Lisa Foust

From:

Lisa Foust

Sent:

Wednesday, November 30, 2011 2:50 PMEC - I PM I2: nd

To:

'joe@gsaudits.com'

Cc: Subject: 'marsha@gsaudits.com'

Attachments:

TRA Docket No. 11-00181

TelmateBondJune2010.pdf; TelmateNov2011.pd

eNov2011.pdf; Telmate repayOnline.pd

Mr. Solana,

I received your November 28, 2011 response regarding the above filing. Please clarify the following:

- 1)The description provided in response 1 as to how service will be provided to inmate facilities in Tennessee appears to be the same as described in response 2. If Telmate is not seeking authority to provide local and long distance services in Tennessee, what is the purpose of its application at this time?
- 2) How does Telmate "service inmate facilities in 22 states" via carrier agreements with authorized carriers? What is Telmate providing in those 22 states, telecommunications service infrastructure, billing only or both/neither? In the facilities of these 22 states, are the contracts with the inmate facilities between Telmate and the facilities or between the "authorized carriers" and the facilities?
- 3)Attachment B to Telmate's October 28, 2011 Tennessee Reseller Application indicates the company "has been certified to provide services in Georgia since September 2010 and has been certified in Montana and Florida for less than 30 days." However, item 2 of the November 28, 2011 response states that "the Company has also filed for certification in Alabama, Georgia, Indiana, Nebraska, New York, Oregon, Wisconsin and Washington" and "has been approved in New Mexico, Florida, Montana, Idaho, New Jersey and Texas." Has Telmate, LLC been approved in Georgia since September 2010? When was Telmate, LLC approved in New Mexico, Florida, Montana, Idaho, New Jersey and Texas? Provide specific approval dates and case numbers for each state. What is the status of Telmate, LLC's applications in Alabama, Indiana, Nebraska, New York, Oregon, Wisconsin and Washington?
- 4) Attached is a copy of the first bond that was delivered by hand to the TRA in June 2010 by Darren Wallace. This bond was a copy, not an original. Also attached is a copy of the response from GS Audits dated November 28, 2011, which did contain the original bond, but there is no signature for the principal on page 1, and the Acknowledgement of Principal is signed by a different individual (Marianne Zhen) than the copy that was provided by Mr. Wallace in 2010. The bond provided in June 2010 was signed and acknowledged by Dinh Huynh. The bond submitted with the November 28, 2011 response appears to be the original, but Dinh Huynh's signature is absent from both the front page and the Acknowledgment of Principal page. Please explain.
- 5) Attached are copies of what appear to be online pre-payment interfaces for Telmate services provided to inmates at facilities in Indiana (Telmate has indicated its application is pending in Indiana), California (Telmate has not indicated that it has applied or been approved to provide service in California), Arizona (no application or approval indicated in Arizona) and South Carolina (no application or approval indicated in South Carolina). Please advise as to whether Telmate, LLC is providing inmate telecommunications services in Indiana, California, Arizona, or South Carolina either via VoIP or by using the services of an authorized carrier. If using an authorized carrier, indicate the name of the carrier used in each state.
- 6) Detail the "regulatory fees" reflected in the online pre-payment form.
- 7) Does Telmate have a parent company, any subsidiaries or affiliate companies?

Please respond to this inquiry by December 7, 2011 and reference Docket No. 11-00181. In accordance with TRA rules submit either (1) thirteen written copies of your response or (2) four written copies and an electronic version. Should you have questions regarding this request, please contact Lisa Foust at 615-741-2904 extension 220.



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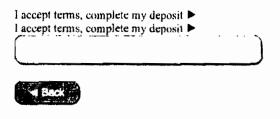
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- *Fees include local, state and federal surcharges, as well as mandatory regulatory assessments.



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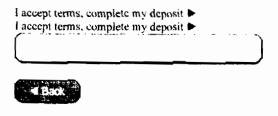
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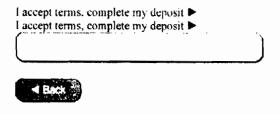
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T.R.A. DOCKET ROSM

Via Overnight Delivery

November 28, 2011

Lisa Foust Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Re: Docket No. 11-00181, Application of Telmate LLC. For Certificate of Authority to Resell Telecommunications Services in Tennessee.

