



September 20, 2024

Jennifer McRae
Attn: National Old Growth Amendment
United States Department of Agriculture—Forest Service
1400 Independence Ave., SW
Washington, DC 20250-0003

Dear Jennifer McRae,

On behalf of undersigned 1247 members of the Theodore Roosevelt Conservation Partnership, thank you for the opportunity to comment on the National Old Growth Amendment Draft Environmental Impact Statement. As hunters and anglers who enjoy the vast acres of the National Forest System, we appreciate and support the USFS proposed action that includes management approaches that are complementary to wildfire risk reduction efforts, active restoration, and vegetation management projects while maintaining and restoring older forests on our National Forest System lands. As the agency develops a final policy, there are several key priorities and considerations below that we believe are crucial for the final policy to be both durable and effective.

- 1. Recognition of Active Forest Management:** There is broad agreement that active forest management is necessary in many forests across the country to reduce risks of uncharacteristic wildfire, optimize carbon outcomes, improve fish and wildlife habitat, and restore impaired ecosystem function. As a tool, active management is not a universal replacement for natural disturbances and neither active nor passive management are appropriate in all situations. For example, some temperate rainforests in the Pacific Northwest and Alaska that are not fire adapted may benefit from passive stewardship.
- 2. Flexibility in Management Practices, Local Decision Making:** The importance of flexibility within management practices must be emphasized, and a diverse suite of management tools should be utilized to ensure the health and sustainability of old growth forests. Local decision-making input is key for successful implementation, and we support the agency's management approach to develop locally driven and stakeholder involved adaptive management plans at the forest unit level to best implement projects that enhance old growth and other forest types.

3. **Complementing Wildfire Management Efforts:** we support the alignment of the NOGA process with the USFS Wildfire Crisis Strategy, recognizing the critical threat that wildfires pose to national forest ecosystems.
4. **Increase the Pace and Scale of Forest Restoration and Reduce Litigation:** Data from USFS Research Stations has found that the USFS should conduct vegetation management at much larger geographic scales to restore forest health and promote resilience of old forests as well as young, regenerating forests. Programs and agreements such as Keystone Agreements, Shared Stewardship Authority, Good Neighbor Authority, and the Water Source Protection Program have been instrumental in enhancing the pace and scale of managing healthy forest stands, benefiting wildlife habitat, and reducing fire risk to communities. The NOGA should complement programs such as these and should be designed in a way that will not create opportunities for additional litigation across our forests.
5. **Recognize the Importance of Other Forest Types:** Wildlife research documents how wildlife diversity is greatest where diverse forest types and ages are interspersed across landscapes, including young, middle-aged, mature, and old growth forests. We support policy and actions that recognize the importance of all forest successional states, young and old growth, and facilitate forest management to optimize carbon stewardship, wildlife habitat, and all co-benefits. Natural Range of Variation and Historical Range of Variation are useful forest planning tools to help managers understand old growth and mature forest characteristics and their variation across community types and geographic regions and should be included as a tool in the development of the *Adaptive Strategies for Old Growth Forest Conservation*.

In conclusion, the USFS Proposed Action offers a balanced and scientifically grounded approach to managing our nation's old-growth forests. It ensures that these forests remain resilient and sustainable for future generations while addressing current and future environmental challenges. The hunting, fishing, and conservation communities stand to benefit from the proactive stewardship and other management approaches outlined in this alternative.

Thank you for your consideration.

