April 29, 2021

U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Re: Docket Number USDA-2021-0003

Dear Secretary Vilsack:

Organic farmers prioritize soil health, biodiversity, and ecological systems and do not use inputs like synthetic fertilizers that contribute to greenhouse gas emissions. But the USDA needs to do more to make sure the organic standards keep up with what organic farmers can do to protect the environment and help reduce climate change.

We urge USDA to:

- Prohibit hydroponic operations from being certified organic. Organic should be based in the soil.
- Finish stalled regulations for livestock (the Origin of Livestock rule and the Organic Livestock and Poultry Practices rule) and enforce the pasture standards to make sure organic animals are raised in climate-friendly pasture-based systems.
- Make sure USDA conservation programs work for organic farms and prioritize practices that build resilience like well-managed grazing and building healthy soils.
- Require any new USDA program on climate to work for all types and sizes of farms – organic, diversified, small-scale, in all regions. Don’t repeat the same mistakes of previous USDA programs that were designed only for large-scale conventional farms raising commodity crops. Reach out to all types of farmers and engage communities of color to find out how to design programs that will work for everyone.
- Invest in research on organic methods and technical assistance to help organic farmers solve production challenges and help farmers who want to transition to organic.
- Farmers cannot help the climate if they can’t afford to keep farming. Climate policy for agriculture must include rules and enforcement to make sure that organic markets provide a fair price for farmers and a fair wage for workers.

Sincerely,
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Arizona Natural Health Center Eric Udell, Arizona Natural Health Center, Phoenix, AZ
Robert Keatley, Arrow Dale Farm, River Falls, WI
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Martin Bezold, Bezold Farms, Moscow, OH
Phil Barbato, Biophilia Organic Farm, Riverhead, NY
Chris Sermons, Bio-Way Farm, Ware Shoals, SC
Peter Hunken, Black Sheep Finds, Lompoc, CA
Jim Riddle, Blue Fruit Farm, Hillsborough, NH
Martin Phillips, Blue Skye Farms, Good Thunder, MN
Artemio & Edana Paz, Blueberry Hill, Springfield, OR
Bob Fish, Bob Fish, Frankfort, NY
Mark Murphy, Bottle Hollow Farm, Shelbyville, TN
Salem Willard, Bread & Roses Nursery, Bloomington, IN
Maurice McFarland, Camas Organics, Eden, ID
Kenneth Carlson, Carlson Farms, Kulm, ND
Casimer Trybuskiewicz, Casimer Trybuskiewicz, Attica, NY
Barbara A King, Cayuga Fields, Aurora, NY
Charles Blood-DBA, Charles Blood-DBA, Hubbardsville, NY
Chi Scherer, Chi & Michele Scherer, Williams, OR
Chris Gubbels, Chris Gubbels, Hartington, NE
Wendy Carpenter, Christopher Farm, Modoc, IN
Meg Darnell, Community Meat Co., Colbert, GA
Concerned Consumer Venessa Smith, Concerned Consumer, Lone Pine, CA
Conway’s Produce Conway Paul, Conway’s Produce, Leavenworth, KS
Corey Acre, Corey Acre, Elsie, MI
Seth kroeck, Crystal Spring Farm, brunswick, ME
Peter Curra, Curra Family Trust, Knox, ME
Daniel Bryant, Daniel N. Bryant, San Gabriel, CA
David Desimpelare, David & Julie Desimpelare, Unionville, MI
Dean Dickel, Dean Dickel, Mineral Point, WI
Dan Weston, Deer Creek Berry Farm LLC, Boise, ID
Eva & Mike Denoma, DeNoma, Sara, Foster, KY
Laura Colligan, Dirt Rich Farm, Springville, NY
Loria Chasnoff, Dove Tail Ridge Farm, Lindside, WV
