

**HONORABLE BOARD OF LEGISLATORS
THE COUNTY OF WESTCHESTER, NEW YORK**

Your Committee is in receipt of an amended bond act ("Amended Bond Act") which, if adopted, would authorize the County of Westchester ("County") to issue additional bonds in the amount of \$1,180,000 to finance capital project BIT32 - Radio System Replacement for 2022.

Your Committee is advised that the Amended Bond Act, in the total amount of \$23,518,183, which includes \$22,338,183 in previously authorized bonds of the County and was prepared by the law firm of Harris Beach, would fund the continued acquisition and installation of equipment and systems necessary for the replacement of the County's emergency communications system. The Department of Information Technology has advised that these systems, which include the Trunked Systems, the F1 and F3 Systems and the radio component of the Computer-Aided Dispatch /Automatic Vehicle Location Systems, are used by first responders and other governmental personnel to ensure safety of life and property and enable delivery of vital services to the citizens of Westchester County.

Your Committee is advised that your Honorable Board has previously authorized the County to issue bonds to finance prior components of BIT32, as follows: Bond Act No. 203-2020 in the amount of \$22,338,183, which increased the total aggregate amount of funding under BIT32 by \$1,180,000 and consolidated the unsold debt under Bond Act Nos. 109-2018, 111-2018, 112-2018, 115-2018, 146-2019, 147-2019 and 148-20 into one Amended Bond Act for a total authorized amount, as amended, of \$22,338,183. Bond Act No. 203-2020 has not been sold. Accordingly, it is now requested that Bond Act No. 203-2020 be amended to increase the total amount authorized by \$1,180,000, for a total authorized amount, as amended, of \$23,518,183.

Your Committee is advised that the County Budget Department is submitting this Amended Bond Act to your Honorable Board simultaneously with the proposed 2022 Capital Budget. It is the County's goal to submit this Amended Bond Act now so that the referenced project will be ready to proceed without delay in early 2022.

The Planning Department has advised that certain components of BIT32 have previously been reviewed and classified as either Type II or Unlisted actions pursuant to SEQR. For the Unlisted actions, the Board of Legislators adopted a collective Negative Declaration on July 15, 2019 via Resolution 176-2019.

As the current request is for additional funding to continue the implementation of this project for which SEQR has been completed and with no change in scope, no further environmental review is required by the County.

It should be noted that an affirmative vote of two-thirds of the members of your Honorable Board is required in order to adopt the Amended Bond Act. Your Committee recommends the adoption of the proposed Amended Bond Act.

Dated: 11/17, 2021
White Plains, New York

Catherine S.
Robert J. Li

Robert J. Li

COMMITTEE ON

C:jpg/10-18-21

Budget &
Appropriations

Public Works
& Transportation

Dated: November 17, 2021

White Plains, New York

The following members attended the meeting remotely, pursuant to Chapter 417 of New York State Laws of 2021, and approved this item out of Committee with an affirmative vote. Their electronic signature was authorized and is below.

Committee(s) on:

Budget & Appropriations



Margaret A. Cunzio



Catherine F. Parker

David Q. Iuliano



Public Works & Transportation



Catherine F. Parker

David Q. Iuliano



FISCAL IMPACT STATEMENT

CAPITAL PROJECT #: BIT32

NO FISCAL IMPACT PROJECTED

SECTION A - CAPITAL BUDGET IMPACT

To Be Completed by Budget

GENERAL FUND

AIRPORT FUND

SPECIAL DISTRICTS FUND

Source of County Funds (check one):

Current Appropriations

Capital Budget Amendment

SECTION B - BONDING AUTHORIZATIONS

To Be Completed by Finance

Total Principal \$ 23,518,183 PPU 10 Anticipated Interest Rate 0.84%

Anticipated Annual Cost (Principal and Interest): \$ 2,461,453

Total Debt Service (Annual Cost x Term): \$ 24,614,530

Finance Department: Interest Rates from October 6, 2021 Bond Buyer - ASBA

SECTION C - IMPACT ON OPERATING BUDGET (exclusive of debt service)

To Be Completed by Submitting Department and Reviewed by Budget

Potential Related Expenses (Annual): \$ -

Potential Related Revenues (Annual): \$ -

Anticipated savings to County and/or impact of department operations
(describe in detail for current and next four years):

