



REASONS FOR DECISION

IN THE MATTER OF an application by the Saint John Transit Commission for approval of the discontinuance of its scheduled public motor bus service between the City of Saint John and the Town of Hampton.

(Matter No. 488)

April 1, 2021

NEW BRUNSWICK ENERGY AND UTILITIES BOARD

IN THE MATTER OF an application by the Saint John Transit Commission for approval of the discontinuance of its scheduled public motor bus service between the City of Saint John and the Town of Hampton.

(Matter No. 488)

NEW BRUNSWICK ENERGY AND UTILITIES BOARD:

Members: Michael Costello

Patrick Ervin

John Patrick Herron

Counsel: Katherine McBrearty

Chief Clerk: Kathleen Mitchell

APPLICANT:

Saint John Transit Commission: Marc Dionne

A. Introduction

- [1] By a letter dated November 10, 2020, the Town of Hampton informed Mr. Marc Dionne, General Manager of Saint John Transit Commission (Saint John Transit), that its Town Council passed a resolution to discontinue, as of December 31, its commitment (which began in 2013) to fund any revenue shortfalls resulting from the operation of Saint John Transit's scheduled public motor bus service between Saint John and Hampton (Hampton Comex). The November 10 letter cited increased costs and low ridership as reasons for the town's decision to discontinue its funding.
- [2] The Hampton Comex, also designated as route 51, was originally approved by the New Brunswick Energy and Utilities Board (Board) in August, 2007. Since that time, Hampton Comex has provided morning and afternoon service between Hampton and Saint John, from Monday to Friday.
- [3] Following media reports of its intention to discontinue its Hampton service, Board staff contacted Saint John Transit on January 6, 2021 to inform them of the requirement to obtain Board approval. This was followed up with correspondence, which included information to assist in the preparation of an application.
- [4] By letter to the Board dated January 7, Saint John Transit applied for Board approval to amend its Motor Carrier licence under the *Motor Carrier Act*, R.S.N.B. 1973, c. M-16 (Act) to reflect that the Hampton Comex route "has been eliminated, effective January 01, 2021." The letter clarified that separate routes to the Kennebecasis Valley and Quispamsis (designated as routes 52 and 53 respectively) were not affected.
- [5] On January 12, the Board sent a letter to Saint John Transit, advising that any discontinuance of a licensed service without prior Board approval will be considered as a failure to comply with section 8 of the Act.
- [6] The Board issued an Order on January 28, setting a written process to consider the January 7th application. Under the *Energy and Utilities Board Act*, S.N.B. 2006, c. E-9.18 (EUB Act), the Board is given broad powers and responsibilities to inquire into, hear or determine any application or matter over which it has jurisdiction.

[7] On March 16, the Board issued a letter to Mr. Marc Dionne, General Manager of Saint John Transit Commission, indicating that the Board had reached a majority decision to grant the application as set out in its letter of January 7, and that a full decision with reasons would follow. The following decision with reasons is in accordance with that letter.

B. Hearing Format

[8] Section 38 of the EUB Act states:

38 The Board may inquire into, hear or determine any application, matter or thing that under this or any other Act it may inquire into, hear or determine and in doing so, the Board:

- (a) is the master of its own procedure and may give directions about process and procedure that it considers appropriate in the circumstances,
- (b) may request from anyone, and require anyone to gather, evidence or require anyone to prepare studies relevant and incidental to the matter over which it is exercising its jurisdiction,
- (c) shall ensure procedural fairness to all affected persons.

[9] The Board's Rules of Procedure provides that the Board has discretion to determine whether a matter should proceed by way of oral or written hearing. Section 5.1 states the following:

5.1. Type of Hearing

5.1.1. The Board may hold a hearing in either of the following formats:

- a) an oral hearing, conducted in accordance with Rule 5.2, requiring that evidence be presented in accordance with Rule 6; or
- b) a written hearing, permitting written evidence and submissions of each party to be filed with the Board and served on all other parties.

5.1.2. In the case of a written hearing, the Board may dispose of the application on the basis of the filed documents before it, or may require additional information or submissions to enable the Board to obtain a full and satisfactory understanding of the subject-matter of the proceeding.

5.1.3. The Board may, at its discretion, conduct a hearing in person, in writing or by teleconference, video conference or by any other electronic means.