Dear Ms. Foust:

Enclosed for filing with the Tennessee Regulatory Authority ("Commission") are an original and thirteen (13) copies of Telmate, LLC's ("Telmate") Responses to interrogatories submitted November 2, 2011 to GSAssociates.

Also attached are the following additional items:

- 1. Original Bond
- 2. Additional Resumes for key personnel

Please acknowledge receipt of this filing by stamping and returning the additional copy of this transmittal letter in the self-addressed, postage prepaid envelope enclosed for this purpose.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely;

Jose L. Solana

Regulatory Consultant to Telmate, LLC.

678-304-6465 joe@gsaudits.com

Enclosures



RE: Docket No. 11-00181

Telmate, LLC application for Certificate of Authority to Resell Telecommunication Services in Tennessee.

- No, Telmate, LLC will only provide service to Inmate facilities in the state. As discussed with Lisa Foust on Monday, November 21st, Telmate does not provide traditional local service. Instead, all calls will leave the state via T1 (VoIP circuits) and route through a soft switch in Texas, returning to Tennessee via a carrier wholesale arrangement with a certified carrier.
- 2. Telmate does service inmate facilities in 22 states, however, those services are currently provided via carrier agreements with authorized carriers. Along with the Company's Tennessee application, the Company has also filed for certification in Alabama, Georgia, Indiana, Nebraska, New York, Oregon, Wisconsin, and Washington, and has been approved in New Mexico, Florida, Montana, Idaho, New Jersey & Texas. Telmate has received two consumer complaints from inmates in Texas and Idaho, respectively. Both were related to misunderstanding by the inmate regarding rates. Specifically, the Idaho complaint was caused when the facility switched to Telmate from the previous provider and that resulted in a different price than the inmate was used to. Both complaints were resolved by refunding the amount to the inmate.
- 3. To address the discrepancy noted by Staff regarding the timing of Mr. Torgersrud responsibilities at Telmate and his overall experience in the industry, we submit the following: Mr. Richard Torgersrud discovered a need in the industry for a streamlined, high-tech telecommunications solution by working with Pinnacle Public Services, a service and installation provider for inmate telecommunication systems in 2000, where he began his research and development of inmate telecommunications solutions. With this experience, he later founded Intelmate LLC, which developed a VoIP based inmate phone system. He officially founded Telmate, LLC in June 2009, to offer unsurpassed inmate telecom management solutions to correctional facilities. In addition, as requested, attached are resumes from two critical directors; Kathryn Jarrell Director of Operations, and Darren Wallace VP of Business Development. These individuals are critical in the day-to-day operation of Telmate.
- Richard Torgersrud functions also as the Chief Technical Officer. Please refer to his previously submitted bio for information regarding his background.
- felmate did not begin operations until June of 2009, so three years of financial data is not available. Attached are financial statements for 2009, 2010 and YTD 2011.
- 6. Attached is the original certified security bond for Tennessee.
- 7. Yes, this provision is noted in Telmate's tariff as well. Telmate has identified the three areas in Tennessee where this may occur and will comply with the CrossLATA requirement through switch software. However, please note that Telmate does not currently serve correctional facilities in areas where this provision would apply.
- 8. Collect Calls will be billed through an ILEC by Legacy Long Distance International. Inc., which is registered as an OSP in Tennessee. Telmate will accept prepayment for calls made by inmates via credit card, cash, money order or money gram, as well as via a facility commissary account or call center where accounts are funded by the inmate's friends and families.

Re: Docket No. 11-00181, Application of Telmate LLC. For Certificate of Authority to Resell Telecommunications Services in Tennessee.

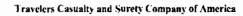
Response to Question #3

Kathryn Jarrell
Role: Director of Operations

Kathryn brings to Telmate with aimost two decades of telecommunications and operational experience. She worked for Intera Communications, one of the largest private Public Telephone companies in the United States for over 15 years where she was in charge of customer service, phone bill management and provisioning. She was also very involved in field services.