SECTION D - EMPLOYMENT

As per federal guidelines, each \$92,000 of appropriation funds one FTE Job

Number of Full Time Equivalent (FTE) Jobs Funded: 256

SECTION E - EXPECTED DESIGN WORK PROVIDER

County Staff

Consultant

Not Applicable

Prepared by: Donna Montera

Title: Director of Admin Services


Department: Information Technology

Date: 10/18/21

Reviewed By: 
Deputy Budget Director

Date: 10/18/21

TO: Michelle Greenbaum, Senior Assistant County Attorney
Jeffrey Goldman, Senior Assistant County Attorney

FROM: David S. Kvinge, AICP, RLA, CFM 
Director of Environmental Planning

DATE: October 15, 2021

SUBJECT: **STATE ENVIRONMENTAL QUALITY REVIEW FOR CAPITAL PROJECT:
BIT32 RADIO SYSTEM REPLACEMENT**

The Planning Department has reviewed capital project BIT32 – Radio System Replacement (Fact Sheet Unique ID: 1820) for compliance with the State Environmental Quality Review Act and its implementing regulations, 6 NYCRR Part 617 (SEQR).

The project provides for design, procurement and implementation services associated with the replacement of large mission critical radio systems, which include the Trunked Systems, the F1 and F3 Systems and the radio component of the Computer-Aided Dispatch/Automatic Vehicle Location Systems, that are used by the departments of Emergency Services, Public Safety, and Public Works and Transportation.

Certain components of BIT32 have previously been reviewed and classified as either Type II or Unlisted actions pursuant to SEQR. For the Unlisted actions, the Board of Legislators adopted a collective Negative Declaration on July 15, 2019 via Resolution 176-2019.

Since the current request is for additional funding to continue the implementation of this project, for which SEQR has been completed and with no change in scope, no further environmental review is required by the County.

Please do not hesitate to contact me if you have any questions regarding this matter.

DSK/CNM

cc: Andrew Ferris, Chief of Staff
Paula Friedman, Assistant to the County Executive
Tami Altschiller, Assistant Chief Deputy County Attorney
Gideon Grande, Deputy Budget Director

Lorraine Yazzetta, Associate Budget Director
Anthony Zaino, Assistant Commissioner
William Brady, Chief Planner
Michael Lipkin, Associate Planner
Claudia Maxwell, Associate Environmental Planner

ACT NO. -20__

BOND ACT OF THE COUNTY OF WESTCHESTER, NEW YORK, AMENDING AND RESTATING BOND ACT NO. 203-2020, ADOPTED NOVEMBER 9, 2020 IN RELATION TO CONSOLIDATING PREVIOUSLY ADOPTED BOND ACTS FOR CAPITAL PROJECT BIT32 – RADIO SYSTEM REPLACEMENT, REVOKING RELATED BOND ACTS AND AUTHORIZING ADDITIONAL BONDS FOR SUCH PROJECT; AT THE TOTAL ESTIMATED COST OF \$23,518,183. (Adopted , 20__).

Recitals

WHEREAS, this Board has heretofore duly authorized the issuance of bonds to finance various elements of Capital Project BIT32, at the total estimated maximum cost of \$47,000,000, pursuant to Act Nos. 109-2018, 110-2018, 111-2018, 112-2018, 113-2018, 114-208 and 115-2018 duly adopted on July 16, 2018, including amendments to 110-2018, 113-2018 and 114-2018 by amending bond acts 146-2019, 147-2019 and 148-2019 duly adopted on July 15, 2019 (collectively, the “Previous Bond Acts”), and it has now been determined that the Previous Bond Acts should be consolidated into one bond act so that the aggregate proceeds of authorized but unissued amounts of bonds pursuant to the Previous Bond Acts may be expended as required on any respective element of Capital Project BIT32; and

WHEREAS, it is necessary to increase the appropriation for such project by \$2,360,000 for increased costs of such project; and

WHEREAS, in order to accomplish such consolidation it is necessary to (i) amend Bond Act 109-2018 to expand the scope of project to be financed pursuant to such bond

act to encompass all project elements as collectively authorized in the Previous Bond Acts, and (ii) revoke the Previous Bond Acts, except for 109-2018 which is being amended hereby, to the extent of authorized but unissued amounts of bonds pursuant to each respective bond act;

BE IT ENACTED BY THE COUNTY BOARD OF LEGISLATORS OF THE COUNTY OF WESTCHESTER, NEW YORK (by the affirmative vote of not less than two-thirds of the voting strength of said Board), TO AMEND AND RESTATE BOND ACT NO. 203-2020 IN ITS ENTIRETY AS FOLLOWS:

BOND ACT AUTHORIZING THE ISSUANCE OF \$23,518,183 BONDS OF THE COUNTY OF WESTCHESTER, OR SO MUCH THEREOF AS MAY BE NECESSARY, TO FINANCE THE COST OF THE RADIO SYSTEM REPLACEMENT PROJECT FOR THE DEPARTMENT OF INFORMATION TECHNOLOGY; STATING THE ESTIMATED MAXIMUM COST THEREOF IS \$23,518,183; STATING THE PLAN OF FINANCING SAID COST INCLUDES THE ISSUANCE OF \$23,518,183 BONDS HEREIN AUTHORIZED TO FINANCE SUCH COST; AND PROVIDING FOR A TAX TO PAY THE PRINCIPAL OF AND INTEREST ON SAID BONDS. (Adopted _____, 20__)

BE IT ENACTED BY THE COUNTY BOARD OF LEGISLATORS OF THE COUNTY OF WESTCHESTER, NEW YORK (by the affirmative vote of not less than two-thirds of the voting strength of said Board), AS FOLLOWS:

Section 1. Pursuant to the provisions of the Local Finance Law, constituting Chapter 33-a of the Consolidated Laws of the State of New York (the "Law"), the Westchester County Administrative Code, being Chapter 852 of the Laws of 1948, as amended, to the provisions of other laws applicable thereto, \$23,518,183 bonds of the County, or so much thereof

as may be necessary, are hereby authorized to be issued to finance the cost of the radio system replacement project for the Department of Information Technology; all as collectively set forth in section 1 of each of the Previous Bond Acts and the County's current year Capital Budget, as amended. To the extent that the County has previously issued bonds pursuant to each of the Previous Bond Acts as detailed in column E of the attached Schedule I, the proceeds of such previously issued bonds shall only be expended for the scope of the project as set forth in the respective bond act, from which such proceeds are derived, when originally adopted and/or amended as set forth in column A of Schedule I. The total estimated maximum cost of said objects or purposes, including preliminary costs and costs incidental thereto and the financing thereof is \$23,518,183. The plan of financing includes the issuance of \$23,518,183 bonds herein authorized, and any bond anticipation notes issued in anticipation of the sale of such bonds, and the levy of a tax to pay the principal of and interest on said bonds.

Section 2. The period of probable usefulness of said class of objects or purposes, within the limitations of Section 11.00 a. 25 of the Law, is ten (10) years.

Section 3. Current funds are not required to be provided as a down payment pursuant to Section 107.00 d. 9. of the Law prior to issuance of the bonds authorized herein, or any bond anticipation notes issued in anticipation of the sale of such bonds. The County intends to finance, on an interim basis, the costs or a portion of the costs of said improvements for which bonds are herein authorized, which costs are reasonably expected to be reimbursed with the proceeds of debt to be incurred by the County, pursuant to this Act, in the maximum amount of \$23,518,183. This Act is a declaration of official intent adopted pursuant to the requirements of Treasury Regulation Section 1.150-2.

Section 4. Subject to the provisions of this Act and of the Law, and pursuant to the provisions of §30.00 relative to the authorization of the issuance of bond anticipation notes or the renewals thereof, and of §§50.00, 56.00 to 60.00 and 168.00 of said Law, the powers and duties of the County Board of Legislators relative to authorizing the issuance of any notes in anticipation of the sale of the bonds herein authorized, or the renewals thereof, relative to providing for substantially level or declining annual debt service, relative to prescribing the terms, form and contents and as to the sale and issuance of the respective amounts of bonds herein authorized, and of any notes issued in anticipation of the sale of said bonds or the renewals of said notes, and relative to executing agreements for credit enhancement, are hereby delegated to the Commissioner of Finance of the County, as the chief fiscal officer of the County.

Section 5. Each of the bonds authorized by this Act and any bond anticipation notes issued in anticipation of the sale thereof shall contain the recital of validity prescribed by §52.00 of said Local Finance Law and said bonds and any notes issued in anticipation of said bonds shall be general obligations of the County of Westchester, payable as to both principal and interest by general tax upon all the taxable real property within the County. The faith and credit of the County are hereby irrevocably pledged to the punctual payment of the principal of and interest on said bonds and any notes issued in anticipation of the sale of said bonds or the renewals of said notes, and provision shall be made annually in the budgets of the County by appropriation for (a) the amortization and redemption of the notes and bonds to mature in such year and (b) the payment of interest to be due and payable in such year.