Respectfully,

Charles Tate
Boyne Falls, MI

Kevin Smith
Himrod, NY

Rhett Becker
Inver Grove Heights, MN

Brent Greninger
Carthage, MO

Michael Hellmuth
Bensalem, PA

Jon Maul
Aurora, IL

Dave Pope
Ravensdale, WA

Brent Kroll
Fife Lake, MI

Noel Willet
Montesano, WA

Richard Williams
Montrose, CO

Lori Thate
Denton, TX

Gail Dieleman
Plymouth, MN

Joel Webster
Missoula, MT

Steven Osa
Centennial, CO

Scott Hed
De Smet, SD

Michael Davis
Delano, MN

Randy Ollila
Kenosha, WI

James Potter
Fredonia, NY

Robert Richards
Saint Louis, MO

Warren Taylor
Granite City, IL

Frederick S. Lockwood IV
Watertown, NY

Harry Murray
Crestview, FL

Neils Wright
Eureka, UT

Thomas Skowronek
Erie, CO

Michael Keles
Crown Point, IN

Virgil Hill
Springfield, MO

Thomas Pruitt
Alder, MT

Gary Golladay
Kenton, TN

Mark Petersen
Poplar Grove, IL

Alfred Canino
Gulfport, FL

George Bogenschutz
Nunda, SD

Doug Finnman
Bellvue, CO

Richard Fish
Minneapolis, MN

Wilfred James
Saugus, MA

Michael Brewer
Novi, MI

Alan Menschner
Minotola, NJ

Joseph Delaney
Minooka, IL

John Carlen
Jonesville, SC

John Smedberg
Fond Du Lac, WI

Gregory Beucher
Oquawka, IL

Tim Smail
West Chester, PA

Clay Hamann
Vernal, UT

Tammy Scott
Littleton, CO

James Fields
Pacifica, CA

Michael Hoover
Millington, MI

Jeffrey Keir
Coeymans Hollow, NY

Barry Smith
Casper, WY

Ned Connelly
Clifton Heights, PA

Patrick Reedy
Loudon, TN

Kathy Mullins
Longmeadow, MA

Gene Odato
Landisburg, PA

Mark Herwig
White Bear Lake, MN

Mark Faroni
Dixon, MT

James Winnett
Woodward, IA

Stanley Steele
Corvallis, OR

Steven Inman
Demotte, IN

Troy Przekurat
Waukegan, IL

Matthew Radosevich
Fairfield, CA

Mark Rasmussen
Livermore, CA

Greg Singleton
Springfield, VA

Al Phelan
Madison, WI

Edward Kohler
Massapequa Park, NY

David Diekmann
Fort Collins, CO

Wayne Peterson
Polaris, MT

Jack Sturm
Soda Springs, ID

Chris Higgins
Johnson City, TN

Daniel Armstead
Glastonbury, CT

John Peters
Lincolndale, NY

Allan Dye
Marysville, WA

Brenton Scott
Littleton, CO

Donald Davis
Plattsmouth, NE

Glenn Buchter
Stevens, PA

Wesley Hamrick
Shelby, NC

Richard Cole
Springdale, AR

David Valle
Portola, CA

Kurt Merg
Cheney, WA

David Gregg
Bozeman, MT

Tom Sykes
Dolores, CO

Mark Sides
Saint Louis, MO

Alan Douglass
Atherton, CA

Charles Woodling
Fort Wayne, IN

Larry Habitz
Fenton, MI

Kristophor Timmons
Santa Rosa, CA

Jonathan Barton
Anderson, SC

Andrew Peterson
Saint Paul, MN

Steve Fry
Centreville, VA

Mark Henjum
Silverton, OR

Richard Grueter
Grass Valley, CA

Robert Gorecki
Eastpoint, FL

Robert Hamann
Putnam, IL

Richard Turner
Heber City, UT

Joseph Gramas
Pottstown, PA

Robert Watson
Kenockee, MI

Kevin Borst
Bend, OR

Howard Bradley
Bloomfield, NM

Robert Smith
Woodland, WA

John Bilotta
Annapolis, MD

Shawn Eckenrode
Fairfield, IL

Jeremy Olmscheid
Albany, MN

Jeff Riemer
Grafton, OH

Mark Kenyon
Hillsdale, MI

Loren Smith
North Platte, NE

Michael Dickinson
San Leandro, CA

Brian Leavy
Albuquerque, NM

Verlin Cross
Ashland, OR

Eric Ohmart
Jackson, WY

Bryan Cook
Gaston, OR

Paul Miles
Portland, OR

Cinda Gallitz
Gahanna, OH

Harvey Neese
Clarkston, WA

Dale Money
Badger, MN

Jodie Shafer
Ashley, OH

George Clements
Afton, MN

William Steiger
Willard, MO

Tristan Harner
Oley, PA

Brett Jones
Fruita, CO

Allen Hockaday
Casper, WY

Preston Larimer
Buena Vista, CO

Mark Hirschberger
Dubois, WY

Todd Twedt
Meridian, ID

Ted Hathaway
Midvale, ID

James Solomon
Missoula, MT

Shaun Pfund
Tucson, AZ

Michael Karbon
Ossining, NY

James Alexander
Laramie, WY

Jason Talley
Fruita, CO

John Eckler
Lakewood, CO

John Ferrera
Mill Creek, WA