Darren Wallace Role: VP of Business Development

Prior to Joining Telmate, Mr. Darren Wallace was instrumental in providing sales leadership within the SE United States for a premier Technology Consulting firm focused on Storage Solutions and Business Continuity Services for Fortune 500 clients. From 2004-2008, Mr. Wallace worked for BSG Clearing Solutions managing immate telephone and other communication providers to ensure their billing infrastructure was sound white maximizing both revenue and investments, clients included Embarq, Sprint, Owest, ATT, Cingular and other Tier I providers in advertising and media verticals. From 1998-2004, Mr. Wallance worked for Owest as a Global Sales Manager selling Collect Call and Credit Card services throughout the United States and Western Europe.





CONTINUATION CERTIFICATE FIDELITY OR SURETY RONDS/POLICIES

FIDELITY OR SURETY BONDS/POLIC	CIES	License	No	_
In consideration of \$400.00 dollars rene	wal premium, the tem	n of Bond/Policy No. 165	307544in th	he
amount of \$20,000.00 , issued on behalf of	of Telmate. LLC			
whose address is 234 Front Street, 2nd Floor, San Fra	ncisco, CA 94111			,
in favor of Tennessee Regulatory Authority				,
whose address is 460 James Robertson Parkway, Nash	wille, TN 37243-0505			
in connection with Telecommunications Service Provi	der Bond	is hereby extended to	May 14, 2012	.,
subject to all covenants and conditions of said be	ond/policy.			
This certificate is designed to extend only the ter	rm of the bond/policy.	. It does not increase the a	amount which may be	
payable thereunder. The aggregate liability of th	c Company under the	said bond/policy togethe	r with this certificate shall	
be exactly the same as, and no greater than it wo		· · · · · ·		
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Signed, sealed and datedNovember 7, 2011				
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WARNING: THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

TRAVELERS

POWER OF ATTORNEY

Farmington Casualty Company Fidelity and Guaranty Insurance Company Fidelity and Guaranty Insurance Underwriters, Inc. Scaboard Surety Company St. Paul Fire and Marine Insurance Company

St. Paul Goardian Insurance Company St. Paul Mercury Insurance Company Travelers Casualty and Surety Company Travelers Casualty and Surety Company of America United States Fidelity and Guaranty Company

Attorney-In Fact No. 220032 Certificate No. 002860933

KNOW ALL MEN BY THESE PRESENTS: That Scabourd Surery Company is a corporation duly organized under the laws of the State of New York, that St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company and St. Paul Mercury Insurance Company are corporations duly organized under the laws of the State of Minnesota, that Farmington Casualty Company, Travelers Casualty and Surety Company, and Travelers Casualty and Surety Company of America are corporations duly organized under the laws of the State of Connecticut, that United States Endelity and Guaranty Company is a corporation duly organized under the laws of the State of Maryland, that Fidelity and Guaranty Insurance Company is a corporation duly organized under the laws of the State of Iowa, and that Fidelity and Guaranty Insurance Underwriters, Inc. is a corporation duly organized under the laws of the State of Wisconsin therein collectively called the "Companies"), and that the Companies do hereby make constitute and appoint

Mikel W. Fitzgerald, Charles T. Bigelow, Robert C. Crosby, Richard W. Riley, Michael N. Venson, Robert B. Wray, Deborah L. Jung, Catherine M. Martinez. Joseph M. Westheimer Jr., and James C. Albright

of the Cuy of	San Antonio	. State of	Texas	, then	true and lawful Attorneyes) in-bact,
each in their sepa	trate capacity if more than one is name-	Labove, to sign, execute	e, seal and acknow	aledge any and all bonds, recogni	zances, conditional undertakings and
other writings ob	ligatory in the nature thereof on behal	f of the Companies in t	heir business of	guaranteeing the fidelity of perso	ns, guaranteeing the performance of
contracts and eve	cuting or guaranteeing bonds and unde	rtakings required or per	mitted in any act	ions or proceedings altowed by la	w.
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Farmington Casualty Company **Fidelity and Guaranty Insurance Company** Fidelity and Guaranty Insurance Underwriters, Inc.

Scaboard Surety Company St. Paul Fire and Marine Insurance Company St. Paul Guardian Insurance Company St. Paul Mercury Insurance Company Travelers Casualty and Surety Company Travelers Casualty and Surety Company of America United States Fidelity and Guaranty Company



day of









IN WITNESS WHEREOF, the Companies have caused this instrument to be signed and their corporate seals to be hereto affixed this armore. March 2009









4th



State of Connecticut City of Hartford ss.

