

THE INSTITUTE OF CHARTERED ACCOUNTANTS OF ONTARIO  
*THE CHARTERED ACCOUNTANTS ACT, 2010*

**DISCIPLINE COMMITTEE**

**IN THE MATTER OF:** Allegations against **TIMOTHY JOSEPH FRENCH, CA**, a member of the Institute, under **Rules 104.1, 104.2(a), 201.1 and 202** of the Rules of Professional Conduct, as amended.

**TO:** Mr. Timothy J. French

**AND TO:** The Professional Conduct Committee, ICAO

**REASONS**  
**(Decision and Order made March 29, 2012)**

1. This tribunal of the Discipline Committee of the Institute of Chartered Accountants of Ontario met on March 28 and 29, 2012 to hear allegations of professional misconduct brought by the Professional Conduct Committee against Timothy J. French, CA, a member of the Institute.

2. Alexandra Hersak appeared on behalf of the Professional Conduct Committee (PCC). Mr. French attended and was unrepresented. He acknowledged that he understood he was entitled to be represented by counsel, and that he was waiving that right. Glenn Stuart attended the hearing as counsel to the Discipline Committee.

3. The decision of the tribunal was made known at the conclusion of the hearing on March 29, 2012 and the written Decision and Order was sent to the parties on April 10, 2012. These reasons, given pursuant to Rule 20.04 of the Rules of Practice and Procedure, include the allegations, the decision, the order, and the reasons of the tribunal for its decision and order.

**CHARGES**

4. Allegations, as amended on consent at the hearing, were made against Mr. French by the PCC on October 24, 2011. Additional allegations were made against Mr. French by the PCC on February 7, 2012. It was agreed by all parties that the following two sets of allegations be renumbered one through six, for ease of reference:

1. THAT the said Timothy J. French, in or about the period October 1, 2002 through March 31, 2006, while engaged to prepare and file income tax returns for "KH", failed to communicate with or provide service to his client in a timely manner, and thereby failed to maintain the reputation of the profession and its ability to serve the public interest, contrary to Rule 201.1 of the Rules of Professional Conduct.
2. THAT the said Timothy J. French, in or about the period October 1, 2002 through March 31, 2006, while engaged to prepare and file income tax returns for "KH", failed to perform his professional services with due care, contrary to Rule 202 of the Rules of Professional Conduct, in that:

- (a) he failed to challenge, or to advise "KH" what action to take in order to challenge, a Notice of Reassessment dated March 17, 2005; and
  - (b) he failed to provide in his response to CRA dated March 13, 2006, all of the information and documentation requested with respect to the assessment of "KH's" 2002 income tax return.
- 3. THAT the said Timothy J. French, in or about the period September 1, 2000 through May 14, 2010, while engaged to provide income tax advice and to prepare and file income tax returns for "LB," failed to perform his professional services with due care, contrary to Rule 202 of the Rules of Professional Conduct, in that:
  - (a) he failed to file T1 Adjustment Requests and T2200 forms for 1995 and 1996;
  - (b) he failed to advise "LB" regarding a Notice of Assessment dated March 13, 2002 showing a balance owing of \$22,367, and failed to make filings to reduce that balance;
  - (c) he failed to advise "LB" regarding a Notice of Assessment dated May 20, 2004 showing a balance owing of \$27,311, and failed to make filings to reduce that balance;
  - (d) he failed to advise "LB" regarding a Notice of Assessment dated March 27, 2006 showing a balance owing of \$30,384, and failed to make filings to reduce that balance; and
  - (e) he failed to advise "LB" regarding a Notice of Assessment dated June 26, 2009 showing a balance owing of \$39,310, and failed to make filings to reduce that balance.
- 4. THAT the said Timothy J. French, in or about the period September 1, 2000 through May 14, 2010, while engaged to prepare financial statements and to prepare and file corporate income tax returns for "BH Inc." for the taxation year ended September 30, 2003, failed to perform his professional services with due care, contrary to Rule 202 of the Rules of Professional Conduct, in that:
  - (a) he failed to ensure that those returns were filed as required; and
  - (b) he failed to advise the client of a notice of Default of Filing Returns issued by the Ontario Ministry of Finance for the years ended September 30, 2003, 2004 and 2005, dated April 7, 2006, received by his office.
- 5. THAT the said Timothy J. French, in or about the period August 5, 2011 through February 7, 2012, failed to co-operate with the regulatory process of the Institute contrary to Rule 104.1 of the Rules of Professional Conduct, in that he failed to co-operate with officers, servants or agents of the Institute who have been appointed to arrange or conduct a practice inspection.

