

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
And Development Commission**

In the matter of,	)	<b>Order No. :</b>
	)	
Application of ConSol Home Energy Efficiency	)	EXECUTIVE DIRECTOR
Rating Services, Inc., for Certification as a	)	RECOMMENDATION TO
California Home Energy Rating System Program	)	CERTIFY CHEERS AS A
Provider for Field Verification and Diagnostic	)	PROVIDER FOR FIELD
Testing of Residential Newly-Constructed	)	VERIFICATION & DIAGNOSTIC
Buildings	)	TESTING
	)	
	)	February 8, 2013

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**I. Executive Summary**

The Warren-Alquist Act directs the California Energy Commission<sup>1</sup> to establish criteria for a statewide home energy rating system.<sup>2</sup> No home energy rating services may be performed in California unless they are certified according to the program established by the Commission.<sup>3</sup> The Commission's California Home Energy Rating System (HERS) Program regulations<sup>4</sup> establish requirements for home energy rating systems, for providers (including the providers' training and certification of raters), and for the Commission's certification of providers. A provider is an organization that administers a California HERS Program home energy rating system.<sup>5</sup>

I recommend that the Energy Commission certify ConSol Home Energy Efficiency Rating Services, Inc., (CHEERS) as a California HERS Program provider, authorized to administer, subject to the conditions described herein, the California HERS Program home energy rating system overseeing HERS Raters conducting its Field Verification and Diagnostic Testing on Residential Newly-Constructed Buildings. CHEERS acquired and is administering a California HERS Program home energy rating system that was previously certified to be administered by California Home Energy Efficiency Rating Services, Inc., and has addressed deficiencies previously identified with that program. That entity was also known as CHEERS, but the name and other assets have been acquired by ConSol Home Energy Efficiency Rating Services, Inc.

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<sup>1</sup> Also known as the State Energy Resources Conservation and Development Commission. See Pub. Resources Code, § 25200.

<sup>2</sup> Pub. Resources Code, § 25942, Section (a).

<sup>3</sup> Pub. Resources Code, § 25942, Section (c).

<sup>4</sup> Cal. Code Regs., tit. 20, §§ 1670-1675. Unless otherwise noted, all subsequent regulatory citations are to the Cal. Code Regs., tit. 20.

<sup>5</sup> § 1671.

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### **II. Background**

On November 18, 2009, the Energy Commission approved California Home Energy Efficiency Rating Services, Inc., to be a California HERS Program provider and certified its home energy rating system for demonstrating compliance with the 2008 Building Energy Efficiency Standards<sup>6</sup> on Newly Constructed Buildings (residential and nonresidential), Alterations (residential and nonresidential) and New Solar Homes Partnership programs.<sup>7</sup>

ConSol Home Energy Efficiency Rating Services, Inc., has acquired the assets of California Home Energy Efficiency Rating Services, Inc.<sup>8</sup> These assets include the “CHEERS” trademarked name, all existing rater agreements with raters it certified (which will be superseded by new Rater Agreements between ConSol Home Energy Efficiency Rating Services, Inc., and HERS Raters it certifies), the California Home Energy Efficiency Rating Services HERS Raters List (past and present), all existing software and databases, intellectual property, accounts receivable, Quality Assurance protocols, Policy and Procedures documents, training materials and curriculum, and existing websites.

ConSol Home Energy Efficiency Rating Services, Inc., has applied to the Energy Commission:

1. to be a certified California HERS Program provider, and
2. for certification of its California HERS Program home energy rating system for demonstrating compliance with the 2008 Building Energy Efficiency Standards on Residential Newly Constructed Buildings.

### **III. CHEERS, Inc., Meets the Requirements for Providers Under Sections 1672 through 1674**

ConSol Home Energy Efficiency Rating Services, Inc., (hereafter CHEERS, Inc.) has submitted an application demonstrating that it meets the requirements established by HERS Regulations Sections 1672 through 1674 for Field Verification and Diagnostic Testing to show compliance with the Title 24 *Building Energy Efficiency Standards* for Residential Newly-Constructed Buildings.