Duane Weiterman, Duane Karl Weiterman, Lodi, WI
Bill Peregrine, Earthdance Organics LLC, Tacoma, WA
Eat From Farms Direct Sales Platform George Duggan, Eat From Farms Direct Sales Platform, West Sand Lake, NY
Deborah Yashar, EcoFarm, Grass Valley, CA
Rebecca Phillips, Ecological Insights, Hazelton, ND
Louis Lego, Elderberry Pond Farm, Auburn, NY
Charles J. Hartway, Empire Dairy, Medina, NY
ESG Legal Services, Inc. Beth-Ann Roth Roth, ESG Legal Services, Inc., Washington, DC
FairShare CSA Coalition Carrie Sedlak, FairShare CSA Coalition, Madison, WI
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Aaron Dinwoodie, Feral Heart Farm, Oakland, CA
Lori Schreier, Fertile Fields Farm, Westmoreland, NH
First Foods Deb Smith, First Foods, Duluth, MN
James Fleck, Fleck-Hansen Ranch, Fresno, CA
Scott Williams, Floyd Peterson Company Dba The Peterson Company, Auburn, WA
Frank Forster, Forster Ricardo Farm, New Vineyard, ME
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Larry Frasco, Frasco Farms, Merino, CO
David Adams, Frogsong Farm, LLC, Woodburn, OR
Judith Redmond, Full Belly Farm, Guinda, CA
Terry Vlossak, Full Harvest Farm, LLC, Hartford, WI
Gaia Gardens Karen Minvielle, Gaia Gardens, Decatur, GA
Luke Gianforte, Gianforte Farm LLC, Cazenovia, NY
Julie Sheen, Giving Ground Farm, Pocatello, ID
Linda Voith, Govinda Goshala Cow Haven Inc, Belfast, NY
Mary Lageman, Grailville Farm, Loveland, OH
Kenneth Barber, Green Gate Family Farm LLC, Wheatland, MO
Stephen Bender, Green Planet Organics, Solacel, CA
Green State Solutions Mike Carberry, Green State Solutions, Iowa City, IA
Kristen Wharton, Handsome Brook Farm, LLC, New York, NY
Torben Hansen, Hansen Farming, Perryton, TX
Alexandra Saffery, Hawaii Clean Seed, LLC, Pahoa, HI
Heidi Eleftheriou, Heidi’s Raspberry Farm, LLC, Albuquerque, NM
Mike Kelly, High Meadow Farm, Johnson Creek, WI
Historic Schaefferstown(Historic Alexander Schaeffer Farm) Emily Holt, Historic Schaefferstown(Historic Alexander Schaeffer Farm), Newmanstown, PA
Diane Honsey, Honsey Farms, Emmons, MN
Stephen Forde, Hop N Hen Farm LLC, Henniker, NH
Whilden Hughes, Hughes Farms, Janesville, WI
21 Acres, HumanLinks Foundation, Woodinville, WA
William Miller, Irongate Ranch, Moorpark, CA
Jack Ulicki, Jack Ulicki, Fort Dodge, IA
Harold Wilken, Janie's Mill, Ashkum, IL
Jay Wells, Jay Wells, Alexandria, VA
Lucas Mumford, JEMS Dairy, Clifton, ID
Jim Tuschen, Jim Tuschen, Rockford, IL
Brad Lerch, John & Bradley Lerch, Eugene, OR
Deb Kenney, John Kenney, Hood River, OR
John Young, John Young, Wakonda, SD
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Kerry Skelton, JPR Acres, LLC, Minnetrista, MN
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Ked Miller, Ked Miller Farm LLC, Bad Axe, MI
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Tom Vigue, Kiwihill, Sidney, ME
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Michael Hobbs, Michael Hobbs, Doylestown, PA
Michael Burgess, Michael N. Burgess, Ithaca, NY
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Raya Carr, Mint Creek Farm, Cabery, IL
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Montana Organic Association (MOA) Jamie Lockman, Montana Organic Association, Missoula, MT
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Diane Matthew, Mt. Barnabe Farm, Lagunitas, CA
Taylor Larson, My Brothers' Farm, Creswell, OR
Eileen Lederman, N/A, Allentown, PA
Nathan Helget, Nathan Helget, Gibbon, MN
Wendy Lowry, Nature's Peace Garden, LLC, Travelers Rest, SC