William Elwell
Sheridan, WY

Bill Crumrine
Soldotna, AK

Kurt Simer
Minneapolis, MN

Sean Steinke
Houston, TX

Matthew Ross
Saratoga Springs, NY

Nathaniel Wallace
Rockville, MD

Pete Garland
Chattanooga, TN

Leonard Marcisz
Scottsdale, AZ

Mark Kaczmarek
Saint Paul, MN

Gayle A'Harrah
Doylestown, PA

Matt Gross
Ottawa, IL

Louis Gemma
Frazer, PA

Virgil Jones
Northport, AL

Phyllis Park
Chillicothe, OH

Tyler Brand
Seattle, WA

Dwain DePew
Carlyle, IL

James Anderson
Knoxville, TN

Gary Johnson
Oak Harbor, WA

David Liedlich
Southbury, CT

Robert Schneider
Chesterfield, MO

Dominic Corsini
Edinboro, PA

Edward Walsh
Aledo, IL

Timothy Mccarty
Red Bluff, CA

Mark Pantuso
Roswell, NM

Greg Stone
Palos Heights, IL

Murray Smith
Tenino, WA

Gregory Biech
Waupun, WI

William Crawford
Libby, MT

Jeff Bingham
Syracuse, UT

Garrett Mann
San Diego, CA

Gregory Sipla
Stevens Point, WI

Karen Spurr
Warrenton, VA

Nicholas Singleton
Houston, TX

Nan Stevenson
Saint Paul, MN

William Lehmann
League City, TX

Michael Bruce
Granite Bay, CA

Bonnie Nelson
Menifee, CA

Duane Nascimento
North Bend, WA

Dolores Wetzel
Alburtis, PA

Harry Gerecke
Vashon, WA

John Sharba
Romeo, MI

Danny Branch
Reno, NV

Robert Woods
North Hollywood, CA

Andrew Elkins
Salt Lake City, UT

Robert New
Rutland, VT

Carolyn Haupt
Alexandria, VA

Teresa Fleener
Burien, WA

Kevin Rustowicz
Grand Island, NY

Patricia Rossi
Levittown, PA

Michael Renfrow
Portland, OR

Wayne Straight
Street, MD

Warren Digness
Truckee, CA

Jeffrey Thomas
Lebanon, IN

Carol Shelton
Bedford, TX

Carol Metzger
Wisconsin Rapids, WI

Michael Broome
Beaver Dam, WI

Todd Petersen
Ogden, UT

Michael Galliher
Muncie, IN

Stevan Brown
Cumberland Foreside, ME

Kim Zwicker
Lynn, MA

John Richkus
Jersey City, NJ

James Mosher
Thurmont, MD

Christopher Anderson
Brownsburg, IN

Frank Thacker
Ironton, OH

Kristen Tripp
Bozeman, MT

Pam Nolan
Wilton Manors, FL

Mercedes Lackey
Claremore, OK

Brent Taft
Sandia Park, NM

Elliott Shanklin
Schenectady, NY

Tom Waters
Louisville, KY

Loren Skow
College Station, TX

Deborah Toppings
Newport, TN

Beverly Mitchell
Boise, ID

Christopher Laird
Reedville, VA

Gary Petruska
Boise, ID

Barry Bennett
Fayetteville, AR

Jack Whitney
Brush Prairie, WA

Juanita Montano
Kenosha, WI

Brice Medin
Colfax, WI

Rusty Smith
Lakeside, MT

Dave Colavito
Rock Hill, NY

Jack Keller
Los Fresnos, TX

Tyler Lebard
Scio, OR

Larry Shaw
Cory, IN

Celio Enriquez
Lake Hughes, CA

Tyler Childs
Fort Myers, FL

Thomas Ohns
Maumee, OH

Christopher Todd
Springfield, MA

Troy Bauer
Chippewa Falls, WI

Rick Price
Bremen, GA

Rene Blanc
El Cajon, CA

Mark Johnsen
Redlands, CA

Greg Garner
Reno, NV

Jodie Provost
Valley City, ND

John Lugar
Marshall, IL

Mark Rehbein
Miami, FL

Shawn O'Connor
Greeley, NE

Thomas Seever
Austin, TX

Chad Plumly
Atlanta, GA

Cliff Laughlin
Boise, ID

Jim Taylor
Columbia, SC

Doug Smentkowski
Jefferson City, MO

Harvey Reading
Shoshoni, WY

Dwayne Johnson
Cody, WY

Barry Bartels
Villard, MN

Rob Hinkle
Riverton, WY

John Nordin
Lake Forest, IL

Robert Sanders
Salem, SC

Darren Sullivan
Spring, TX

Alan White
Missoula, MT

Luke Schultz
Cora, WY

Joshua Zimmerman
Marshalls Creek, PA

Nathan Kettner
Monument, CO

Erik Heggland
Coeur D'Alene, ID

Charles Monson
Minot, ND

Doug Dunkle
Pecos, NM

Carl Barner
Auburn, WA

Thomas McCarthy
Missoula, MT

Kris Strate
Fairview, UT

Dave Furman
Jericho, VT

Thomas Rinda
Saint Petersburg, FL

Brian Moran
Marysville, MI

Mark Beilfuss
New London, WI

Curt Engels
New Hope, MN

Curtis Darrah
New Iberia, LA

Dane Hammond
Washougal, WA

Dillon Lamping
Scappoose, OR

Chaz Harter
