

A. Completeness Comments

Please provide the following information in order to complete your application:

I. General Application. The General Application for the proposed project indicates that the applicant and property owner are separate people/entities. The application lists “Dominican Valley LLC” as the property owner and “Ray Cassidy” as the applicant. The application form is signed by Ray Cassidy. Please provide documentation verifying that Ray Cassidy is authorized to sign on behalf of Dominican Valley LLC or provide authorization from someone authorized to sign on behalf of Dominican Valley LLC.

This item was not listed on the initial January 4, 2024 incompleteness determination and therefore the City is prohibited from requesting this item in any subsequent review. (Gov. Code § 65943). Regardless, Mr. Cassidy already provided this documentation with the preliminary application.

II. Fees. The project currently has outstanding fees and requires additional tentative subdivision and security deposits. A total of **\$72,952.90** is due at this time in order to continue processing the application. Nonpayment of this deposit by September 22, 2024, (30 days after the date of this letter) shall be deemed a withdrawal of the application, consistent with the Cost Based Fee System outlined in the General Application Form (See Attachment 1).

Outstanding Fees: Outstanding fees total \$30,364.90, including fees for both Planning Division and Department of Public Works Review (see Attachment 2).

Additional Deposit for Tentative Subdivision Map: Additional deposit is required for the Tentative Subdivision Map application as the expenditures exceed 75% of the deposit amount required by the Cost Recovery Fee Program (See Attachment 1 and 3).

There is no legal authority for the City to consider an application withdrawn. As previously indicated, the applicant has requested additional documentation to support the fees that are being charged. Although during our call to discuss the appeal, the City attorney confirmed that the City does not have the legal authority to consider an application withdraw, the City attorney refused to timely respond in writing to confirm that the City would not unlawfully attempt to withdraw the application, forcing our client to pay significant fees without proper documentation. Please be advised that the applicant paid these fees under protest due to the City’s unlawful threat, and the applicant reserves the right to challenge the fees paid under protest.

Further, it appears that the Town is relying on clauses within the City’s General Plan application to argue that the applicant “agreed” to pay all the City’s legal fees, indemnify the City, and pay all the City’s costs regardless of whether those fees were adopted by the City Council and appear on the City’s fee schedule.

This type of coerced “agreement” has already been rejected by a court of appeal in *San Luis Obispo Local Agency Formation Comm’n v. City of Pismo Beach* (2021) 61 Cal.App.5th 595.) State law mandates a procedure for implementing new permit fees, and that procedure may not “be avoided by inserting a provision in an application form.” (*Id.* at 601.) Moreover, this type of

one-sided “agreement” is not a valid contract because the Town already “has a statutory duty to accept all completed applications.” (*Id.* at 600.)

The City is legally required to accept and process development applications under state law, and the only legally valid method to impose permit fees is through the procedures required by state law. The City’s purported Cost Reimbursement and Indemnity Agreement is invalid and does not provide the City with the authority to refuse to accept and process the application.

III. Required Entitlements: Below is a list of entitlements required to process the project. After each entitlement, staff has noted what completeness items need to be submitted in order to determine the project is complete.

1. MAJOR ENVIRONMENTAL AND DESIGN REVIEW PERMIT

Per the General Planning Permit Submittal Requirements found on the City’s website, please provide the following plans **for each proposed building and lot.**

The initial incompleteness determination (Jan 4th letter) stated that a Major Environmental and Design Review Permit was requested “to review the details of the *overall* site plan, architecture, landscaping, building design, and other site improvements *for the project.*”

Subsequently, (April 26th) this determination requests a separate site plan for “each proposed building and lot,” which was not requested in the initial determination. This item was not listed on the initial January 4, 2024 incompleteness determination and therefore the City is prohibited from requesting this item in any subsequent review. (Gov. Code § 65943). Regardless, the applicant *did* provide plans for every building and lot.

A. Provide a site plan that identifies the structure, parking lot and any potential site improvements. For each proposed lot provide:

We note that the items below simply copy and paste the City’s application checklist. AN incompleteness determination must “specify those parts of the application which are incomplete and shall indicate the manner in which they can be made complete, including a list and thorough description of the specific information needed to complete the application.” (Gov. Code § 65943.) The City’s determination fails to provide any description, let alone a thorough description, explaining the specific information that is missing. Thus, the City’s incompleteness determination is invalid.