David Colson, New Leaf Farm, Durham, ME
NOFA-VT Maddie Kempner, NOFA-VT, Richmond, VT
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Maryrose Livingston, Northland Sheep Dairy, Marathon, NY
Norman Baker, Northstar Nurseries, Inc., Sequim, WA
Greg Valdivia, Northwest Organic Farm, Ridgefield, WA
Katherine McLeod, Oak Grove Meadows LLC, Lake Wales, FL
Jennifer Schmehl, Oak Nut Farm, Bethel, PA
Katie Freeman, OMRI (Organic Materials Review Institute), Eugene, OR
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Katherine Mendenhall, Okoboji Organics, Okoboji, IA
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Pacific Botanicals Holdings, LLC Mike Moran, Pacific Botanicals Holdings, LLC, Grants Pass, OR
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William Troutman, Persimmon Hollow Organic Farm LLC, Dornsife, PA
Pete Sajadi, Pete Sajadi, Minneapolis, MN
Mike Sadler, Pine View Farm, Silverwood, MI
Michael Adsit, Plymouth Orchards, Plymouth, MI
Angela Jackson, Prairiesun Organics LLC, Vermillion, SD
Martin Primus, Primus Fresh Air Farm, Sauk Centre, MN
Janetta Boyles-Cooper, Prosperous Boyles Tree Fruit Wine Orchard & Wine Company, Chicago, IL
Tony Crabb, Puma Springs Vineyards, LLC, Healdsburg, CA
Sara Dolan, Purple Karat Enterprises, Inc. Dba Blue Sky Organic Farms, Litchfield Park, AZ
Matt Roben, Rancho Roben, San Jose, CA
George Petakis, Realty Mark, Bensalem, PA
Mary Dodd, Red Scout Enterprises, LLC Dba Red Scout Farm, Black Mountain, NC
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Stephen Ashbaugh, Rocky Creek Too, Valley Center, CA
Ronald Schiek, Ronald Schiek, Penn Yan, NY
Walter kaminski, Rosewalk Farms, LLC, Sauquoit, NY
Randall Krag, Round River Farm, Witter Springs, CA
Wendy Lehman, Royal Berry Farm, Royal, AR
Dexter Rice, Rudra Farms, Snyder, CO
Russell Barriger, S & T Farms, Unionville, MI
Susan Schmidt, Schmidt Family Farms, Medina, OH
Terry Cunningham, School House Place, Twin Lakes, MN
Dela Ends, Scotch Hill Farm, Spring Valley Town of, WI
Drew Scott, Scott's Baked Goods, Columbia, MO
Deb Houck, Secep, Virginia Beach, VA
Thomas Pettitt, Self, Goldendale, WA
Tj Shambaugh, Shambaugh Farms Organics LLC., Oakley, IL
Robert Sherman, Sherman Family Farm, LLC, Caro, MI
Sandra Santucci, Silvercloud Farm LLC, Rohrersville, MD
Milt Whaley, Singing Frog Farm, Pleasant Grove, CA
Karen Gunning, Spring Weather Farm, Trumansburg, NY
Mark Stang, Stang Organic Farm, Sartell, MN
Ralph Straits, Straits Brothers Farm Inc., Walnut Creek, OH
Stratagem Natiello, Stratagem Business Solutions, LLC, Macungie, PA
Greg Wilt, Sublime Organics LLC, Sublimity, OR
Brian Hannagan, Sun Spirit Farms, GrantsPass, OR
Gavin Curran, Sweet Ring Farm, Sandy Hook, CT
Harriet Behar, Sweet Springs Farm, Gays Mills, WI
Katherine Rogers, Teter Organic Farm, Noblesville, IN
Joann Scott, The Anna Scott Ranch, Petaluma, CA
The Arc San Francisco David Duckworth, The Arc San Francisco, San Francisco, CA
Dallas McCann, The Hunter Foundation, Inc., Tannersville, NY
Dominique Herman, The Kitchen Garden, Warwick, NY
The Sentient Bean Kristin Russell, The Sentient Bean, Savannah, GA
Rita Galchus, The Sprout House, Lake Katrine, NY
Shannon Simpson, Thirteen Moons Farm, Asheville, NC
Abby Harned, Three Sisters Farm, Redlands, CA
Tom Cail, Tom Cail, New Paris, OH
Kathie Arnold, Twin Oaks Dairy LLC, Truxton, NY
Bill Bredderman, Twin Ponds Farm, Sloansville, NY
Jean Walters, Uhlenkott Farm, Spokane, WA
Vollmar INC., Vollmar Family Farms, Inc, CARO, MI
Ashley Turner, W.C. Bradley Farms, Inc, Columbus, GA
