

**BEFORE THE COMMISSIONER OF INSURANCE
OF THE STATE OF KANSAS**

In the Matter of the Application of)
)
 Altamont FRA; Atchison County District #5 FRA;)
 Burr Oak FRA; Butler County #1 FRA; Butler)
 County #4 FRA; Clearwater FRA; Clifton FRA;)
 Ellis County Rural FRA; Florence FRA;)
 Fredonia FRA; Gorham Fire District #1 FRA;)
 Harvey County Fire District #1 Walton FRA;)
 Hillsboro FRA; Hoisington FRA; Hoyt Rural)
 Fire District #3 FRA; Jackson County Rural)
 Fire District #2 FRA; Jetmore FRA; Kanwaka)
 FRA; Kiowa County FRA; Labette County Fire)
 District #9 FRA; Lake Quivira FRA; Leavenworth)
 County Fire District #1 FRA; Leawood FRA;)
 Leoti FRA; McPherson County #7 FRA; Moundridge)
 FRA; Mulvane Fire & Rescue FRA; Oskaloosa)
 Township FRA; Ozawkie Township FRA; Rawlins)
 County #3 FRA; Reading Benefit Fire District)
 #1 FRA; Republic County Consolidated FRA; Rural)
 Township Fire District #3 FRA; Saline County #5)
 FRA; Sarcoxie Township FRA; Satanta FRA;)
 Seneca FRA; Shawnee FRA; Shawnee Heights)
 FRA; Sherman Township Leavenworth County)
 FRA; Smith County #1 FRA; Sterling FRA; Stranger)
 Township FRA; Sublette FRA; Tescott FRA;)
 Washington FRA; Washington County Rural Fire)
 District #9 FRA; Wellsville FRA; Willow Springs FRA;)

Docket No. 4704-FR

FINAL ORDER

After due and proper notice, this matter was called for hearing on November 18, 2014, pursuant to Kansas Statutes Annotated (K.S.A.) 40-1706(c)(6) and the Kansas Administrative Procedure Act, K.S.A. 77-501, et seq. Those Firefighter Relief Associations applying for a redetermination (“Applicants”) were: The Altamont Firefighters Relief Association presented evidence by sworn electronic affidavit. The Atchison County District #5 Firefighters Relief Association presented evidence by sworn

electronic affidavit. The Burr Oak Firefighters Relief Association presented evidence by sworn electronic affidavit. The Butler County #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Butler County #4 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Clearwater Firefighters Relief Association presented evidence by sworn electronic affidavit. The Clifton Firefighters Relief Association presented evidence by sworn electronic affidavit. The Ellis County Rural Fire Department Firefighters Relief Association presented evidence by sworn electronic affidavit. The Florence Firefighters Relief Association presented evidence by sworn electronic affidavit. The Hesston Firefighters Relief Association presented evidence by sworn electronic affidavit. The Fredonia Firefighters Relief Association presented evidence by sworn electronic affidavit. The Gorham FD #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Greensburg Firefighters Relief Association presented evidence by sworn electronic affidavit and their application was denied. The Harvey County FD #1 Walton Firefighters Relief presented evidence by sworn electronic affidavit. The Hillsboro Firefighters Relief Association presented evidence by sworn electronic affidavit. The Hoisington Firefighters Relief Association presented evidence by sworn electronic affidavit. The Hoyt Rural FD #3 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Jackson CO Rural FD #2 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Jetmore Firefighters Relief Association presented evidence by sworn electronic affidavit. The Kanwaka Firefighters Relief Association presented evidence by sworn electronic affidavit. The Kiowa County Firefighters Relief Association presented evidence by sworn electronic affidavit. The

Labette CO FD #9 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Lake Quivira Firefighters Relief Association presented evidence by sworn electronic affidavit. The Leavenworth CO FD #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Leawood Firefighters Relief Association presented evidence by sworn electronic affidavit. The Leoti Firefighters Relief Association presented evidence by sworn electronic affidavit. The McPherson CO #7 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Moundridge Firefighters Relief Association presented evidence by sworn electronic affidavit. The Mulvane Fire & Rescue Firefighters Relief Association presented evidence by sworn electronic affidavit. The Leavenworth CO FD #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Oskaloosa TWP Firefighters Relief Association presented evidence by sworn electronic affidavit. The Ozawkie TWP Firefighters Relief Association presented evidence by sworn electronic affidavit. The Rawlins CO #3 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Leavenworth Reading Benefit Fire District #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Republic CO Cons Firefighters Relief Association presented evidence by sworn electronic affidavit. The Rural Township FD #3 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Saline CO#5 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Sarcoxie Firefighters Relief Association presented evidence by sworn electronic affidavit. The Satanta Firefighters Relief Association presented evidence by sworn electronic affidavit. The Seneca Firefighters Relief Association presented evidence by sworn electronic affidavit.