Further, all the information below has already been provided in the submittal. If the City is suggesting that every piece of the information listed below must be shown on a single site plan for each lot, this request is impossible and absurd. To show areas of hillside natural state, tree and vegetation removal areas, extent of grading including filling and cutting areas, frontage and roadway improvements, zoning information, floor plans, etc. on a single sheet site plan would be completely illegible. The applicant has gone above and beyond what would typically be required at this stage of review and has provided the City with more than enough information to understand the project details, which is the entire purpose of the application. The City appears to be abusing the PSA process as a delay tactic and to drive up project costs.

i. Property lines and lot dimensions

Sheet c1.1 shows all property lines, lot dimensions, and lot area.

ii. Setbacks – note required setbacks for zoning district

This comment is nonsensical. The zoning district is PD and there are no required setbacks for the PD zoning district. All of the proposed setbacks are shown on Sheet A 001.

iii. Proposed Site Conditions - show proposed roadway and frontage improvements, outdoor improvements, accessory structures, fences and retaining walls, hillside natural state, tree and vegetation removal or addition, pools/spas, A/C units/generators, any other mechanical equipment, and any other proposed site features.

All of this information is included in the submittal. Natural state calculations are on sheet C3.0. Roadways improvements are shown on Sheet C4.0, with more detailed information on Sheets C4.2-C4.5. Tree vegetation and removal is included in Sheets L1.0-3.0. Fencing is shown on Sheets L3.1-4.0. Retaining Walls are shown on Sheets C5.0-5.3.

iv. Site Work - extent of grading, including filling and cutting or excavation.

The grading plans have been provided and have even been color-coded on Sheet C4.1 to demonstrate the extent of cut and fill to make it easier to identify as the Department requested in the initial January 4 Incompleteness letter, which stated “Identify and graphically show areas of cut and fill in a verifiable manner *on Sheet C4 of the Civil Plan set.*”

v. Project Data. Show proposed site size, building floor areas, parking supply, landscape and natural state, required yard areas and other relevant zoning district development standards.

The first incompleteness determination stated: “Specifically, provide setbacks from all property lines, proposed lot area, average lot width, proposed maximum building height, and proposed maximum setback height for each proposed lot; and proposed gross square footage for each unit type. This information can be added to the table on Sheet A1.” This information has all been provided in the table on Sheet A1 as specifically directed. We are puzzled why this comment continues to be included.

B. Roof Plan. Show property lines, outline of building footprint, direction and slope of drainage, location of drainage collectors, rooftop structures (i.e., vents, equipment, screening, access), material, ridge elevations, roof levels and slopes for each building.

A roof plan has been provided for every single lot. (See, e.g., sheet A002). This same information has also been shown on a project-wide basis, which shows the roof plans in relation to the property lines. (Sheet A 001.) Materials, ridge elevations, roof levels, location of collectors and drainage slopes are shown for every single building, (See, e.g., sheet A003). The property lines and outlines of building footprints have been provided for every single lot. (See, e.g., sheet A003).

C. Landscape Plan. Show proposed landscape improvements for each lot, including the types of plant and landscape materials proposed, soils characteristics, and plant/landscape amenities cut sheets or illustrations for each lot.

Landscaping plans have been provided with all of this information. The plans have been shown in quadrants, as specifically approved by Planning Department staff in a June 21st email. (See Exhibit A) This appears to suggest that each lot must be shown on a separate sheet, which was not identified as an incomplete item on the initial incompleteness determination. The initial letter requested that the soil characteristics and landscaping “can be on *a* separate sheet in the Landscape Plan.”

This comment is also absurd and unnecessary, including because the tree driplines cross property lines and the landscaped areas include ROW that are not part of any lot. The landscaping plans are more than adequate for the City to understand the landscaping that will be proposed.

2. AFFORDABLE HOUSING

1. **Inclusionary Housing:** Pursuant to San Rafael Municipal Code Section 14.16.030, residential development projects shall provide affordable housing units as described in the policies and procedures specified in the San Rafael City Council's Guidelines for the Administration of the Affordable Housing Trust Fund (Resolution 14890; see Attachment 5). Per Section C: Location and Type of Affordable Housing Units: Affordable housing units shall be dispersed throughout the residential development project. Units may be clustered within the residential project when the city determines that such clustering furthers affordable housing opportunities. The affordable housing units shall be of a similar mix and type to that of the residential development project as a whole, including, but not limited to:

- a. The same or substantially similar mix of unit size (e.g., number of bedrooms, square footage);
- b. Compatibility with the design, materials, amenities, and appearance of the other developed units.

