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August 13, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: Application of PPL Electric Utilities Corporation for approval of the alteration of the crossing where State Route 1005 (Mount Sidney Road) crosses, above grade, tracks of the National Railroad Passenger Service (AMTRAK) (DOT 518 160 Y) for the purpose of replacing an existing utility pole and relocating an aerial utility line in East Lampeter Township, Lancaster County
Docket No. A-2025-3054947**

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is an Answer of the National Railroad Passenger Corporation to the Preliminary Objections of PPL Electric Utilities Corporation and New Matter in the above-referenced proceeding.

Sincerely,

A handwritten signature in blue ink that reads 'Kenneth R. Stark'.

Kenneth R. Stark
MCNEES WALLACE & NURICK LLC

c: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA EMAIL or U.S. MAIL

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PENNDOT
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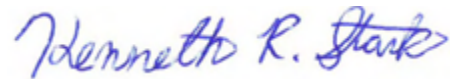
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Kenneth R. Stark

Counsel to Amtrak

Dated this 13th day of August, 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of PPL Electric Utilities :
Corporation for approval of the alteration of :
the crossing where State Route 1005 (Mount :
Sidney Road) crosses, above grade, tracks of :
the National Railroad Passenger Service : Docket No. A-2025-3054947
(AMTRAK) (DOT 518 160 Y) for the :
purpose of replacing an existing utility pole :
and relocating an aerial utility line in East :
Lampeter Township, Lancaster County :

NOTICE TO PLEAD

TO: PPL Electric Utilities Corporation
c/o Mallory Sweeney, Esquire
645 Hamilton Street, Suite 601
Allentown, PA 18101

Pursuant to 52 Pa. Code §§5.101 *et seq.* you are hereby notified that The National Passenger Railroad Corporation (“Amtrak”) has filed its Answer and New Matter to PPL Electric Utilities Corporation’s (“PPL”) Preliminary Objections which you are hereby notified to file a written response to within ten (10) days unless otherwise provided in Chapter 5 of Title 52 of the Pennsylvania Code. Your failure to answer will allow the presiding officer to rule on the New Matter without a response from you, thereby requiring no proof. All Pleadings such as a New Matter must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Amtrak.

Respectfully submitted,

MCNEES WALLACE & NURICK LLC

Kenneth R. Stark

Susan E. Bruce (Pa. I.D. 80146)
Kenneth R. Stark (Pa. I.D. 312945)
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*Counsel for the National Passenger Railroad
Corporation*

Dated: August 13, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of PPL Electric Utilities :
Corporation for approval of the alteration of :
the crossing where State Route 1005 (Mount :
Sidney Road) crosses, above grade, tracks of :
the National Railroad Passenger Service : Docket No. A-2025-3054947
(AMTRAK) (DOT 518 160 Y) for the :
purpose of replacing an existing utility pole :
and relocating an aerial utility line in East :
Lampeter Township, Lancaster County :

**ANSWER OF THE NATIONAL RAILROAD PASSENGER CORPORATION TO
THE PRELIMINARY OBJECTIONS OF
PPL ELECTRIC UTILITIES CORPORATION
AND NEW MATTER**

Pursuant to Sections 5.61(a)(2) and 5.101 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations, 52 Pa. Code Sections 5.61(a)(2) and 5.101, and the stipulation executed on July 23, 2025 between the National Railroad Passenger Corporation (“Amtrak”) and PPL Electric Utilities Corporation’s (“PPL”), Amtrak, by and through its counsel, hereby responds to PPL’s Preliminary Objections to Amtrak’s Letter Objection to PPL’s May 1, 2025 Application for approval of the alteration of the crossing where State Route 1005 (Mount Sidney Road) crosses, above grade, Amtrak’s tracks (DOT 518 160 Y) for the purpose of replacing an existing utility pole and relocating an aerial utility line in East Lampeter Township, Lancaster County (“Application”). With this Answer to Preliminary Objections, Amtrak has included a New Matter and a Notice to Plead.¹

¹ Amtrak recognizes that this Answer to Preliminary Objections includes new matter that was not previously raised in detail in Amtrak’s June 15, 2025 letter objection to PPL’s Application. Therefore, Amtrak is including a Notice to Plead and New Matter in this pleading, consistent with the Commission’s rules governing preliminary objections.

