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COUNTY OF DEL NORTE

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WILLIAM H. FOLLETT Superior Court Judge

> CHRIS DOEHLE Superior Court Judge

AGENDA DATE:

June 24, 2014

TO:

Del Norte County Board of Supervisors

FROM:

Lonnie Reyman, Chief Probation Officer

SUBJECT:

Public Safety Realignment Plan

RECOMMENDATION FOR BOARD ACTION:

Approve the attached Public Safety Realignment Plan for FY 2014-2015

SUMMARY:

The Community Corrections Partnership Executive Committee has approved the proposed 2014-2015 Public Safety Realignment Plan.

DISCUSSION/JUSTIFICATION:

The programs that have been developed by the CCP have been instrumental in maintaining community safety while supporting the successful transition of offenders from custody back in to our community to lead productive and pro-social lives.

ALTERNATIVE:

N/A

FINANCING:

The plan utilizes realignment funds – no county general funds

CHILDREN'S IMPACT STATEMENT:



Del Norte County

Public Safety Realignment 2014/15

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Review

California enacted historic criminal justice system changes to respond to a variety of factors present in 2011: a significant U.S. Supreme Court decision which could have led to arbitrary early release of tens of thousands of prison inmates; years of state and local government budget deficits; and an unacceptably high recidivism rate for criminal offenders. The plan resulted in what is commonly called "Public Safety Realignment," enacted through California Assembly bills AB 109 and AB 117. As a result, in the first six months of Realignment, over 38,000 individuals who would have been the responsibility of the State prior to these changes were instead being supervised and housed by local county probation and sheriff departments.

In addition to those being supervised by probation as PRCS, an additional 60,114¹ offenders have or are serving their sentences in local jails, rather than state prison, under the new Penal Code section 1170(h)². Many of these offenders will eventually serve a portion of their local time under the supervision of the probation department, on "Mandatory Supervision" (19.9 supervision³).

Probation Department Status

In this past fiscal year, the Probation Department (the Department) has suffered drastic staff rollover that has also resulted in a complete change in administration. Coupled with this sea change is a shift in the paradigm of implementation of Realignment in Del Norte County. Although establishing Evidence-Based Practices (EBP) has been talked about since the passage of SB 678 in 2009, the Department has had only limited success in implementing a disjointed amalgam of these practices, to include training for staff, programming for offenders, and establishing a business infrastructure that will support such change. A cohesive and focused vision of what can be accomplished as a result of SB 678 and Realignment has been sorely lacking in the Department.

Despite these challenges, the small amount of remaining staff are dedicated to the idea of effecting change in offenders and making a significant impact on recidivism in Del Norte County, while ensuring the community's safety. Some progress has been made in implementing changes and putting in place critical pieces that will allow us to continue to move forward in fully establishing EBP in the Department. Attempts to recruit new staff will continue, and new initiatives for retaining existing staff members will be explored.

Historically, the Department has only provided the statutory minimum amount of training annually for staff. This has been a detriment to morale as it has been perceived that little investment is made in adding to the abilities and knowledge of the probation officers. The intent

¹California Realignment Dashboard (2014). http://www.cpoc.org/assets/Realignment/dashboard.swf.

² 1170(h)(5)(A) PC allows the court to sentence an offender "For a full term in custody as determined in accordance with the applicable sentencing law."

³ 19.9 PC defines mandatory supervision.

moving forward is to reverse this trend and invest heavily in our officers. This will result in better staff morale, as well as providing needed advanced training that has been sorely lacking.

Caseload Status

Realigned populations in Del Norte County have been typically categorized into 3 groups: Postrelease Community Supervision offenders (PRCS), mandatory supervision offenders (19.9), and offenders serving prison sentences in county jail (1170[h]). Although these categories do reflect realigned populations, they do not take into account the breadth of impact that Realignment has on Del Norte County.

The reality is that offenders on standard felony probation should also be categorized in realigned populations. Many of these offenders, if their suspended sentence is executed, will either move directly into the 19.9 or 1170(h) categories, or, for those offenders whose crime would mandate a state prison commitment, will meet the criteria for PRCS release and thus be returned to the Department for supervision after incarceration.