The proposed application does not clearly describe the affordable housing component; however, it seems to indicate that the project proposes for 14 JADUs located in the lower level of townhomes on Lots 15-22, 25-28 and 30-31 to satisfy the requirements under SRMC Section 14.16.030. The JADUs appear to total approximately 230 sf each.

A Junior accessory dwelling unit" ("JADU") means an accessory dwelling unit that is no more than five hundred (500) square feet in size and contained entirely within the walls of a proposed or existing single-family residential space and meets the additional standards provided in section 14.16.285 C.2.

The proposed JADUs do not appear to meet the criteria for the affordable housing units pursuant to SRMC Section 14.16.030. Specifically, the JADUs are not the “same or substantially similar mix of unit size (e.g., number of bedrooms, square footage)”. JADUs cannot be sold separately from the primary residence and the City cannot force a property owner to rent a portion of their property for the purposes of affordable housing.

The affordable units are clearly shown on Sheet A 001. Whether the units are labeled as JADUs or ADUs is irrelevant, as the proposed units meet the definition of either. Regardless, the application materials in the July 24th submittal consistently identified the units only as ADUs. Further, this comment also does not appear to request any information, but instead suggests that the project does not comply with City code. The Department of Housing and Community Development has repeatedly confirmed that when “a local jurisdiction improperly characterizes [compliance] comments as incomplete items, the jurisdiction impermissibly raises the bar to achieving a complete application, in violation of the PSA.”¹ This comment is regarding code compliance, which is not a valid reason to determine that an application is incomplete.

3. DENSITY BONUS

RESOLUTION NO. 14891 notes the items that are required to be submitted for the Density Bonus application. Although some items were included in the last submittal, additional items are still outstanding:

A. Clarification on Accessory Dwelling units and Junior Accessory Dwelling Units. In this submittal, there are inconsistencies in the identification of Accessory Dwelling Units and Junior Accessory Dwelling Units. Please state how many of each type of these units are proposed, and show the location of each one of these units on a plan set. Sheet A 001 indicates ADUs, as does the Density Bonus Statement. However, Project Description (dated December 6, 2023) indicates the units would be Junior ADUs. The floor plans note the units are ADUs, however, the plans don't clearly demonstrate that the units meet the required criteria.

The affordable units are clearly shown on Sheet A 001. Whether the units are labeled as JADUs or ADUs is irrelevant, as the proposed units meet the definition of either. The comment that the plans “don't clearly demonstrate that the units meet the required criteria” is vague.

B. Any requested waivers or modifications of development standards necessary to physically accommodate “density bonus” units (e.g., increased height, reduced setbacks or parking, etc.) e. If the project is requesting an incentive or concession, describe each incentive or concession being requested in addition to (or instead of) waivers or modifications necessary to accommodate density bonus.

This information was already provided. (See Exhibit B.)

C. **Density Bonus Base Project Plans.** Provide plans showing a “base project” that complies with all applicable Zoning Ordinance requirements, without any waivers or modification to development standards.

¹ HCD Letter of Technical Assistance issued to Fillmore, CA, dated August 24, 2023 available at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/fillmore-attachments-TA-082422.pdf>; see also HCD Notice of Violation issued to City of La Cañada Flintridge, CA, dated June 8, 2023 available at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/la-canada-flintridge-nov-060823.pdf>.

An applicant may seek a “density bonus,” which means a “density increase over the otherwise maximum allowable gross residential density,” or “base density” but makes clear that a developer may elect “a lesser percentage of density increase, including, but not limited to, no increase in density.” (Gov Code § 65915(f).) There is no “base project,” as the applicant does not seek any density bonus.

The City’s application checklist requires a density bonus analysis for “projects requesting a density bonus pursuant to Government Code Section 65915 and City Council Resolution No. 14891.” As noted, the applicant is not requesting a density bonus and therefore these submittal requirements are not applicable to the project.

