



**SPECIAL LEGAL COMMITTEE MEETING AGENDA**  
Monday, April 25, 2022 4:00 PM  
Roswell Convention & Civic Center  
912 N. Main St. Meeting Room A, Roswell, NM 88201

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Chair: Ed Heldenbrand, Ward 3  
Vice Chair: Cristina A. Arnold, Ward 1  
Members: Juan Oropesa, Ward 1  
Robert Corn, Ward 4  
Staff Liaison: Parker W. Patterson

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**CALL TO ORDER**

**ROLL CALL**

**APPROVAL OF AGENDA**

**APPROVAL OF MINUTES**

Approval of the minutes from the Legal Committee meeting on Thursday, March 24, 2022. *(page 3)*

**REGULAR ITEMS**

1. Ord. 22-07: Cannabis – Consider recommending to authorize to advertise proposed Ord. 22-07 amending Chapter 27 of the Roswell City Code for a public hearing. *(page 6)*

**CHAIR COMMENTS, REPORTS, ANNOUNCEMENTS**

**PUBLIC PARTICIPATION**

**ADJOURN**

Notice of this meeting has been given to the public in compliance with Sections 10-15-1 through 10-15-4 NMSA 1978 and Resolution 22-14.

NOTICE OF POTENTIAL QUORUM – A quorum of the City Council may or may not attend, but there will not be debate by the City Council. The Council, acting as attendees to an informational presentation, will not be discussing public business and no action will be taken.

If you are an individual with a disability who is in need of a reader, amplifier, qualified sign language interpreter, or any other form of auxiliary aid or service to attend or participate in the hearing or meeting, please contact Human Resources at 575-624-6700 at least one week prior to the meeting or as soon as possible. Public documents including the agenda and minutes can be provided in various accessible formats. Please contact the City Clerk at 575-624-6700 if a summary or other type of accessible format is needed.

Printed and posted: Thursday, April 21, 2022

**TO ATTEND THE LEGAL COMMITTEE MEETING BY GO-TO-MEETING**

Monday, April 25, 2022, 4:00 PM - 5:00 PM (MDT)

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**Regular Meeting of the Legal Committee  
Held in the Roswell Convention & Civic Center  
Thursday, March 24, 2022**

Notice of this meeting was given to the public in compliance with Section 10-15-1 through 10-15-4 NMSA and Resolution 21-14.

**ROLL CALL**

The meeting convened at 4:01 p.m. with Chair Stubbs presiding, Councilor Perry via GoTo, Councilor Foster present and Councilor Lopez present.

Staff present: Joe Neeb, Christopher Josh Nairn-Mahan, Jessica Collier, Amalia Martinez, Parker Patterson, Steve Christopher and Scott Stark.

Guests present: Rita Kane-Doerhoefer, Ed Heldenbrand, Andrew Cobos, Robert Corn, Savino Sanchez, Beto Bejarano and Cristina Arnold.

Public present via GoToMeeting: Peter Kelton with Admiral Beverage and Keith Hartnett.

**APPROVAL OF AGENDA**

Councilor Barry Foster moved to approve the March 24, 2022, Legal Committee meeting agenda and addendum. Councilor Daniel Lopez as a second. A voice vote was 4-0, and the motion passed.

**APPROVAL OF MINUTES**

The Thursday, February 24, 2022, Legal Committee minutes were approved as written.

**REGULAR ITEMS**

1. RFP-22-010 Security Guard Services – Steve Christopher discussed RFP. RFP-22-010 sought proposals from qualified firms to provide security guard services for the Roswell Air Center (ROW) and any City of Roswell owned or leased property. The RFP was opened for proposals on January 16 through February 8, 2022. Three proposals were received. The Evaluation Committee completed their review and it is their recommendation to award this contract as a Multi-Source Award to Crusader Protective Services, Imperium Risk, Inc. and S.C.P. Security, LLC based on the evaluation criteria (average) scores provided in the award recommendation report. **For the Record**, Parker Patterson made notice Beto Bejarano is married to the City Payroll Administrator. Councilor Foster moved to recommend approval to full City Council to authorize the City Manager to enter into negotiation with all three offers. Councilor Lopez as the second. A voice vote was 4-0, and the motion passed.
2. Admiral Beverage IRB Indenture – Peter Kelton discussed the Indenture. The City Council will consider adoption of proposed Ordinance 22-05 at its April 14, 2022 regular meeting, to issue an Industrial Revenue Bond in an amount of \$9 million for the construction of a facility by Admiral Beverage Company at its facility located on

