, Mr. Kintner answered "yes" to the following question: "Do you own/operate a check-cashing business at any other location?"
23. SAMCO's business model and flow of funds from check-cashing kiosks was provided to Mr. Robertson in an October 31, 2023, email from Mr. Kintner. Division Hearing Exhibit 15. In the email, Mr. Kintner stated that he was the owner of SAMCO and that SAMCO administers software and compliance for merchant-owned check-cashing kiosks across the United States. The following business model/flow of funds was explained by Mr. Kintner in the email.
  - a. "A Merchant (e.g. gas station, supermarket, convenience store, etc.) purchases a check cashing kiosk from SAMCO. SAMCO delivers, installs, and maintains the kiosk. The Merchant loads the kiosk with the fiat currency, which will be dispensed to the end user. (Thereafter, referred to as the Customer) who cashes

a check using the kiosk. SAMCO maintains the software for each kiosk and performs all of the compliance (i.e. BSA/AML monitoring & reporting) functions for all activity conducted through each kiosk.

#### Transactions & Flow of Funds Explanation

- b. Customer steps up to kiosk.
- c. Customer inserts check into kiosk.
- d. Kiosk prompts Customer to scan their ID and provide biometric fingerprint.
- e. Kiosk software performs sanctions search on Customer in accordance with requirements promulgated by the Treasury Department's Office of Foreign Assets Control (OFAC).
- f. Upon successful screening, the kiosk dispenses fiat currency to the Customer, minus service fees charged.
- g. Nightly, Monday-Friday, SAMCO electronically sends check image(s) from kiosk to its bank for clearing.
- h. Following check clearing process, SAMCO sends Merchant periodically (usually weekly) an ACH deposit, equal to the amount of checks cashed.
- i. Merchant withdraws currency from their bank account and replenishes kiosk."

24. When kiosks are sold, SAMCO uploads them with software at SAMCO's Warrensville Heights office before they are delivered to the customer. Day 2 transcript, p. 17.

25. SAMCO creates and owns the software which facilitates the process of cashing checks at kiosks. Day two transcript pp. 54-55, 118.

26. Without the SAMCO software, a kiosk cannot cash checks. Day 2 transcript, p. 55.

27. When a kiosk is delivered to a buyer, buyers load the machine with their own cash. SAMCO does not load the machine with cash. Day 2 transcript, pp. 19, 118-119.

28. The buyer loading cash into the kiosks isn't check cashing activity, but SAMCO indorsing the check and depositing it into its bank account is. Day 1 transcript, pp. 329-330.

29. The check cashing process at a kiosk is as follows:

- a. When a customer approaches a kiosk, he must have a valid ID and a check written within the previous 21 days. Day 2 transcript, p. 18.
- b. The kiosk prompts the customer to scan a form of identification, such as a driver's license, and provide a biometric fingerprint to confirm the customer's identity. Day 2 transcript, pp. 18, 124.
- c. A photograph is taken of the customer while he/she is cashing a check. Day 2 transcript, p. 18.
- d. SAMCO can visually check if the photograph of the customer matches what is on the customer's driver's license. Day 2 transcript, pp. 126-127.
- e. When a customer inserts a check into the kiosk, a screen asks what type of check it is. Day 2 transcript, p. 124. Employees at SAMCO's office can see the check and determine if routing/account numbers match. Day 2 transcript, pp. 124-128. Sometimes SAMCO calls the payor to verify if it is a real company. Day 2 transcript, p. 127. This may include doing online research about the company to verify the check. Day 2 transcript, p. 127. This is done by SAMCO employees who are looking at the kiosk screen/transaction in real time. Day 2 transcript, p. 128.
- f. The check must be endorsed by the customer. Day 2 transcript, p. 19.
- g. The customer must wait for SAMCO's software to either accept or deny the check. Day 2 transcript, p. 18.
- h. If the check is "good" it stays in the machine and is cashed minus the fee, and a receipt is issued. Day 2 transcript, pp. 18-19. SAMCO can refuse to cash a check and relies on its software to identify fraud. Day 2 transcript, p. 104.
- i. Before a check is cashed, the customer will see a screen that identifies the fee that is going to be charged, the fee percentage and how much is going to be dispensed at the kiosk. Day 2 transcript, pp. 125-126. The customer can accept or decline the transaction at this point. Day 2 transcript, p. 31.
- j. Receipts issued from the kiosks state "SAMCO check cashing." Division Exhibits 11 and 12.
- k. Once the check is cashed, checks inserted into a kiosk are deposited into SAMCO's bank account electronically via a batch process every evening. Day 2 transcript, p. 20.
- l. The back of checks inserted into kiosks are indorsed with SAMCO's name and