By

On this the 4th 2009 , before me personally appeared George W. Thompson, who acknowledged himself to be the Semor Vice President of Farinington Cusualty Company. Tidelity and Guaranty Insurance Company. Fidelity and Guaranty Insurance Underwriters. Inc. Scabourd Surety Company, St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and Hinted States Fidelity and Guaranty Company, and that he, as such, being authorized so to do, executed the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

In Witness Whereof, I hereunto set my hand and official seal. My Commission expires the 30th day of June, 2011.





58440-5-07 Printed in U.S.A.

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TENNESSEE REGULATORY AUTHORITY

TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #. <u>105</u> 307544	
WHEREAS, Telmate, LLC	(the "Principal"), has
	athority to provide telecommunications services in the State of Tennessee, and
required to file this bond in order to obtain such auth	er 4, Section 125(j) of the Termessee Code Annotated, as amended, the Principal is nority and to secure the payment of any monetary sanction imposed in any enforcement Code Annotated or the Consumer Telemarketing Act of 1990 by or on behalf of the
WHEREAS, Travelers Casualty and	d Surety Company of America
Insurance to engage in the surety business in this sta	in the State of Tennessee and duly authorized by the Tennessee Commissioner of ate pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to ply with the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code
accordance with the provisions of Tennessee Code A dollars (\$20,000.00) lawful money of the United State imposed against the Principal, its representatives, s Lennessee Code Annotated or the Consumer Telem	incipal and the Surety are held and firmly bound to the STATE OF TENNESSHE, in innotated, Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand so of America to be used for the full and prompt payment of any monetary sanction accessors or assigns, in any enforcement proceeding brought under Title 65 of tarketing Act of 1990, by or on behalf of the TRA, for which obligation we bind its, each jointly and severally, firmly and unequivocally by these presents.
annual renewal period or portion thereof shall constitut the liability of the Surety shall not be cumulative, and bond shall not exceed Twenty Thousand Dollars (\$20,6	day of May 2010 and shall be continuous; provided, however, that each be a new bond term. Regardless of the number of years this bond may remain in force, the aggregate liability of the Surety for any and all claims, suits or actions under this 200.00). The Surety may cancel this bond by giving thirty (30) days written notice of the dial, it being understood that the Surety shall not be relieved of liability that may collation.
PRINCIPAL	SURETY
Telmate, LLC	Travelers Casualty and Surety Company of Amer
Name of Company authorized by the TRA	Name of Surety
	4650 Westway Park Blvd., Houston, Tx 77041
Company ID # as assigned by TRA	Address of Surety
SIGNATURE OF PRINCIPAL	SIGNATURE OF SCRETY AGENT THE WORLD
Vanie:	Name: Catherine M. Martinez
Title:	Title: Attorney-In-Fact
	Address of Surety Agent: 131 Interpark Blvd. San Antonio, Texas 78216
THIS BOND IS ISSUED IN ACCORDANCE WITH T	THE PROVISIONS OF SECTION 125, CHAPTER 4, TTILE 65 OF THE TENNESSFE

THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)

ACKNOWLEDGMENT OF PRINCIPAL

CALIFORNIA STATE OF TENNESSEE COUNTY OF SAN Before me, a Notary Public of the State and County aforesaid, personally appeared MARZANNE with whom I am personally acquainted and who, upon oath, soknowledged himself to be the individual who executed the foregoing bond on behalf of TELMATE , and he acknowledged to me that he executed the same. WITNESS my hand and seal this My Commission Expires: Notary Public IGH-DUNG THI NGUYEN COMM. #1924983 ACKNOWLEDGMENT OF SURETY ry Public - Cultic Texas STATE OF TENRIEDOUS Bexar COUNTY OF Before me, a Notery Public of the State and County aforesaid, personally appeared Catherine M. Martinez with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the g bond on behalf of revelors Gastaly and surely Company of within named Surety, a corporation licensed to do business in the foregoing bond on hehalf of State of Tempesees and duly authorized by the Tempesee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annelated, and that he as such an individual being authorized to do so, executed the foregoing bond, by signing the name of the corporation by himself and as such individual. WITNESS my hand and seal this 14th day of May My Commission Expires: MARIE CANCHOLA HOTARY PUBLIC STATE OF TEXAS m, Esp. 08-31-2910 APPROVAL AND INDORSEMENT This is to certify that I have exemined the foregoing boad and found the same to be sufficient and in conformity to law, that the surreies on the same are good and worth the penalty thereof, and that the same has been filed with the Tennessee Regulatory Authority, State of Tennessee, this _____ day of ____ Name: Tale:

ACKNOWLEDGMENT OF PRINCIPAL

STATE OF TENNESSEE COUNTY OF	
	inty aforcsaid, personally appeared
WITNESS my hand and seal this day of	of, 20
My Commission Expires	
, 20	
	Notary Public
ACKNOWLEDCME	ENT OF SURETY
Texas	
COUNTY OF Bexar	
Before me, a Notary Public of the State and Cou	inty aforesaid, personally appeared Catherine M. Martinez
with whom I am personally acquainted and who, foregoing bond on behalf of State of Tennessee and duly authorized by the Tennessee	upon oath, acknowledged himself to be the individual who executed the index of America plant of America the within named Surety, a corporation licensed to do business in the Commissioner of Insurance to engage in the surety business in this state annotated, and that he as such an individual being authorized to do so.
WITNESS my hand and seal this 14th day of	of <u>May</u> , 20 <u>10</u> .
My Commission Expires:	Mario and C.
MARIE CANCHOLA NOTARY PUBLIC STATE OF TEXAS My Corum. Exp. 08-31-2010	(Wanterman)
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	Name: Title

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TRAVELERS

POWER OF ATTORNEY

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St. Paul Guardian Insurance Company St. Paul Mercury Insurance Company Travelers Casualty and Surety Company Travelers Casualty and Surety Company of America United States Fidelity and Guaranty Company

Attorney-In Fact No. 219876

Certificate No. 002313734

KNOW ALL MEN BY THESE PRESENTS. That Scaboard Surety Company is a corporation duly organized under the laws of the State of New York, that St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company and St. Paul Meicury Insurance Company are corporations duly organized under the laws of the Mate of Minnesota, that Farinington Casualty Company, Travelers Casualty and Surety Company, and Travelers Casualty and Surety Company of America are corporations duly organized under the laws of the State of Connecticut, that United States Endelity and Guaranty Company is a corporation duly organized under the laws of the State of Maryland, that Fidelity and Guaranty Insurance Company is a corporation duly organized under the laws of the State of Iowa, and that Fidelity and Guaranty Insurance Underwriters, Inc. is a corporation duly organized under the laws of the State of Wisconsin theirem collectively called the "Companies"), and that the Companies do hereby make, constitute and appoint

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other writings obligatory in th	if more than one is named abo e nature thereof on behalf of t ranteeing bonds and undertake	ve, to sign execute, seal and the Companies in their busi	ness of guaranteeing the fi	bonds, recognizances, co delity of persons, guara		and
IN WITNESS WHEREOF, of April	he Companies have caused this	anstrument to be signed and	d their corporate seals to be	e hereto affixed, this	10th	_
	Farmington Casualty Co Fidelity and Guaranty I Fidelity and Guaranty I Scaboard Surety Compa St. Paul Fire and Marin	gstrance Company nstrance Underwriters, In my	St. Paul M c. Travelers C Travelers C	uardian Insurance Con ercury Insurance Com Jasualty and Surety Co Jasualty and Surety Co tes Fidelity and Guara	puny ompany ompany of America	
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State of Connecticut City of Hariford 88.			By Geon	thompson enger is	a President	_
Scaboard Surety Company, St Casualty and Surety Company		npany, 14denty and Guara nee Company, St. Paul Gu ly Company of America, an	ardian Insurance Company d Unned States Fidelity a	s. St. Paul Mercury Inst ad Guaranty Company.	irance Company, Irasi and that he, as such b	me elers eing
In Witness Whereof, I berein My Commission expires the 30	to set my hand and official sea 0th day of June, 2011	CONTROL OF		Marie C Tetresoil	Jetreaul Novem Parke	<u></u>

58440-5-07 Printed in U.S.A.