The success or failure of all of these offenders to rehabilitate has a direct impact on county resources and community safety. The following is a summary of the status of these offender categories.

POSTRELEASE COMMUNITY SUPERVISION

Del Norte County was projected to receive 23 PRCS offenders over the first three years of Realignment. To date, we have received 69 offenders. At the end of 2014, based upon the current projections we will have received 75 PRCS offenders. This number is 326% above the projections in 2011. Estimates are that we will continue to receive on average 2 PRCS releases every month through June 2015 (See Appendix A).

With a few exceptions, these offenders have reported to the Department and completed risk/needs assessments. At 5%, we are slightly below the statewide average for absconded offenders⁴. Over the past year, some PRCS offenders have participated in cognitive-behavioral therapy, programming at the Rural Human Services' Workforce Center, and alcohol & drug treatment. There are currently 37 offenders on the PRCS caseload (See Figure 1). As of March 2014, 3 PRCS offenders have been convicted of new crimes since being placed on supervision.

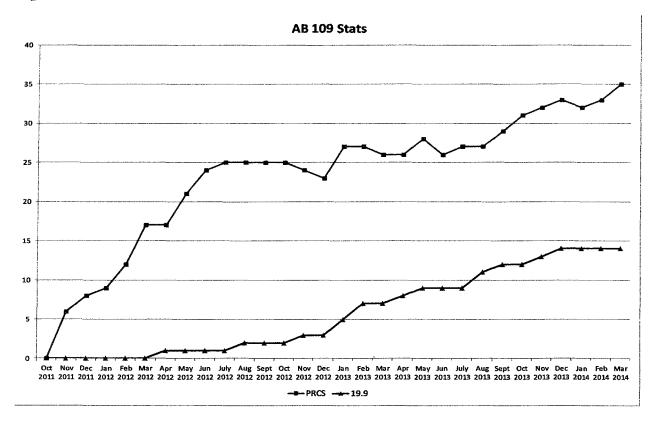
The Federal 3-Judge Court decision on February 10th of this year⁵ will have an increasing impact on the PRCS releases in Del Norte County. Due to a variety of measures that the California Department of Corrections and Rehabilitation is using to meet the Court's requirements⁶, it is estimated that over the next 2 ½ years PRCS releases will be accelerated and possibly reach as much as 800 days sooner than original estimated parole release dates.

⁴ California Realignment Dashboard (2014). http://www.cpoc.org/assets/Realignment/dashboard_county.swf.

⁵ RALPH COLEMAN, Et Al., Plaintiffs, v. EDMUND G. BROWN JR., Et Al., Defendants. MARCIANO PLATA, Et Al., Plaintiffs, v. EDMUND G. BROWN JR., Et Al., Defendants. Three-Judge Court. 10 Feb. 2014. California Department of Corrections. N.p., n.d. http://www.cdcr.ca.gov/News/docs/3ip-Feb-2014/Three-Judge-Court-order-2-20-2014.pdf

⁶ Rice, Benjamin T., California Department of Corrections (2014, May 15). Status Update. http://www.cdcr.ca.gov/News/docs/3JP-May-2014-Filed-Status-Report-Ex-B.PDF

Figure 1



1170(H) SENTENCING

As of March 2014, since Realignment there have been 47 offenders sentenced pursuant to 1170(h). 24 of these offenders have been sentenced to split sentences and placed on 19.9 PC supervision. As they have been convicted of a prison sentence, 19.9 offenders are supervised similarly to the PRCS population. Both categories have high percentages of high-risk offenders that require intensive supervision. They are often directed to check in more frequently than others, and generally have more contact with the Department. Currently there are 13 19.9 offenders on active supervision (See Figure 1), with approximately 7 more in custody serving their initial custody term.