Section 6. The validity of the bonds authorized by this Act and of any notes issued in anticipation of the sale of said bonds, may be contested only if:

(a) such obligations are authorized for an object or purpose for which the County is not authorized to expend money, or

(b) the provisions of law which should be complied with at the date of the publication of this Act or a summary hereof, are not substantially complied with, and an action, suit or proceeding contesting such validity, is commenced within twenty days after the date of such publication, or

(c) such obligations are authorized in violation of the provisions of the Constitution.

Section 7. This Act shall take effect not earlier than January 1, 2022 and in accordance with Section 107.71 of the Westchester County Charter.

STATE OF NEW YORK)

: ss.:

COUNTY OF NEW YORK)

I HEREBY CERTIFY that I have compared the foregoing Act No. -20__ with the original on file in my office, and that the same is a correct transcript therefrom and of the whole of the said original Act, which was duly adopted by the County Board of Legislators of the County of Westchester on , 20__ and approved by the County Executive on , 20__.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the corporate seal of said County Board of Legislators this day of , 20__.

(SEAL)

The Clerk and Chief Administrative Officer of the
County Board of Legislators
County of Westchester, New York

LEGAL NOTICE

A Bond Act which is published herewith, has been adopted by the Board of Legislators on November 2, 2020 and amended and restated on _____, 20__ and approved, as amended and restated, by the County Executive on _____, 20__ and the validity of the obligations authorized by such Bond Act may be hereafter contested only if such obligations were authorized for an object or purpose for which the County of Westchester, in the State of New York, is not authorized to expend money or if the provisions of law which should have been complied with as of the date of publication of this Notice were not substantially complied with, and an action, suit or proceeding contesting such validity is commenced within twenty days after the publication of this Notice, or such obligations were authorized in violation of the provisions of the Constitution.

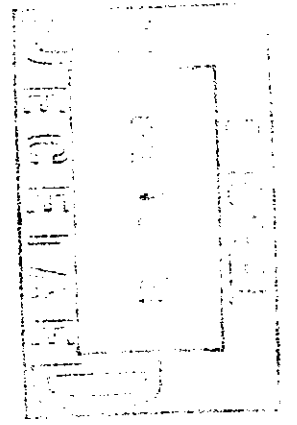
Complete copies of the amended and restated Bond Act shall be available for public inspection during normal business hours at the Office of the Clerk of the Board of Legislators of the County of Westchester, New York, for a period of twenty days from the date of publication of this Notice.

Dated: _____, 20__
White Plains, New York

Clerk and Chief Administrative Officer of the County Board of
Legislators of the County of Westchester, New York

SCHEDULE I - BIT32 CAPITAL PROJECTS

A		B	C	D	E	F	G	H	I	J
Category		Project Name	Maximum Cost	Authorization	Previously Borrowed	Authorized but Unissued Amount	PPU	Paratrap	Special Class & Combination	SECRA TYPE
Bond Act No. and adoption date										
111-2018 (7-16-18)		REPLACEMENT OF MOBILE (VEHICLE-MOUNTED) RADIOS USED BY EMERGENCY PERSONNEL	\$ 9,700,000.00	\$ 9,700,000.00	\$ 4,912,714.00	\$ 4,787,286.00	10	Par. 25	S	
112-2018 (7-16-18)		REPLACEMENT OF PORTABLE AND BASE STATION RADIOS USED BY EMERGENCY PERSONNEL	\$ 9,300,000.00	\$ 9,300,000.00	\$ 4,574,033.00	\$ 4,725,967.00	10	Par. 25	S	
109-2018 (7-16-18)		REPLACEMENT OF COUNTY'S WIRELESS RADIO SYSTEM FOR FIRE, EMS, POLICE, AND OTHER EMERGE	\$ 6,300,000.00	\$ 6,300,000.00	3,659,830.00	\$ 2,640,170.00	10	Par. 25	S	
115-2018 (7-16-18)		INTEGRATE TRUNKED RADIO SYSTEM WITH TRANSPORTATION COMMUNICATION SYSTEM	\$ 6,240,000.00	\$ 6,240,000.00	3,392,332.00	\$ 2,847,668.00	10	Par. 25	S	
14-2018, 148-2019 (7-16-18, amend 7-15-1)		REPLACEMENT OF WIRELESS RADIO SYSTEM INCLUDING VOICE RADIO PAGING SYSTEM	\$ 5,540,000.00	\$ 5,540,000.00	3,325,914.00	\$ 2,214,086.00	10	Par. 25	S	
13-2018, 147-2019 (7-16-18, amend 7-15-1)		REPLACEMENT OF RADIO DISPATCH & COMMUNICATION SYSTEMS USED BY COUNTY POLICE	\$ 2,900,000.00	\$ 2,900,000.00	1,729,454.00	\$ 1,170,546.00	10	Par. 25	S	
10-2018, 146-2019 (7-16-18, amend 7-15-1)		REPLACEMENT OF TRUNKED RADIO SYSTEM FOR EMERGENCY SERVICE COMMUNICATION	\$ 7,020,000.00	\$ 7,020,000.00	4,247,540.00	\$ 2,772,460.00	10	Par. 25	S	
Total - BIT32			\$47,000,000.00	\$47,000,000.00	\$25,841,817.00	\$ 21,158,183.00				