[10] The Board chose to proceed by way of written hearing. A notice was published in the Telegraph Journal and L'Acadie Nouvelle on January 29, and on Saint John Transit's website, which informed that any person wishing to oppose the application may file a notice of objection, with reasons, by noon on February 5.

[11] The Board received objections from Stephanie Jardine, Lynn Goddard, Debbie Burke and Cathy Wright. All of the objections referred to the Hampton Comex as a vital or important service for certain individuals living outside of Saint John, in terms of commuting to work or accessing essential services.

C. Evidence

[12] The Affidavit of Marc Dionne, General Manager of Saint John Transit, sworn February 5, explains that the Hampton Comex funding comprises of (a) a subsidy paid by the Town of Hampton (approximately \$60,000 in 2020); and (b) fares paid by users of the service. His affidavit refers to the town's November 10 decision to discontinue the subsidy, and states: "Without a resolution to fund any revenue shortfalls... [Saint John Transit] cannot operate the Hampton/Saint John Comex service on a revenue neutral basis."

[13] Mr. Dionne's affidavit also states that, following Hampton's resolution to no longer fund the route, there was mutual agreement between the town and Saint John Transit that the Hampton Comex route would "discontinue" as of January 1, 2021. It further states that calculations done by Saint John Transit confirmed that "the funding formula in place for the Hampton/Saint John Comex route was not revenue neutral, but was causing a loss for the SJTC."

[14] There is no indication in the evidence or submissions filed with the Board of a current intention to resume the Hampton Comex service at any time in the future.

D. Analysis and Decision

[15] Section 8 of the Act states:

Except as provided in section 9 no licensed motor carrier shall abandon or discontinue any public motor bus service comprised within its licence without an order of the Board which shall be granted only after a hearing upon such notice as the Board may direct. [Section 9 is not relevant to this matter]

[16] The evidence submitted by Saint John Transit clearly indicates that the Hampton Comex service is currently not viable from a financial standpoint, due to the loss of funding from fares and the subsidy previously provided by the Town of Hampton. The Board considers this as sufficient justification for abandoning the service.

[17] The Board grants the application of Saint John Transit to abandon the Hampton Comex service, effective immediately.

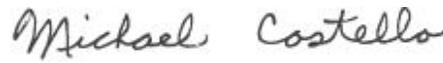
[18] The Board acknowledges the objections that were filed with the Board, as noted above. The loss of the Hampton Comex service affects those who have used or relied on the service over the past several years. Without sufficient funding from subsidies and fares, Saint John Transit cannot be expected to operate the service at a loss, at the risk of jeopardizing its other operations.

[19] For future purposes, the Board wishes to emphasize that section 8 of the Act requires a Board order before a motor carrier discontinues or abandons a service comprised within its licence.

Dated at Saint John, New Brunswick, this 1st day of April, 2021.



Patrick Ervin
Member and Panel Chair



Michael Costello
Member

DISSENTING OPINION AND REASONS OF MEMBER HERRON

I depart from my colleagues with this dissent in this Matter for the following reasons.

- (a) The hearing format inserted by the Board to consider this Matter does not adhere to the statutory provisions of the *Motor Carrier Act (Act)*.
- (b) The Board has exceeded its statutory authority by supplanting the hearing format depicted in subsection 4(8) of the Act for another.
- (c) I find that the hearing format and Notice of Application have not ensured procedural fairness to all affected persons as required pursuant to Subsection 38(c) of the *Energy and Utilities Board Act (EUB Act)*.

A. Introduction

- [1] The Hampton Comex has ceased to operate since January 1, 2021.
- [2] The Hampton Comex, also designated as route 51, was originally approved by the New Brunswick Energy and Utilities Board (Board) in its decision dated August 24th, 2007. Since that time, the Hampton Comex has provided morning and afternoon service between Hampton and Saint John, from Monday to Friday.
- [3] In the Board's 2007 Decision on the Matter, the Board reminded Saint John Transit that neither changes to its tariffs nor the abandonment or discontinuance of any of the approved services are permitted without an Order of the Board.
- [4] Saint John Transit's application for Board approval to amend Saint John Transit's Motor Carrier licence to reflect that the Hampton Comex route has been "eliminated" was received by letter dated January 7, 2021.

B. Legislative Construct – Interdependence of Sections 3, 4 and 8 for Public motor bus licence, conditions on licences

- [5] The Board's authority to grant a licence to operate public motor bus service is found in Subsection 3(1) of the Act.