Brasher Rd. The proposed Indenture has been submitted by Admiral's bond counsel for approval by the City Council in connection with the issuance of the IRB, as contemplated by proposed Ord. 22-05. **For the Record**, page 17 of the indenture has been replaced with a new signature page. Councilor Foster moved to recommend approval to full City Council of a proposed Indenture in connection with the proposed Admiral Beverage IRB with page 17 and A-4 of the Indenture being replaced with a new signature page and to include Exhibit A, B and C, with all other conditions. Councilor Lopez as the second. A voice vote was 4-0, and the motion passed.

3. Admiral Beverage IRB BPA – Peter Kelton discussed the BPA. The City Council will consider adoption of proposed Ordinance 22-05 at its April 14, 2022 regular meeting, to issue an Industrial Revenue Bond in an amount of \$9 million for the construction of a facility by Admiral Beverage Company at its facility located on Brasher Rd. The proposed BPA has been submitted by Admiral's bond counsel for approval by the City Council in connection with the issuance of the IRB, as contemplated by proposed Ord. 22-05. Councilor Foster moved to recommend approval to full City Council of a proposed Bond Purchase Agreement in connection with the proposed Admiral Beverage IRB with exhibits A, B, C and D and with the change of the signature page on page 10 of the BPA, with all other conditions. Councilor Lopez as the second. A voice vote was 4-0 and the motion passed.
4. Admiral Beverage IRB Lease Agreement – Peter Kelton discussed the Lease Agreement. The City Council will consider adoption of proposed Ordinance 22-05 at its April 14, 2022 regular meeting, to issue an Industrial Revenue Bond in an amount of \$9 million for the construction of a facility by Admiral Beverage Company at its facility located on Brasher Rd. The proposed Lease has been submitted by Admiral's bond counsel for approval by the City Council in connection with the issuance of the IRB, as contemplated by proposed Ord. 22-05. Councilor Foster moved to recommend approval to full City Council of proposed Lease Agreement in connection with the proposed Admiral Beverage IRB with exhibits A and B and with the change of the signature page on page 26 of the Lease Agreement, with all other conditions. Councilor Lopez as the second. A voice vote was 4-0 and the motion passed.
5. Department Reports – City Clerk, Safety and Legal Department. Discussion only, no action taken.

#### **CHAIR COMMENTS, REPORTS, ANNOUNCEMENTS**

None

#### **PUBLIC PARTICIPATION**

Rita Kane-Doerhoefer

#### **ADJOURN**

The meeting adjourned at 5:14 p.m.



**AGENDA ITEM NO. 1– ABSTRACT**

LEGAL COMMITTEE MEETING

**Monday, April 25, 2022 4:00 PM**

Roswell Convention & Civic Center

912 N. Main St. Meeting Room A, Roswell, NM 88201

Ord. 22-07: Amending Chapter 27

**ACTION REQUESTED:** Consider recommending to authorize to advertise proposed Ord. 22-07 amending Chapter 27 of the Roswell City Code for a public hearing.

**BACKGROUND:** **Initiated by: Parker W. Patterson**

City Council adopted Ordinance 21-09 on August 12, 2021, establishing Chapter 27 of the Roswell City Code governing cultivation, manufacture, sale, and consumption of cannabis in City limits. City Council subsequently expanded and filled in additional provisions of Chapter 27 in Ordinances 21-10 and 21-13.

The proposed amendment to Chapter 27 would permit pre-existing medicinal medical businesses to begin recreational sales upon obtaining an operational permit from Community Development, but without the necessity of obtaining a zone change and conditional use permit. The proposed amendment would additionally set operating times for retail cannabis sales and on-site consumption. Finally, the proposed amendment provides a definition of “vertically integrated cannabis establishments” based on the state law provision.

**FINANCIAL CONSIDERATION:** There is no direct financial impact associated with this item.

Existing medicinal establishments intending to commence recreational sales would be exempted from paying fees related to pre-application review, zone change, and conditional use permits, but fees relating to operational permitting, and other relevant fees provided for in Resolution 21-59, would still apply.

