

# Southwest GEOSCIENCE

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October 22, 2012

Lewisville Independent School District  
340 Lake Haven  
Lewisville, Texas 75057  
Attn: Mr. Paul Siddall

Re: Limited Mold Assessment Services  
Lakeview Middle School  
Room 117  
4300 Keys Drive  
The Colony, Texas,  
SWG Project No. 0112273

## **Introduction**

Southwest Geoscience (SWG) conducted limited mold assessment activities for the Lewisville Independent School District (Lewisville I.S.D.) within Lakeview Middle School located at 4300 Keys Drive in The Colony, Texas (hereinafter referred to as the "Site"). The investigation was limited to areas of the Site identified by Lewisville I.S.D. as described below. The assessment was performed by Mr. Clinton S. Jech, a State of Texas licensed mold assessment technician (License #MAT1075), on October 17, 2012 SWG's mold services definitions and limitations are included as an attachment to this report.

## **Investigation Areas**

Lewisville I.S.D. identified the following physical portions of the Site as the target investigation areas ("Investigation Areas") for mold assessment: readily accessible areas within room 117. SWG's mold assessment services were limited to the Investigation Area(s) identified by Lewisville, I.S.D. Additional areas or portions of the Site were out-of-scope and not included in SWG's mold assessment or this report at this time.

## **Scope of Work**

As set forth in SWG's Mold Assessment Proposal (No. 01121350) dated October 5, 2012, SWG's scope-of-work was to provide visual and/or analytical mold assessment and related services in the Investigation Areas which included:

*Visual Reconnaissance:* SWG performed a visual reconnaissance of the Investigation Areas for visible indications of moisture intrusion (as indicated by staining or visible moisture) and/or suspect mold growth. SWG's visual reconnaissance only included readily accessible or visible portions of the Investigation Areas.

*Suspect Mold Growth Sampling and Analysis:* SWG collected limited ambient air samples for nonviable mold spores utilizing Air-O-Cell cassettes. "Air-O-Cell" refers to slit impaction air sampling cassettes manufactured by Zefon Analytical Accessories, St. Petersburg, Florida.

## **Site Reconnaissance Observations/Findings and Recommendations**

SWG's Mold Assessment Site reconnaissance was performed on October 17, 2012 by Mr. Clinton S. Jech. SWG's visual reconnaissance of the Investigation areas revealed the following:

### **Temperature and Relative Humidity**

Temperature readings collected inside the room were reported as 77.0 degrees Fahrenheit while relative humidity was reported as 40.8 percent. Temperature readings collected outside the

building ranged from 77.3 to 86.3 degrees Fahrenheit while outside relative humidity ranged from 33.6 to 38.5 percent.

Relative humidity is a measure of the moisture content of air and is closely tied to the comfort of the office/workplace temperature. As with temperature, there are no regulations governing acceptable office/workplace humidity ranges. Humidity levels in the office/work place are not only related to health effects, but also have operational impacts on modern office equipment.

Workplace/office temperatures have historically been considered a subjective factor because the perception of uncomfortable temperature levels is specific to each individual. There are no regulations governing acceptable office/workplace temperature ranges, but significant research has been conducted which indicates that there are temperature ranges that are not only comfortable but also result in optimum performance. ASHRAE (American Society of Heating, Refrigerating & Air Conditioning Engineers) has published guidelines describing thermal environmental conditions that at least 80% of the persons who occupy that environment will find acceptable or "comfortable." Table I below explains the applicable limits and guidelines.

Table I Acceptable Ranges Of Temperature And Humidity		
Relative Humidity	Winter Temperatures	Summer Temperatures
30%	68.5 to 76°F	74 to 80°F
40%	68.5 to 75.5°F	73 to 79.5°F
50%	68.5 to 74.5°F	73 to 79°F
60%	68 to 74°F	72.5 to 78°F

SWG utilized a Protimeter Moisture Measurement System (MMS) instrument (Model No. BLD2000) to measure and diagnose dampness in the drywall within random areas. The MMS is a battery powered handheld unit that is equipped with hydrostick probes to measure moisture content in wood, drywall and other and non-conductive materials. The device measures electrical conductivity of building materials and compares the conductivity readings to an internal, electronic standard reading for normal or "dry" materials.

Moisture content readings were obtained by pushing the moisture probe pins into surfaces. The measured values were then displayed on a colored scale depicting if the materials measured were normal (dry), higher than normal but not critical (at risk) or contained excessive moisture levels (wet). Based on the manufacturer's guidelines, the instrument measurement values are described below:

< 5%	Out of Range
> 5% but < 16%	Normal
> 17% but < 20%	Higher than Normal but Not Critical
> 20%	Excessive Moisture Levels

Moisture meter readings taken from the walls within the room were reported as 12-14% which is considered normal by the manufacturer.