WARNING THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

TENNESSEE REGULATORY AUTHORITY

TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #: 105307544	
WHEREAS Telmate, LLC	
applied to the Tennesses Regulatory Authority for authority to	provide telecommunications services in the State of Tennessee; and
required to file this bond in order to obtain such authority and	ion 125(j) of the Tennessee Code Annotated, as amended, the Principal is to secure the payment of any monetary sanction imposed in any enforcement sotated or the Consumer Telemarketing Act of 1990 by or on behalf of the
WHEREAS, Travelers Casualty and Sure	
Insurance to engage in the surety business in this state pursus	ate of Tennessee and duly authorized by the Tennessee Commissioner of unit to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code
accordance with the provisions of Tennessee Code Annotated, dollars (\$20,000.00) lawful money of the United States of Amimposed against the Principal, its representatives, successor Tennessee Code Annotated or the Consumer Telemarketing	nd the Surety are held and firmty bound to the STATE OF TENNESSEE, in Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand erica to be used for the full and prompt payment of any monetary sanction is or assigns, in any enforcement proceeding brought under Title 65 of Act of 1990, by or on behalf of the TRA, for which obligation we bind ointly and severally, firmly and unequivocally by these presents.
annual renowal period or portion thereof shall constitute a new be the liability of the Surety shall not be cumulative, and the aggr bond shall not exceed Twenty Thousand Dollars (\$20,000.00).	May 2010 and shall be continuous; provided, however, that each cond term. Regardless of the number of years this bond may remain in force, regate liability of the Surety for any and all claims, suits or actions under this The Surety may cancel this bond by giving thirty (30) days written notice of a being understood that the Surety shall not be relieved of liability that may
PRINCIPAL	SURETY
Telmate, LLC	Travelers Casualty and Surety Company of Amer
Name of Company authorized by the TRA Name of	f Surety
Company ID # as assigned by TRA Address	4650 Westway Park Blvd., Houston, Tx 77041
	À
Name: Dink Huyth	Name: Catherine M. Martinez
Director of Finance	Title: Attorney-in-Fact
2	Address of Surety Agent: 131 Interpark Blvd.
	San Antonio, Texas 78216

THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)

ACKNOWLEDGMENT OF PRINCIPAL

24440,44,44	Public of the Sta	ite and County afores	aid, personally appeared	
			edged himself to be the individual who executed the fore e acknowledged to me that he executed the same	goin
WITNESS my hand	and seal this	day of	20	
My Commission Expires:				
	. 20			
			Notary Public	
	A CTERNOS	VLEDGMENT OF S	VANGERY	
Texas	ACK140V	VIRLOWENT OF S	ORE1	
STATE OF TENNESSEE	Bexar			
COUNTY OF	Devai			
State of Tennessee and duly a	authorized by the	Tennessee Commiss	h, acknowledged himself to be the individual who execu- illing named Surety, a corporation licensed to do business ioner of Insurance to engage in the surety business in the	is sta
State of Tennessee and duly a pursuant to Title 56, Chapter executed the foregoing bond	ruthorized by the r 2 of the Tennes , by signing the r	Tennessee Commiss usee Code Annotated, same of the corporati	ioner of Insurance to engage in the surety business in the and that he as such an individual being authorized to on by himself and as such individual.	is sta
State of Tennessee and duly a pursuant to Title 56, Chapter executed the foregoing bond	ruthorized by the r 2 of the Tennes , by signing the r	Tennessee Commiss usee Code Annotated,	ioner of Insurance to engage in the surety business in the and that he as such an individual being authorized to on by himself and as such individual.	is stat
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State of Tennessee and duly a pursuant to Title 56, Chapter executed the foregoing bond, WITNESS my hand My Commission Expires:	authorized by the r 2 of the Tennes, by signing the r and seal this	Tennessee Commiss usee Code Annotated, same of the corporati	ioner of Insurance to engage in the surety business in the and that he as such an individual being authorized to on by himself and as such individual. 20 10	is stat
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State of Tennessee and duly a pursuant to Title 56, Chapter executed the foregoing bond. WITNESS my hand My Commission Expires: MARIE CANC MOTARY PUM STATE OF TE My Comm. Exp. 68-	authorized by the r 2 of the Tennes, by signing the r and seal this 1 3/ 20/0 HOLA BLIC APPROVENAMENT APPROVENAM	Tennessee Commiss see Code Annotated, same of the corporati 4th day of May AL AND INDORSI egoing bond and four penalty thereof, and	ioner of Insurance to engage in the surety business in the and that he as such an individual being authorized to on by himself and as such individual. 20 10 Mary Public CMENT Ind the same to be sufficient and in conformity to law, that the same has been filed with the Tennessee Regi	is stat do so
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WARNING: THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