**LEGAL REVIEW:** The City Attorney drafted the proposed ordinance.

**BOARD and/or COMMITTEE ACTION:** The City Council referred proposed ordinance 22-07 to the Legal Committee for further consideration at its April 14, 2022 regular meeting.

**STAFF RECOMMENDATION:** Consider recommending to authorize to advertise proposed Ord. 22-07 amending Chapter 27 of the Roswell City Code for a public hearing.



1  
2 *Cannabis project application.* The entire package of applications, maps, plans, studies,  
3 and supporting documentation that comprises a zoning request, regulatory permit, and  
4 other supporting documentation as deemed necessary and proper for review, approval,  
5 and permitting purposes by the city.  
6

7 *CCAN:* Commercial Cannabis Zoning District  
8

9 *Certificate of occupancy.* The document issued by the city building department certifying  
10 a building's compliance with applicable building codes and other laws, indicating it to be  
11 in a condition suitable for occupancy.  
12

13 *Childcare facility* refers to an establishment operated by a person, society, agency,  
14 corporation, institution, or any other licensed entity where children are under the  
15 supervision and management of a day-care center, babysitter, or other provider when the  
16 legal guardians of the children are unable to supervise.  
17

18 *City manager.* The city manager of the City of Roswell or his designee.  
19

20 *Conditional use permit (CUP)* allows property owners to utilize land in a way that is not  
21 specifically permitted under the location's designated zone. For each cannabis-related  
22 business, in addition to a CUP, an application for change of zone, regulatory permit  
23 application, and supporting documentation (including any other related permit  
24 applications), shall comprise a complete cannabis project application, to which conditions  
25 of approval shall be attached.  
26

27 *Distribution.* The procurement, sale and transport of cannabis or cannabis products  
28 between cannabis businesses.  
29

30 *Division* refers to the Cannabis Control Division (CCD), as defined in section 26-2C-3(A)  
31 of the Cannabis Regulation Act.  
32

33 *Edible cannabis product.* Also known as a cannabis edible, cannabis-infused food, or  
34 simply an edible, is a food product (either homemade or produced commercially)  
35 containing cannabis extract as an active ingredient. Although edible may refer to either a  
36 food or a drink, a cannabis-infused drink may be referred to more specifically as a liquid  
37 edible or drinkable.  
38

39 *Floating zone.* A zoning district with delineated requirements and/or conditions to be met  
40 by an applicant prior to approval of the zone designation for a particular parcel of land.  
41 Rather than being placed on the zoning map as traditional zones are, however, the floating  
42 zone is simply written as an amendment in the zoning ordinance. Thus, the zone "floats"  
43 until a development application is approved, when the zone is then added to the official  
44 zoning map.  
45

46 *Halfway House:* See Rehabilitation facility; inpatient

1  
2 *ICAN: Industrial Cannabis Zoning District*  
3

4 *Industrial Cannabis Establishment:* Includes, but is not limited to, businesses established  
5 principally for the purposes of cultivation, manufacture, distribution, laboratory testing  
6 (including research & development), and transportation (including possession,  
7 processing, storing, and labeling incidental to such activities) of cannabis and cannabis  
8 products as provided in this chapter. Industrial cannabis establishments must be sited  
9 within the ICAN zoning district.  
10

11 *Mature cannabis plant.* A cannabis plant that has flowered and has buds that are  
12 observable by unaided visual examination.  
13

14 *Medical dispensary.* A cannabis business facility where cannabis, medical cannabis  
15 products, or devices for the use of medical cannabis or medical cannabis products are  
16 offered, either individually or in any combination, for retail sale, including an  
17 establishment (whether fixed or mobile) that delivers, pursuant to express authorization,  
18 medical cannabis and medical cannabis products as part of a retail sale, and where the  
19 operator holds a valid cannabis business regulatory permit and business license from the  
20 city, authorizing the operation of a dispensary, and a valid State of New Mexico license,  
21 approved by the Cannabis Control Division (CCD) for the operation of a cannabis  
22 medical dispensary.  
23