the indorsement includes the phrase "licensed check-cashing business."  
Respondent Exhibit D.

m. SAMCO sends funds collected in their entirety via ACH back to the merchant for the amount of the checks cashed for the previous three or four days. Day 2 transcript, pp. 20, 137.

n. The store is charged by SAMCO for a percentage of the fees that are earned at the end of every month for the use of the software. Day 2 transcript, p. 137.

30. SAMCO is registered as a Money Service Business with the U.S. Department of the Treasury and has an anti-money laundering program. Division Hearing Exhibit 10.

31. SAMCO maintains records of government checks that are cashed at kiosks. Division Exhibits 5 and 6.

32. Mr. Kintner provided Mr. Robertson with several documents including a list of locations where check-cashing kiosks are located (Division Hearing Exhibit 8), and pdfs of two government check cashing reports (Division Hearing Exhibits 5 and 6). Exhibit 8 provides a list of 51 businesses where kiosks are located. SAMCO does not have a license for these locations. Day 1 transcript, p. 109. Division Hearing Exhibit 5 is titled "Ohio Checks September 2021-August 2023 New Software," and contains check information from 2023; the second report, Division Hearing Exhibit 6, is titled "Ohio Checks September 2021-August 2023 Old Software," and contains check information from 2021 and 2022.

33. The reports that were provided to the Division did not contain all the information required by Ohio Adm. Code 1301:8-8-03(B).

34. Mr. Robertson testified regarding deficiencies in the reports. The report admitted as Division Hearing Exhibit 5 shows a fee, but does not state the amount of money given to the customer, does not contain the address of the payee or the amount of cash given to a customer. It contains a date, but it is unclear if the date refers to the date of the check or

the date the check was cashed. Day 1 transcript, pp. 100-103.

35. The report admitted as Hearing Exhibit 6 does not contain the name or address of the payee, the last five digits of the preprinted number of the check or the name of the issuer of the check. It contains a date, but again, it is unclear if the date refers to the date of the check or the date the check was cashed. The report does not identify which checks were issued by the government. Day 1 transcript, pp. 103-104.
36. Mr. Kintner testified the Division requested check-cashing reports in pdf format. Day two transcript p. 89. SAMCO's check-cashing report is allegedly a sortable spreadsheet, and additional information not identified in the report can allegedly be accessed from a computer by using SAMCO's software. Day 2 transcript, pp. 38-39, 47-48, 88.
37. Mr. Robertson did not know whether SAMCO's computer system allows a user to pull up information behind each of the categories of items on the reports. Day one transcript p. 159. He never asked Mr. Kintner to access their computer system, and Mr. Kintner never offered him that opportunity. Day 1 transcript, pp. 158-160.
38. Mr. Kintner could not recall if he informed Mr. Robertson that there is a separate file with more information regarding categories of information identified on the check-cashing report. He admitted that he could have provided the Division with a pdf containing the information requested by the Division. Day 2 transcript, pp. 93, 133.
39. On November 2, 2023, a Report of Examination ("ROE"), signed by Mr. Williams was issued to SAMCO. Division Hearing Exhibit 4. The ROE identified six "violations." SAMCO responded to violations two, four and five to the satisfaction of the Division. Day 1 transcript, p. 204. The ROE notified Mr. Kintner of the following alleged violations:

- A schedule of fees and charges was not conspicuously posted and at all times displayed in violation of R. C. 1315.26(B).