#### **A. CHEERS, Inc., Has Submitted the Required HERS Provider Program Documents**

As required by Section 1674(a)(1), CHEERS, Inc., has submitted a “complete copy of all rating procedures, manuals, handbooks, Rating System, descriptions, and training materials”.

These materials include revised training materials specifically tailored to the newly-developed CHEERS, Inc., Registry and database, and instruction on the latest versions of Title 24 compliance forms and diagnostic testing procedures.

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<sup>6</sup> Cal. Code Regs., tit. 24, parts 1 and 6.

<sup>7</sup> Energy Commission Business Meeting, Nov. 18, 2009, item no. 9.

<sup>8</sup> Notice of Significant Change, May 22, 2012.

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**B. CHEERS, Inc., Meets the Applicable Requirements of Section 1672**

As required by Section 1674(a)(2), CHEERS, Inc., has provided a detailed explanation of how its Rating System for HERS Raters it certifies meets each requirement of Section 1672.

1. Section 1672(a): California Whole-House Home Energy Rating or California Home Energy Audit. A California Whole-House Home Energy Rating or a California Home Energy Audit shall be completed for a home only if the rating or audit is completed as specified by the HERS regulations and the HERS Technical Manual.<sup>9</sup>
2. Section 1672(b)(1): Data Collection. For ratings of existing homes that produce a California Whole-House Home Energy Rating or a California Home Energy Audit, each Rating System shall have documented procedures for site inspection and diagnostic testing of Energy-Rated Homes.
3. Section 1672(b)(2): Data Collection. For ratings of newly constructed homes that produce a California Whole-House Home Energy Rating, procedures for initial testing, sampling, resampling, and corrective action specified in the Residential Appendices to Title 24, Part 6, shall be followed.

Sections 1672(a), 1672(b)(1), and 1672(b)(2) are not applicable in this situation, as these sections specifically address requirements for which CHEERS, Inc., is not seeking approval.

4. Section 1672(b)(3): For ratings of newly constructed homes to establish compliance with Title 24, Part 6, through field verification and diagnostic testing, data shall be collected as specified by the Residential Appendices to Title 24, Part 6. A Rater who collects such data and performs such diagnostic tests shall be certified by the Provider as a California Field Verification and Diagnostic Testing Rater.

CHEERS, Inc., agrees to fully comply with the data collection requirements indicated by Section 1672(b)(3).

5. Section 1672(c): Data Analysis Requirements.
6. Section 1672(d): Energy Uses Rated.
7. Section 1672(e): On-Site Renewable Generation.
8. Section 1672(f): Rating Scale.
9. Section 1672(g): Method of Calculating TDV Energy.
10. Section 1672(h): Utility Bill Analysis.
11. Section 1672(i): Recommendations for Energy Efficiency Improvements.
12. Section 1672(j): Greenhouse Gas Emissions.
13. Section 1672(k): HERS Report

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<sup>9</sup> Publication CEC-700-2008-012, December 2008. See Sections 1670, 1671.

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Sections 1672(c) through (k) are not applicable in this situation, as these sections specifically address requirements for which CHEERS, Inc., is not seeking approval.

14. Section 1672(l): Field Verification and Diagnostic Testing. The Provider and Rater shall provide field verification and diagnostic testing of energy efficiency improvements as a condition for those improvements to qualify for the Title 24, Part 6, Building Energy Efficiency Standards compliance credit, as required by Title 24, Part 6, Building Energy Efficiency Standards and Reference Appendices.

CHEERS, Inc., will conduct quality assurance inspections of CHEERS, Inc.-certified HERS Raters to ensure that said Raters are providing complete and accurate Field Verification and Diagnostic Testing as required by Title 24, Part 6, Building Energy Efficiency Standards including the associated Reference Appendices.

15. Section 1672(m): Provider and Rater Conduct and Responsibility. Providers and Raters shall not knowingly provide untrue, inaccurate, or incomplete rating information or report rating results that were not conducted in compliance with these regulations. Providers and Raters shall not knowingly accept payment or other consideration in exchange for reporting a rating result that was not in fact conducted and reported in compliance with these regulations.