24 *Non-storefront retailer.* An approved cannabis retailer that provides recreational or  
25 medicinal cannabis exclusively through an approved and permitted delivery service.  
26

27 *Owner/operator.* A person or entity including:  
28

- 29 (1) All persons with an aggregate ownership interest of 20% or more in the applicant,  
30 unless such interest is solely a security, lien, or encumbrance; or  
31  
32 (2) An individual that will be participating in the direction, control, or management of  
33 the permitted cannabis establishment.  
34

35 *Permittee.* The individual or entity to whom a regulatory permit has been issued under  
36 this chapter. A permittee includes all representatives, agents, parent entities, or subsidiary  
37 entities of the permittee.  
38

39 *Pre-application review (PAR).* The process by which an applicant for a cannabis project  
40 submits preliminary documentation to the planning and zoning division for review by city  
41 staff. The PAR is required for all cannabis related projects and no formal application for  
42 permitting (zone change, CUP, regulatory permit, etc.) shall be accepted or processed  
43 without completion of the PAR.  
44

45 *Regulation and licensing department (RLD or NMRLD).* Refers to the regulation and  
46 licensing department of the State of New Mexico.



1  
2 *Rehabilitation Facility*: A facility for the purposes of temporary or long-term treatment,  
3 for addiction to alcohol or drugs. Rehabilitation facilities may provide care, treatment,  
4 and/or counseling through either medical, or non-medical practices. The structures and  
5 land associated with the rehabilitation facility may be provided for by inpatient or  
6 outpatient services and needs:  
7

8 a. Inpatient treatment facility: where one or more patients are provided with care,  
9 treatment, meals, and lodging.

10  
11 b. Outpatient treatment facility: where one or more patients are provided with care  
12 and/or treatment, but no meals or lodging are provided.  
13

14 *Retail Cannabis Establishment*: Is limited to those businesses established principally for  
15 the purposes of retail sales and/or on-site consumption of cannabis and/or cannabis  
16 products to qualified patients, primary caregivers, reciprocal participants, or directly to  
17 consumers. Retail cannabis establishments may be sited within the CCAN or ICAN  
18 zoning districts.  
19

20 *Retirement facility*. Any form of housing, either detached or attached dwelling units,  
21 apartments, or residences designed for and principally occupied by senior citizens. Such  
22 facilities may include a congregate meals program in a common dining area, but exclude  
23 institutional care such as medical or nursing care.  
24

25 *Substance Abuse Treatment Center*: See Rehabilitation facility.  
26

27 *School*. An instructional facility or institution for the teaching of children or adults, either  
28 public or private.  
29

30 *Senior care facility* refers to a facility that provides housing that is suitable for the needs  
31 of an aging population, where the emphasis of the establishment predominantly concerns  
32 safety, accessibility, adaptability and longevity. The functions of a senior care facility can  
33 range from an independent living facility to a 24-hour care facility.  
34

35 *State license*. A license issued by the state of New Mexico, Cannabis Control Division.  
36

37 *Vertically Integrated Cannabis Establishment*" or "VICE" means a person that is  
38 authorized under the Cannabis Regulation Act to act as any of the following:  
39

40 (1) a cannabis courier;

41  
42 (2) a cannabis manufacturer;

43  
44 (3) a cannabis producer; and

45  
46 (4) a cannabis retailer.

1  
2       *Zoning request.* A written request, included in an application, for a zone change to an  
3 appropriate floating zone, and for issuance of a conditional use permit in connection  
4 therewith.  
5

6  
7 SECTION 3. Section 27-53 of Chapter 27 of the Roswell City Code is hereby amended as follows:  
8

9       **Sec. 27-53. – Operational Permit Required**

10  
11       A. Prior to initiating operations, and as a continuing requirement to operate, a retail  
12 cannabis establishment or industrial cannabis establishment, the legal representative of  
13 the person(s) or entity intending to operate and/or lease a facility for the development  
14 of a proposed cannabis establishment shall obtain and pay all fees associated with:  
15

- 16           1. an operational permit from the city as required by this chapter
- 17
- 18           2. except in cases of non-conforming uses, a conditional use permit from the city  
19 as required by this chapter.
- 20
- 21           3. all application, processing, and permitting fees as established and adopted by  
22 resolution of the city council, including such amendments as may be adopted  
23 from time to time
- 24