The original application submittal merely stated that because the project includes the minimum affordability levels to be *eligible* for a density bonus, incentives/concessions, and waivers, the applicant reserved the right to request these at a later date. After planning staff specifically requested that the applicant identify incentives/concessions and waivers, the applicant did so. However, this project does not need incentives/concessions and waivers. If the City refuses to accept the application as complete based on purported “incomplete” density bonus materials, the applicant will simply withdraw any supposed density bonus “application” previously submitted.

However, we note that Gov Code § 65915(e) does not require an applicant to request development standard waivers. Rather, § 65915(e) prohibits that City from applying “any development standard that will have the effect of physically precluding the construction of a development” when the project provides a minimum level of affordability, as this project does.

IV. Additional Requirements

1. TRANSPORTATION IMPACT ANALYSIS.

The draft TIS dated March 29, 2024 has not been updated per the changes noted in Response to City Comments on the Draft Transportation Impact Study for the Dominican Valley Subdivision Project (WTrans, July 18, 2024). Please provide a revised Transportation Assessment that addresses the comments in the attached memorandum from Fehr & Peers, dated April 5, 2024 and as identified in the April 26, 2024 notice of incompleteness (see DPW memorandum dated April 16, 2024 item 10).

The initial incompleteness determination requested this information based on the submittal requirements for a zoning map amendment contained in SRMC 14.07.060. The applicant is not requesting, nor does the applicant need, a zoning map amendment. This item is therefore an invalid request.

Moreover, a transportation impact analysis was already provided. This comment is regarding the City’s disagreement with the substantive analysis included within the analysis, specifically arguing that the model used should be adjusted to increase the assumed number of future occupants. The applicant’s traffic engineers disagree with the suggested approach. Regardless, not only is this item not required for the application, but this comment is akin to a compliance determination and does not request any information that has not already been provided.

Comments from other City Departments

The City's April 26 incompleteness letter also included comment letters from the Department of Public Works, Sanitation, and Fire Department. These comments were about compliance with various City standards, were completely untethered from any of the items actually listed on the City's application checklist, and therefore were not valid incomplete items. We are assuming that these comment letters were for informational purposes only, and that the City is not basing its incompleteness determination on the compliance comment letters from other City departments.

Exhibit A

From: Kristina Estudillo <Kristina.Estudillo@cityofsanrafael.org>
Subject: RE: Dominican Valley Project - thank you and addition of a project new planner
Date: June 21, 2024 at 2:48:06 PM PDT
To: "sean@lakassociates.com" <sean@lakassociates.com>, Margaret Kavanaugh-Lynch <Margaret.Kavanaugh-Lynch@cityofsanrafael.org>, 'Raymond cassidy' <marindevelop@gmail.com>
Cc: Micah Hinkle <Micah.Hinkle@cityofsanrafael.org>

Hi Sean,

I wanted to make sure that the message was passed along that in response to your email below. As long as the LA plans show what will be planted on each lot, with plant species and sizes identified, the 20 scale will be fine. They can show the requested separate area calculations for each lot on the cover sheet or anywhere else that makes sense to the reader.

Let me know if you have any questions!

Kristina Estudillo, AICP | City of San Rafael
Principal Planner, Community Development Department
1400 5th Avenue
San Rafael, CA 94901
(415) 458-5048



On Jun 13, 2024, at 2:35 PM, sean@lakassociates.com wrote:

Hi Kavitha/Margeret –
Specific to the Landscape Plan revisions – RHAA may not be able to prepare

individual site plans for each lot in a timely manner – rather they can provide a 20 scale drawing, breaking the project up in the quadrants which shall be eligible and clear to understand while also importantly providing the requested separate area calculations for each lot.

Can you please confirm that this will be acceptable as part of the resubmission process? We will endeavor to send you a draft revision to confirm.

Thanks in advance –

Sean

Sean Kennings
planning consultant

PO Box 7043
Corte Madera, CA 94976
415-533-2111
sean@lakassociates.com
www.lakassociates.com

From: sean@lakassociates.com <sean@lakassociates.com>
Sent: Friday, June 14, 2024 2:28 PM
To: Margaret Kavanaugh-Lynch <Margaret.Kavanaugh-Lynch@cityofsanrafael.org>; 'Raymond cassidy' <marindevelop@gmail.com>
Cc: Kristina Estudillo <Kristina.Estudillo@cityofsanrafael.org>; Micah Hinkle <Micah.Hinkle@cityofsanrafael.org>
Subject: RE: Dominican Valley Project - thank you and addition of a project new planner

Thanks, Margaret.