SUMMARY AND STANDARD OF REVIEW

PPL filed a rail crossing application with the Commission to obtain the Commission's approval for PPL to enter Amtrak's property, which would interrupt Amtrak's operations and public passenger services, on terms that are not agreeable to Amtrak and are inconsistent with how Amtrak reviews and processes other permits to enter Amtrak's property. PPL's Application, if approved as filed, would bypass Amtrak's well-established rules, permitting and license procedures, and engineering practices and specifications for utilities and parties seeking to enter Amtrak's property to conduct any work. Amtrak opposes PPL's Application as it was filed.

As a threshold matter, PPL has failed to demonstrate that its proposed removal of an existing, wooden utility pole and transfer of the aerial line to an existing steel pole constitutes an alteration of the public crossing at Mount Sidney Road ("the Crossing") subject to this Commission's rail safety jurisdiction under Chapter 27, 66 Pa. C.S. §§ 2702, 2704. Under PPL's proposal, the proposed work involved would occur over Amtrak's tracks and between Amtrak's catenary and transmission wires.² The wireline that PPL wishes to transfer is not adjacent to the bridge and physical roadway at Mount Sidney Road.³ PPL has not demonstrated that its proposed plan of work is within a PUC-jurisdictional right-of-way and consistent with the Commission's 1969 order in Complaint Docket No. 18330.⁴ Even if PPL were to demonstrate that PPL's

See 52 Pa. Code § 5.101. As necessary, Amtrak respectfully requests that the Commission treat this Answer and any new matter raised herein as timely.

² Per Amtrak's specifications (CE-4), aerial crossings consisting of communication lines and power lines below 115,000 volts are not permitted to cross the Railroad in electrified territory. Power lines below 115,000 volts and communication lines shall cross the Railroad through underground means. However, Amtrak is willing to work with PPL in good faith to effectuate PPL's proposed work. *See* <https://www.amtrak.com/about-amtrak/engineering-practices-library.html>

³ *See* Exhibit A (Google Maps images of the Crossing at Mount Sidney Road).

⁴ *Conestoga Valley School District And Supervisors of The Township of East Lampeter v. The Pennsylvania Railroad Company, Department of Highways of the Commonwealth of Pennsylvania, County of Lancaster, Pennsylvania Power & Light Company, and The Bell Telephone Company of Pennsylvania*, Docket No. 18330 (Order Entered August 18, 1969).

wireline is within an appropriate right-of-way from the Crossing, PPL has not demonstrated that the Commission's rail crossing jurisdiction is appropriate in this instance or that any such jurisdiction overrides real estate law, license agreements, Amtrak's permitting procedures, and federal laws authorizing Amtrak as a rail passenger carrier.

While the Commission has some basis for exercising jurisdiction to issue an order pertaining to utility lines, wires, or facilities within a public rail highway crossing, the Commission's primary jurisdiction and purpose in regulating public railroad crossings is to promote safety and protect the public interest when a railroad public utility seeks to construct, relocate, suspend, or abolish a public crossing. *See* 66 Pa. C.S. §§ 2702, 2704; 52 Pa. Code § 3.361 (authorizing complaints contending a crossing is dangerous or inadequate). The Commission only has the powers delegated expressly to it by the General Assembly. *Fairview Water Co. v. Pa. Pub. Util. Com.*, 502 A.2d 162 (1985); *W. Pa. Water Co. v. Pa. PUC*, 311 A.2d 370 (1973). Section 2702 of the Public Utility Code provides:

No public utility, engaged in the transportation of passengers or property, shall, without prior order of the commission, construct its facilities across the facilities of any other such public utility or across any highway at grade or above or below grade, or at the same or different levels; and no highway, without like order, shall be so constructed across the facilities of any such public utility, and, without like order, no such crossing heretofore or hereafter constructed shall be altered, relocated, suspended or abolished.