Hampton, VA

Jeffrey Knaub
Idaho Falls, ID

Martin Jaqua
Portland, OR

David Burgess
Aurora, CO

Adam Cotchen
Johnstown, PA

George Pitsakis
Pedricktown, NJ

Josh Krafka
Two Harbors, MN

Michael Kroenke
Hales Corners, WI

Brock Wahl
Bismarck, ND

Bruce Wade
Mount Vernon, WA

Kevin Montague
Dallas, OR

Terrence Grimm
Bellevue, NE

Colin Pahl
Denver, CO

Andrew Mumford
Red Bank, NJ

Shane Norell
Columbia, MO

Susan Lobonc
Naperville, IL

Mickey Reves
Little Elm, TX

Rick Winter
Saxonburg, PA

Steven Lindquist
Broomfield, CO

Steve Lindow
Ponsford, MN

Michael Handforth
Parks, AZ

Joseph Jurgelonis
Debary, FL

Dana Sewall
Gresham, OR

Erik Bullock
Murphy, ID

Dave Roehm
Ocean Park, WA

Scott Cowee
Littleton, CO

Colleen Grant
Eden Prairie, MN

Gregory Chandler Jr.
Huntsville, AL

Brad Sanders
Washoe Valley, NV

Gary Funk
Greeley, CO

Curtis Mason
Prineville, OR

Kurt Kremers
Springfield, OR

Randolph Holford
Greenwood, AR

Anthony Casucci
Apollo Beach, FL

Alexander Franz
Grosse Pointe Farms, MI

Evan Brown
Thomasville, GA

Joel Meeks
West Jordan, UT

Logan Brudenell
Boise, ID

Bradley Smith
Marietta, OH

Donna Crane
Anderson, CA

Wayne Smith
Grawn, MI

Tyler Bivins
San Tan Valley, AZ

Patrick Bennett
Saint Jacob, IL

David Saveikis
Seaford, DE

Zachary Markham
Westfield, IN

Paul Hopkins
Norwalk, OH

Jonathan Holliday
Kearney, NE

Antonio Coniglio
Bellingham, WA

Robert Coet
Pueblo, CO

Noah Davis
Tyrone, PA

Ryan Viers
Rockport, WA

Gregson Gabrio
Los Angeles, CA

Woodrow Albin
North Kingstown, RI

Ryan Steptoe
Apo, AE

Glen Gilliam
Spring, TX

Joshua Miller
Newville, PA

Sam Demarais
Fargo, ND

Todd Eubank
Trafalgar, IN

Andrew Vincent
Pocatello, ID

Jacob Merrow
Inverness, FL

Dylan Baxter
Denver, PA

Jordan Hind
Gardner, KS

Damon Graham
Westfield, IN

Jordan Taraschuk
Auburn, PA

Carl Mozeleski
Scott Township, PA

Stu Boren
Florence, WI

Dale Bennett
Rowlesburg, WV

Jon Boosinger
Sioux Falls, SD

Aaron Lingwall
Wellington, CO

Julian Torres
Oceanside, CA

Michael Seppamaki
Lakeville, MN

Ryan Leonard
Richmond, VA

David Bess
Wilton, CA

Andrew Martin
Vestavia Hills, AL

John Bunting
Hopewell, NJ

Troy Kirby
Ventura, CA

Hunter Pauling
Peoria, AZ

Charles Fiorillo
Townsend, DE

Todd Sytsma
Alto, MI

Chris Stoterau
Hermosa, SD

Rodney Brown
Williston, ND

Grace Silva
North Hollywood, CA

Robert Shosted
Mesquite, NV

Logan Medeiros
Ashland, OR

Larry Cahoon
Livingston, MT

Frederick Fillmore
Marana, AZ

Lee Ulshoffer
Littleton, CO

Phyllis Chavez
Santa Monica, CA

Scott Kearns
Damascus, OR

Patrick Costello
Bozeman, MT

Maurilio Maldonado Jr.
Ontario, CA

Alan McDonald
Norton Shores, MI

Ken Porter
Kansasville, WI

Andrew Shipley
Larchmont, NY

Joshua Althouse
Mohnton, PA

Randy Byers
Cheyenne, WY

John Jones
Lovelock, NV

Scott Houle
Springfield, NH

Lewis Lange
Baraboo, WI

Samuel Rosenau
Lincoln, NE

Stacy Goldschen
Gurnee, IL

Matthew Meade
Kieler, WI

Julie Hansen
Freeman, SD

Johnathan Dykstra
Roscoe, IL

Kathy Winterburn
Littleton, CO

Bruce Cratty
Akron, OH

Lewis Ward
Newfield, NY

Matthew Wilkins
Camarillo, CA

Richard Ferrara
Brookfield, CT

Aaron Cline
Clovis, NM

Desiree Quintanilla
Springfield, MO

Clint Frady
Reno, NV

George Harkness
Manteo, NC

Anthony Vinciguerra
Canton, MA

Tate Anderson
Murray, UT

Robert Mowen
Clear Spring, MD

Kevin Walsh
Madison, CT

Edward Staheli
Lansing, IA

Ernest Mellon
Southampton, NJ

Les Lockhart
Heiskell, TN

Mary Skirving
Franklin, TN

Michael Vernon
San Antonio, TX

June Esposito
Sparks, NV

Karl Findling
Bend, OR

Connie Raper
Rougemont, NC

Daniel Figured
Olyphant, PA

Brian Gingras
Braintree, MA