The Shawnee Firefighters Relief Association presented evidence by sworn electronic affidavit. The Shawnee Heights Firefighters Relief Association presented evidence by sworn electronic affidavit. The Sherman TWP LV CO Firefighters Relief Association presented evidence by sworn electronic affidavit. The Smith CO #1 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Sterling Firefighters Relief Association presented evidence by sworn electronic affidavit. The Stranger Township Firefighters Relief Association presented evidence by sworn electronic affidavit. The Sublette Firefighters Relief Association presented evidence by sworn electronic affidavit. The Tescott Firefighters Relief Association presented evidence by sworn electronic affidavit. The Washington County Rural FD #9 Firefighters Relief Association presented evidence by sworn electronic affidavit. The Washington Firefighters Relief Association presented evidence by sworn electronic affidavit. The Wellsville Firefighters Relief Association presented evidence by sworn electronic affidavit. The Willow Springs Firefighters Relief Association presented evidence by sworn electronic affidavit.

Zachary J.C. Anshutz, Assistant Commissioner, was the Presiding Officer duly appointed by Commissioner Sandy Praeger.

The Kansas Insurance Department was represented by John Wine, General Counsel, and Steven Lehwald, administering the Firefighter Relief Association regulatory activities for the Kansas Insurance Department.

Said Presiding Officer, being fully advised in the premises and giving due consideration to the evidence presented, makes the following findings of fact, conclusions of law, and determination of public policy:

Findings of Fact

At issue is the 2014 and future distributions of the Firefighters Relief Fund to firefighters relief associations throughout the State of Kansas pursuant to the Firefighters Relief Act, K.S.A. 40-1701, et seq. Applicants are contending that changed circumstances exist to warrant a redetermination of proportionate amounts payable to all firefighters relief associations from the Firefighters Relief Fund pursuant to K.S.A. 40-1706. Exempt property was not included in the evidence or used for computation of assessed tangible property valuations in accordance with K.S.A. 40-1706(c)(6) and K.A.R. 40-10-2(d) excluding exempt property. John Boyd researched the 2014 Kansas Certified Population and the Kansas Assessed Tangible Property Report in order to verify the population and valuation data submitted. After reviewing this additional evidence the Presiding Officer makes the following findings of fact:

EXHIBIT 1: The Altamont Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,969 with a 2014 Kansas Assessed Tangible Property Report valuation of \$14,641,687.

EXHIBIT 2: The Atchison County District No 5 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 810 with a 2014 Kansas Assessed Tangible Property Report valuation of \$10,708,981.

EXHIBIT 3. The Burr Oak Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 308 with a 2014 Kansas Assessed Tangible Property Report valuation of \$4,361,108.

EXHIBIT 4. Butler CO #1 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 14,792 with a 2014 Kansas Assessed Tangible Property Report valuation of \$148,630,375.

EXHIBIT 5. Butler CO #4 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population

revealed 340 with a 2014 Kansas Assessed Tangible Property Report valuation of \$5,468,399.

EXHIBIT 6. Clearwater Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 3,281 with a 2014 Kansas Assessed Tangible Property Report valuation of \$23,576,891.

EXHIBIT 7. Clifton Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 852 with a 2014 Kansas Assessed Tangible Property Report valuation of \$18,840,174.

EXHIBIT 8. Ellis CO Rural Fire Dept Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 4,361 with a 2014 Kansas Assessed Tangible Property Report valuation of \$189,279,206.

EXHIBIT 9. Florence Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 572 with a 2014 Kansas Assessed Tangible Property Report valuation of \$9,800,552.

EXHIBIT 10. Fredonia Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,390 with a 2014 Kansas Assessed Tangible Property Report valuation of \$10,770,388.

EXHIBIT 11. Gorham FD Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 687 with a 2014 Kansas Assessed Tangible Property Report valuation of \$19,453,735.

EXHIBIT 12. Greensburg Firefighters Relief Association did not offer evidence in support of changed circumstances. Research showed a redetermination would decrease their distribution amount.

EXHIBIT 13. Harvey County FD #1 Walton Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,015 with a 2014 Kansas Assessed Tangible Property Report valuation of \$10,622,944.

EXHIBIT 14. Hillsboro Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 3,811 with a 2014 Kansas Assessed Tangible Property Report valuation of \$30,756,661.

EXHIBIT 15. Hoisington Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 3,361 with a 2014 Kansas Assessed Tangible Property Report valuation of \$37,092,337.

EXHIBIT 16. Hoyt Rural FD #3 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,269 with a 2014 Kansas Assessed Tangible Property Report valuation of \$18,789,484.

EXHIBIT 17. Jackson CO Rural FD #2 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 613 with a 2014 Kansas Assessed Tangible Property Report valuation of \$6,622,365.