POWER OF ATTORNEY

TRAVELERS

Farmington Cusualty Company Fidelity and Guaranty Interance Company Fidelity and Guaranty Insurance Underwriters. Inc. Scaboard Surety Company St. Paul Fire and Marine Insurance Company

St. Paul Guardisa Ensurance Company St. Paul Mercury Insurance Company Travelers Casualty and Surety Company
Travelers Casualty and Surety Company of America
United States Edelity and Guaranty Company

Attorney-In Fact No. 219876

Certificate No. 002313734

KNOW ALL MEN BY THESE PRESENTS: That Seahoard Surery Company is a corporation duty organized under the faws of the State of New York, that St. Paul Fire and Manne Insurance Company, St. Paul Guardian Insurance Company, and St. Paul Metritury Insurance Company are corporations duly organized under the Insurance the State of Minnesota, that Familiagion Castalty Company, Travelers Castalty and Surety Company, and Travelers Castalty and Surety Company of America are corporations duly organized under the laws of the State of Connecticut, that United States Fidelity and Guaranty Company is a corporation duly organized under the laws of the State of Maryland, that Ridelay and Guaranty Insurance Company to a corporation duly organized under the laws of the State of Maryland, that Ridelay and Guaranty Insurance Company is a corporation duly organized under the laws of the State of Own, and that Ridelay and Guaranty Insurance Underwriters, lac. is a corporation duly organized under the laws of the State of Own State of Own, and that Course of the State of Own State of Own, and that the Companies.

the Companies of	io hereby make. C	nasticuse and appoint						
		T. Bigelow, Robert Ioseph M. Westheim		nard W. Riley,	Michael N. V	enson, Robert B	, Wray, Debo	rsh L. Jung,
each in their sep other writings o	bligatory in the n	nore than one is normed all ature thereof on helialf o sceing bonds and undertal	f the Companies in 4	heir basiness of g	ledge any and all b narantering the Ge	lelity of persons, g	es, conditional un	dettakings and
IN WITNESS I	WHEREOF, the	Companies have caused the	us multiment to be s	igned and their co	rporate seals to be	hereto affixed, this	100	<u> </u>
		Farmington Casualty Fidelity and Guaranty Fidelity and Guaranty Seshoord Sorety Com St. Paul Fice and Mari	Insurance Compon Insurance Underwi pany	itters, Inc.	St. Paul Me Travelers C Travelers C	undan Insurance reary Insurance (Insualty and Suret Insualty and Suret of Fidelity and Go	Company y Company y Company of A	
		(1925) (1922) (1925)						0
State of Commercial City of Hartford				Ву:	Grong	Stanger Land	of free Provident	
to be the Senio Seahuard Surety Custality and St	y Company, St. P arety Company, T	Say of April Sermingson Causalty C Taul Fire and Marine last Favelers Custody and Su furegoing instrument for the	ompany, Palelity as Pance Company, St. rety Company of An	pi Guaranty Idsur Paul Guardian In serica, and United	unce Company, Fi surasce Company States Fidelity w	St. Paul Mercury of Guaranty Comp	y Insurance Und Insurance Comp ony, and that he.	lerwriters, Inc., pany, Travelers as such, heing
		set my hand and official s day of June, 2011.				Marie To	C. Jeth Vesula Nessy Pas	<u>eault</u>
58440-5-07 Pt	inted in U.S.A.							

WARNING: THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

WARNING THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

This Power of Attorney is granted under and by the authority of the following testilations adopted by the Boards of Directors of Farmington Casualty Company, Endeling and Guaranty Insurance Company, Six Past Company, Six Past Fire and Marine Insurance Company, Six Past Guarantian Insurance Company, Six Past Marine Insurance Company, Traveler Company, Six Past Six Company, Six Company of America, and Crased States Fulcility and Guaranty Company, Which resultations are now in full conceased effect, reading as follows:

RESOLVED, that the Charman, the President, any Vee Croiman, any Executive Vice President, any Section Vice President, any Vee President, any Vee President, any Vee President, any Vee President (the Treasurer, any Assistant Treasurer, the Corporate Secretary or any Assistant Secretary in any Aspiration Secretary or any Assistant Section (the Company) and may give such appointed such ambienty as his on her certificate of ambienty may preserve to sign with the Company's seal brades recognizances, contracts of indepentity, and other weigness of objectively in the nature of a board, recognizance, or conditional andertuiting, and any of said officers or the Board of Directors at any time may remove any such appointed and revoke the power given bim or her, and in 6.