James Cesario
Longs, SC

Marilee Corey
Salem, OR

Douglas Broom
Fort Worth, TX

Kim Hoffman
New Port Richey, FL

Sean Lewis
Castle Rock, CO

Darlene Schenck
Oak Ridge, TN

Andrew Gibbons
Denton, TX

James Bradley
Ellijay, GA

Cameron Law
Kalispell, MT

Brian Hidden
Klamath Falls, OR

James Bumgarner
Osawatomie, KS

Linda Pawloski
Peoria, AZ

Helen Greer
Tucson, AZ

Carl Aune
Tucson, AZ

Anthony White
North Vernon, IN

Jim Harvey
Broken Arrow, OK

Mark Tilburt
Debary, FL

Jonathan Schmaltz
Houston, TX

Brant MacDuff
Brooklyn, NY

Ernie Hughson
Sun Valley, NV

Marcia Sliwinski
Buffalo, NY

Benjamin Stout
Wabash, IN

Chad Fuqua
Houston, TX

Wes Cline
Watertown, TN

Taylor McGarrigle
Black Diamond, WA

Jacob Cheek
Oakdale, CA

Cathy Chapman
Kansas City, MO

Nancy Porcino
Commack, NY

Shannon Kiehn
Woodburn, OR

Jacob Pickett
Oakville, CA

Jamie Lurtz
Las Vegas, NV

Dan Smith
Hayden, ID

Karen Larsen
Delano, MN

Patricia Poole
Lake Isabella, MI

Yolanda Walsh
Ottawa, KS

Adam Sapp
Albuquerque, NM

Tina Godlove
Meridian, ID

David Coulter
Clark, CO

Stone Miller
Indianapolis, IN

Richard Casey
Fort Collins, CO

Richard Tamblyn
Vero Beach, FL

Dave Peterson
Pentwater, MI

Daniel Montgomery
Lakehurst, NJ

Jacob Hansen
Eau Claire, WI

Joshua Restad
Davis, CA

Pat Gilliland
Denver, CO

Larry Proffer
Memphis, TN

Joseph Bucci
Steamboat Springs, CO

David Eastman
Greeley, CO

Jeremiah Harkins
Grafton, NH

Robert Moore
Wake Forest, NC

Pearl Baenchantha
Las Vegas, NV

Tyler Van Brunt
Portland, OR

Frank Clause
Almont, CO

Kelly young
Redford, MI

Martin Burns
Grand Junction, CO

Michael O'Connor
Keego Harbor, MI

Nancy McLaughlin
Naples, FL

Stuart Taylor
Winston Salem, NC

Joshua Hoffman
Columbus, OH

Jennifer Adams
New Port Richey, FL

Jeanine Mielke
Columbia, MO

Stephanie Franklin
Aurora, CO

Richard Smith
Rexburg, ID

Chris Aldrich
Worcester, MA

John Dalla
Las Vegas, NV

Chad Kaili
Sandy, OR

Scott LaCosse
Arlington Heights, IL

Francis Gajewski
Jersey City, NJ

David Cencula
Fairport Harbor, OH

Michael Peterman
Parker, CO

Karen Leifker
Nine Mile Fls, WA

Rick Lewis
Cloverdale, CA

Bradley English
Santa Cruz, CA

Kathy Kane
Oak Forest, IL

Beth Larson
Chandler, AZ

Jeffrey DeCristofaro
Asheville, NC

Jacob Mannix
Nome, AK

Rachel Gorlin
Washington, DC

Lisa Graham
Madison Heights, MI

Angie Heide
Portland, OR

James Gleason
Brooksville, FL

Robert Bergan
Pottsville, PA

Geraldine Card
Exeter, CA

Deanne Dzikowski
Scherverville, IN

Geoff Regalado
Burbank, CA

Deborah Crump
Florissant, MO

Sam Simeone
New Orleans, LA

Lisa Maccaro
Odessa, NY

Jeff Montejo
Menifee, CA

Alexander Carlson
Spotsylvania, VA

Scott Olszowy
Schenectady, NY

Michael Quontamatteo
Martinez, CA

Marian Griffith
Hughesville, PA

Rae Lynn Boyer
Milford, VA

Sara Gann
Fairfax, VA

James Goodhart
Newburyport, MA

Philip Gagnon
Aptos, CA

John Eckler
Lakewood, CO

Carl Stapler
Evanston, WY

John Hunter
Lake Stevens, WA

Jim Loveland
St Petersburg, FL

Kris Gata
Redondo Beach, CA

Scott Hess
Harper Woods, MI

Ericka Abrams
Aurora, CO

Lynn Murphy
Tucson, AZ

Dan Showalter
Redding, IA

Shauna Henry
McMinnville, OR

Lance Feher
Pleasant Grove, UT

Scott Anderson
Owatonna, MN

Matthew Gross
Dickinson, ND

Scott Lincourt
Manchester, VT

David Van Sant
Minneapolis, MN

Koi Woodson
Livingston, MT

Erik Castello
Fort Collins, CO

Salissa Chavez
San Tan Valley, AZ

Patti Blevins
Phillips, ME

Dean Borgeson
Crosslake, MN

Todd Beasley
Columbia, SC

John Alcott
Scottsdale, AZ

Robert Smith
York, PA

Jacob Peacock
Denver, CO

Jeremy Meshew
Gobles, MI

Stephen Johnston
Moab, UT

Jason Gonzales
Milwaukee, WI