66 Pa. C.S. § 2702(a). The plain language in Section 2702 envisions the triggering of the Commission's rail crossing jurisdiction when a railroad public utility seeks to alter a public crossing and when the alteration of that public crossing impacts existing non-rail utility facilities. Here, PPL seeks to use the Commission's *potential*, incidental regulatory authority in an area where any regulatory authority – to the extent it exists – is incidental to the Commission's primary regulatory authority in evaluating proposed physical modifications to public roadways, bridges, and crossing approaches at rail public crossings. No such alterations to the bridge,

roadway, and crossing approaches at Mount Sidney Road are being proposed. Notably, the Commission has expressly disclaimed jurisdiction over interpreting easements and adjudicating real estate disputes. *Daniel K. Smith v. Verizon Pennsylvania Inc.*, 2012 Pa. PUC LEXIS 326, *7-8, Docket No. C-2011-2243681 (Order Entered March 2, 2012). PPL fails to demonstrate that any applicable Commission regulatory authority is superior to real estate law and the federal permitting process that governs requests to enter Amtrak's property.

Commission procedure regarding the disposition of preliminary objections is similar to the procedure utilized in Pennsylvania civil practice. *Application of East Coast Resources, LLC*, 2016 Pa. PUC LEXIS 21, *8-9, Docket No. A-2014-2453533 (Order entered Jan. 28, 2016). When evaluating Preliminary Objections, the Commission must accept as true all well-pleaded, material facts of the non-moving party (here, Amtrak), as well as every reasonable inference from those facts. *Id.*; *see also County of Allegheny v. Cmwlth. of Pa.*, 490 A.2d 402 (Pa. 1985); *Cmwlth. of Pa. v. Bell Telephone Co. of Pa.*, 551 A.2d 602 (Pa. Cmwlth. 1988). The Commission must resolve any doubt in favor of the non-moving party (here, Amtrak) by refusing to sustain the preliminary objections. *Id.* As demonstrated herein, PPL has failed to provide an adequate legal basis for the Commission to entertain, let alone accept, PPL's Application. PPL has failed to demonstrate Commission jurisdiction is proper and displaces the body of real estate law in Pennsylvania and Amtrak's federal regulatory regime.

The Commission should dismiss PPL's Application or, alternatively, direct PPL to follow Amtrak's well-established rules, permitting and license procedures, and engineering practices and specifications for public utilities and other parties seeking to enter Amtrak's property to conduct any work. In the event that the Commission does not dismiss PPL's Application, the Commission should transfer PPL's application from the Bureau of Technical Utility Services to

the Office of Administrative Law Judge because PPL's Application is contested and presents genuine material issues of fact in dispute.

ANSWER TO PRELIMINARY OBJECTIONS AND NEW MATTER

With that preface, Amtrak submits its answer to PPL by stating and averring as follows:

1. Amtrak submits that Paragraph 1 of the Preliminary Objections speaks for itself and no response is required insofar as PPL, on May 1, 2025, filed an application with the Commission. However, Amtrak challenges PPL's assumption that the Application is properly submitted as a rail crossing application before the Commission. Amtrak further observes that the Application is deficient because the accompanying Certificate of Service to the Application is undated and unexecuted. Therefore, Amtrak is unable to ascertain whether all concerned and interested parties have been effectively served and notified of the Application.

2. Amtrak denies Paragraph 2 insofar as PPL has not demonstrated that the Commission has authority to review and entertain PPL's Application pursuant to Chapter 27 in the Public Utility Code. Amtrak notes that PPL asserted that it submitted the Application pursuant to Chapter 2702, but there is no Chapter 2702 in the Public Utility Code. Amtrak presumes PPL intended to submit an application pursuant to Section 2702 in Chapter 27 of the Public Utility Code and therefore denies that PPL properly submitted an application pursuant to Section 2702 in the Public Utility Code.

3. Amtrak submits that Paragraph 3 speaks for itself and no response is required. However, Amtrak denies Paragraph 3 to the extent that PPL implies that the letter correspondence from staff in the Commission's Rail Safety Division constitutes a final Commission determination on the deadline for protests to PPL's Application.

4. Amtrak submits that Paragraph 4 speaks for itself and no response is required. However, Amtrak denies Paragraph 4 to the extent that PPL implies that the letter correspondence from staff in the Commission's Rail Safety Division constitutes a final Commission determination on the deadline for protests to PPL's Application.