In addition to the quality assurance inspections indicated under #14, above, all HERS Raters certified by CHEERS, Inc., will be required to agree to and sign Rater Agreements and Registry Agreements that make clear the conduct and responsibility requirements for CHEERS, Inc., HERS Raters.

### **C. CHEERS, Inc., Meets The Applicable Requirements of Section 1673**

Section 1674(a)(3), requires the following detailed explanation of how each applicable part of Section 1673 is met by CHEERS, Inc.

1. Section 1673(a)(1): Each Provider's training program shall include classroom and field training of applicants for California Whole-House Home Energy Rater certifications, incorporating training in analysis, theory, and practical application in specified areas.
2. Section 1673(a)(2): California Home Energy Inspector applicants shall be required to be trained by the Provider in specified areas.
3. Section 1673(a)(3): California Home Energy Analysts applicants shall be required to be trained by the Provider in specified areas.

Sections 1673(a)(1) through (3) are not applicable in this situation, as these sections specifically address requirements for which CHEERS, Inc., is not seeking approval.

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4. Section 1673(a)(4): California Verification and Diagnostic Testing Raters . . . shall be required to receive specific training in Sections 1673(a)(1)(H) and (K) through (M) and general training in Sections 1673(a)(1)(A) to (G) and (P).

This section has been met by CHEERS, Inc., through its acquisition of the training curriculum developed by California Home Energy Efficiency Rating Services, Inc.'s, which included Commission-approved training materials for Rater certification for Field Verification and Diagnostic Testing in Newly-Constructed Buildings, Alterations, and the New Solar Homes Partnership Program. This previously-approved curriculum sufficiently includes all of the content to provide classroom and field training and certification on the topics shown as required in Section 1673(a)(1). Because CHEERS, Inc., applied for certification for its rating system for only Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings, it may only provide training for Rater certification for Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings.

5. Section 1673(a)(5): The training for all certifications and Raters shall include thorough instruction in using the Provider's Rating System and database.

CHEERS, Inc.'s training curriculum includes thorough instruction on the use of the CHEERS, Inc., Rating System and database. This includes but is not limited to instruction in the correct completion and registration of compliance documentation, the correct use of diagnostic testing equipment, description of conflict of interest provisions, HERS Rater ethics, and the correct use of the CHEERS, Inc., Registry.

6. Section 1673(a)(6): The training shall require California Whole-House Home Energy Rater applicants to satisfactorily perform a rating for at least one home that includes field verification and diagnostic testing in the presence and under the direct supervision of the Provider's trainer or Quality Assurance Reviewer. The training shall require California Field Verification and Diagnostic Testing Rater applicants to satisfactorily perform field verification and diagnostic testing for at least one home in the presence and under the supervision of the Provider's trainer or Quality Assurance Reviewer. The Provider shall review and approve these ratings for accuracy and completeness.

For this specific approval process, this section is only applicable to the quality assurance evaluation of Field Verification and Diagnostic Testing Rater applicants, and not Whole House Rater applicants, as CHEERS, Inc., is not seeking approval for the training or certification of California Whole-House Home Energy Raters. CHEERS, Inc., has developed a Quality Assurance Program as required by Section 1673(i) and has a staff of Quality Assurance Reviewers, all of whom are certified HERS Raters with extensive field experience, who will provide the quality assurance oversight of HERS raters conducting Field Verification and Diagnostic Testing.

7. Section 1673(a)(7): The Provider shall require each applicant to take an Energy-Commission-approved written and practical test that demonstrates his or her competence in

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all subjects specified in Section 1673(a)(1). The Provider shall retain all results of these tests for five years from the date of the test.

This section has been met by CHEERS, Inc., through its acquisition of the training curriculum and tests developed by California Home Energy Efficiency Rating Services, Inc., which includes Commission-approved training materials and tests for Rater certification for Field Verification and Diagnostic Testing in Newly-Constructed Buildings, Alterations, and the New Solar Homes Partnership Program. Because CHEERS, Inc., applied for certification for its rating system for only Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings, it may only provide training for Rater certification for Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings.

8. Section 1673(a)(8): Each Provider may establish an Energy Commission-approved challenge test that evaluates competence in each area addressed by the Provider's training program.