Derek Tomczik
Wausau, WI

Bryan Duff
Plain City, OH

Clyde Smith
Henrietta, TX

Chelsea Kilpack
Riverton, UT

Greg Frick
La Crosse, WI

Elisa Townshend
Denver, CO

Thomas Berg
Green Bay, WI

Alex Davie
Cumming, GA

Erik Bute
Pembina, ND

Susan McTigue
Countryside, IL

Carolina Morgan
Missoula, MT

Paul Brunhuber
Franklin Square, NY

Chris Gukeisen
Pierre, SD

Joshua Belder
Holland, PA

Aaron Miller
Red Bank, NJ

Tracy Kanno
Cranston, RI

Joseph Googe
Knoxville, TN

Gregory Goltz
Durango, CO

Dean Waters
Nampa, ID

James Brandenburg
Bentonville, AR

Steven Prochoroff
Sebastian, FL

Eric Lomas
Castle Rock, CO

Sawyer Cunningham
Starksboro, VT

Darlene Falk
Boone, NC

Julie Roedel
Saint Louis, MO

David Tetrick
Portland, OR

Victor Calamaro
Rochester, NY

Matthew Middleton
Saint Charles, MO

Jeremiah Harris
Orofino, ID

Joseph Fansler
Terrebonne, OR

Shawn Kennedy
Sandy, UT

Trent Grandy
West Jordan, UT

Sharynn Blood
Janesville, CA

Gerald Blankenau
Omaha, NE

Thomas Augustine
Fairview Park, OH

Tammie Steidinger
Lehighton, PA

Michael Wahl
Waynesboro, VA

Todd Craig
Rapid City, SD

Stewart Engel
Abilene, TX

Chris von der Lieth
King Of Prussia, PA

Ryan Boll
Sheboygan, WI

Herbert Brin
Terrell, TX

Michael Beckner
Livonia, MI

Edward Gerlach
Etna, WY

Damon Franklin
Marion, IA

Robbie Hemmer
Little Rock, AR

John Kalinowski
Rio Dell, CA

Shawn Sargent
West Yarmouth, MA

Richard Kula
Enfield, CT

Christopher Reiger
Santa Rosa, CA

Darryl Eason
Marrero, LA

Rich Speer
Wexford, PA

Sheila Malone
Las Vegas, NV

Jole Lheureux
Chesterfield, MI

Colonel Meyer
North Port, FL

Jordan Hayes
Camden, SC

Michele Sabo
Waterford, MI

Wanda Anthony
Weaver, AL

Jerrilynn Titsworth
Sarasota, FL

Tammy Lettieri
Coconut Creek, FL

Matthew Hall
Lexington, KY

Linda Francisco
Oak Park, MI

Michelle Thomas
Lake Geneva, WI

Caleb Nippert
Annville, PA

Tammy Bullock
Ramona, CA

Janice Lacotta
Tucson, AZ

Tamara Lukachy
Henderson, NV

Barbara Abraham
Leominster, MA

Jean Ross
Minneapolis, MN

Adam Wood
Lake Forest, CA

Ronald Woods
Phoenix, AZ

Robert Ripley
Sutter, CA

Keynan Hobbs
El Cajon, CA

Rona Rosen
Philadelphia, PA

Ruth Quinones
Brooklyn, NY

Joseph Hyland
Council Bluffs, IA

Tiffany Marsh
Midway, KY

Jeffrey Buring
Germantown, NY

Chantal Eldridge
Austin, TX

Chris Gardner
Las Cruces, NM

Matthew Slade
Durand, IL

Katarina Spelter
Madison, WI

Jess Bradley
Penrose, NC

Roy Anderson
Fruita, CO

Elizabeth Gifford
West Roxbury, MA

Julie Brickell
Anaheim, CA

Kim Froehlich
Waukegan, IL

Katja Kirsch
Weatherford, TX

Michele Bouchard
Waterville, ME

Larry Jenkins
North Richland Hills, TX

Randi Byron
Avon, CT

Michael Hinshaw
Inkster, MI

Andrew Rees
Redmond, WA

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Bend, OR

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Pittsburgh, PA

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Lowville, NY

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Covington, LA

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Waldorf, MD

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Hickory, NC

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Sumter, SC

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Topanga, CA

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Leonardtown, MD

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Fort Myers, FL

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David Blake
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Michael Chapdelain
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Les Ruhs
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Sioux Falls, SD