5. Amtrak admits Paragraph 5. By way of further answer, Amtrak's June 16, 2025 letter objection filed with the Commission ("Letter Objection") expressly objected to PPL's Application at this time and emphasized the need for PPL to submit an application directly with Amtrak, to enter Amtrak's property, as directed at <https://www.amtrak.com/about-amtrak/real-estate/utility-installations.html>. Amtrak further explained that it would be able to complete its review of PPL's Amtrak application, when submitted, as soon as possible.

6. Amtrak denies Paragraph 6. Amtrak clearly stated a substantive objection and highlighted PPL's failure to "submit an electronic application to Amtrak for documentation on the following web site: <https://www.amtrak.com/about-amtrak/real-estate/utility-installations.html>." Letter Objection at 1.

7. Amtrak admits that PPL's failure to submit an application via Amtrak's online portal is one basis for Amtrak's objection to PPL's Application. As discussed herein and in Amtrak's protest that is concurrently being submitted in this proceeding, Amtrak objects to and protests PPL's Application on several grounds, including jurisdictional grounds.

8. Amtrak submits that Paragraph 8 speaks for itself and no response is required.

9. The averment of Paragraph 9 is a conclusion of law to which no response is required.

10. The averment of Paragraph 10 is a conclusion of law to which no response is required.

11. The averment of Paragraph 11 is a conclusion of law to which no response is required.

12. The averment of Paragraph 12 is a conclusion of law to which no response is required.

13. Amtrak denies Paragraph 13. Paragraph 13 refers to “Rules” but fails to specify the Rules to which the Letter Objection fails to conform. To the extent it may be construed that the Letter Objection was not substantive enough to constitute a formal Protest or formal Preliminary Objections, Amtrak has now retained outside counsel to submit a Protest and an Answer to Preliminary Objections on behalf of Amtrak in this proceeding. Both the initial Application by PPL and Amtrak’s Letter Objection were initiated and filed by the business units of the respective organizations, not by counsel.

14. Amtrak admits that PPL has properly cited Section 2702 of the Public Utility Code in Paragraph 14. However, Amtrak denies that PPL’s Application was properly submitted pursuant to Section 2702 of the Public Utility Code, 66 Pa. C.S. § 2702.

15. Paragraph 15 is a reference to an appellate case and a conclusion of law to which no response is typically required. However, PPL’s recitation of the law is cursory and incomplete. In *Dep’t of Highways v. Pa. PUC*, 182 A.2d 267 (Pa. Super. 1962), the Superior Court held that the Commission had jurisdiction to direct the construction of a bridge over a public highway rail crossing in a manner that would permit The Bell Telephone Company “to relocate and install its facilities *in the structure of the bridge.*” *Id.* at 268 (emphasis added). Bell had asked the Commission for authorization to place its telephone cables in conduits at the bridge and to replace poles carrying telephone cable across the bridge. The Department of Highways contended that Bell should have obtained a permit from the Department of Highways. The Court emphasized that

the Commission has the exclusive authority to direct any construction at a public highway-rail crossing and “can direct the details of construction so as to provide for occupancy and relocation of the facilities of a utility occupying a highway or street in the area under commission jurisdiction.” *Id.* at 272. Here, no construction, alteration, or reconstruction of the bridge or crossing the bridge, roadway, or crossing approaches at the Crossing at Mount Sidney Road are being proposed. And PPL has not demonstrated that the entire area in which PPL seeks to conduct work in Amtrak’s property is subject to the Commission’s public rail highway crossing jurisdiction as claimed in the Application. While the Commission’s jurisdiction over public rail highway crossings may be exclusive if such jurisdiction attaches, *see Phila. v. PECO*, 473 A.2d 997, 1003 (Pa. 1984), the Commission’s jurisdiction “over rail-highway crossings is not unlimited,” (*id.*) and the General Assembly ensured that the Commission’s jurisdiction “was carefully limited to *public or highway crossings.*” *Del. v. Shuman*, 115 A.2d 161, 164 (Pa. 1955). Highway is defined in the Public Utility Code as a “way or place of whatever nature open to the use of the public as a matter of right for purposes of the vehicular traffic.” *See id.*; 66 Pa. C.S. § 102. In its Application, PPL does not seek to alter or reconstruct the highway at the Crossing.⁵ PPL has not shown why any potential, incidental Commission jurisdiction – to the extent any exists here – is superior to real estate law and the permitting process that governs requests to enter Amtrak’s property. PPL has not shown that any incidental jurisdiction of the Commission appropriately displaces Amtrak’s permitting procedures and the federal laws authorizing Amtrak as a rail passenger carrier. Notably,

