



Local Agency Formation Commission of Napa County
Subdivision of the State of California

1030 Seminary Street, Suite B
Napa, California 94559
Phone: (707) 259-8645
www.napa.lafco.ca.gov

We Manage Local Government Boundaries, Evaluate Municipal Services, and Protect Agriculture

Agenda Item 6a (Public Hearing)

TO: Local Agency Formation Commission

PREPARED BY: Brendon Freeman, Executive Officer

MEETING DATE: April 5, 2021

SUBJECT: Appointment of Public Member

RECOMMENDATION

It is recommended the Commission take the following actions:

- 1) Open the public hearing and take testimony;
- 2) Invite candidates to address the Commission;
- 3) Close the public hearing;
- 4) Appoint a Public Member to complete an unexpired term ending on May 2, 2022.

BACKGROUND AND SUMMARY

Under Government Code (G.C.) Section 56325(d), the composition of Local Agency Formation Commissions (LAFCOs) includes one Public Member representing the general public who is appointed to a four-year term by the city and county members of the Commission. The city and county members may also appoint one Alternate Public Member pursuant to G.C. Section 56331. Sitting public members may participate in the discussion but do not vote in the appointment process.

To qualify, the Public Member and Alternate Public Member must be residents of Napa County and cannot be officers or employees with local governmental agencies. The Public Member and Alternate Public Member must receive at least one vote each from a city and county member of the Commission.

The Public Member position is currently vacant with an unexpired four-year term ending May 2, 2022. Staff recommends the city and county members of the Commission appoint a new Public Member appointment to complete the unexpired term.

Margie Mohler, Chair
Councilmember, Town of Yountville

Diane Dillon, Vice Chair
County of Napa Supervisor, 3rd District

Vacant
Representative of the General Public

Mariam Aboudamous, Commissioner
Councilmember, City of American Canyon

Brad Wagenknecht, Commissioner
County of Napa Supervisor, 1st District

Eve Kahn, Alternate Commissioner
Representative of the General Public

Beth Painter, Alternate Commissioner
Councilmember, City of Napa

Ryan Gregory, Alternate Commissioner
County of Napa Supervisor, 2nd District

Brendon Freeman
Executive Officer

Staff fully complied with the notice requirements and recruitment procedure found in the Commission's *Policy on the Appointment of a Public Member and Alternate Public Member* ("the Policy"), included as Attachment One, including publishing an announcement in the Napa Valley Register as well as posting the announcement on the Commission's website and Facebook page. The announcement was also circulated to all local agencies subject to Commission oversight as well as other local stakeholder groups.

Six candidates have applied:

- Bruce Bardessono
- Tom Gamble
- Eve Kahn
- Kenneth Leary
- Nick Van Male
- Alton Weeks

All six candidates are eligible for the position of Public Member. The applications with personal contact information redacted are included as Attachments Two through Seven.

ATTACHMENTS

- 1) Policy on the Appointment of a Public Member and Alternate Public Member
- 2) Candidate Application: Bruce Bardessono
- 3) Candidate Application: Tom Gamble
- 4) Candidate Application: Eve Kahn
- 5) Candidate Application: Kenneth Leary
- 6) Candidate Application: Nick Van Male
- 7) Candidate Application: Alton Weeks



LOCAL AGENCY FORMATION COMMISSION OF NAPA COUNTY

Policy on the Appointment of a Public Member and Alternate Public Member

(Adopted: October 11, 2001; Last Amended: November 18, 2019)

I. Background

The Cortese-Knox-Hertzberg Local Government Reorganization (CKH) Act of 2000 includes provisions for the composition of the Commission including the Public Member as follows:

The composition of the Commission shall include one member representing the general public, hereinafter referred to as “public member.” The Commission may designate one alternate public member. The selection of the public member and alternate public member shall be subject to the affirmative vote of at least one of the members appointed by each of the appointing authorities ([California Government Code \(G.C.\) §56325\(d\)](#)).

II. Purpose

It is the intent of the Commission to establish a policy for the appointment of a public member and alternate public member which is consistent with CKH. This policy also includes procedures to address a vacancy in the position and other relevant matters.

III. Eligibility

The public member and alternate public member shall be a resident of Napa County. No person may serve as public member or alternate public member if at the same time they are an officer or employee of the County, a city, town or district within Napa County.¹ For purposes of this policy, an officer of a local government agency is a member of a local public board, commission, committee, or council with the authority to make advisory or final decisions relative to land use or the provision of municipal services.