25       B. This section, and the requirement to obtain an operational permit, does not apply to the  
26 individual possession or cultivation of cannabis for personal use, as allowed by state  
27 law. Personal possession and use, including non-commercial cannabis cultivation, is  
28 regulated under Chapter 27, Article 5. Personal possession and use of cannabis pursuant  
29 to state law and local ordinance, is permitted in the City of Roswell.  
30  
31

32 Section 4.       Section 27-102 shall be amended as follows:  
33

34       **Sec. 27-102. – Operating Standards**

- 35       A. Limited access areas. A permitted retailer shall only permit authorized individuals to  
36 enter the retail cannabis establishment limited-access areas.  
37
- 38       B. Retail area. Individuals shall only be granted access to the area to purchase cannabis  
39 goods after the permittee has identified the individual as a medical cannabis patient,  
40 primary caregiver, or person over the age of twenty-one (21), depending on whether the  
41 retail cannabis establishment sells medicinal or recreational cannabis or both.  
42
- 43       C. Delivery. All deliveries of cannabis must be performed in compliance with State law,  
44 corresponding state-issued regulations, and local ordinance.  
45  
46

- 1 D. An inventory record documenting the dates and amounts of cannabis produced or  
2 received at the premises, the daily amounts of cannabis on the premises, and the daily  
3 amounts of cannabis transported from the premises. The retail cannabis establishment  
4 manager shall report any loss, damage, or destruction of these records to the city manager  
5 within twenty-four (24) hours of the loss, damage, or destruction.  
6
- 7 E. Security. A permittee shall comply with the security plan that is submitted during the  
8 application process as approved by the city manager. A permittee shall report to the  
9 Roswell Police Department all criminal activity occurring on the premises. Should  
10 compliance with the security plan fail to properly secure the retailer or retail  
11 microbusiness premises, the city manager may impose additional or modified plan  
12 restrictions.  
13
- 14 F. Cannabis consumption prohibited. No person shall smoke, ingest, or otherwise consume  
15 cannabis in any form on the premises of a retail cannabis establishment unless the retailer  
16 has a valid onsite consumption permit. No person shall smoke, ingest, or otherwise  
17 consume cannabis in violation of state law.  
18
- 19 G. Alcohol and tobacco sales prohibited. A permittee shall not sell alcoholic beverages or  
20 tobacco products on or at any premises permitted under this chapter.  
21
- 22 H. Juveniles prohibited. No one under the age of eighteen (18) shall be allowed on the  
23 premises, nor shall anyone under the age of twenty-one (21) operate a retail cannabis  
24 establishment in any capacity, including, but not limited to, as a manager, staff,  
25 employee, contractor, or volunteer.  
26
- 27 I. No cannabis odors shall be detectable outside of the permitted retail cannabis  
28 establishment.  
29
- 30 J. State law compliance. All retail cannabis establishments must operate in full compliance  
31 with state law.  
32
- 33 K. Hours of Operation. Retail sales of cannabis shall be permitted only during the following  
34 hours:  
35  
36 (1) Sunday through Thursday from 10:00 am to 8:00 pm; and  
37  
38 (2) Friday and Saturday from 9:00 am to 10:00 pm.  
39

40  
41 SECTION 5. Section 27-132 is hereby added and shall provide as follows:  
42

43 **Sec. 27-132. – Operating times for on-site consumption.**  
44

45 On-site consumption shall only be allowed during those times permitted for retail sales.  
46

1  
2 SECTION 6. Section 27-151 of the Roswell City Code is hereby amended as follows:  
3

4 **Sec. 27-151. - Authority to continue.**  
5

- 6 (a) Any previously permitted cannabis establishment and/or cannabis related use, including  
7 medical dispensaries and retail cannabis establishments, that existed lawfully, prior to the  
8 effective date of this chapter, may continue to operate as that same use, as it did prior to  
9 becoming non-conforming, subject to the rules, regulations, operational requirements of  
10 section 27-102 relating to retail sales, including operating times., and the restrictions  
11 listed below.  
12  
13 (b) ~~The above notwithstanding, no~~ Upon the issuance of an appropriate state license, a  
14 previously permitted non-conforming medical dispensary shall be permitted to engage in  
15 retail recreational sales and on-site consumption unless the dispensary complies with the  
16 requirements of this chapter, including without the requirements to obtain a zone change,  
17 or CUP, but such establishment shall obtain a city regulatory operational permit, on-site  
18 consumption permit, if applicable, and all other applicable permits hereunder, and pay all  
19 fees associated therewith, and shall comply with all operational requirements of section  
20 27-102 relating to retail sales, including operating times.  
21  
22