Hi, Kristina, nice to meet you virtually. I will reach out to you next week to discuss.

Enjoy your weekend.

Sean Kennings
planning consultant

PO Box 7043
Corte Madera, CA 94976
415-533-2111
sean@lakassociates.com
www.lakassociates.com

From: Margaret Kavanaugh-Lynch <Margaret.Kavanaugh-Lynch@cityofsanrafael.org>
Sent: Friday, June 14, 2024 1:24 PM
To: sean@lakassociates.com; Raymond cassidy <marindevelop@gmail.com>
Cc: Kristina Estudillo <Kristina.Estudillo@cityofsanrafael.org>; Micah Hinkle

<Michah.Hinkle@cityofsanrafael.org>

Subject: Dominican Valley Project - thank you and addition of a project new planner

Hello Ray and Sean-

I want to reach out and thank you and Sean for taking the time to meet with Planning and Public Works staff over a series of three meetings to discuss in detail the outstanding completeness items related to the Dominican Valley project. At the last meeting, you've informed us that you plan to resubmit a complete development application and respond to the various information that we have informed you in our letter of April 26, 2024 is required in order for your application to be complete. You also told us that at this time you do not plan to appeal the City's incomplete determination of April 26, 2024. If you do plan to appeal, please let us know so we can provide you information on processing and holding an appeal hearing.

I also want to tell you that due to the importance and complexity of this project, I have reassigned it to a new project planner. Kristina Estudillo is our new Principal Planner here in San Rafael. She is experienced in land use planning and I think she will be an excellent addition to the team. She is already briefed on this project status and is ready to take the lead once we receive the resubmittal. I have cc'd her in this message so you have her email address. She and I will work together to ensure a seamless transition.

We look forward to working with you,

Margaret Kavanaugh-Lynch (she/her) | [City of San Rafael](#)

Planning Manager, Community Development Department

1400 5th Avenue

San Rafael, CA 94901



Exhibit B

July 24, 2024

Kristina Estudullio, Project Planner
 San Rafael Community Development Agency
 1400 Fifth Street
 San Rafael, CA 94903

Re: Dominican Valley Inclusionary Housing Proposal (File No: CDR23-002, ED23-062, TS23-001 (PLAN23-081))

Dear Kristina:

In response to the April 26, 2024 incompleteness letter, we are writing to provide the requested information needed to satisfy the City of San Rafael’s affordable housing requirements as detailed in Chapter 14.16 of the San Rafael Municipal Code.

Per the requested information in Section 2. Density Bonus of the letter, please find the following information.

- A. Density Bonus eligibility table: This table shall include: the number of market rate units in the project; the number of affordable housing units proposed & level of affordability for each of the designated affordable units; the number of other eligible units (senior housing, supportive housing, etc.); number of density bonus units requested; total allowable density bonus (see Table 3 of City Council Resolution);

Unit Type	Total #units	Market Rate	Very Low	Low	Moderate	Total Project
Base Density per Zoning	47 (10% affordable requirement per SRMC 14.16.030)					47
Density Bonus	17 (35% bonus per Govt Code Section 65915(f))					17
A – Margarita SFR	6	6				6
B – Deer Park SFR	5	5				5
C – Margarita Duplex	4	4				4
D.1 – Deer Park Townhome	17	17				17
D.2 – Deer Park Townhome	14*			14 (ADUs)		14
E – Gold Hill SFR	5	5				5
F – Loop Road SFR	13	13				13
Total	50	50		14		64*

*currently, the proposed project consists of 50 market rate units, and 14 affordable, deed-restricted, ADUs. Depending on how the City of San Rafael counts total units, the ADUs and overall units would account for 50 or 64 total units.

- B. Plans noting location of affordable dwelling units. Project plans showing the total number of units, the number and location of the affordable units and the number and location of the proposed density bonus units. *Please show on a plan set which units will be designated as affordable.;*

Please see the revised Dominican Valley Housing Planning Submittal, dated July 24, 2024, that includes Tentative Map and Architectural details. Please see revised Sheet A001 that depicts the proposed site plan and unit types (including the affordable ADUs).