The implementation of mandatory supervision is a continual challenge. Clean-up bills such as AB 579⁷ are regularly put forward for consideration in order to clarify and streamline the process. The Governor has also stated his intention to pursue legislation that would mandate presumptive split sentences⁸. The Department continues to closely monitor these proposals and changes and will continue to adapt to the ever-changing landscape of 1170(h) sentencing.

Assembly Bill 579. http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB579&search_keywords=.

⁸ Governor's 2014/15 Budget Summary: Public Safety. http://www.ebudget.ca.gov/2014-15/pdf/BudgetSummary/PublicSafety.pdf.

FELONY PROBATION

The Department continues to supervise offenders granted felony probation as it always has. There are approximately 300 felony probation offenders being supervised at the present time. The changes EBP is bringing about will continue to directly impact these offenders as business models change and pieces like restructured caseloads, risk/needs assessments, sanction/incentive matrices, and field supervision are put into place.

Del Norte County has traditionally been below average in revocations, and that trend has continued. This is not solely attributable to the Department, but is a result of the values of our community and the desire to give offenders opportunity for rehabilitation.

Program Implementation

One of the critical components in making Realignment work in our remote and resource-poor community is building collaborative relationships with governmental and community based partners. The "We Can Do It All" mentality and style of management has monumentally failed the Department, and a change to a more realistic vision is long overdue. As a result, the Department is reevaluating the previous programs and methods of implementation of Realignment, and is beginning to align current practice to a pragmatic EBP model.

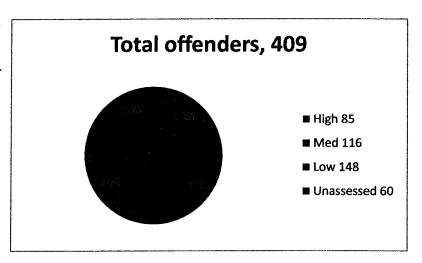
What follows is a brief synopsis of the previous programs, practices, and infrastructure that were envisioned as a result of Realignment, their current status, and the current vision of implementation

RISK/NEEDS ASSESSMENTS

A previous management audit conducted in 1998 identified the need to implement a comprehensive risks/needs assessment instrument for the Department as a whole. The push for EBP implementation via SB 678 & Realignment gave impetus to securing a contract with Assessments.com (ADC) in 2009/10. Although training was completed for its use, full implementation of the STRONG assessment was never completed across the entire adult caseload. Full risk/needs assessments were completed on all PRCS offenders through the 1st quarter of 2014; however, it was not until the 2nd quarter of 2014 that initial risk assessments were completed on the majority of adult offenders. At that time, 85% of adult offenders on formal probation were assessed for risk, excluding offenders on warrant and various other like categories (See Figure 2). The data indicates that for the entire adult population on formal probation, approximately 24% are high risk, 33% are medium risk, and 42% are low risk for committing a serious or violent felony offense. (See Appendix B)

Due to the ADC contract expiring in December 2013, and various other factors including the ability to integrate with the Department's case management system, the decision was made to

transition to the CAIS assessment Figure 2 instrument which is maintained by the National Council on Crime & Delinquency. Training for this instrument was completed at the beginning of May, and is now fully implemented with policies in place to complete an initial full assessment on each offender and reassessment every 6 months. The CAIS assessment provides a comprehensive risk assessment well identifying as as needs criminogenic and providing guidance for the creation of case plans for offenders.



COGNITIVE-BEHAVIORAL THERAPY (CBT)

A significant component to EBP implementation in the Department has been establishing groups to address the criminogenic needs of offenders utilizing cognitive-behavioral therapy. With that goal in mind, several staff members were trained to facilitate groups, and curriculum was purchased. Unfortunately, participation in CBT groups was limited primarily to PRCS and 19.9 offenders who are overwhelmingly high risk. Statistics indicate that programming with high risk individuals is typically ineffective in reducing recidivism, and the Department's experience would support such a determination. Attendance and engagement were sporadic and limited, leading to a high failure rate with very few offenders completing an entire series. Additionally, facilitation of groups by probation officers has proven prohibitive in their ability to maintain their caseloads and meet other obligations.