IV. Term of Office

The term of office for Public Member and Alternate Public Member shall be four years and shall end on the first Monday in May of the year in which the term expires. The Public Member and Alternate Public Member shall continue to serve until a successor is appointed.

¹ The term “district” is defined in [G.C. §56036](#).

V. Appointment Procedures

A) New Term for Public Member or Alternate Public Member

It is the policy of the Commission that in anticipation of the expiration of a four-year term for the Public Member or Alternate Public Member, the following procedures will be taken:

At a regular meeting at least 120 days prior to the scheduled expiration of the Public Member or Alternate Public Member's term, the Executive Officer shall inform the Commission of the impending vacancy and whether the incumbent is eligible to seek reappointment. The Commission shall take one of the following two actions as set forth in the following subsection 1 or 2 below.

- 1) Direct the Executive Officer to recruit candidates and schedule a public hearing to consider making an appointment to the position. Tasks of the Executive Officer shall include, but not limited to, the following:
 - (a) At least 60 days prior to the scheduled hearing for the appointment, issue a notice announcing the vacancy and that the Commission is accepting applications for the position. The notice shall be posted at the LAFCO office and on its website, sent to all local agencies, and published in a newspaper of general circulation in Napa County.² The notice shall indicate if the incumbent is eligible for reappointment.
 - (b) Determine the filing period to receive applications for the position. All applications shall be made available to each city and county member on the Commission at least 14 days prior to the scheduled hearing for the appointment.
 - (c) If it becomes necessary for the Commission to cancel or reschedule the meeting at which the hearing for the appointment has been scheduled, the Executive Officer shall reschedule the hearing for the next regular meeting.
- 2) If the incumbent is eligible and has served no more than one four-year term, the Commission may direct the Executive Officer to schedule a public hearing to consider approving reappointment. Tasks of the Executive Officer shall include, but not limited to, the following:
 - (a) Issue a notice announcing the scheduled reappointment of the incumbent. The notice shall be posted at the LAFCO office and on its website and sent to all local agencies. The notice shall be posted at least 21 days prior to the hearing for which the reappointment has been scheduled.
 - (b) If it becomes necessary for the Commission to cancel or reschedule the meeting at which the hearing for the reappointment has been scheduled, the Executive Officer shall reschedule the hearing for the next regular meeting.

² For purposes of this policy, notice to local agencies is fulfilled by sending a copy of the notice to the clerk or secretary of the legislative body of each local agency in Napa County. Publishing in a newspaper of general circulation in Napa County shall be conducted by publishing, at minimum, a prominently placed display ad.

B) Mid-Term Vacancies

An appointment to fill an unexpired term for the position of Public Member or Alternate Public Member shall be preceded by posting a notice of vacancy. The notice will be posted at the LAFCO office and on its website and sent to all local agencies. The notice will be posted at least 21 days prior to the meeting at which time the Commission will consider taking action to fill the unexpired term. An appointment to fill an unexpired term will occur as follows:

- 1) Public Member: If the position of Public Member becomes vacant prior to the expiration of the term, it is the policy of the Commission that it may fill the unexpired term through one of the following:
 - (a) Appoint the Alternate Public Member.
 - (b) Fill the position in the manner prescribed in Section V(A) “New Term for Public Member or Alternate Public Member” for the appointment of the Public Member to a new term.
- 2) Alternate Public Member: If the position of Alternate Public Member becomes vacant prior to the expiration of the term, it is the policy of the Commission that it may fill the unexpired term in the manner prescribed in Section V(A) “New Term for Public Member or Alternate Public Member” for the appointment of the Alternate Public Member to a new term.

C) Conducting Public Hearings for Appointing a Public Member or Alternate Public Member

It is the policy of the Commission that a public hearing to appoint either the Public Member or Alternate Public Member shall be conducted as follows:

The Chair shall open the public hearing and first invite candidates to address the Commission. The Commission may ask questions of the candidates. The Chair shall then invite public comments from the audience. Upon the close of the public comment period, the Public Member or Alternate Public Member will be selected based upon a motion and second followed by an affirmative vote.