⁵ Indeed, the engineering diagram in Exhibit A to PPL’s Application and Exhibit A to this Answer confirm that the wooden poles and wireline where PPL proposes to conduct work are not adjacent to the physical Highway and bridge at the Mount Sidney Road Crossing. Even if the wooden poles and wireline are in the Highway’s right-of-way – which PPL has not demonstrated – no physical alteration of the Highway and the bridge is being proposed. In fact, if the wooden pole and/or wireline were to fall, the wooden pole/wireline would fall on Amtrak’s facilities and interrupt Amtrak’s operations (not highway operations at Mount Sidney Road). PPL’s specific plan of work is unclear, and PPL has not provided to Amtrak any site plans, construction plans, specifications, or computations signed and sealed by a Registered Professional Engineer.

the Third Circuit Court of Appeals has concluded that a Pennsylvania statute that would otherwise confer sovereign immunity on a Pennsylvania-based entity is preempted by the Amtrak Reform and Accountability Act of 1997 (“the Amtrak Reform Act”), 49 U.S.C. § 24301 *et seq.* *DeWeese v. Nat’l R.R. Passenger Corp.*, 590 F.3d 239 (3d Cir. 2009). In *DeWeese*, the Court preempted the Pennsylvania statute because the Amtrak Reform Act “reveals that giving Amtrak the freedom to negotiate agreements with other carriers to allocate the financial consequences of liability was a key component of the Reform Act, and § 28103(b) [in the United States Code] was specifically needed to eliminate ‘the possibility that state laws can nullify [Amtrak’s] indemnification contracts.’” 590 F.3d at 248.

16. Paragraph 16 is a reference to an appellate case and a conclusion of law to which no response is typically required. However, PPL has failed to demonstrate that the Commission has the power to act on PPL’s Application and that any potential, incidental Commission jurisdiction – to the extent any exists here – is superior to real estate law and the permitting process that governs requests to enter Amtrak’s property.

17. Paragraph 17 is a reference to the Commission’s regulation and a conclusion of law to which no response is typically required. By way of further response, Amtrak is concurrently filing a protest in this proceeding, in addition to Amtrak’s Answer to PPL’s Preliminary Objections.

18. Paragraph 18 is a reference to the Commission’s regulation and a conclusion of law to which no response is typically required. By way of further response, Amtrak is concurrently filing a protest in this proceeding.

19. Paragraph 19 is a reference to the Commission’s regulation and a conclusion of law to which no response is typically required. By way of further response, Amtrak is concurrently filing a protest in this proceeding.

20. Denied. Amtrak is concurrently filing a protest in this proceeding in addition to Amtrak's Answer to PPL's Preliminary Objections. No express deadline for protests in this proceeding has been established. PPL and Amtrak agreed to extend the time by which Amtrak could substantively respond to issues raised in the Application. Both Amtrak's Answer to the Preliminary Objections and Amtrak's protest detail the grounds and reasons for Amtrak's objection and protest to PPL's Application. Because PPL seeks to enter Amtrak's land, Amtrak's standing as a party of interest in PPL's Application is self-evident.

21. Denied. Amtrak is concurrently filing a protest in this proceeding in addition to the Answer to PPL's Preliminary Objections. No express deadline for protests in this proceeding has been established. PPL and Amtrak agreed to extend the time by which Amtrak could substantively respond to issues raised in the Application. Both Amtrak's Answer to the Preliminary Objection and Amtrak's protest detail the grounds and reasons for Amtrak's objection and protest to PPL's Application. Further, Amtrak already stated a substantive objection to PPL's Application by highlighting PPL's need to "submit an electronic application to Amtrak for documentation on the following web site: <https://www.amtrak.com/about-amtrak/real-estate/utility-installations.html>" consistent with Amtrak's requirements. Letter Objection at 1.