This section has been met by CHEERS, Inc., through its acquisition of the training curriculum and tests developed by California Home Energy Efficiency Rating Services, Inc., which includes Commission-approved training materials and tests for Rater certification for Field Verification and Diagnostic Testing in Newly-Constructed Buildings, Alterations, and the New Solar Homes Partnership Program. Because CHEERS, Inc., applied for certification for its rating system for only Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings, it may only provide training for Rater certification for Field Verification and Diagnostic Testing in Residential Newly-Constructed Buildings.

9. Section 1673(a)(9): Programs incorporating Building Performance Contractors shall provide specific training in all areas specified in Section 1673(a)(1). These programs shall be submitted by the Provider for individual review and approval by the Energy Commission.

This section is not applicable in this situation, as this section specifically addresses the requirements for Building Performance Contractor certification, for which CHEERS, Inc., is not seeking approval.

10. Section 1673(b): Rater Agreements. As a condition of Rater registry under Section 1673(d), each Provider shall ensure that a Rater applicant who has met the applicable requirements of Section 1673(a) has entered into an agreement with the Provider to provide home energy rating and field verification and diagnostic services in compliance with these regulations.

CHEERS, Inc., acquired and assumed the previously-approved Rater Agreements entered into by California Home Energy Efficiency Rating Services, Inc. CHEERS, Inc., has also written a new Rater Agreement which will be required to be signed by all CHEERS, Inc.-certified raters once CHEERS, Inc., obtains Energy Commission approval of its California HERS Program rating system.

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11. Section 1673(c): Building Performance Contractor Agreements.

This section is not applicable in this situation, as this section specifically addresses the requirements for Building Performance Contractor agreements, a category for which CHEERS, Inc., is not seeking approval.

12. Section 1673(d): Rater and Building Performance Contractor Registry.

CHEERS, Inc., is required to meet all applicable requirements of Sections 1673(a) and 1673(b). It has submitted a training curriculum as required by Section 1673(a) and Rater Agreements as required by Section 1673(b). This application is not applicable to the Building Performance Contractor designation.

13. Section 1673(e): Data Maintenance.

The database, web-based interface, and reporting functionality developed by CHEERS, Inc., fulfill all of the data retention requirements of Section 1673(e). Per these requirements, data will be retained for a minimum of ten (10) years.

14. Section 1673(f): Field Verification and Diagnostic Testing Evaluation.

The database, web-based interface, and reporting functionality developed by CHEERS, Inc., addresses all of the data retention requirements of Section 1673(e)(2) for a minimum of 10 percent random sampling of homes actually field verified and diagnostically tested annually, or 500 such homes annually, whichever is less.

15. Section 1673(g): Data Submittal.

CHEERS, Inc., will submit to the Energy Commission the information collected pursuant to Section 1673(e) and will provide the Energy Commission with ongoing access to the database maintained pursuant to that section.

16. Section 1673(h): Training Materials Retention. Each Provider shall retain for at least five years after the last date they are used, at least one copy of all materials used to train Raters.

CHEERS, Inc., will retain, for at least five years after the date they are used, at least one copy of all materials used to train Raters.

17. Section 1673(i): Quality Assurance. Each Provider shall have a quality assurance program meeting the required elements.

CHEERS, Inc., has developed a Quality Assurance Program that meets and exceeds the requirements of Section 1673(i) and a staff of Quality Assurance Reviewers, all of whom are experienced HERS Raters, in preparation for certification of its own California HERS Program

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rating system. CHEERS, Inc., has also developed a Complaint Response System in accordance with the requirements of Section 1673(i)(5).

### 18. Section 1673(j): Conflict of Interest.

The HERS regulations require that providers be “independent entities” from raters. Section 1673, Section (j), states:

- (1) Providers shall be independent entities from Raters.
- (2) Providers and Raters shall be independent entities from the builder and from the subcontractor installer of energy efficiency improvements field verified or diagnostically tested.
- (3) Providers and Raters shall be independent entities from any firm or person that performs work on the home for a California Home Energy Audit or a California Whole-House Home Energy Rating.<sup>10</sup>

Section 1671 defines “independent entity” and “financial interest” as follows:

*Independent Entity* means having no financial interest in, and not advocating or recommending the use of any product or service as a means of gaining increased business with, firms or persons specified in Section 1673(j).