Luke Zangger, W.O. Zangger And Son, Inc, North Loup, NE
Relinda Walker, Walker Farms, Sylvania, GA
Katherine Miller, Weathertop Farm LLC, Sharon Springs, NY
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Wendel Lutz, Wendel Lutz, Dewey, IL
Claire Lichtenfels, Whitestone Mountain Orchard, Tonasket, WA
Jerry Wiebusch, Wiebusch Valley View Family Farm, Lake City, MN
Kevin Wilcox, Wilcox Heritage Farm, Ovid, MI
William Ortman, Windberry Acres, Inc, Marion, SD
Doug Dransfield, Windspring Farms Inc., Gap Mills, VA
Brittany Hopkins, Wise Acres Farm, Kenduskeag, ME
Jess Bernstein, Wonderfarm, Mount Horeb, WI
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Zimmermans High Tunnels Dan Healy, Zimmermans High Tunnels, Barnett, MO
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Robin Graham, Santa Barbara, CA
Michael Laird, Pittsford, NY
Steve Fox, Richmond, VA
Sarah Sailer, Loveland, CO
Janet McGarry, San Francisco, CA
Amy Klapak, East Stroudsburg, PA
Michael Ryan, Kings Park, NY
Leslie Loftin, Cornelius, NC
Erin Ely, Eugene, OR
Steve Kenin, Taos, NM
Emery Goff, Portland, ME
Carissa Smit, Snohomish, WA
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Nicole Clifford, Enola, PA
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Anne Anderson, Longmont, CO
Marlee DeMoss, Fort Wayne, IN
Annie Bliss, Henderson, NV
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Kathy Nunes, Mc Ewen, TN
Dr. Jones, Kalamazoo, MI
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Gregory Whynott, Rochester, NH
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Beth Burrows, Edmonds, WA
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Georgina Shanley, Red Bank, NJ
Jaymie Crider, Winchester, VA
Kena Vogel, Guthrie, OK
Lance Lamson, Gaines Twp, MI
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Reed Hamilton, Grass Valley, CA
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Zenaida Mitchell, Turlock, CA
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Renee Sarge, Reading, PA
Ethan Riddle, Syracuse, NY
Catherine Howze, Fairburn, GA
Emily Voutsinas, Wynnewood, PA
Kimberli Swann, Deerfield Beach, FL
Kim McLennon, Verona, NJ
Larry Holmquist, Shafer, MN
Samuel Rile Jr, San Jose del Monte City, Susan Guggenheim, Millersville, PA
Anna Wolak, Lancaster, OH
Nancy Emig Chapman, Ephrata, PA
Kristin Buchanan, New York, NY
Betsy and Peter Wild, Sandwich, MA
Michael Weber, Mentor, OH
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Abigail Giguere, Litchfield, ME
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Kathryn Christison, Tulsa, OK
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Russell Sanders, Buda, TX
Kenneth Davis, Jackson, MS
Keara Donahue, Auburn, CA
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Nick Lenhard, White Plains, NY
Kacy Cullen, Portland, OR
Stephen Altman, Jacksonville Beach, FL
Patricia Scott, Emmaus, PA
Karla Griffin, Arlington, TN
Chris Bentley, Louisville, CO
Mary Wilson, Naples, FL
Lisa Morris, Rancocas, NJ
Cassandra Campbell, Blanco, TX
Tabby Shah, Clarion, PA
Bruno Kieffer
Amy Hansen, Asbury, NJ
Mark Canright, Asbury, NJ
Nancy schlosser, Wilmot, NH
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Susan Maurer, Skokie, IL
Tom Libby, Wellesley, MA
Tom-Scott Gordon, Little Rock, AR
Christine Joseph, Edison, NJ
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Nancy Gearhard, Murrysville, PA
Nicole Harris, Waterloo, NY
Andres Mejides, Homestead, FL
Michael Devlin, Nashville, TN