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Norfolk, VA

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Bay Shore, NY

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New Windsor, MD

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Brookfield, IL

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Carrollton, TX

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Fort Lauderdale, FL

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Eagle Point, OR

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Hillsboro, ND

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Carpentersville, IL

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Trabuco Canyon, CA

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Northridge, CA

Ann-Marie Christopher
Pittsburgh, PA

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Minneapolis, MN

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Woodbridge, VA

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Sierra Vista, AZ

Michelle Dust
Highland, IN

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Pottstown, PA

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Lincoln, NE

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San Diego, CA

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Richardson, TX

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Bay Village, OH

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Yonkers, NY

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Columbia Falls, MT

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Pamela Bielma
Ritzville, WA

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Camarillo, CA

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Oro Valley, AZ

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Lake Forest Park, WA

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Winder, GA

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Canyon Lake, TX

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Parks, AZ

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Missoula, MT

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Powell, WY

Chris Gray
Dover, DE

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Wilmington, DE

Derrick McCallister
Akron, OH

Ron Hyer
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North Logan, UT

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Raleigh, NC

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Homer, AK

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Eagle River, AK

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Christiansburg, VA

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Romney, WV

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Whitehall, WI

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Wittenberg, WI

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Juneau, AK

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Dyess Afb, TX

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Golden, CO

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Adel, IA

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Boulder, CO

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Barbourville, KY

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Len Fortunato
Cody, WY

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Broadway, VA

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Boise, ID

Otto Jose
Centennial, CO

Nick Hayes
South Hadley, MA

Paul Lithgow
Pagosa Spgs, CO

Joseph Schueler
Boise, ID

Davie Parten
West Fork, AR

Bruce Oliver
Boise, ID

Edmund Chinchar
Ridgeland, MS

Morgan Harrell
Columbia, SC

Michael Miller
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Kenneth DeGraaf
Emigrant, MT

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Norman Hoppas
Anchorage, AK

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Paguete, NM

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Mayfield Hts, OH

Aaron Misenheimer
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Al Niebel
Manheim, PA

Easton Hess
Fort Collins, CO

Aaron Jantz
Columbus, MT

Peter Lehmann
Jamesport, NY

Benjamin Hunt
North Pole, AK

Robert McQueen
Missoula, MT

Sean Byrne
Pagosa Springs, CO

Scott Boggs
Carnation, WA

Robert Prather
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Bowerston, OH

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Kurt Stuckwisch
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Muncy, PA

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Chase Lawhorn
Vinton, VA

Greg Harris
Jonestown, PA

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Bethlehem, PA

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Ryan Indergand
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Parshall, CO

Dennis Mahony
Show Low, AZ

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Spartanburg, SC

Christopher McCullough
Novelty, OH

Rod Emery
Chandler, AZ

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Galesville, WI

Brad Hageman
Akron, CO

Kevin Mangan
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Brendan Mason
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Mark Stephanz
Albuquerque, NM

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Pulaski, NY

Rob Somers
Manor, TX

Rob McMahon
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Anchorage, AK

Barbara Feiss
Syracuse, NY

Jamie Walton
Bozeman, MT

Michael Larson
Eau Claire, WI

Jack Brothers
Anchorage, AK

Christopher Bartine
Sonoita, AZ

Sheila Dufford
Fairbanks, AK

Jarad Luchka
North Scituate, RI

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Woodland, CA

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Salem, OR

Larry Lundberg
San Jose, CA

Christine Johnson
Burlington, WI

Gary Bell
Oregon City, OR

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Lawrenceville, GA

Gregory Wade
Atlanta, MI

Paul Middleton
Beaumont, TX

Harold Lee
Glendale, AZ

TJ Brooks
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Jeremy Brown
Sandpoint, ID

Scott Pajer
Mason City, IA

Logan Watkins
Cashion, OK

Kim Miceli
Newark, OH

Dris Abraham
Marathon, TX

Michael Reed
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Chris Casner
Dallas, TX