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APPLICATION FOR LAFCO PUBLIC MEMBER

The Local Agency Formation Commission (LAFCO) of Napa County invites applications for the position of Public Member with an unexpired four-year term ending May 2, 2022. The Public Member actively participates in LAFCO meetings with respect to providing input and voting on all regulatory and planning matters before the agency.

Eligibility

Applicants must be a resident of Napa County. Applicants also must not be currently employed by a local public agency or serving as a member on a local public body with the authority to make final or advisory decisions relative to land use or municipal service.

Time Commitments

LAFCO currently meets on the first Monday of every even-numbered month unless otherwise scheduled. Regular meetings are calendared to begin at 2:00 P.M. Special meetings are calendared as needed. All members are expected to attend unless excused and receive a \$150.00 per diem for each regular, special, and subcommittee meeting attended.

Deadline for Applications

Applications must be received by LAFCO staff by **5:00 P.M. on Monday, March 1, 2021**. LAFCO is expected to consider making an appointment for the Public Member position at its April 5, 2021 meeting. Questions and emailed applications should be directed to Executive Officer Brendon Freeman at (707) 259-8645 or bfreeman@napa.lafco.ca.gov.

I. General Information			
a) Name:	Bruce	Bardessono	
	First	Last	
b) Address:		Napa	94558
	Street Address	City	Zip Code
c) Contact Information:			
	Phone Number	E-Mail	
d) Present Employer:	Self	Consultant	
	Employer Name	Employer Field	

II. Questionnaire (Applicants may use additional sheets to complete the following questions)	
a) Summarize your interest in serving on the Commission.	My daily life has been, since my youth, directly affected by thoughtful ongoing debate in planning and land My home has been at the interface of the Ag Preserve and a newly incorporated city, Yountville. As a farmer and farm manager employed throughout the valley during my career I understand the issues at the agriculture and urban boundaries of our communities as well as that of my neighbors in Napa where my wife and have our home. My interest is in seeing thoughtful decision making the valley has experienced continue and I am hopeful my knowledge base might contribute in that regard.
b) Summarize your qualification to serve on the Commission.	Professionally I've been employed as a manager within structures of family business, management for hire, international wine making corporations and investment modeled vineyard development projects. I am also part of a family business. It is my hope the breadth of this experience, my background, education, and interest in the LAFCO Commission Seat will meet the requirements you are seeking.
c) List any formal education received beyond high school.	Bachelors of Science, University of California, Davis A.A. Napa College
d) List community activities and interests.	Rotary Club of Napa, Director Napa County Farm Bureau, Director Napa 20-30 Club, Past Active Cycle for Sight, Volunteer Cal Aggie Alumni Asso. Life Member National Eagle Scout Association, Life Member

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I. General Information
a) Name: First Last
b) Address: Street Address City Zip Code
c) Contact Information: Phone Number E-Mail
d) Present Employer: Employer Name Employer Field

II. Questionnaire (Applicants may use additional sheets to complete the following questions)	
a) Summarize your interest in serving on the Commission.	
b) Summarize your qualification to serve on the Commission.	
c) List any formal education received beyond high school.	
d) List community activities and interests.	

Letters of recommendation/reference are not required, but will be accepted and should be attached to the completed application at the time of submission.

LAFCO 2021 PUBLIC MEMBER APPLICATION
TOM GAMBLE RESPONSE TO QUESTIONS

Land use decisions in Napa County are unique and distinct from most other California counties. Long before it was fashionable, Napa valued its farmland, watersheds, open space, and compact cities deriving from these attributes. Simply put, residents of Napa County value our urban uses limited to urban areas and rural uses in unincorporated areas. Some cities value this so much, they have voted for fixed urban limit lines that can only be changed by a vote of the people. Of course, life is an imperfect compromise. We have some historic urban uses in rural areas, and urban islands of county lands surrounded by cities, all posing dilemmas and opportunities for LAFCO to assist in orderly development and play its part in helping both County and cities meet regional mandates.

As a third-generation resident living in the unincorporated area, and deriving a sustainable living from the land, I have a deep and abiding passion for the Ag Preserve and all the related land use measures that make Napa special. The biggest dilemma with Ag Protection is balancing these rural open space needs with housing needs. The need to make decisions that do not make it more difficult for County of Napa to balance farmland and open space preservation with the need for housing. Walkable, livable cities need density, and just as there is aversion to sprawl, there is often an initial aversion to increasing density within incorporated areas.