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Barbara Chambers, Willow Grove, PA
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Heather Taylor, Chapel Hill, NC
Judd Mosser, East Aurora, NY
Tiffany Pineda, Basalt, CO
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Kyle Dykstra, Roseville, CA
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Meredith Ritchie, Charlotte, NC
Barb Cato, Nashville, TN
Kellie Barry, Eagle Point, OR
Charles Mann, Louisville, KY
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Gemma Barba, Abington, PA
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Leslie Moran, Reno, NV
Michael McClellan, Bowling Green, KY
Brad Walker, Poplar Grove, IL
Jessie Haddad, Oak Park, IL
Meg Ritchie, Lynchburg, VA
Kay Trible, Madison, WI
Julie Lowe, Wittman, MD
Peri Caylor, Corte Madera, CA
Thomas Bringham, Pompano Beach, FL
Jerry Plush, Blue Ridge, GA
Cathy Weston, Post Falls, ID
Steve Wilson, Columbus, OH
Ellen Kunselman, Erie, PA
Tim Kirley, Seattle, WA
Michelle Carroll, Colorado Springs, CO
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Holly Arnett, Penrose, CO
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Merrill HURST, Trumansburg, NY
Bruce Antognini, Petaluma, CA
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Deb Weise, Nederland, CO
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Debbie Friedman, San Rafael, CA
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Jena Simms, Wichita, KS
Woody Rehanek, Watsonville, CA
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Wayne Gibson, Moyock, NC
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James Cunningham, Arlington, TX
Barbara Rooney, York, PA
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Robert Ribbens, Viroqua, WI
Barbara Schader, Nipomo, CA
James Baker, Atlanta, GA
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Joanne Moritz, Gunnison, CO
Barbara & Ebell
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Joe Graham, Anchorage, AK
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Joseph, Manteca, CA
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Marjorie Johnson, Espanola, NM
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Lynne Boudreau, Marlow, NH
Leticia Esquer, San Jose, CA
Whitney Robinson, Vista, CA
Alex Pearl, Dayton, OH
Jeff Middlebrook, Land O Lakes, FL
David Richard, Milford, PA
Dona Willoughby, Paradox, CO
Metra Augustin, Lake Oswego, OR
Jennifer Ho, Montrose, CA
David Owen, Mustang, OK
Brian Hutchison, Rancho Palos Verdes, CA
Anna Slabicki, Miami Beach, FL
Jessica Espy, Bellingham, WA
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Heidi Palmer, Westport, CT
George Hunt, Garland, TX
Mary Gelder, Westmont, IL
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Jaimie Cole, Palm Harbor, FL
John Hood, Santa Maria, CA
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Daniel Sterk, Fairfield, IA
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Dennis Dierks, Bolinas, CA
Jimma Byrd, San Saba, TX
John Hooper, Sunfield, MI
Callie Lathangue, Atlanta, GA
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Kathleen Kemp, Sarasota, FL
Matt Meacham, Gig Harbor, WA
Darlene Bergdoll, Muncie, IN
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Nicole Schude, Downers Grove, IL
John Casazza, San Francisco, CA
Carolin Schellhorn, Ardmore, PA
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Jd Skinner, Flint, MI
Mary Stout, San Angelo, TX
Melissa Fogg, Califon, NJ
John Ippolito, Eagle River, AK
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