Due to the preceding factors, CBT groups have been suspended at the current time. Alternatives are being explored including online education programs for low-risk offenders, and establishing sustainable infrastructure within existing governmental and community-based partners so that long-term programming solutions can be established without depending on the Department alone. Instead of targeting only PRCS and 19.9 offenders, programming will be inclusive of felony probationers and primarily target medium-risk offenders who statistically have the best chance of benefitting from programs. The overall goal is to reduce recidivism across the board so that fewer offenders are sent to prison and become PRCS and 19.9 cases.

MOTIVATIONAL INTERVIEWING (MI)

MI has long been a valued tool of the Department, and is an established component in EBP, useful in helping offenders move along the cycle of change. Training in MI is ongoing and will continue for new and experienced staff.

INTENSIVE FIELD SUPERVISION

A critical component in EBP is intensive supervision of high risk offenders. The old model of doing business in the Department has generally precluded officers from conducting intensive supervision in the field where offenders engage the community. Additionally, the Department's staffing challenges have diminished the number of officers with the necessary training to conduct field supervision.

Despite this, over the past few years there has been a foundation laid for positive change by the purchase of new equipment, arming officers, and providing appropriate training. This in itself was a paradigm shift from previous eras when officers were not even equipped with body armor, yet expected to conduct residence checks. With a new business model, closer adherence to EBP, and continued training of experienced and new staff, the Department will become consistent in intensive field supervision within the next fiscal year. Continued maintenance and procurement of equipment, and continued training will be needed to maintain the capability of the Department to implement these changes.

ELECTRONIC MONITORING (EM)

The Department has long maintained an EM program that focused on using radio frequency (RF) equipment for home detention. These cases have been primarily referred from the Court. However there is great opportunity to utilize EM in a more aggressive manner in order to enhance supervision of offenders. The traditional RF monitoring can be used as a graduated sanction, rather than incarcerating for technical violations of supervision. GPS also allows the Department to add an additional layer of monitoring for high-risk offenders.

A recent change in vendor for the Department's EM equipment will allow us to move forward in creating a more effective program. The primary obstacle to this goal has always been a lack of staff to manage and monitor offenders on EM. The '14-'15 budget directly addresses this obstacle by providing funding for a Probation Technician whose primary responsibility will be the monitoring and maintenance of the EM program. An additional benefit, over and above enhanced monitoring of offenders on supervision, is the ability to directly impact the number of offenders incarcerated in county jail. A reduction of just 2.5 inmates a month will more than offset the cost of the new position.

Day Reporting Center (DRC)

The Del Norte County DRC was opened in December of 2012. Day reporting centers can be an effective tool in assisting in the reentry of offenders after extended incarceration by creating necessary connections with needed services in the community. Unfortunately this project

suffered from a lack of vision and ineffective implementation. As a result the program has been closed and the Department is planning to use the associated funding elsewhere.

CAL-FIRE CONTRACT

The Department has pursued establishing a contract with Cal-Fire to place appropriate 1170(h) offenders in fire camps to serve out their sentences. The proposed contract has been reviewed by County Counsel and was sent to the State for review. The current status of that contract proposal is unknown.

While this program would be beneficial for the county by allowing a reduction in the jail population, the criteria for placement in the Cal-Fire fire camp programs would be somewhat prohibitive. Offenders must be low risk, and our 1170(h) offenders have typically been assessed as high risk. This could be an obstacle easily overcome as risk tools used by CDCR sometimes assess different factors than that used by the Department. However, another obstacle is that offenders must have fairly lengthy prison terms to serve, as fire camp participants earn additional custody credit for their participation in the program.

Currently, the Department has not identified anyone sentenced pursuant to 1170(h) who would meet the qualifications of the fire camp program. The Department is proposing to defund this program for the current fiscal year and reevaluate its viability for the '15-'16 fiscal year based upon further information gathered in the interim.