6. THAT the said Timothy J. French, in or about the period November 25, 2011 to February 7, 2012, failed to co-operate with the regulatory process of the Institute contrary to Rule 104.2(a) of the Rules of Professional Conduct, in that he failed to promptly reply in writing to a letter from the Institute to which a written reply is specifically required, in that he failed to reply to letters dated November 9, 2011 and December 2, 2011 from Ms. Theresa Tonelli, CA, Director of Standards Enforcement at the Institute.

#### **PLEA**

5. Mr. French entered a plea of not guilty to Allegation Nos. 1, 2, 3 and 4 and a plea of guilty to Allegation Nos. 5 and 6.

#### **THE PROCEEDINGS**

6. Ms. Hersak made a brief opening statement and said that the evidence of the PCC would be provided by way of witnesses "KH" and "LB", both former clients of Mr. French who brought the allegations to the attention of the Institute, and Raymond Harris, FCA, the investigator retained in this matter. The PCC filed Document Briefs (Exhibit 1 and 2) to which Mr. Harris referred in the course of his evidence. Evidence was also provided by way of affidavits of Mr. Grant Dickson, FCA, the Director of Practice Inspection, sworn on February 15, 2012 and Ms. Theresa Tonelli, CA, Director of Standards Enforcement, sworn on February 16, 2012 (Exhibit 4).

7. Mr. French testified on his own behalf and was cross-examined by Ms. Hersak. Mr. French also answered questions from the tribunal.

#### **EVIDENCE**

##### *Evidence of KH*

8. In September 2000, KH had sustained back and neck injuries in a motor vehicle accident, which had also resulted in cognitive deficiencies. Since that time, he has been unable to work and has been on short and long-term disability. Due to the complicated nature of his tax returns and financial affairs, he had hired Mr. French as his accountant in 2003. KH had turned over all his original documents and receipts, medical reports and tax slips from 2001 onward to Mr. French. Mr. French assured KH that he would owe no tax for 2001 and 2002 due to medical expenses including a therapeutic hot tub and a credit balance would be applied to 2003 and 2004.

9. Despite Mr. French's assurances that he was in contact with Canada Customs and Revenue Agency ("CCRA") and that all outstanding tax matters would be dealt with, KH was informed by CCRA that tax returns had not been filed for 2002 to 2004. KH recalled signing the tax returns and assumed they had been filed by Mr. French. After numerous attempts to retrieve his receipts and documents from Mr. French, KH was provided with a package that contained very little of what he had originally given Mr. French. KH attempted to obtain copies of the hundreds of medical reports and receipts he had turned over to Mr. French as proof of claims made to CCRA. KH subsequently filed his income tax returns through another accountant after incurring tax penalties, a property lien and garnishment of his disability income.

##### *Evidence of LB*

10. LB had engaged Mr. French to prepare his personal and business taxes in 1999 or

2000, when Mr. French was still with his former firm. LB was in the midst of an appeal of a reassessment with CCRA and felt that the person who previously prepared his tax returns had not done a proper job. LB engaged Mr. French based on Mr. French's assurance that his 1996 returns under appeal would be dealt with by filing a T-1 adjustment form. LB stated that problems arose once Mr. French left the firm and established his own practice.

11. All documents were provided to Mr. French who advised LB not to pay the assessments as he would deal with the officers at CCRA and was confident the amount owing could be brought down to a minimal amount. LB had no reason to believe Mr. French was not dealing with CCRA as he was continuing to pay fees to Mr. French, forwarding tax arrears notices and receiving letters from Mr. French indicating he was dealing with these matters. LB stated that he had made payments to Mr. French, including a cash payment of \$5,000.

12. Despite assurances from Mr. French that LB's personal and corporate taxes were being taken care of, LB received a letter from the Government of Ontario stating that his corporation had lost its corporate status because corporate returns had not been filed. The original amount of taxes due based on the 1996 reassessment of LB personal income amounted to \$16,000 but had now increased to \$43,000 as a result of interest and penalties. LB had to borrow money to make payments, causing him and his family financial hardship, and he has since hired another accountant to deal with his income tax returns.