3(1) The Board may grant to any person a licence to operate or cause to be operated public motor buses over specified routes or in respect of specified points or geographic areas or generally throughout the Province, either as a regular service or an irregular service.

[6] In granting any licence under the Act, paragraph 3(2)(b) authorizes the Board to impose such conditions as it considers necessary. In granting the amendment to Saint John Transit's licence to operate, the Board imposed a set of conditions specific to the application in the Board's August 24th, 2007 decision.

[7] The Board stated:

During the hearing, the Board reminded the Applicant that neither changes to its tariffs nor the abandonment or discontinuance of any of the approved services are permitted without an Order of the Board.

[8] The Board has considered requests for new licences or amendments of an applicant's licence according to the process set out in section 4 of the Act. On at least two occasions, including the 2007 decision, the Board outlined this process.

[9] The Board stated in the August 24th, 2007 decision:

The Board dealt with the request for an amendment of the Applicant's licence according to the process set out in Section 4 of the Motor Carrier Act, R.S.N.B. c.M-16.

[10] Similarly, the Board outlined the process in Matter 192¹ in its decision dated November 9, 2012, it stated:

Obtaining permission to operate a scheduled service motor coach business in New Brunswick is a two-step process. The consideration for the request for a scheduled service licence follows the process set out at section 4 of the *Motor Carrier Act*.

¹ Note that in the case of Matter 192, a hearing was not required as the objection did not establish a prima facie case as required by Section 4(4). In contrast Section 8 of the Act requires a hearing in a circumstance of discontinuance or abandonment as outlined below.

1. Application for licence, procedure, hearings and powers of the Board

[11] Section 4 of the Act provides the Board with the statutory process for the consideration of an application under the Act, the procedures to consider an application, and how the Board must conduct a hearing.

Application for licence, procedure, hearings, powers of Board

4(1) Any person wishing to obtain a licence referred to in section 3, or to obtain the granting of an application referred to in section 10, shall file with the Board an application in writing, in such form and containing such information as prescribed by the Board.

[12] Section 4 of the Act also provides several prescriptive and detailed notice requirements that the Board is to follow in considering an application under the Act.

[13] Paragraph 4(8)(b) specifies the format in which the Board must conduct a hearing under the Act. Paragraph 4(8)(b) stipulates that the Board shall provide parties “full opportunity” to be heard in an “in person” hearing. The stipulated requirement for an “in person” hearing is unique to the Act compared to the other Acts under the Board’s purview.

[14] Subsection 4(8) provides:

4(8) In conducting a hearing, the Board

(a) has all the powers of a Commissioner under the Inquiries Act, and

(b) shall give all parties full opportunity to present evidence and make representations, in person or by counsel or agent.

[15] Section 8 of the Act states:

8 Except as provided in section 9 no licenced motor carrier shall abandon or discontinue any public motor bus service comprised within its licence without an order of the Board which shall be granted only after a hearing upon such notice as the Board may direct. [Section 9 is not relevant to this Matter]

- [16] Section 8 of the Act states that a licensed motor carrier shall not abandon or discontinue any public motor bus service without an order of the Board. The 2007 Decision of the Board reminded Saint John Transit of this condition of their licence *inter alia*.
- [17] Saint John Transit's letter, dated January 7 requested that the Board amend the terms of their licence to reflect that the Hampton Comex Service, between the City of Saint John and the Town of Hampton, had been "eliminated" effective January 1. This after the fact application necessitated a reply from the Board. In a letter dated January 12, the Board stated, that until an order had been rendered by the Board the Hampton Comex Service was not considered discontinued.
- [18] In considering an application for an amendment to approved licence conditions, the Board is to follow the process set out in section 4 of the Act. Section 8 does provide further instruction to the Board in considering an application to abandon or discontinue a service. The Board can grant an order to abandon or discontinue a service, but only after a hearing. Section 8 does provide the Board discretion upon the notice required for the required hearing, which obviates the prescriptive notice requirements depicted in section 4. Section 8 does not, however, provide an alternative hearing format to the "in person hearing" that is detailed in section 4.
- [19] Section 4 of the Act sets out the process for an amendment to a condition of a licence. Certainly, the discontinuance or abandonment of an existing service is a significant change to a licence where affected parties require a full opportunity to be heard.
- [20] The legislative intent of the words in Subsection 4(8) are instructive. The Board "shall" give all parties full opportunity to present evidence "in person." There cannot be any other interpretation of the words.
- [21] To proceed with another hearing format in the context of this Act, would give no meaning to the words of Subsection 4(8) and their legislative intent.