*Financial Interest* means an ownership interest, debt agreement, or employer/employee relationship.<sup>11</sup>

CHEERS, Inc., and ConSol, Inc.,<sup>12</sup> active California corporations,<sup>13</sup> are both wholly owned by Michael G. Hodgson. Mr. Hodgson is also the President and sole director of both ConSol, Inc., and CHEERS, Inc. Jay Lenzmeier is the Chief Financial Officer of both. ConSol, Inc.’s services have included: energy code compliance documentation; energy efficiency, retrofit, and green program design and management; builder energy code training; and HERS inspections.<sup>14</sup>

Mr. Hodgson’s common ownership of CHEERS, Inc., and ConSol, Inc., and the common identities of the officers and directors present opportunities for conflicts of interest that are prohibited by the

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<sup>10</sup> §1673(j)(3) exempts raters who are working as or for a Building Performance Contractor approved as specified in §1674(e) of the regulations and in the HERS Technical Manual, from being independent entities from firms or persons working on the home. This exception does not apply to California Field Verification and Diagnostic Testing Raters performing field verification and diagnostic testing of newly constructed homes or alterations to existing homes to verify compliance with the requirements of Title 24, Part 6.

<sup>11</sup> Financial interest does not include ownership of less than five percent of the outstanding equity securities of a publicly traded corporation. § 1671.

<sup>12</sup> CHEERS, Inc., Application to be approved as a Provider, October 31, 2012.

<sup>13</sup> See <http://kepler.sos.ca.gov/cbs.aspx, C1245197>.

<sup>14</sup> See <http://www.consol.ws/about-consol.php>.

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HERS regulations. In order to mitigate the potential for this conflict, ConSol, Inc., has agreed to the operational limitations described below.

### **Limitations on ConSol, Inc.**

To guard against such conflicts, ConSol, Inc., has agreed to the following limitations of its activities:

1. ConSol, Inc., will not prepare or conduct the necessary analyses for Certificates of Compliance, Installation Certificates, or Certificates of Field Verification and Diagnostic Testing (hereafter “compliance documentation”), for demonstrating compliance with the Title 24 Building Energy Efficiency Standards. Any compliance documentation conducted by ConSol, Inc., will not be allowed into the CHEERS, Inc., registry.
2. ConSol, Inc., will not perform California HERS Program ratings<sup>15</sup> for demonstrating compliance with the Title 24 Building Energy Efficiency Standards.
3. For any governmental home energy efficiency program which it administers or manages, ConSol, Inc., will not permit any California HERS program ratings, compliance documentation, or rating data that is developed under such program by a California HERS program rater from being entered into the CHEERS, Inc., registry.<sup>16</sup> California HERS program ratings, compliance documentation, and rating data for work that is not related to such a governmental home energy efficiency program is not prohibited from being entered into the CHEERS, Inc., registry, so long as other applicable requirements are met.

Further, CHEERS, Inc., has agreed to the Conditions of Certification referenced in Paragraph **IV** and set forth below and at the end of the Recommendation, to ensure the conflicts-of-interest provisions of the California HERS program regulations are met.

19. Section 1673(k): Improvement Measures Cost Database. Each Provider shall develop and maintain a database of the cost of implementing the efficiency improvement measures specified in the HERS Technical Manual. The database shall contain statewide standardized cost values and regional adjustment factors.

This section pertains to Whole-House HERS Ratings, for which CHEERS, Inc., is not seeking approval.

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<sup>15</sup> § 1671.

<sup>16</sup> Maintained pursuant to § 1673, section (e).

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**D. CHEERS, Inc., Contact Information**

ConSol Home Energy Efficiency Rating Services, Inc.  
5757 Pacific Ave., Suite 220  
Stockton, CA 95207

**E. Articles of Incorporation and By-Laws Provided**

CHEERS, Inc., has provided its articles of incorporation and by-laws.