CASE MANAGEMENT SYSTEM

A critical component that was identified as lacking in the Department as far back as the 1998 audit was an effective electronic case management system. In 2012, the Department contracted with Automon LLC and secured the Caseload Explorer system. The CE system has been implemented for the adult caseloads and the process of utilizing all the components of the system is ongoing. The CE system has the potential to integrate multiple modules such as drug testing and automated check-ins as experience is gained with the system. The Department's new assessment tool, CAIS, is already integrated with the CE system through the Ce Assessments module.

DATA COLLECTION

Data collection is an integral part of EBP. The Department still faces challenges with data collection despite the addition of the CE system. State mandated data has been maintained, although the Department is still working with Automon to automate the collection of these numbers. Recently, barriers to successful data accumulation have been eroded and progress is being made.

The next step in this process is to go beyond collection of the mandated data and determine what data is critical to the local stakeholders of Realignment. EBP and data-driven decision-making are dependent on the accumulation, dissemination, and correct analysis of relevant data. This will continue to be a critical component that the Department will maintain and expand upon in the years to come.

Housing

One critical need that has been identified for PRCS offenders is stable housing. Although not the original intent, the DRC formerly filled this need for offenders who had no stable residence upon their release.

More appropriate methods of housing offenders have been identified and funding is being redirected to these programs. One is the Oxford House program⁹, a clean & sober living environment that was established in 1975 in Maryland and has a history of successfully housing addicts of all kinds, including offenders. Contact has been made with Parole & Probation in Oregon where Oxford House is well established, and officers there have had very positive experiences with Oxford House.

In addition, the Department will provide payment for short-term housing for offenders with no other residence immediately after their release from custody.

MENTAL HEALTH & DRUG AND ALCOHOL SERVICES

Following the model of establishing a sustainable treatment infrastructure outside of the Department, funds are being set aside to incentivize county agencies to provide expanded treatment options for offenders of all risk levels.

GOLDPOST

In December of 2013, a contract was signed with GoldPost Technologies to provide the Department with access to its Probe Smart software package as a mobile user interface to the Caseload Explorer system and other relevant data sources. GoldPost and Automon are currently collaborating to create the necessary infrastructure to implement this tablet-based mobile system.

TRAINING FACILITY

A unique opportunity has arisen with the Unified School District moving the McCarthy Alternative Education Center to a new facility closer to the High School in 2014/15. The former MAEC buildings are available to be purchased, and this provides the Department with an opportunity to purchase a facility that can be used for training Department personnel, and conducting education and programming for both adult and juvenile offenders. The Department is budgeting funds from a variety of sources to attempt to complete a purchase of the three buildings, and some AB 109 funding is included in order to purchase office supplies such as tables and chairs. Negotiations are currently underway with the School District.

⁹ http://www.oxfordhouse.org/userfiles/file/index.php. (2014)

Budget and Funding Allocations

FUNDING ALLOCATIONS

 2011/12 Allocation —
 237,062

 2012/13 Allocation —
 544,959

 2013/14 Allocation —
 646,288

 2014/15 Allocation —
 682,000

PREVIOUS REALIGNMENT BUDGETS

Probation	2011/	12	2012/13	2013/14
Community Corrections Case Management	77,10	0	246,703	308,649
Electronic monitoring	59,25	3	39,187	13,003
Cognitive Behavioral	10,00	0	10,000	13,000
Flash Incarceration	40,15	0	49,280	8,030
Special Department Expense (Contingency)	15,00	0		
CalFire			12,702	0
Day Reporting Center			98,280	45,600
Sex Offender Containment			10,000	5,000
Inmate Reimbursement				253,006
Sheriff's	2011/12	2012/13	2013/14	
Department				•
Off-set costs of 109	35,559	78,807	0	

CURRENT REALIGNMENT BUDGET

Probation	2014/15
Payroll	250,000
Electronic monitoring	10,000
Prof Services Total D&A / MH Services Oxford House Hotel Vouchers GoldPost	123,364 50,000 25,364 8,000 40,000
Vehicle Maint, fuel	7,000
Office Sup, Postage, etc	10,500
UA Testing	9,000
Training	27,600
Tactical	26,200
Support & Care	7,300
Flash Incarceration	8,030
Inmate Reimbursement	203,006

Summary

Despite significant challenges internally over the last two years, coupled with the inherent challenge of the drastic change that Realignment has brought upon us, a new chapter has been started in the Del Norte County Probation Department. New leadership will bring new life to languishing goals. Dedicated probation officers will be better equipped to effect change in offenders. The capacity to ensure community safety will continue to grow.