13. LB expressed his dissatisfaction with Mr. French's failure to do the work he said he had done and the chartered accounting profession in general. LB also had difficulty retrieving his paperwork from Mr. French, which he feels is still incomplete.

14. In response to cross-examination by Mr. French, LB responded that he had paid monies, sometimes in cash, to Mr. French and did not get receipts for all transactions. LB acknowledged that he was aware of Mr. French's medical problems, including bypass surgery, but stated that this did not occur over the whole ten-year period of their association.

#### *Evidence of Raymond Harris*

15. Raymond Harris, the investigator for the Professional Conduct Committee, provided background on Mr. French's past and present practice, noting that his current engagements are mainly compilations, personal and corporate tax returns and planning advice. His staff consists of two technicians and an administrative assistant. Mr. Harris stated that Mr. French's quality control manual and Handbooks are not up to date, and there was no evidence of particulars of file standards or quality review. Mr. Harris was unable to confirm the extent of Mr. French's professional development as this information was not provided.

16. Mr. Harris stated that Mr. French's file for KH contained a May 29, 2003 letter to KH and the 2001 tax return that Mr. French said had been filed electronically. Mr. Harris noted the return could not have been filed electronically at the end of May, after the e-deadline date. There was no engagement letter on file. Mr. French's files for KH also contained notices of assessments, income tax returns and letters from CCRA but there was no verification in the files or from Mr. French that the tax returns had actually been filed and assessments dealt with.

17. With respect to LB's reassessment from CCRA, there was no indication from Mr. French and nothing in his file to indicate that the appeal had been pursued and that T1 adjustment requests and T2200 forms had been filed for 1995 and 1996. LB had been advised by Mr. French to not make payments until the matter was resolved. Corporate tax returns for LB's

company were not prepared after 2003, resulting in the loss of corporation status. Mr. Harris stated that the 2003 file for LB's corporation contained four sets of signed and two plain sets of financial statements, two copies of T2 returns, four copies of unsigned CT23 returns and an unsigned letter to LB concerning terms of engagement for preparation of his corporation's financial statements for 2004.

18. Mr. Harris stated that there was no indication these documents had ever been picked up by the client or filed with CCRA. There were no copies of tax returns in Mr. French's files for LB prior to 2003.

19. Mr. French had advised Mr. Harris that he had planned to prepare the corporate financial statements for 2004 but there was a problem with disposal of fixed assets. Mr. French said he had not been paid for his services by LB and had planned to do the work in his slack time. There was nothing in the file to indicate he had communicated with LB. On the notice of dissolution of LB's corporation found in Mr. French's file, there was a post-it note dated April 15, 2008 from LB indicating he had spoken to Mr. French who had undertaken to bring all files up to date.

20. Mr. French cross-examined Mr. Harris who confirmed that Mr. French had been cooperative during the investigation, although he did not provide an up-to-date Handbook, quality control manual or professional development log. In response to Mr. French's enquiry about the completeness of KH's files, Mr. Harris stated that the general files seemed complete but there was a lack of supporting documents and the number of copies in the file was unusual. Mr. Harris did not see a letter referenced by Mr. French from CCRA to KH in the file or a Notice of Objection. Mr. Harris confirmed that there were copies in the file of a lower court case concerning hot tubs where a tax credit was allowed but he did not examine the cases as it was not part of his mandate. Mr. Harris did recall seeing a letter from Mr. French telling KH to contact him if he had any questions, but he did not recall seeing a planning letter in the file.

21. Mr. Harris was able to confirm that the 1999 corporate files for LB had been restated and redone by documentation found in the file containing work completed by the predecessor and Mr. French. Mr. Harris was unable to confirm that a tax return was done for 2004 as Mr. French's file only contained a summary. Mr. Harris did not recall whether the 2004 assessment came from Mr. French's file.

22. In response to Mr. French's query about assessments for other years, Mr. Harris stated that the Default of Filing document had no date stamp and was a copy that he got from Mr. French's file.