John Conroy
Tigard, OR

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Neptune, NJ

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Estacada, OR

Kathy Bell
Oregon City, OR

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Ridgeland, MS

Rawlins Gray
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Coalport, PA

Lauren White
Boulder, WY

Joseph Lipuma
Nantucket, MA

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Wayland, NY

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Little Rock, AR

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College Station, TX

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Flagstaff, AZ

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Miami, FL

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Knoxville, TN

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Eaton, IN

Alison Fuchs
Hillsboro, OR

Julie Gauman
Albuquerque, NM

Marvin Weger
Prineville, OR

Mervin Knotts
Falling Waters, WV

Samuel McGlone
Oxford, MS

Ethan Halbert
Garden Valley, CA

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Aiken, SC

Rex Hancock
Alachua, FL

Walter Mallett
Port Richey, FL

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Newville, PA

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Lompoc, CA

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Placitas, NM

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Sunnyvale, TX

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Hooksett, NH

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Arcadia, FL

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Bend, OR

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Summit, WI

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Louisville, KY

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Riverton, IL

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Wisconsin Rapids, WI

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Donalsonville, GA

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Hamilton, OH

Matthew Flory
Granite Falls, WA

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Silverdale, WA

Graham Bullmore
Kenosha, WI

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Lewis Center, OH

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Burke, VA

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Collegeville, PA

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Carbondale, CO

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Colorado Springs, CO

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Port Royal, PA

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Enterprise, AL

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Delray Beach, FL

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Johnson City, NY

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Bozeman, MT

Joey Knight
Gore Springs, MS

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Scio, OR

Larry Anderson
Noblesville, IN

Adam Kohler
Olustee, OK

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Spirit Lake, ID

Carl Walton
Sparks, NV

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Tucson, AZ

Michael Fostakowsky
Lake Balboa, CA

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Camas, WA

Tom Murtaugh
Park Rapids, MN

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Granite Falls, WA

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Sebastopol, CA

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Cloquet, MN

Collin Hildebrand
Grand Junction, CO

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North Fort Myers, FL

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Bentonville, AR

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Lawrence, KS

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Lovelock, NV

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Cloquet, MN

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Lakewood, CO

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Sacramento, CA

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Alvin, TX

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Wheatfield, IN

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Empire, MI

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Weston, WV

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Kintnersville, PA

Jason Brennell
Juneau, AK

Maryellen Fernbacker
Hicksville, NY

Brad Foster
Brookhaven, GA

Mathew Volkmer
Rossville, IN

Terry Robb
New Wilmington, PA

Marc Imlay
Bryans Road, MD

Jim Poling
Simpson, IL

David Crespo Jr.
Grayling, MI

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Thomasville, GA

Bob Habig
Lancaster, PA

John Coyne
Lords Valley, PA

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Murphysboro, IL

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Idabel, OK

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Corvallis, MT

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Masury, OH

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Harrisburg, PA

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Babcock, WI

Debra Barmichael
Phoenix, AZ

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Wisconsin Rapids, WI

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Lakeville, MN

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Saint Clair, MI

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Ridgefield, NJ

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Cleveland, OH

Marl Wilson
Boise, ID

Tim Border
Gallatin Gateway, MT

Paula Kay Roberts-Lindauer
Santa Rosa, CA

Brent Thomas Gurtek
Duluth, MN

Jeremy Barber
Bullard, TX

Kina Shepard
Arroyo Grande, CA

Adam Lichtman
Brooklyn, NY

Tim Paich
Long Beach Township, NJ

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Dallas, TX

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Oregon City, OR

John Leen
Chicago, IL

Deanne Dzikowski
Scherverville, IN

Gail H. Skinner
Tucson, AZ

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Westland, MI

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Salem, OR

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Plano, IL

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New Ulm, TX

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Garden City, NY

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Moir, NY

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Hudson, FL

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Tempe, AZ

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Fairfield, CA

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Henrico, VA

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Lakeville, MN

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Steamboat Springs, CO

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Novelty, OH

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Arrowsic, ME

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Hartland, WI

Diana Marie Centro
Cornelius, NC

Douglas E. Wilson
Little Deer Isle, ME

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East Syracuse, NY

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West Babylon, NY

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Bristolville, OH

Vinny Rusch
Schenectady, NY

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North Canton, OH

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Miami Shores, FL

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Eastpointe, MI

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Landrum, SC

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Lake Stevens, WA

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Goodyear, AZ

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Potosi, WI

Alan Cox
Tallahassee, FL

Mike Brown
Pueblo, CO

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Medford, OR

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North Mankato, MN

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Santa Fe, NM

Gary Gliwa
Bala Cynwyd, PA

Carolyn M. Teschic
Bayonne, NJ

Karen Delmonico
Cocoa, FL

Gary R. Crawford
Vancouver, WA

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Raleigh, NC

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San Diego, CA

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Milwaukee, WI

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Salt Lake City, UT

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Plaquemine, LA

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Boyd, MD

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St George, UT

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Buckeye, AZ

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Roanoke, VA

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Tonganoxie, KS

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Scottsdale, AZ

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Jeffersonville, IN

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Stuyvesant, NY

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Urbandale, IA

Juan Hernandez Garibay
El Paso, TX

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Campbellsville, KY

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Abbeville, SC

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Elmira, NY

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Hartsel, CO

Jim Chlubna
Roseville, MI

Timothy Hurley
Coeur D Alene, ID

Alice Imlay
Bryans Road, MD