This is not to say all obstacles have been removed, and that the road ahead will not be difficult. But there is hope for the future again. A great opportunity has been presented to us, and we will pursue it.

Approval

Chair, Del Norte County Board of Supervisors	Date
Joe Dann	6/19/14
Chair, Community Corrections Partnership	Date
Court Executive Officer	Date
Sheriff	Date
Chief of Police	Date
District Attorney	Date
Public Defender	Date
Director Health and Human Services	Date

Appendix A

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Alpine	0.00%							energen en e						1	1	1	1	1	1	1	12
Amador	0.06%	1		1	1		1	6	1	1	1	19	1 19	19	20	18	19	18	19	19	227
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Calaveras	0.06%	1	1	1	1	1			1		т		1			<u>.</u>		1			12
Colusa	0.00%								Personal Cartesian		· ·								19	19	227
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Del Norte	0.13%	2	2	2	2	2	2	12	<u>Z</u>	2	2	2			2	·	*******************	2_	2	2	24
El Dorado	0.26%	4	4	4	4	4	4	23	4	4	4	. 4	. 4	. 4		4	. 4	4	4	4	48
Fresno	4.03%	57	58	62	59	60	61	357	61	62	63	62	62	61	65	59	63	59	61	62	741
Glenn	0.06%	1	1	1	1	1	1		1	1	1	1		1	1	1	1	<u>1</u>	<u>1</u>	1	12
Humboldt	0.49%			8			7	43	7	8		7	8		8	7	8		7	8	90
Imperial	0.52%		7	. 8	8	8	8	46	8	8	8		8			8	8	8	8	8	96
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Kings	1.07%	15	15	17	16	16	16	95	16	17	17	16	17	16	17	16	17	16	16	17	197
Lake	0.26%	4	4	4	4	4	4	23	4	4	4	4	4	4	4	4	4	4	4	4	48
Lassen	0.06%	1	1	1	1	1	1	6	1	1	1	1	1	1	1	1	1	1	1	1	12
Los Angeles	29.11%	410	418	449	429	434	438	2,577	441	451	454	445	449	442	467	429	458	428	441	449	5,355
Madera	0.42%	6	6	7	6	6	6	37	6	7	7	6	7	6	7	6	7	6	6	7	78
Marin	0.06%	1	1	1	1	1	1	6	1	1	1	1	1	1	1	1	1	1	1	1	12
Mariposa	0.06%	1	1	1	1	1	1	6	1	1	1	1	1	1	1	1	1	1	1	1	12
Mendocino	0.29%	4	4	5	4	4	4	26	4	5	5	4	5	4	5	4	5	4	4	5	54
Merced	0.68%	10	10	11	10	10	10	60	10	11	11	10	11	10	11	10	11	10	10	11	126
Modoc	0.00%	_	-	-	-	-	-		-		-		-	-	-	-	-	-	-	-	•
Mono	0.00%	-	-	•	•	-	-	-	-		-	•	-	-	-	-	-	-	-	-	· · · · · · · · · · · · · · · ·
Monterey	1.20%	17	17	19	18	18	18	106	18	19	19	18	19	18	19	18	19	18	18	19	221
Napa	0.19%	3	3	3	3	3	3	17	3	3	3	3	3	3	3	3	3	3	3	3	36
Nevada	0.06%	1	1	1	1	1	1	6	1	1	1	1	1	1	1	1	1	1	1	1	12
Orange	4.61%	65	66	71	68	69	69	408	70	72	72	71	71	70	74	68	73	68	70	71	849
Placer	0,62%	9	9	10	9	9	9	55	9	10	10	9	10	9	10	9	10	9	9	10	114
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Riverside	7.93%	112	114	122	117	118	119	702	120	123	124	121	122	120	127	117	125	117	120	122	1,458