23 SECTION 7. Section 27-152 of the Roswell City Code is hereby amended as follows:  
24

25 **Sec. 27-151. - Restrictions.**  
26

- 27 (a) Any non-conforming cannabis establishment or use, existing as of the effective date of  
28 this chapter, that does not conform to the regulations of the zoning district(s) established by  
29 this chapter, shall be subject to the following:  
30  
31 (1) ~~Repairs and alterations.~~ ~~Ordinary cosmetic repairs may be made to a building or~~  
32 ~~structure devoted to or designed for a cannabis establishment or use not permitted in~~  
33 ~~the zoning district in which it is located. No structural repairs or alterations shall be~~  
34 ~~made in or to such building or structure, except those required by law, or to alter the~~  
35 ~~design and use of the building or structure to conform to the permitted use regulations~~  
36 ~~of the zoning district in which it is located.~~  
37  
38 (2) ~~Additions and enlargements.~~ ~~A building or structure, devoted to or designed for a~~  
39 ~~cannabis establishment, or use not permitted in the zoning district in which it is~~  
40 ~~located, shall not have additions or enlargements made to it in any way other than to~~  
41 ~~bring such building or structure into compliance with the permitted use(s) of the~~  
42 ~~zoning district in which it is located.~~  
43  
44 (3) ~~(1)~~ Restoration as a result of damages. A building or structure, devoted to or designed  
45 for a cannabis establishment, or use not permitted in the zoning district in which it is  
46 located, that is damaged or destroyed by any means, and where the cost of the repairs

1 exceed 50% or more of its replacement value, shall not be restored except if such  
2 restoration results in a building, structure, or sign devoted to or designed for a use that  
3 conforms to the regulations of the zoning district in which it is located.  
4

5 ~~(4)~~(2) *Discontinuance of a non-conforming use.* In the event that a non-conforming use  
6 of a building, structure, premises, sign, or parts thereof, is discontinued for any reason  
7 for a period of six months or longer, and such non-conforming use is changed to or  
8 replaced by a use conforming to the zoning district in which it is located, such building,  
9 structure, premises, sign, or parts thereof shall not thereafter be used or occupied by a  
10 non-conforming use, even though the building, structure, sign, premises, or parts  
11 thereof may have been originally constructed for the prior non-conforming use.  
12

13 ~~(5)~~(3) *Vacant non-conforming use.* In the event the building, structure, sign, or premises  
14 of a non-conforming use have sat vacant for a period of six months or longer, any use  
15 brought into said building, structure or premises shall be a use conforming to the  
16 regulations of the zoning district in which it is located and all requirements of the  
17 zoning ordinance shall be met before the new permitted use is allowed to operate,  
18 including the most current requirements for parking, landscaping, and general zoning  
19 and building guidelines as set forth in this and other ordinances.  
20  
21

22 SECTION 8. All ordinances or parts of ordinances in conflict or inconsistent herewith are hereby  
23 repealed to the extent of such inconsistency. This repealer shall not be construed to revive any  
24 ordinance or part of any ordinance heretofore repealed.  
25

26  
27 SECTION 9. If any section, paragraph, clause or provisions of this ordinance for any reason shall  
28 be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph,  
29 clause or provision shall not affect any other part of this ordinance.  
30

31  
32 SECTION 10. This ordinance shall be effective after five (5) days following its publication as  
33 required by law.  
34

35  
36 PASSED, ADOPTED, SIGNED and APPROVED \_\_\_\_\_, \_\_\_\_\_.  
37

38 CITY SEAL  
39

40  
41  
42 \_\_\_\_\_  
43 Timothy Z. Jennings, Mayor

44 ATTEST  
45  
46

1  
2 Amalia Martinez, Interim City Clerk  
3

DRAFT