C. Jurisdiction of Administrative Tribunals and the Modern Approach to Statutory Interpretation

[22] It is well understood that regulatory tribunals, such as this Board, are creatures of statute. Jurisdiction must be found in its governing legislation, either expressly, or by necessary implication. In a leading Canadian case on this point, the Supreme Court of Canada stated:

Administrative tribunals or agencies are statutory creations: they cannot exceed the powers that were granted to them by their enabling statute; they must “adhere to the confines of their statutory authority or ‘jurisdiction’ [; and t]hey cannot trespass in areas where the legislature has not assigned them authority”.

....

But more specifically in the area of administrative law, tribunals and boards obtain their jurisdiction over matters from two sources; 1) express grants of jurisdiction under various statutes (explicit powers); and 2) the common law, by application of the doctrine of necessary implication (implicit powers).

(ATCO Gas & Pipelines Ltd. v. Alberta (Energy and Utilities Board) [2006] 1SCR 140, at paras. 35 and 38)

[23] It that decision, the Supreme Court of Canada confirmed that determination of jurisdiction is an exercise in statutory interpretation, in which the so-called “modern approach” to interpretation governs.

[24] The principles that have been adopted by the Supreme Court of Canada and the New Brunswick Court of Appeal in relation to the “modern approach” are encapsulated in Construction of Statutes (2nd ed. 1983) by Elmer Driedger, at p.87, where he states:

Today there is only one principle or approach, namely, the words of an Act are to be read in their entire context and in their grammatical and ordinary sense harmoniously with the scheme of the Act, the object of the Act, and the intention of Parliament.

[25] The implications of that rule of statutory interpretation are that all provisions of the statute must be given meaning. The result of this test is the requirement that legislation be interpreted in a consistent manner that gives meaning to all relevant provisions. As such, interpretations that attribute no meaning to relevant wording are to be avoided.

- [26] The Board’s decision to supplant the “in person hearing” by inserting a “written hearing” format is to give no meaning to the words in subsection 4(8).
- [27] Said differently, relevant sections of the legislation are interdependent. There are sections of the Act where the interpretation relies on what is said in other parts of the legislation. This is the case when the Board considers an application to amend and/or discontinue a service under the provisions of the Act. The relevant sections 3, 4 and 8 are interdependent. The Board is required to interpret all of the pieces of the legislation and every aspect has meaning. Meaning must be attributed to every part of the statute.
- [28] In supplanting the legislated “in person” hearing procedure, for an option outlined only in its own Rules of Procedure, has caused the Board to exceed its statutory powers. As stated earlier, administrative tribunals must adhere to the confines of their statutory authority or jurisdiction and cannot trespass in areas where the legislature has not assigned them authority. The Board’s own operating Rules of Procedure can not in any case trespass or attempt to supersede the statutory authority assigned to them by the legislature. The legislative construct found in sections 3, 4 and 8 – specifically the words found in subsection 4(8) cannot be supplanted by the Board’s own Rules. In this case The Board’s own Rule 5.1 does not supersede the provisions of the Act. The Board under no circumstance should suggest that its own Rules of Procedure can ever supersede the statutory authority assigned to them by the legislature.
- [29] For further clarity, subsection 38(a) of the EUB Act does state that the Board:
- 38(a)** is the master of its own procedure and may give directions about process and procedure that it considers appropriate in the circumstances,
- [30] Although the Board is the “master of its own procedure”, the Board must adhere to the statutory authority granted by the Act. The Board’s operating procedures in carrying out its work do not supersede the authority to alter any of the Acts’ legislative intent under the Board’s purview.
- [31] Sections 2 and 29 of the EUB Act provide additional clarity, the Board cannot exercise any authority or power conferred to the Board under the EUB Act that is inconsistent with those conferred under another act.

Inconsistency with other Acts

2 Except as provided in section 72, where any provision of this Act is inconsistent with any provision of another Act, that other provision prevails to the extent of the inconsistency. 2007, c.34, s.2

Exercise of powers under other Acts

29 The Board and the Chairperson or Vice Chairperson may exercise any of the authority or powers conferred upon them under this Part under any other Act where the Board been given jurisdiction insofar as those authorities and powers are not inconsistent with those conferred under that other Act.