#### *Submissions on Allegation Nos. 5 and 6*

23. Ms. Hersak filed the affidavit of Mr. Grant Dickson, FCA, the Director of Practice Inspection, sworn on February 15, 2012 and the affidavit of Ms. Theresa Tonelli, CA, Director of Standards Enforcement, sworn on February 16, 2012. The Affidavits and the exhibits attached were included in a document brief entitled Affidavits April 2012 (Exhibit 4). Ms. Hersak briefly reviewed the Affidavits and the exhibits to the Affidavits, particularly the letters sent from the Institute to Mr. French. Ms. Hersak did not present any other evidence with respect to the allegations.

24. Mr. French, a sole practitioner, was advised by letter dated May 3, 2011 that his practice was scheduled for reinspection. The reinspection had been deferred from 2010 at Mr. French's

request due to his health problems. He was advised by letter dated June 13, 2011 to submit client working paper files and documentation relating to quality control policies and procedures not later than August 5, 2011. He was then advised by registered letter dated August 15, 2011 that he was required to submit the client files by August 29, 2011. He was also told that if he failed to do so the matter would be referred to the PCC. Despite a courtesy reminder emailed to him on August 30, 2011, Mr. French did not submit his files and the matter was referred to the PCC.

25. The Director of Standards Enforcement, Ms. Tonelli, CA, wrote to Mr. French on November 9, 2011, advising him of the referral and asking him to respond to the complaint on or before November 24, 2011. Mr. French did not do so. Ms. Tonelli wrote to Mr. French again on December 2, 2011, asking for a reply by December 16, 2011 and advising him that his failure to reply could result in an allegation by the PCC. As at February 7, 2012, Mr. French had not submitted his files or responded to correspondence.

26. Mr. French accepted the affidavits as filed and did not have any submissions on Allegations 5 and 6.

#### *Evidence of Member*

27. Ms. Hersak filed a document entitled CRA Requests and Responses (Exhibit 5) for ease of reference during Mr. French's testimony.

28. Mr. French submitted that he left his previous partnership in 2003 to commence his own practice. The growth of his practice over the years was more than anticipated consisting of two or three audits, Notice to Reader, and corporate and personal tax returns. He did experience some staffing problems over the years and takes a "hands on" approach to his practice. In 2010, he had a heart bypass operation and was unable to work during this time. Another local CA was available for his clients to contact. He gradually returned to work, but his billings were down significantly and he had fallen behind in his work. Mr. French stated he put in a lot of extra hours to make up for this, but did not prioritize his engagements and as a result did not complete client engagements in a timely manner.

29. Mr. French stated that KH had come to him in 2003 with disability tax credit claims and medical expenses relating to the purchase of a hot tub that had been disallowed by CCRA for 2001. KH had a large tax liability that he wanted to offset with an RRSP and Mr. French thought KH would be eligible to claim the hot tub as a medical expense by providing supporting evidence. Mr. French said he was in communication with a Mrs. Smith, a collections officer at CCRA, concerning the tax arrears of KH. Mr. French was not always able to get back to KH with information due to the volume of work in his practice.

30. Mr. French said he intended to do the tax work without cost for KH but he was unable to keep up with the volume of work in his practice. Mr. French stated he did not receive the notices for penalties and interest.

31. Mr. French submitted that LB came to him in late 2000 requesting amendments to his personal and corporate tax returns and an assessment appeal. Mr. French did the tax work for LB at his former firm but when Mr. French opened his own practice, he had other priorities with clients and chose ones that could pay, noting that LB was experiencing financial difficulties. Mr. French stated that he had done nothing fraudulent and had never received \$5,000 in cash from LB.

32. Mr. French expressed his embarrassment at being before the tribunal and stated that he would send in the practice inspection files within 20 days.

33. Ms. Hersak cross-examined Mr. French concerning documents provided by KH in support of his medical expenses and hot tub installation. Mr. French had advised KH that some of the documents provided would support the eligibility of the hot tub as a medical expense, thereby minimizing his taxes owing. Ms. Hersak stated that KH understood that Mr. French would take care of his tax matters and had provided original receipts. A lesser amount of receipts were returned to KH and Mr. French agreed that Mr. Harris, during his investigation, could not find the balance of the receipts in the file.