I believe my involvement with LAFCO would contribute a unique perspective. I would be the only member who lives and works in the largest portion of Napa County – the rural unincorporated area.

My decades of experience in advocating land use policies benefiting both livable cities, while preserving open space and farmland, have educated me on LAFCO's important role in this challenging decision-making process. Creating and sustaining both a farming and then a winemaking business from scratch has certainly trained me in the tradeoffs of hard decisions.

Beyond many environmental restoration efforts including a leading role in the Napa River Restoration effort, my wine business, Gamble Family Vineyards, has raised millions for charities over the last decade and privately assisted residents recover from earthquake and fire. When free time is available, I can be found enjoying the more than 100,000 acres of Napa County's public open space.

Bachelor of Arts English, emphasis in Agricultural History University of California, Davis & Los Angeles.



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I. General Information			
a) Name:	Eve	Kahn	
	First	Last	
b) Address:		Napa	94558
	Street Address	City	Zip Code
c) Contact Information:			
	Phone Number	E-Mail	
d) Present Employer:	Keller Williams Napa Valley	Real Estate Services	
	Employer Name	Employer Field	

II. Questionnaire (Applicants may use additional sheets to complete the following questions)	
a) Summarize your interest in serving on the Commission.	I was appointed as Alternate Public Commissioner in August 2019. Shortly after I attended the annual CALAFCO statewide conference which gave me a strong foundation of the roles, responsibilities, and activities of the local and statewide LAVCO organizations. Last year I volunteered to participate in the Outreach Committee and have taken an active role representing LAFCO on county and city issues. The unexpected resignation of the Public Commissioner has provided an opportunity for me to expand my involvement and participation.
b) Summarize your qualification to serve on the Commission.	For 20+ years I have been engaged in preventing sprawl and promoting slow, smart, and sustainable growth. See my community interests below. In the past few months I have been proactive to engage and encourage input to Countywide MSR. I initiated discussions regarding the City of Napa's unincorporate island annexation and participate in the City of Napa's General Plan update.
c) List any formal education received beyond high school.	BA Mathematics State University of NY at Oneonta MA Mathematics/Education State University of NY at Albany California licensed realtor 2001- current
d) List community activities and interests.	Citizen Activist Leadership Napa Valley Class 17 Chair, Get a Grip on Growth and founding member of Napa Vision 2050 Member of Napa Housing Coalition Recording Secretary Congregation Beth Shalom Board of Trustees North Bay Association of Realtors - Local Government Relations council and chair of scholarship committee.

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I. General Information			
a) Name:	Kenneth	Leary	
	First	Last	
b) Address:	Street Address		Zip Code
	City		
c) Contact Information:	Phone Number		E-Mail
d) Present Employer:	Retired	N/A	
	Employer Name	Employer Field	

II. Questionnaire (Applicants may use additional sheets to complete the following questions)	
a) Summarize your interest in serving on the Commission.	I understand that community values and land use are important factors affecting the decisions that lead to the determinations Napa LAFCO makes to ensure current and future community needs are met by their governing agencies and municipal service areas. Furthermore it is with this understanding the preservation of ag lands is a community value and the provision of services in the county are delivered by governing agencies and municipal service areas. They are often seen as competing interest I see them as what makes Napa a great place to live and I want to work so neither unnecessarily restrains the other.
b) Summarize your qualification to serve on the Commission.	Former LAFCO commissioner serving in the following: Chair, City Representative and Alternate; Past member WICC. City Re; Former Public Member Touro University of California’s Bio Safety Committee; Two terms American Canyon City Council. I have a passion for community services and it is reflected in my 35 plus years of municipal service with the following governing agencies; Community Services Director Town of Yountville, Twenty-seven years increasing in responsibilities which included facility management, staffing/supervision, budgeting and program management.
c) List any formal education received beyond high school.	MPA: Public Policy, California State University Eastbay (1975) BS: Recreation and Leisure Studies, California Hayward (2000) Certificate in Graphic Design: University of California Berkeley Extension (1991)
d) List community activities and interests.	Former member and Past President of the Kiwanis Club of Yountville Current member and former Board Member of the Kiwanis Club of American Canyon Current Kiwanis Advisor to the American Canyon High School Key Club a service organization Life member of the American Canyon Community Parks Foundation Member American Canyon Arts Foundation Member and supporter of America’s National Park Associations just to name a few: Yosemite Conservancy, Lassen Park Assoc, Grand Canyon Conservancy, California State Parks Foundation

Letters of recommendation/reference are not required, but will be accepted and should be attached to the completed application at the time of submission.