Reasons for Dissent

[32] Accordingly, I must dissent from the findings of the Board in this Matter as:

- a) The hearing format inserted by the Board to consider this Matter does not adhere to the statutory provisions of the Act; and
- b) The Board has exceeded its statutory authority by supplanting the hearing format depicted in subsection 4(8) of the Act.

D. Benefits of an Oral In Person Hearing in this Circumstance

[33] It is noted that the written hearing format remains a useful tool for the Board to consider matters in different circumstances, where the applicable legislation permits and where procedural fairness to affected parties is ensured.

[34] The dispute in this Decision, however, concerning the “in person” hearing format (also referred to by this Board as an oral hearing) has further intrinsic and practical advantages to consider for this application. It is more than a mere procedural or academic debate.

[35] The Board lacks evidence and information on several issues to render an informed Decision in this Matter. These include, but are not limited to:

1. The Board does not have any evidence or clear understanding on whether Saint John Transit’s “elimination” of the Hampton Comex service should be considered a discontinuance (interruption) or an abandonment (more permanent).

2. The Board does not have sufficient evidence or a clear understanding of whether the “elimination” of the Hampton Comex Service is a temporary casualty of the COVID-19 pandemic, as Stephanie Jardine, Lynn Goddard, and Cathy Wright all state in their letters to the Board. Or whether the commercial viability of the service was even sustainable pre-pandemic?
3. The Board does not have a sufficient understanding of whether the Town of Hampton and Saint John Transit intends to pursue a new funding model to re-establish the Hampton Comex post-pandemic that is said to serve commuters, the communities and post-secondary education students currently permitted only to study online.
4. Whether Saint John Transit or the Town of Hampton intends to engage other potential funders, as the Board recently witnessed in its consideration of Matter 487.

[36] The Board would benefit from an iterative exchange with the parties in an oral “in person” hearing to enhance its understanding to such pertinent questions while giving the parties a full-opportunity to give evidence as stated in the Act.

[37] The existence of an oral in person hearing does not inhibit those affected by the elimination of the service to provide the Board with written submissions. The Board often requests and considers written submissions together with the evidence of an oral in person hearing.

[38] It should also be noted that the ease and agility to conduct an in person oral hearing has been greatly enhanced with the onset of various technological platforms, including Zoom. These in person oral hearings have increased participation in recent proceedings with minimal (reduced) cost to the Board and participating parties.

E. Procedural Fairness

[39] The letter from Stephanie Jardine has raised a procedural fairness concern for the Board. Ms. Jardine’s letter states in part:

So sad to see this much needed service disappear with no more fanfare than one paragraph on the Town's social media site and a one liner on Saint John Transit's

website. I travelled on the Comex every day and it was willed [*sic*] to capacity until Covid hit and the seats were reduced.

[40] In similar Matters, namely Matters 445 and most recently 487, the Board had ordered that the Notice of the Application:

- a) be served upon the mayors of the affected municipalities (Matter 445) or the Board had directly contacted the affected municipalities (Matter 487).
- b) be published in the English and French language in the Telegraph Journal (Matters 445 & 487) and in L'Acadie Nouvelle (Matter 487).
- c) be published on the Applicant's websites (Matters 445 and 487), and on the Applicant's social media sites (Matter 487).
- d) Be posted on the Applicant's bus (Matter 445) or the Applicant's terminals (Matter 487).

[41] Subsection 38(c) states that the Board "shall ensure procedural fairness to all affected persons." The Board's consideration of Saint John Transit's application in this Matter, which is an exercise after the fact, has greatly impacted the procedural fairness to the affected persons who have used or relied on the service over the past several years.

[42] The Board did require that the Notice of Application be published in both the English and French languages in the Telegraph Journal and L'Acadie Nouvelle and be published on Saint John Transit's website and social media platforms.

[43] I agree with Ms. Jardine, however, that the Board's January 28 Order and Notice of the Application was greatly lacking.