CAPITAL PROJECT FACT SHEET

Project ID:* BIT32	<input type="checkbox"/> CBA	Fact Sheet Date:* 10-15-2021
Fact Sheet Year:* 2022	Project Title:* RADIO SYSTEM REPLACEMENT	Legislative District ID:
Category* BUILDINGS, LAND & MISCELLANEOUS	Department:* INFORMATION TECHNOLOGY	CP Unique ID: 1820

Overall Project Description

The Department of Information Technology oversees the design, implementation, and management of large mission critical radio systems used by the Departments of Emergency Services, Public Safety, Public Works, and Transportation. These systems are used by first responders and other governmental personnel to ensure safety of life and property and enable delivery of vital services to the citizens of Westchester County. This capital project will begin the process of specifying, designing, procuring, and implementing replacements for the Trunked Systems, the F1 and F3 systems and at least the radio component of the CAD/AVL systems.

- | | | |
|--|--|--|
| <input type="checkbox"/> Best Management Practices | <input type="checkbox"/> Energy Efficiencies | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Life Safety | <input type="checkbox"/> Project Labor Agreement | <input type="checkbox"/> Revenue |
| <input checked="" type="checkbox"/> Security | <input type="checkbox"/> Other | |

FIVE-YEAR CAPITAL PROGRAM (in thousands)

	Estimated Ultimate Total Cost	Appropriated	2022	2023	2024	2025	2026	Under Review
Gross	61,700	56,980	1,180	1,180	1,180	1,180	0	0
Less Non-County Shares	0	0	0	0	0	0	0	0
Net	61,700	56,980	1,180	1,180	1,180	1,180	0	0

Expended/Obligated Amount (in thousands) as of: 46,326

Current Bond Description: This will fund the continued acquisition and installation of equipment and systems for the replacement of the County's emergency communications system.

Financing Plan for Current Request:

Non-County Shares:	\$ 0
Bonds/Notes:	1,180,000
Cash:	0
Total:	\$ 1,180,000

SEQR Classification:

TYPE II

Amount Requested:

1,180,000

Comments:

Energy Efficiencies:

Appropriation History:

Year	Amount	Description
2014	6,000,000	PHASE I AND II
2015	2,000,000	REPLACEMENT OF VOICE RADIO SYSTEMS USED BY FIRE AND EMS RESPONDERS
2016	6,000,000	REPLACEMENT OF VOICE RADIO SYSTEMS USED BY FIRE AND EMS RESPONDERS
2017	8,000,000	CONTINUATION OF THIS PROJECT
2018	25,300,000	IMPLEMENTATION OF STUDY RECOMMENDATIONS
2020	8,500,000	CONTINUATION OF THIS PROJECT
2021	1,180,000	CONTINUATION OF THIS PROJECT

Total Appropriation History:

56,980,000

Financing History:

Year	Bond Act #	Amount	Issued	Description
14	74	300,000	290,027	RADIO SYSTEM REPLACEMENT - PHASE I & II OF COUNTY WIRELESS SYSTEM
18	110	0	0	TRUNKED RADIO SYSTEM SIMULCAST CONTROL & REMOTE SITE EQUIPMENT
18	111	4,912,714	4,912,714	REPLACEMENT OF MOBILE (VEHICLE-MOUNTED) RADIOS USED BY EMERGENCY PERSONNEL
18	112	4,574,033	4,574,033	REPLACEMENT OF PORTABLE AND BASE STATION RADIOS USED BY EMERGENCY PERSONNEL
18	109	3,659,830	3,659,830	REPLACEMENT OF COUNTY'S WIRELESS RADIO SYSTEM FOR FIRE, EMS, POLICE, AND OTHER EMERGENCY PERSONNEL
18	113	0	0	REPLACEMENT OF RADIO DISPATCH AND COMMUNICATION SYSTEMS USED BY COUNTY POLICE
18	115	3,392,332	3,392,332	INTEGRATE TRUNKED RADIO SYSTEM WITH TRANSPORTATION COMMUNICATION SYSTEM
18	114	3,325,914	3,325,914	REPLACEMENT OF WIRELESS RADIO SYSTEM INCLUDING VOICE RADIO PAGING SYSTEM
19	146	4,247,540	4,247,540	REPLACEMENT OF TRUNKED RADIO SYSTEM FOR EMERGENCY SERVICE COMMUNICATION
19	148	2,214,086	0	REPLACEMENT OF VOICE RADIO PAGING SYSTEM USED TO DISPATCH FIRE DEPARTMENTS & EMS AGENCIES
19	147	1,729,454	1,729,454	REPLACEMENT OF RADIO DISPATCH & COMMUNICATION SYSTEMS USED BY COUNTY POLICE
20	203	20,124,097	0	

Total Financing History:

48,480,000

Recommended By:

Department of Planning
WBB4

Date
09-30-2021

Department of Public Works
RJB4

Date
09-30-2021

Budget Department
GKGA

Date
10-04-2021

Requesting Department
DDMK

Date
10-05-2021

RADIO SYSTEM REPLACEMENT (BIT32)

User Department : Information Technology

Managing Department(s) : Information Technology ;

Estimated Completion Date: TBD

Planning Board Recommendation: Project approved in concept but subject to subsequent staff review.

FIVE YEAR CAPITAL PROGRAM (in thousands)

	Est Ult Cost	Appropriated	Exp / Obl	2022	2023	2024	2025	2026	Under Review
Gross	61,700	56,980	46,326	1,180	1,180	1,180	1,180		
Non County Share									
Total	61,700	56,980	46,326	1,180	1,180	1,180	1,180		

Project Description

The Department of Information Technology oversees the design, implementation, and management of large mission critical radio systems used by the Departments of Emergency Services, Public Safety, Public Works, and Transportation. These systems are used by first responders and other governmental personnel to ensure safety of life and property and enable delivery of vital services to the citizens of Westchester County. This capital project will begin the process of specifying, designing, procuring, and implementing replacements for the Trunked Systems, the F1 and F3 systems and at least the radio component of the CAD/AVL systems.

Current Year Description

The current year request funds implementation services.

Current Year Financing Plan

Year	Bonds	Cash	Non County Shares	Total
2022	1,180,000			1,180,000

Impact on Operating Budget

The impact on the Operating Budget is the debt service associated with the issuance of bonds.

Appropriation History

Year	Amount	Description	Status
2014	6,000,000	Phase I and II	IN PROGRESS
2015	2,000,000	Replacement of voice radio systems used by Fire and EMS responders	IN PROGRESS
2016	6,000,000	Replacement of voice radio systems used by Fire and EMS responders	IN PROGRESS
2017	8,000,000	Continuation of this project	IN PROGRESS
2018	25,300,000	Implementation of study recommendations	IN PROGRESS
2020	8,500,000	Continuation of this project	AWAITING BOND AUTHORIZATION
2021	1,180,000	Continuation of this project	IN PROGRESS
Total	56,980,000		

**RADIO SYSTEM REPLACEMENT
(BIT32)**

Prior Appropriations

	Appropriated	Collected	Uncollected
Bond Proceeds	56,980,000	26,131,844	30,848,156
Total	56,980,000	26,131,844	30,848,156

Bonds Authorized

Bond Act	Amount	Date Sold	Amount Sold	Balance
74 14	300,000	12/15/17	165,292	9,973
		12/15/17	30,349	
		12/15/17	256	
		12/10/18	94,129	
109 18	3,659,830	12/10/19	3,056,289	
		12/10/19	603,541	
110 18				
111 18	4,912,714	12/10/19	4,102,561	
		12/10/19	810,153	
112 18	4,574,033	12/10/19	3,819,731	
		12/10/19	754,302	
113 18				
114 18	3,325,914	12/10/19	2,777,439	
		12/10/19	548,475	
115 18	3,392,332	12/10/19	2,832,904	
		12/10/19	559,428	
146 19	4,247,540	12/10/19	3,547,080	
		12/10/19	700,460	
147 19	1,729,454	12/10/19	1,444,251	
		12/10/19	285,203	
148 19	2,214,086			2,214,086
203 20	20,124,097			20,124,097
Total	48,480,000		26,131,844	22,348,156