**F. Identification of CHEERS, Inc.'s Owners, Parents, Subsidiaries, and Affiliates.**

CHEERS, Inc., has identified its owner as Michael G. Hodgson, and identified that ConSol, Inc., is also wholly owned by the same owner.

**G. Statement of Accuracy**

CHEERS, Inc., has stated that ratings are accurate, consistent, and uniform. The other requirements of Section 1674, Section (a)(8), regarding utility bill estimates and recommendations on cost-effective energy efficiency improvement measures are not applicable to this application.

**H. Statement of Compliance**

CHEERS, Inc., has stated that it understands and will not knowingly fail to comply with the requirements of these regulations.

**I. Declaration of Veracity**

CHEERS, Inc., has certified under penalty of perjury that all statements in the application are true.

**IV. Conditions of Certification**

In order to guard against conflicts of interest and comply with Section 1673(j), CHEERS, Inc., has agreed to the conditions for certification at the end of this Recommendation, in addition to the generally-applicable requirements in the HERS regulations.

**V. Conclusion**

After considering the application, I find that CHEERS, Inc., meets the requirements described above for Providers for Field Verification and Diagnostic Testing on Residential Newly Constructed Buildings as required by the California Code of Regulations, Title 24, Part 6, associated

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administrative regulations in Part 1, and Title 20, section 1670 et seq., including but not limited to the applicable provisions in Title 20, sections 1672 and 1673.

Accordingly, I recommend that the Energy Commission confirm these findings and certify CHEERS, Inc., as a California HERS Program provider for Field Verification and Diagnostic Testing for Residential Newly Constructed Buildings, subject to the conditions above.



\_\_\_\_\_  
ROBERT P. OGLESBY  
Executive Director  
California Energy Commission

2-28-13

\_\_\_\_\_  
Date

**Executive Director Recommendation  
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**Conditions of Certification**

In order to guard against conflicts of interest and comply with Section 1673(j), ConSol Home Energy Efficiency Rating Services, Inc., (CHEERS, Inc.) hereby agrees, in addition to generally-applicable program requirements, the following conditions for certification as a California Home Energy Rating Services (HERS) Program provider for Field Verification and Diagnostic Testing on Residential Newly-Constructed Buildings.

1. CHEERS, Inc., may not accept California HERS program compliance documentation or rating data for work performed at homes whose owners have subscribed to or enrolled in a governmental home energy efficiency program for which ConSol, Inc., is a program manager or administrator.
2. CHEERS, Inc., may not accept compliance documentation or rating data for work for which ConSol, Inc., has prepared or conducted the necessary analyses for the compliance documentation required by the Title 24 Building Energy Efficiency Standards.
3. CHEERS, Inc., may not certify, enter rating agreements with, or accept for inclusion in its rating database compliance documentation or rating data from raters that are employed by ConSol, Inc.
4. CHEERS, Inc., will require raters, as conditions of entering a rating agreement, to refrain from:
  - (a) recommending or advocating for the services of persons or entities that perform work subject to a home energy rating, and;
  - (b) entering an employment relationship with ConSol, Inc.
5. CHEERS, Inc., shall not advocate nor recommend the use of its certified raters to builders or subcontractor installers of energy efficiency improvements that are field verified or diagnostically tested.
6. CHEERS, Inc., shall not advocate nor recommend the use of its certified raters to any firm or person that performs work on a home for a California Whole-House Home Energy Rating.
7. ConSol, Inc., because of its common ownership by Michael G. Hodgson of CHEERS, Inc., shall not:
  - a. Perform California HERS Program ratings;
  - b. Provide California Code of Regulations, Title 24, Part 6, Building Energy Efficiency Standards, field verification and diagnostic testing compliance or whole-house home energy rating services, or;

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c. Advocate or recommend the use of any particular California HERS Program rater.

The foregoing Limitations on ConSol, Inc., and Conditions of Certification on CHEERS, Inc., are agreed to:

Michael G. Hodgson  
Michael G. Hodgson  
President  
ConSol, Inc.

2/8/13  
Date

Michael G. Hodgson  
Michael G. Hodgson  
President  
ConSol Home Energy Efficiency Services, Inc.

2/8/13  
Date