34. Ms. Hersak asked Mr. French if he could recall what receipts were given back to KH and what documents were sent to Revenue Canada. Mr. French stated he would have sent CCRA the supporting original receipts including the hot tub, mileage and Cashway purchases. Ms. Hersak pointed out that there were no copies in Mr. French's file of the 2001 tax return and when he met with Mr. Harris, Mr. French said he thought he had filed the return. Mr. French could not recall what follow-up he had done with KH on income tax arrears notices. Mr. French did not recall letters or emails from KH concerning garnishment and liens for outstanding tax arrears. Mr. French agreed that he should have filed a notice of objection for KH and had not advised KH to pay the arrears.

35. Ms. Hersak questioned Mr. French on his treatment of LB's financial statements, personal and corporate income tax returns. Ms. Hersak noted that despite Mr. French's assertion that he had filed adjustments to the 1995 and 1996 returns of LB and had given direction on the yearly escalating balances owing, Mr. Harris did not find any evidence of such action. Mr. French agreed he told LB not to pay as he was handling the matter by T1 adjustments. Concerning the absence of any documentation in the file, Mr. French stated that he had discussions with CCRA staff and had refiled the T1 adjustment.

36. With respect to LB's corporation, Mr. French affirmed that Mr. Harris had found four unsigned client copies of financial statements in the file, along with T2 corporation tax returns. Despite LB attending at his office a number of times, Mr. French stated that he had not advised him that these documents were ready to be signed and filed.

37. Mr. French confirmed that, despite receiving letters from practice inspection and standards enforcement, he did not respond or send in his files.

## **DECISION**

38. After deliberating, the panel made the following decision:

THAT, Allegation No. 2 having been amended at the hearing and having heard the plea of guilty to Allegation Nos. 5 and 6, and having seen, heard and considered the evidence, the Discipline Committee finds Timothy Joseph French guilty of Allegation Nos. 1, 2, 3, 4, 5 and 6.

## **REASONS FOR FINDING**

39. With respect to allegations 1 through 4, the panel found the evidence presented by both KH and LB to be credible and convincing. The evidence of Mr. Harris including the documentation contained in the Document Briefs I and II supported the allegations of

professional misconduct in that Mr. French failed to maintain the good reputation of the profession and its ability to serve the public interest in providing professional services to KH and LB. Further, Mr. French's working papers clearly demonstrated that the work performed was not performed with proper due care.

40. In Mr. French's testimony, his defence amounted to the observation that his practice had grown too quickly for Mr. French to handle all the work. He also stated he had medical problems resulting in bypass surgery. Finally, in some cases, he gave lower priority to certain clients based on a perceived inability to pay.

41. As a member in public practice, Mr. French has a clear obligation to accept clients to whom he could provide competent timely service. If he is unable or unwilling to provide professional services consistently and with due care, then the clients should not be accepted. Once an engagement is accepted, a client cannot be ignored based on the ability to pay. Finally, Mr. French's medical problems, although very serious, arose well after the problems with these two particular files.

42. Accordingly, the panel was unanimous in its finding of guilty for Allegation Nos. 1 through 4.

43. Mr. French pleaded guilty to Allegation Nos. 5 and 6, and in his own testimony admitted he had not responded to letters received from the Institute. The panel's finding was therefore guilty of Allegation Nos. 5 and 6.

#### **SANCTION**

Ms. Hersak filed a letter dated to July 14, 2009 addressed to Mr. French from the PCC (Exhibit 6) relating to *Income Tax Act* charges against Mr. French for not filing his own taxes. Although the matter had been resolved and PCC had closed the file with a caution, Ms. Hersak submitted it had a bearing on penalty. Ms. Hersak, for the PCC, submitted that an appropriate sanction would be: a written reprimand; a fine of \$5,000; two specified professional development courses, an order that Mr. French cooperate with Practice Inspection within 20 days and, in the event he fails to do so, he should be suspended for a period of 30 days, and if he still does not cooperate, then his membership should be revoked; and the usual order with respect to publication. Ms. Hersak filed a Costs Outline (Exhibit 7) as the PCC also sought an order for approximately 50% of the costs of the investigation and hearing in the amount of \$25,000.

44. Ms. Hersak expressed the PCC's concerns that a large number of clients are using Mr. French's services. Protection of the public must be considered and despite Mr. French's claims that his practice was experiencing growing pains, clients should expect to have their tax work done properly and in a timely manner. Failure to exercise due care resulted in financial hardship for his clients. In mitigation, Mr. French seems to feel remorse and has been cooperative throughout the hearing process. Public protection could be achieved through the principles of specific deterrence and rehabilitation.