FURTHER RESOLVED, that the Chairman, the President, any Vice Chairman, any Evecutive Vice President, any Senior Vice President or any Vice President may delegate all or any part of the foregoing authority to one or more officers or cuphoyees of this Company, provided that each such delegation is in writing and a copy thereof is filled in the office of the Secretary and it is

FURTHER RESOLVED, that any bond, recognizance, contract of indemnity, or writing obligatory in the nature of a bond, recognizance, or conditional undertaking shall be valid and binding upon the Company when (a) signed by the President, any New Claiman, any Executive Vice President, any Souther Vice President or any New President, are Secretary New President, are Secretary and advanced and sealed with the Company's seal by a Secretary or Assistant Secretary or desistant Secretary or desistant Secretary; or each start secretary or desistant secretary; or each secretary or desistant secretary; and it is

FURTHER RESOLVED, that the signature of each of the full twing officers: President, any Executive Vice President, any Secretary, any Assistant Vice President, any Secretary, any Assistant Secretary, and the seal of the Company may be affixed by facsimile to any power of attorney or to any certificate retaining thereto appointing Resident Vice Presidents. Residents Assistant Secretaries or Attorneys-In-Force for purposes unly of executing and attention and undertakings and other verificials religiously in the nature thereof, and any soch power of attorney or certificate bearing such facsimile signature or facsimile seal shall be salid and binding upon the Company and my such power so executed and certified by such facsimile signature and facsimile seal shall be valid and binding on the Company in the future with respect to any hand or emberstanding to which it is attached.

I. Kori M. Johanson, the undersigned, Assistant Secretary, of Farnington Cosnahy Company, Fidelity and Guaranty Insurance Underwriters. Inc. Scabband Survey Company, St. Paul Fire and Marine Insurance Company, St. Paul Guaranty Insurance Company, St. Paul Mercury Insurance Company, Trivelers Cassalty and Survey Company, Trivelers Cassalty and Survey Company of America, and United States Fishelity and Guaranty Company of Interior Cassalty and Survey Company of America, and United States Fishelity and Guaranty Company of Interior and States of Companies, which Is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have bereumo set my limit and affirmed the seals of said Companies him 14th day of Hay 20 10.

Kori M. Johanson Assistant Secretary





















To varify the authenticity of this Power of Atomicy, call 1-800-421-3888 or contact on at www.tracetersbond.com, Please refer to the Atomicy-In-Fact number, the above named individuals and the details of the bond to which the power is attacked.

ACKNOWLEDGMENT OF PRINCIPAL

STATE OF TENNESSEE		
with whom I am personally acquainted and who, upon oath, ac	aforesaid, personally appeared Dinh Hoyhh eknowledged himself to be the individual who executed the foregoing and he acknowledged to me that his described the satisfactory of the commission # 177404	
My Commission Expires:	Notary Public - Coliforni Son Frenches Co.	
Nivember 16, 2011 , 28	Me AA Notary Public	. • ~
ACKNOWLEDGMENT		
STATE OF TENNESSEE COUNTY OF San Francisco	Duplicate Complete 1 11 - 11 - 11	
foregoing bond on behalf of <u>fel mate</u> . State of Tennessee and duly authorized by the Tennessee Con	on oath, acknowledged himself to be the individual who executed the the within named Surety, a corporation licensed to do business in the nmissioner of insurance to engage in the surety business in this state otated, and that he as such an individual being authorized to do so, poration by himself and as such individual.	
WITNESS my hand and scal this day of	Merculin C Giz. Merculin C Giz. Commission # 1774642 Molory Public - Colleg vie	
My Commission Expires:	San Francis C:	1
Nov 16 2011 , 2000	Me Morary Public	

APPROVAL AND INDORSEMENT

Name:

TREASURER