From: [Geoff Ellsworth](#)
To: [Freeman, Brendon](#)
Subject: Letter in support of Ken Leary for LAFCO public member
Date: Monday, February 22, 2021 5:55:45 AM

[External Email - Use Caution]

Hi Brendon,

This letter is in support of Ken Leary being appointed as the public member on the Napa County LAFCO and I request for it to be included in the record and shared with the decision making body.

I have known and worked with Mr. Leary as a fellow Napa County elected official for the last 4 years and know Mr. Leary to be astute and fair in his considerations, and his appointment would allow an important continuity and institutional knowledge to remain with the board. Ken has been committed to community service both as an elected official and as a local resident and citizen on cross-jurisdictional issues such as infrastructure, water administration, racial & social equity and it would be an incredible asset to have him remain on the board as the public member.

Best,
Geoff Ellsworth



February 15, 2021

TO WHOM IT MAY CONCERN:

I am writing to recommend **Kenneth Leary** for the Public Member of the Napa County Local Agency Formation Commission (LAFCO).

I have known Ken for over 15 years and have seen firsthand his dedication to serving the Napa Valley. With a strong background in local government and community service, he is well qualified to serve as the public member. In addition, given the fact that he has represented American Canyon on LAFCO for the last four years, he will need no time to learn the duties of his office and already knows the current issues facing LAFCO.

I also believe appointing Kenneth Leary as the public member would demonstrate a commitment to diversity and ensuring all parts of the County are represented.

For these reasons and many more, I urge you to support his candidacy. He is the right choice.

Sincerely,

**Mark Joseph, Vice Mayor,
City of American Canyon**



From: Jim Wilson
Sent: Wednesday, February 17, 2021 10:42 AM
To:
Subject: LAFCO - Kenneth Leary recommendation for Public Member

Dear Marjie Mohler, Chair, LAFCO of Napa County,

I strongly encourage you to consider Kenneth Leary for the Public Member position you have open. As you know, Ken wants to return to LAFCO. I think you and other commissioners would be happy to see him return.

Ken is highly respected in the environmental community and will be able to serve from day one with no learning curve. His passion for our special place is also notable in his service on WICC and the CAC. While on LAFCO, he pressed for county-wide municipal services reviews. He is an outspoken advocate for environmental and social justice, having served in leadership capacities in Kiwanis Clubs and the American Canyon Citizens Academy, which he helped to create.

Kenneth Leary has the vision and political courage to serve the public well. Please allow him to continue to serve us as the LAFCO Public Member.

Sincerely,

Jim Wilson

From: Barry Christian
Sent: Friday, February 12, 2021 11:51 AM
To: Kenneth Leary
Subject: Re: LAFCO Public Member Seat Recommendation

To whom it may concern:

I would recommend Mr. Kenneth Leary for service on the LAFCO Board.

I have known Mr. Leary for 10 or more years in a number of capacities.

Mr. Leary served as elected City Council Member for City of American Canyon for a number of terms.

Mr. Leary served on the Board of WICC (Watershed Information and Conservation Council) for County of Napa.

Mr. Leary also served as Advisor to the Key Club in American Canyon, participating in many public service activities.

During the fire emergencies in Napa County, Mr. Leary volunteered many hours supporting the community.

In all my interactions with him, Mr. Leary has acted honorably, reasonably, insightfully, and with great care and compassion, including generosity of personal effort, in service to the residents of American Canyon and Napa County.

I believe Mr. Leary's participation on the LAFCO board would be a benefit to the residents of the Napa Valley.