Sacramento	3.77%	53	54	58	56	56	57	334	57	58	59	58	58	57	60	56	59	55	57	58	693
San Benito	0.13%	2	2	2	2	2	2	12	2	2	2	2	2	2	2	2	2	2	2	2	24
San Bernardino	10.66%	150	153	164	157	159	160	943	162	165	166	163	165	162	171	157	168	157	161	164	1,960
San Diego	6.73%	95	97	104	99	100	101	595	102	104	105	103	104	102	108	99	106	99	102	104	1,237
San Francisco	0.84%	12	12	13	12	13	13	75	13	13	13	13	13	13	14	12	13	12	13	13	155
San Joaquin	2.14%		31	33	32	32	32	190	33	33	33	33	33	33	34	32	34	32	32	33	394
San Luis Obispo	0.52%	7	7	8	8	8	8	46	8	8	8	8	8	8		8	8	8		8	96
San Mateo	0.65%	9	9	10	10	10	10	58	10	10	10	10	10	10	10	10	10	10	10	10	120
Santa Barbara	0.88%	12	13	14	13	13	13	78	13	14	14	13	14	13	14	13	14	13	13	14	161
Santa Clara	2.63%	AND THE RESERVED IN THE PERSONNEL PROPERTY.	38	41	39	39	40	233	40	41	41	40	41	40	42	39	41	39	40	41	484
Santa Cruz	0.26%	wheter course a residence of	4	4	4	4	4	23	4	4	4	4	4	4	4	4	4	4	4	4	48
Shasta	1.07%	15	15	17	16	16	16	95	16	17	17	16	17	16	17	16	17	16	16	17	197
Sierra	0.00%	and the second s							40		!./ .		-					10			197
Siskiyou	0.00%	2	2	2	2	2	2	12	2	2	2		2	2	2		2	2	2	2	-
Solano	1.01%	14	14	16	15	15	15	89	15	16	16	15	FT - MANUAL TO THE TOTAL TOTAL TO THE TOTAL	15	16	2	AT THE R. P. LEWIS CO., LANSING MICH.	an armen america descrip	and the best of a construction and a second		24
Sonoma	0.68%	10	10	10	10	10	10	89 60	15 10	10	70	10	16	15 10	er Personal Proposition Supply and Company and Company	15	16	15	15	16	185 126
Stanislaus	2.66%	and the exercise of a strength of						CAPPAGE AND A SECURE LANGE AND ADDRESS OF THE PROPERTY AND ADDRESS OF THE PARTY AND ADDRESS OF T			7.T		11		11	10	11	10	10	11	
Sutter	0.23%	and determine the second company of	38	41	39	40	40	236	40	41	42	41	41	40	43	39_	42	39	40	41	490
promote the second seco	CONTRACTOR			4	3	3	3	20	3	4	4		4	3_	4		4	3	3	4	4.
Tehama	0.32%	autoria de la composito de la		5		5	5	29	5	5_	5	5	5_	5		5		5	5	5_	60
Trinity	0.06%	action is about a serious and make	their area or area sensence or a	1	a planta de la companya de la compan	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1.
Tulare	1.46%		An area and the same and the same	23	. 22	22	22	129	22	23	23	22	23	22	23	22	23	22	22	23	
Tuolumne	0.06%			1		1	1		1			1	1	1	1	1	1	1	1	1	
Ventura	1.17%	and of their decident to the a	terms and presenting a	18		17	18	104	18	18	18	18	18	18	19	17	18	17	18	18	215
Yolo	0.42%	garden and an extension	etteration a maintaine to					37	. 6	7	. 7	6	7	6	7	6	7	6	6	7	78
Yuba	0.39%	5	6	6	6	6	6	35	6	6	6	6	6	6	6	6	6	6	6	6	72

Appendix B