22. Denied. PPL fails to support, with reference to any applicable law, its generic assertion that Amtrak's requirement that PPL submit an application through Amtrak's online portal "is contrary to Pennsylvania law and is therefore legally insufficient." As the owner of the property that PPL seeks to enter, Amtrak retains rights to set forth the conditions by which PPL or any other party may enter Amtrak's property.

23. Denied. PPL fails to support, with reference to any applicable law, its generic assertion that "Amtrak has no legal right to impose on PPL Electric a separate review process

outside the purview of the Commission’s review.” As the owner of the property to which PPL seeks to enter, Amtrak retains robust rights in property law to set forth the conditions by which PPL or any other party may enter Amtrak’s property. PPL has failed to demonstrate that any applicable Commission jurisdiction preempts and overrides Amtrak’s authority as the owner of the property in setting forth reasonable conditions by which parties enter Amtrak’s property.

24. Denied. PPL presumes exclusive and preemptive PUC authority without demonstrating exclusive and preemptive PUC authority over all facets of PPL’s Application and proposed entry into Amtrak’s property. PPL has failed to demonstrate that the Commission has the power to act on PPL’s Application and that any potential, incidental Commission jurisdiction to order the relocation of non-rail utility lines – to the extent any such jurisdiction exists here – is superior to real estate law and the federal permitting process that governs requests to enter Amtrak’s property. In the event PPL’s Application triggers some potential Commission jurisdiction over a portion of PPL’s proposed project, PPL fails to demonstrate that such Commission jurisdiction is exclusive and preemptive over portions of PPL’s project that are distant from the physical bridge structure at the Crossing. Accessing Amtrak’s tracks and right of way where a public highway is not involved is subject to real estate law and thus Amtrak’s well-established rules, permitting and license procedures, and engineering practices and specifications for utilities and other parties seeking to enter Amtrak’s property to conduct any work.

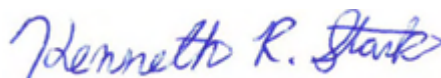
25. Denied. Amtrak already stated a substantive objection to PPL’s Application by highlighting PPL’s need to “submit an electronic application to Amtrak for documentation on the following web site: <https://www.amtrak.com/about-amtrak/real-estate/utility-installations.html>” consistent with Amtrak’s requirements. Letter Objection at 1. Amtrak is concurrently filing a

protest in this proceeding. Both Amtrak's Protest and Answer to PPL's Preliminary Objections are being plead with specificity and both adhere to the Commission's rules and regulations.

26. Denied. PPL fails to demonstrate why Amtrak's Letter Objection should be stricken with prejudice. PPL and Amtrak have agreed that Amtrak may substantively respond to PPL's Preliminary Objections by August 13, 2025. Amtrak has substantively responded to PPL's Preliminary Objections and is protesting Amtrak's Application, consistent with Amtrak's rights.

WHEREFORE, Amtrak respectfully requests that the Commission deny PPL's Preliminary Objections and dismiss PPL's Application. In the event that the Commission does not dismiss PPL's application, the Commission should transfer PPL's application from the Bureau of Technical Utility Services to the Office of Administrative Law Judge because PPL's application is contested and presents genuine issues of material fact or direct PPL to follow Amtrak's rules, permitting and licensing procedures, and engineering practices and specifications for utilities and parties seeking to enter Amtrak's property to conduct any work.

Respectfully submitted,



Susan E. Bruce (Pa. I.D. 80146)
Kenneth R. Stark (Pa. I.D. 312945)
Victoria A. Geddis (Pa. I.D. 335500)
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Counsel for the National Passenger Railroad Corporation

Dated: August 13, 2025

VERIFICATION

I, Krista L. Keene, Senior Director of Real Estate at The National Railroad Passenger Corporation (“Amtrak”), hereby state that the facts above set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: August 13, 2025

Signed by:
Krista Keene
1E0B44A8886A465...

EXHIBIT A