Thank you,
Barry Christian



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I. General Information			
a) Name:	Nicholas	Van Male	
	First	Last	
b) Address:			
	Street Address	City	Zip Code
c) Contact Information:			
	Phone Number	E-Mail	
d) Present Employer:	Retired Attorney	Gaw Van Male, Law	
	Employer Name	Employer Field	

II. Questionnaire (Applicants may use additional sheets to complete the following questions)	
a) Summarize your interest in serving on the Commission.	I am a long time resident of Napa County and have a continuing interest in land use. I would like to apply my conflict resolution skills to the competing needs for housing, appropriate winery usages, transportation alternatives and the URL.
b) Summarize your qualification to serve on the Commission.	I served as vice-chair of the St. Helena Planning Commission. My law practice included extensive appearances dealing with land use issues in Napa County and all of its cities. I have dealt with issues involving winery permit approval (and disapproval), the Airport Specific Plan, traffic impacts, boundary disputes and inverse condemnation. I have authored legislation which became law. I am the immediate past Chair of the Board of Paradise Valley Estates, a Continuing Care Retirement Community with responsibilities for completing the \$200,000,000 expansion of the current campus located in Fairfield.
c) List any formal education received beyond high school.	BA University of California, Berkeley Navy Officer Candidate School JD University of California, Davis Navy War College, D.C. CAPTAIN, USNR-ret.
d) List community activities and interests.	Past president of Napa Bar Association, Legal Aid, Napa Valley Velo Bicycle Club, past member St. Helena Rotary and current member of the Fairfield-Suisun Rotary, Life member of Cal Aggies Alumni Association, Marines Memorial Association, former member of the NorthBay Bioethics Committee and the Fairfield Community Services Foundation (Citizen of the year 2008). Past National Masters and Nor Cal Cycling Champion and US Pan American Games Team member.

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LAFCO currently meets on the first Monday of every even-numbered month unless otherwise scheduled. Regular meetings are calendared to begin at 2:00 P.M. Special meetings are calendared as needed. All members are expected to attend unless excused and receive a \$150.00 per diem for each regular, special, and subcommittee meeting attended.

Deadline for Applications

Applications must be received by LAFCO staff by **5:00 P.M. on Monday, March 1, 2021**. LAFCO is expected to consider making an appointment for the Public Member position at its April 5, 2021 meeting. Questions and emailed applications should be directed to Executive Officer Brendon Freeman at (707) 259-8645 or bfreeman@napa.lafco.ca.gov.

I. General Information			
a) Name:	Alton	Weeks	
	First	Last	
b) Address:		Napa	94558
	Street Address	City	Zip Code
c) Contact Information:			
	Phone Number	E-Mail	
d) Present Employer:	Think Ahead	IT Consulting Firm	
	Employer Name	Employer Field	

II. Questionnaire

(Applicants may use additional sheets to complete the following questions)

<p>a) Summarize your interest in serving on the Commission.</p>	<p>I was born and raised in the Napa Valley, and with the exception of a few years, have always called this my home. To many, Napa is a glamorous destination but Napa has a very diverse population. Growing up here, I know families from all ends of the social and economical spectrum. More specific to this commission, I live in a modest 3 bedroom home that resides within an unincorporated pocket of Napa County that is 100% within city limits. Many people within my neighborhood like being in the county and feel there is benefit to it. I'd like to represent them, and learn more about the pro's and con's of being incorporated into the city. I feel I can share with the commission my neighbor's views, and communicate to my neighbors the pro's and con's of incorporation.</p>
<p>b) Summarize your qualification to serve on the Commission.</p>	<p>Over the course of my professional career in IT sales and as president and founder of a non-profit, I have developed many skills that I think will be beneficial to the commission. The most important of those being the art of compromise. When developing a solution you need to look at the challenges and needs of sometimes competing groups. Mutually beneficial solutions can only be found by listening to everyone's needs and concerns, and openly sharing those with all involved. As a member of the commission I would do just that. I would help the commission learn how people who live in pockets of the county feel about incorporation, and share with them any benefits incorporation would bring to them.</p>
<p>c) List any formal education received beyond high school.</p>	<p>I never received a formal college degree. However I attended Napa College for 3 years and Dominican University for a year. My major was in Music with a minor in Political Science. I have attended numerous technical trainings associated with my career. Amongst those was training in "ITIL". "ITIL" is a framework for developing roles and processes within an organization.</p>
<p>d) List community activities and interests.</p>	<p>I am founder and currently president of North Bay Air Cooled. A non-profit car club that raises awareness around the history and preservation of classic Volkswagens. We also hold an annual carshow fundraiser for the Boys and Girls Club.</p>

Letters of recommendation/reference are not required, but will be accepted and should be attached to the completed application at the time of submission.