- The record of cashed government checks did not disclose all information required by Ohio Adm. Code 1301:8-8-03(B)(3).
- SAMCO failed to obtain a license for all locations from which it operates, as required by R.C.1315.22(A) and Ohio Adm. Code 1301:8-8-02(A) and failed to comply with Ohio Adm. Code 1301:8-8-04(C)(1).

40. SAMCO did not provide responses to the ROE to the satisfaction of the Division regarding the above-referenced allegations. Day 1 transcript, pp. 204, 214-215.
41. In March and April 2024, several Division employees visited over 50 merchants with SAMCO check-cashing kiosks on their premises. The Division employees were asked by Mr. Haynie to visit the premises of these merchants to verify if kiosks were present and to take photographs. Testimony was provided about their visits and what they did at each location. Photographs taken by Division employees documenting the locations are contained within Division Hearing Exhibits 7 and 17.
42. The paper fee schedules were provided by SAMCO to merchants at the request of the Division. Day 2 transcript, p. 46. The information on the fee sheets was information the Division requested. Day 2 transcript, p. 78.
43. Not all kiosk locations have fee sheets posted at or near kiosk locations, and some fee sheets are partially obstructed or are posted on the sides of kiosks. Division Hearing Exhibits 7 and 17.
44. Division field examiners Sich, Circle and Carlozzi testified about their visits to multiple kiosk locations. Ms. Sich took photos of a location in Akron with no posted fee schedule. Day 1 transcript, pp. 193-194; Division Hearing Exhibit 7.
45. Ms. Circle took photos of a kiosk location in Hamilton County that showed no evidence of a posted fee schedule. Day 1 transcript, pp. 92-94, 194-199; Division Hearing Exhibit 7.

46. Ms. Carlozzi visited over thirty kiosk locations and took photographs and did observe posted fee schedules at many of the locations, but some were posted on the sides of kiosks or partially obscured. Division Hearing Exhibit 7, pp. 25, 47, 57; Day 1 transcript, pp. 276-285. Ms. Carlozzi photographed a kiosk in Toledo where a paper fee schedule was affixed to a kiosk, and the schedule identifies SAMCO's license number and lists SAMCO as the "parent name." Exhibit 7, p. 49.
47. A spreadsheet prepared by Mr. Haynie summarizes the locations visited and photographed by Division employees. Day 1 transcript, p. 305; Division Hearing Exhibit 18.
48. SAMCO objected, based upon relevancy, to a question concerning the five percent gross income exemption in the R.C. 1315.21(B)(4) definition of a check-cashing business. The objection was sustained by the Hearing Officer. Day 1 transcript, p. 331.

#### **CONCLUSIONS OF LAW**

1. The Division is authorized pursuant to R.C. 1315.12 and 1315.24 to examine and investigate the conduct of SAMCO to determine whether SAMCO violated provisions of the OCCA.
2. The Notice of Hearing and Intent to Suspend or Revoke issued by the Division on April 16, 2024, was properly served upon SAMCO pursuant to R.C. 119.07.
3. The hearing in this matter was held in compliance with R.C. 119.09 and R.C. 1315.23(G).
4. The Ohio General Assembly enacted R.C. 1315.22(A) and R.C. 1315.23(B)(1) at the same time as H.B. 332, 119<sup>th</sup> General Assembly (1992), creating the Ohio Check Cashing Act ("OCCA").
5. R.C. 1315.22(A) prohibits any person from cashing checks without a license, and R.C. 1315.22(D) requires a license applicant to pay an annual license fee for each business location.
6. Ohio Administrative Code 1301:8-8-02(A) provides that, in accordance with sections 1315.21

to 1315.30 of the Revised Code, each check-cashing business shall obtain a license for its main office. An application, license fee and investigation fee shall also be submitted to the Superintendent of Financial Institutions for authorization for each additional business location where check-cashing activity is to be conducted.