EXHIBIT 18. Jetmore Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 879 with a 2014 Kansas Assessed Tangible Property Report valuation of \$3,443,799.

EXHIBIT 19. Kanwaka Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,442 with a 2014 Kansas Assessed Tangible Property Report valuation of \$21,285,763.

EXHIBIT 20. Kiowa County Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 801 with a 2014 Kansas Assessed Tangible Property Report valuation of \$81,819,386.

EXHIBIT 21. Jetmore Labette CO FD #9 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 682 with a 2014 Kansas Assessed Tangible Property Report valuation of \$5,977,263.

EXHIBIT 22. Lake Quivira Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 933 with a 2014 Kansas Assessed Tangible Property Report valuation of \$26,342,305.

EXHIBIT 23. Leavenworth CO FD #1 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 14,747 with a 2014 Kansas Assessed Tangible Property Report valuation of \$115,765,041.

EXHIBIT 24. Leawood Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 32,991 with a 2014 Kansas Assessed Tangible Property Report valuation of \$786,023,732.

EXHIBIT 25. Leoti Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,192 with a 2014 Kansas Assessed Tangible Property Report valuation of \$39,995,357.

EXHIBIT 26. McPherson Fire District #7 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,587 with a 2014 Kansas Assessed Tangible Property Report valuation of \$15,752,141.

EXHIBIT 27. Moundridge Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,753 with a 2014 Kansas Assessed Tangible Property Report valuation of \$15,781,197.

EXHIBIT 28. Mulvane Fire & Rescue Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 6,979 with a 2014 Kansas Assessed Tangible Property Report valuation of \$84,322,030.

EXHIBIT 29. Oskaloosa Twp. Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,126 with a 2014 Kansas Assessed Tangible Property Report valuation of \$16,183,412.

EXHIBIT 30. Ozawkie Twp. Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,613 with a 2014 Kansas Assessed Tangible Property Report valuation of \$9,764,176.

EXHIBIT 31. Rawlins Co. #3 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 307 with a 2014 Kansas Assessed Tangible Property Report valuation of \$32,986,615.

EXHIBIT 32. Reading Benefit Fire District #1 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 578 with a 2014 Kansas Assessed Tangible Property Report valuation of \$65,379,621.

EXHIBIT 33. Republic Co. Cons. Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,221 with a 2014 Kansas Assessed Tangible Property Report valuation of \$23,270,302.

EXHIBIT 34. Rural Township FD #3 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 752 with a 2014 Kansas Assessed Tangible Property Report valuation of \$9,125,688.

EXHIBIT 35. Saline Co. #5 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,619 with a 2014 Kansas Assessed Tangible Property Report valuation of \$28,862,061.

EXHIBIT 36. Sarcoxie Twp. Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 993 with a 2014 Kansas Assessed Tangible Property Report valuation of \$10,362,068.

EXHIBIT 37. Satanta Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,656 with a 2014 Kansas Assessed Tangible Property Report valuation of \$107,846,585.

EXHIBIT 38. Seneca Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 3,763 with a 2014 Kansas Assessed Tangible Property Report valuation of \$57,354,837.

EXHIBIT 39. Shawnee Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 64,323 with a 2014 Kansas Assessed Tangible Property Report valuation of \$718,194,189.

EXHIBIT 40. Shawnee Heights Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 14,833 with a 2014 Kansas Assessed Tangible Property Report valuation of \$166,818,154.

EXHIBIT 41. Sherman Twp. LV Co. Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,694 with a 2014 Kansas Assessed Tangible Property Report valuation of \$27,994,338.

EXHIBIT 42. Smith Co. #1 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 672 with a 2014 Kansas Assessed Tangible Property Report valuation of \$6,957,150.

EXHIBIT 43. Sterling Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,299 with a 2014 Kansas Assessed Tangible Property Report valuation of \$8,933,887.

EXHIBIT 44. Stranger Township Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,703 with a 2014 Kansas Assessed Tangible Property Report valuation of \$29,425,747.

EXHIBIT 45. Sublette Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 2,485 with a 2014 Kansas Assessed Tangible Property Report valuation of \$109,060,313.

EXHIBIT 46. Tescott Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 480 with a 2014 Kansas Assessed Tangible Property Report valuation of \$8,184,555.

EXHIBIT 47. Washington County Rural FD #9 Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 371 with a 2014 Kansas Assessed Tangible Property Report valuation of \$7,281,796.

EXHIBIT 48. Washington Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,095 with a 2014 Kansas Assessed Tangible Property Report valuation of \$5,730,879.

EXHIBIT 49. Wellsville Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 3,037 with a 2014 Kansas Assessed Tangible Property Report valuation of \$25,171,271.