45. Ms. Hersak submitted that Mr. French's failure to cooperate with Practice Inspection and failure to respond to Standards Enforcement, prolonging the investigation and hearing, were aggravating factors. Time and resources have been spent on this matter, which only required a few hours of Mr. French's time to submit the files.



46. Ms. Hersak distributed a Case Brief containing ICAO Discipline Committee cases involving failure to cooperate: *Collaton, Kloosterman and Hubbard*, and cases involving failure to respond to or service clients in a timely manner: *Kilbourn, O'Hara, Ricketts, Jeffery and Menaker*. She pointed out that these cases resulted in orders similar to the order sought in this matter by the PCC.

47. Mr. French submitted that he has no issue with the professional development courses or providing the files to Practice Inspection. However, he did feel that payment of the fine and costs would be a financial hardship and requested that the time for payment be extended and that the costs be reduced to less than 50% of the actual costs of the investigation and hearing.

## ORDER

48. After deliberating, the panel made the following order:

IT IS ORDERED in respect of the allegations:

1. THAT Mr. French be reprimanded in writing by the Chair of the hearing.
2. THAT Mr. French be and he is hereby fined the sum of \$5,000 to be remitted to the Institute within six (6) months from the date this Decision and Order is made.
3. THAT Mr. French be and he is hereby required to complete, by paying for and attending in their entirety, on or before December 31, 2012 the following professional development courses made available through the Institute:
  - (a) Professional Risk Management – A Practical Perspective
  - (b) Time Management – Surviving Your Schedule
 or in the event a course listed above becomes unavailable, the successor course which takes its place.
4. THAT Mr. French co-operate by submitting the requested files referred to in the letter from Practice Inspection dated June 13, 2011 within twenty (20) days of the date this Decision and Order is made.
5. THAT notice of this Decision and Order, disclosing Mr. French's name, be given after this Decision and Order is made:
  - (a) to all members of the Institute;
  - (b) to the Public Accountants Council for the Province of Ontario; and
  - (c) to all provincial institutes/Ordre;
 and shall be made available to the public.

IT IS FURTHER ORDERED:

6. THAT Mr. French be and he is hereby charged costs fixed at \$20,000 to be remitted to the Institute within twenty-four (24) months from the date this Decision and Order is made.

AND IT IS FURTHER ORDERED

7. THAT in the event Mr. French fails to comply with any of the requirements of this Order, he shall be suspended from the rights and privileges of membership in the Institute and his public accounting licence shall be suspended until such time as he does comply, provided that he complies within thirty (30) days from the date of his suspension, and in the event he does not comply within the 30-day period, his membership in the Institute and his public accounting licence shall be revoked, and notice of his membership and licence revocation, disclosing his name, shall be given in the manner specified above, and in a newspaper distributed in the geographic area of Mr. French's practice and/or residence. All costs associated with the publication shall be borne by Mr. French and shall be in addition to any other costs ordered by the committee.

#### **REASONS FOR SANCTION**

49. During Mr. French's testimony, he had shown remorse for his actions and expressed apologies with respect to LB & KH. The tribunal concluded that a rehabilitation approach was appropriate.

50. The tribunal concluded this was a case where the principles of general and specific deterrence could be achieved by the imposition of the fine of \$5,000 as requested by the PCC.

51. The requirement of specific courses would provide Mr. French with the means to better manage his practice.

52. Although Mr. French stated he intended to provide the requested files to practice inspection, it is necessary to make this a requirement through the sanction. This will be the first opportunity to see if Mr. French has learned his lesson.

53. The tribunal noted with respect to Allegation Nos. 1 through 4, Mr. French has been cooperative. However, as a result of two complaints, the investigation was extensive resulting in significant costs. After due consideration, the panel concluded a charge for costs of \$20,000 was appropriate in the circumstances.

DATED AT TORONTO THIS *29<sup>TH</sup>* DAY OF MAY 2012  
BY ORDER OF THE DISCIPLINE COMMITTEE



S.F. DINELEY, FCA – DEPUTY CHAIR  
DISCIPLINE COMMITTEE

#### **MEMBERS OF THE PANEL:**

R.H. CARRINGTON (PUBLIC REPRESENTATIVE)  
R.S. DUSCHEK, CA  
G. KROFCHICK, CA  
S.J. HOLTOM, CA