7. Ohio Administrative Code 1301:8-8-04(C)(1) provides that a licensed check-cashing business shall not directly or through its agents, cash any check, nor act as intermediary, agent, or in any way assist in the negotiation of any check, at any place other than the licensed business locations.
8. In reading R.C. 1315.22 together with R.C. 1315.23, along with the Administrative Rules, it is a reasonable interpretation that each kiosk represents a separate business location of SAMCO where check-cashing is occurring, and subject to the requirement for a license for each such location.
9. R.C. 1315.22 and 1315.23, and Ohio Adm. Code Sections 1301:8-8-02(A) and 1301:8-8-04(C)(1), are not so vague and indefinite that they fail to set forth a standard or rule, nor are they substantially incomprehensible. The laws and rules are specific enough to prevent arbitrariness or discrimination in its enforcement.
10. R.C. 1315.22 and 1315.23, and Ohio Adm. Code Sections 1301:8-8-02(A) and 1301:8-8-04(C)(1), give sufficient warning of what conduct is proscribed so that a person of ordinary intelligence may conduct themselves so as to avoid that conduct which is forbidden.
11. The activities SAMCO participated in at both its Warrensville Heights office and through all of its kiosks constituted check-cashing activities. SAMCO's kiosks and employees at Warrensville Heights caused checks to be accepted, endorsed and turned into cash with fees withheld.

12. SAMCO participated in the negotiation of checks at multiple places other than its licensed business location at Warrensville Heights.
13. The Court finds specifically that each of the kiosk locations where SAMCO participates in cashing checks is a separate business location for purposes of R.C. 1315.22.
14. At the administrative hearing, the Division proved by a preponderance of the evidence that SAMCO operates a "check-cashing business" as defined by R.C. 1315.21(B).
15. The Division proved by a preponderance of the evidence that SAMCO holds a check-cashing license issued by the Division for at least one location, in Warrensville Heights, and is therefore a "check-cashing business" and subject to the Division's regulatory authority.
16. As a licensed check-casher, SAMCO is subject to regulation by, and compliance with, the statutes, administrative rules and orders of the Division.
17. The Division proved by a preponderance of the evidence that each SAMCO kiosk is a separate business location and subject to obtaining a license as provided by R.C. 1315.22(A) and Ohio Adm. Code 1301: 8-8-02(A).
18. The Division proved by a preponderance of the evidence that SAMCO violated R.C. 1315.22(A).
19. The Division proved by a preponderance of the evidence that SAMCO violated Ohio Adm. Code 1301:8-8-04(C)(1) and Ohio Adm. Code 1301:8-8-02(A).
20. The Division proved by a preponderance of the evidence that SAMCO violated Ohio Adm. Code 1301:8-8-03(B)(3).
21. The Division proved by a preponderance of the evidence that SAMCO violated R.C. 1315.26(B).
22. The Division has the authority to suspend or revoke SAMCO's check-cashing license pursuant

to R.C. 1315.23(F), because the Division proved by a preponderance of the evidence that SAMCO violated R.C. 1315.22(A) and 1315.28.

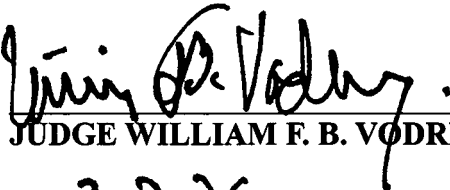
23. The Division's administrative order is supported by reliable, probative and substantial evidence, and is in accordance with the law.

24. When an agency order is supported by reliable, probative and substantial evidence, and is in accordance with the law, a Common Pleas court must affirm an administrative agency's order.

R.C. 119.12.

25. Accordingly, this court affirms the April 24, 2025 Ohio Department of Commerce's Division of Financial Institutions's confirmation and adoption of the Hearing Examiner's Report and Recommendation.

26. Court costs to Plaintiff-Appellant Samco Financial Services Corp.

  
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JUDGE WILLIAM F. B. VODREY  
3.2.26  
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DATE