[44] Given that the Hampton Comex had already ceased to operate, Saint John Transit could not post the Notice of Application on the bus itself as the Board has ordered in such situations in the past. Thus, users who were still riding the bus during the pandemic had a reduced opportunity to understand that Saint John Transit had an obligation to apply to the Board to cease operating the service. Moreover, more occasional riders, commuters and post-secondary students who had not been using the bus during the pandemic would have been even less aware the service was to be ceased.

[45] The Board's chosen period of notice of just five days was unnecessarily short. There was no requirement to expedite the disposition of the Application as the service had already halted. A more extended period of notice with more extensive communication of the Notice of Application to potentially affected parties is required to ensure procedural fairness in this circumstance.

Reason for Dissent

- c) Accordingly, I find that the hearing procedure and notice of hearing have not ensured the procedural fairness to all affected persons as the Board is required to do pursuant to subsection 38(c) of the EUB Act.

F. Recommendations

1. Review of the Decision by the Board

[46] In my view the reasons of this dissent may justify an affected party to make application for judicial review of the decision pursuant to section 52 of the EUB Act. I recommend that the Board review and rescind its Decision and Order on this matter and order a rehearing of the Matter pursuant to sections 44 and 45 of the EUB Act.

2. Improving the Board's Practice

[47] In reviewing the previous Board Orders and Notice of Applications under the Act, I found the Board to be relatively inconsistent in its Notice of Application requirements and their ensuing Board Orders.² It is difficult for Applicants to meet the expectations of the Board and the Act for similar circumstances without a consistent framework.

[48] Subsection 6(1) of *New Brunswick Regulation 84-301 under the Motor Carrier Act* provides the Board with partial direction of an improved practice. The regulation reads:

² Matters 192, 221, 445, 464, 487 and the Saint John Transit Decision of 2007 were reviewed. Note: None of these Matters conducted a written hearing process. The recent Matter 487's application that was withdrawn had contemplated a written process. Matter 487, however, was also subject to the concerns of this dissent should it have proceeded.

6(1) Notice of hearing shall be served by the applicant on any competing common carrier and on the mayor of any local government to or through which the proposed transportation service is to be operated

- [49] An excessively narrow interpretation of this regulation could indicate that such requirements are only for future services to be operated. In my view, it is inconceivable that the legislative intent would be so limited. Clearly, municipalities who have been served by a motor bus service have an interest in an application that seeks to discontinue or abandon an existing service. The Board has for the most part ensured that competitive carriers and municipalities have been given notice of such applications.
- [50] Matter 445 should serve as a guide for the Board of its better practice. In Matter 445 potentially affected parties were provided a Notice of Application that required the notice to be published on the Applicants social media and company website, it was published in a newspaper in both official languages, albeit in just in an English paper, and the Notice of Application was posted on the Bus.
- [51] In my view, the Board, the motor carrier sector and potentially affected parties would benefit from a detailed practice directive that incorporates consistently all the best practices for Notice that have been utilized in its previous proceedings.

G. The Public Intervener

- [52] It is in the public interest that procedural fairness and the concerns of affected parties are fully represented in all proceedings before the Board. The Board has had the benefit of the good work of the Public Intervener in proceedings connected with other Acts under its purview. To date, the Public Intervener has not intervened in any proceeding initiated by the Board connected to the Act.
- [53] The Public Intervener is reminded that they do have jurisdiction to intervene in a proceeding before the Board pursuant to subsection 6(3) of an *Act Respecting a Public Intervener for the Energy Sector*, S.N.B. 2013, c. 28 (PI Act). The Public Intervener has the discretion to intervene in any proceeding before the Board when they consider it to be in the public interest.
- [54] Subsections 6(2) and 6(3) of the PI Act read as follows:

6(2) The Public Intervener shall intervene in a proceeding of the Board initiated under any of the following Acts and, when intervening, shall make those representations that the Public Intervener considers to be in the public interest:

(a) the *Electricity Act*;

(b) the *Gas Distribution Act, 1999*;

(c) the *Petroleum Products Pricing Act*; and

(d) the *Pipeline Act, 2005*.

6(3) The Public Intervener may intervene in a proceeding of the Board initiated under an Act not listed in subsection (2), and, when intervening, shall make those representations that the Public Intervener considers to be in the public interest.

Dated at Saint John, New Brunswick, this 1st day of April, 2021.

A handwritten signature in black ink, appearing to read "John Patrick Herron". The signature is written in a cursive style with a horizontal line underneath it.

John Patrick Herron
Member