EXHIBIT 50. Willow Springs FD Firefighters Relief Association did not offer evidence in support of changed circumstances. The July 1, 2014 Kansas Certified Population revealed 1,487 with a 2014 Kansas Assessed Tangible Property Report valuation of \$18,512,320.

The presiding officer therefore makes findings of fact consistent with the above evidence.

Conclusions of Law

K.S.A. 40-1706(c)(6) which gives the Commissioner of Insurance the authority to redetermine the proportionate amounts of the distribution payable to all firefighters relief associations, is silent as to the specific method by which the Commissioner is to make such a redetermination after hearing. The statute gives the Commissioner the discretion to determine how the redetermination is to be made.

As stated in K.S.A. 40-1706(d)(6), the commissioner of insurance ***“may”*** redetermine such proportionate amounts of the distribution based upon such information as is presented to or otherwise made available by the applicants to the commissioner and ***“may”*** make a finding of changed circumstances.

Based upon the evidence and subject to the limitations discussed herein, changed circumstances are found to exist for the Applicants as noted above, to support a redetermination of the proportionate amounts of the distribution payable to all firefighters relief associations from the Firefighters Relief Fund for 2014 and future distributions pursuant to the Firefighters Relief Act, specifically K.S.A. 40-1706(c)(6).

To redetermine the proportionate amount of the distribution payable to all firefighters relief associations, the Commissioner has previously determined and continues to hold that the additional population and assessed tangible property valuation added above shall be treated separately, as a nonreceiving association, and these figures of the additional population and assessed tangible property valuation of each association will be placed into the formula used to determine the proportionate

amounts payable to nonreceiving associations, as contained in K.S.A. 40-1706(c)(6) and K.A.R. 40-10-16.

The procedure described above shall affect the proportionate amount of the distribution payable to all firefighters relief associations.

Determination of Public Policy

The presiding officer previously ordered that from 2009 and forward that the distribution to the FRAs that redetermine in the state of Kansas will be calculated by a formula based on the population and Assessed Tangible Property Valuation in accordance with K.S.A. 40-1706 (a) (5) (A) and K.A.R. 40-10-2 (d):

- 50% of the distribution is based on the population of the respective FRA in comparison to the entire population as certified to the secretary of state on July 1.
- 50% of the distribution is based on the assessed tangible property valuation of each FRA in proportion to the entire state of Kansas as reported by the County Clerks on the November 1 tax rolls. This formula has been codified in K.A.R. 40-10-16.

The presiding officer determined that it would not be good public policy to redetermine FRAs that would see a decrease in their distribution amount as a result of redetermination.

IT IS THEREFORE, BY THE COMMISSIONER OF INSURANCE, ORDERED THAT:

Changed circumstances exist as to all Applicants identified above, with the exception of Greensburg Firefighters Relief Association.

The changed population and assessed tangible property valuation of each applying firefighters relief association shall be individually placed into the formula as described in the "Determination of Public Policy" paragraph used to calculate shares of distribution. The resulting amount will be added to the amount that the applying

association would receive as a receiving association's proportionate share of future distributions.

Each firefighters relief association shall receive their 2014 distribution amount calculated in accordance with K.S.A. 40-1706 on or about July, 2015.

The Commissioner of Insurance retains jurisdiction over this matter to issue any and all further Orders deemed appropriate or to take such further action necessary to dispose of this matter.

NOTICE OF RIGHTS

Pursuant to K.S.A. §77-601 et seq. any party is entitled to judicial review to the extent that this order constitutes final agency action. The petition for judicial review must be filed within thirty (30) days of service of this Order (Plus three (3) days for service by mail pursuant to K.S.A. §77-531). In the event a party files a petition for judicial review pursuant to K.S.A. §77-613(e), the Agency Officer to be served on behalf of the Kansas Insurance Department is:

Diane Minear, Interim General Counsel
Kansas Insurance Department
420 S.W. 9th Street
Topeka, Kansas 66612

IT IS SO ORDERED THIS ___17th___ DAY OF MARCH, 2015, IN THE CITY OF TOPEKA, COUNTY OF SHAWNEE, STATE OF KANSAS.



_____/s/ Ken Selzer_____

Ken Selzer

Commissioner of Insurance

BY:

/s/ John Wine_____

John Wine

Assistant Commissioner

Presiding Officer

Certificate of Service

The undersigned hereby certifies that the foregoing Notice of Formal Hearing was deposited in the United States Mail, first-class postage prepaid, on the 17th day of March, 2015, to the following:

ALTAMONT F R A

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ATCHISON COUNTY DISTRICT #5 FRA

Tim Callahan

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Lancaster, KS 66041

BURR OAK F R A

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Burr Oak, KS 66936

BUTLER CO #1 F R A

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BUTLER CO #4 F R A

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LEAVENWORTH CO FD #1
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_____/s/ Jana L. Beethe_____
Jana L. Beethe
Legal Assistant