- C. Clarification on Accessory Dwelling units and Junior Accessory Dwelling Units. In this submittal, there are inconsistencies in the identification of Accessory Dwelling Units and Junior Accessory Dwelling Units. *Please state how many of each type of these units are proposed, and show the location of each one of these units on a plan set.*

Consistent with Builders Remedy affordability requirements, the project proposes 20% + of the housing units as affordable. 14 attached accessory dwelling units (ADUs) shall be deed restricted “affordable” for low-income households. Attached ADUs are identified on the Site Plan, sheet A 001 and the Architectural sheets Identified as Lots 15-22, 25-28, 30-31

- D. Concessions/Incentives: The application shall include the total number of concessions or incentives being requested; The written statement shall include the actual cost reduction achieved through the concession/incentive and evidence that the concession/incentive allows the applicant to develop affordable housing at the specified affordable rents/sales price. *Provide the total number of concessions/incentives requested along with the financial explanation requested above;*

The project, by providing 20% of units as affordable housing, qualifies for two incentives /concessions (meaning reduction in development standards pursuant to California government code section 65915(d)(2)(B) or 65915(e) and applicant reserves the right to request as needed through the application process.

The primary concession that the applicant is requesting is to remove the requirements of the Hillside Guidelines for the overall project. This concession will result in identifiable and cost reductions because it will increase the value of the project and help reduce construction costs thereby facilitating the development of the affordable units.

- **The 50 residential units (+ 14 ADUs) comprises of the following types of units.**
 - **27 Single-Family Homes ranging in size from 2612 sq ft - 3215 sq ft**
 - **17 Townhomes ranging in size from 1150 sq ft - 1390 sq ft (14 Townhomes with attached ADUs)**
 - **6 Duplex units each 1705 sq ft**

- E. Waivers. The application shall include a list of requested waivers or reduction of development standards. Any request for waivers or reduction of development standards shall be accompanied with evidence that the development standards for which a waiver is requested would have the effect of physically precluding the construction of a development at the densities or with the concessions or incentives permitted by Government Code Section 65915; *Provide the total number of waivers requested along evidence that the noted development standard would preclude the construction of a development at the densities or with the concessions or incentives permitted by Government Code Section 65915 as requested above.*

At this time, the applicant is requesting waivers to the development standards for certain units within the Hillside Area designations pursuant to SRMC Section 14.12.030 - Property development standards (See Sheet A 001 for details – footnotes 2 through 5 in column “Hillside Guideline Compliant”), including the following:

- **Waiver for specific lots for step back and setback requirements**
- **Waiver for five (5) Unit type “E” lots for balcony projections into the 20 step back**
- **Waiver for 17 Unit types D1 and D2 for step backs and wall planes**
- **Waiver for nine (9) Unit types A and C for road access and height**
Waiver for 26 lots for “natural state” requirements pursuant to Hillside Guidelines

In addition, a waiver is requested for the requirement for two covered off-street parking spaces for all residential units. The townhomes units (unit type D1 and D2) include tandem parking for two cars, or one covered off street parking space, and therefore a waiver is needed for this requirement.

These waivers are necessary because strict application of the development standards will reduce available project area to build housing.

The project also qualifies for unlimited waivers or reductions to any development standard and the applicant reserves the right to request as needed through the application process.

The Development Application includes 50 single-family detached, duplex, and townhome residential units, which under the City’s inclusionary housing requirement for 10% affordable units will require 5 units of affordable housing. To meet those requirements, we are proposing an alternative consisting of 14 Deed Restricted Accessory Dwelling Units (“ADUs”) integrated throughout the townhomes (Unit Type D2) at the Low-Income affordable levels.

Pursuant to Government Code Sections 65852.2(m) and Section 65583.1, ADU’s may be utilized towards meeting the Regional Housing Need Allocation (RHNA) and Annual Progress Report pursuant to Government Code section 65400. The definition of ADUs includes both attached and detached product. In this case, the proposal conforms to the definition of an attached ADU under Government Code section 65852.22.

We look forward to working with San Rafael staff to process this application. Please do not hesitate to contact us should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ray Cassidy". The signature is written in a cursive, flowing style.

Ray Cassidy
Dominican Valley, LLC