### **Air Monitoring Results**

SWG collected one (1) sample from the interior of the classroom and two (2) samples from the exterior of the building. The microbial samples were analyzed by Steve Moody Micro Services, Inc. (SMMS) in Farmers Branch, Texas; SMMS is a State of Texas licensed mold analysis

laboratory and accredited under the AIHA Laboratory Quality Assurance Program for Environmental Microbiology.

Air testing performed using spore traps found that airborne mold spores in the room were considerably lower and were qualitatively similar to those measured outside of the building at the time the sampling was performed. Total fungal spore concentration within the investigation area was reported as 3,000 counts/m<sup>3</sup> while the exterior level ranged from 18,154 to 24,440 counts/m<sup>3</sup>.

Three (3) types of mold were identified at a higher concentration within the investigation area as compared to the sample collected from the exterior of the building. Air sample(s) collected within the room reported *Curvularia* as 220 counts/m<sup>3</sup> while exterior levels of 40 counts/m<sup>3</sup> were reported, *Drechslera/ Bipolaris* group was reported as 260 counts/m<sup>3</sup> while exterior levels of 160 counts/m<sup>3</sup> were reported. *Stachybotrys* was reported as 60 counts/m<sup>3</sup> while no exterior levels were reported.

The American Conference of Governmental Industrial Hygienists (ACGIH) sets forth assessment criteria related to the "indoor/outdoor" relationship where the indoor air quality should be at or below that of outdoor air quality with regard to fungal spores (see ACGIH Bioaerosols, Assessment and Controls publication, 1999).

#### **Suspect Mold**

No visible mold was observed during the assessment.

#### **Conclusions and Recommendations**

SWG recommends that the room be cleaned and retested.

If you have any questions regarding this report or if we can assist you with any other matter, please contact the undersigned at (214) 350-5469.

Sincerely,  
**Southwest Geoscience**



Darren G. Bowden  
Corporate Director  
Industrial Hygiene Services  
Texas Mold Assessment Consultant  
Lic. No. MAC0321

Attachments: Analytical Results/Chain of Custody  
Mold Services Definitions & Limitations/Standard of Care and Reliance

Analytical Results/Chain of Custody

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# IAQ Mold Report

Steve Moody Micro Services, LLC  
 2051 Valley View Lane  
 Farmers Branch, TX 75234 Phone: (972) 241-8460

## Summary

DSHS License No.: LAB0117  
 AIHA EMPAT ID: 102577

**Client :** Southwest Geoscience - Dallas, TX **Lab Job No.** 12F-12393  
**Project :** Lakeview Middle School **Report Date** 10/19/2012 11:30 AM  
**Project # :** 0112247/0112273 **Sample Date :** 10/17/2012  
**Sample Type:** Spore Trap, Non-cultured **Spore Trap Type:** Zefon - Air-O-Cell  
**Test Method:** Mold: ASTM D7391-09 - Standard Profile Page 1 of 3

On 10/17/2012, three (3) samples were submitted by Clint Jech of Southwest Geoscience - Dallas, TX (located at 2351 W NW Hwy #3321, Dallas, TX 75220) for Spore Trap, Non-cultured mold analysis. This report consists of three sections; a summary section, a data detail section, and an analytical notes section.

Sample Number	Volume (liters)	Sample Description	Identification	Concentration spores/cubic meter
1	75	Exterior, Center South * See Analytical Notes report for further details	Agroclybe Alternaria Ascospores Aspergillus / Penicillium Basidiospores Cladosporium Coprinus Drechslera / Bipolaris group Epicoccum Fusarium Hyphal / Spore Fragments Myxomycete / Rust / Smut Non-specified Fungal Spore(s) Spegazzinia  <div style="text-align: right;">Total:</div>	80 2520 1160 920 1440 11000 120 160 40 120 3960 2600 280 40  24440

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Sample Number	Volume (liters)	Sample Description	Identification	Concentration spores/cubic meter
2	75	Exterior, Southwest * See Analytical Notes report for further details	Agroclybe Alternaria Ascospores Aspergillus / Penicillium Basidiospores Chaetomium Cladosporium Coprinus Curvularia Drechslera / Bipolaris group Fusarium Hyphal / Spore Fragments Myxomycete / Rust / Smut Non-specified Fungal Spore(s) Paecilomyces Peronospora Pithomyces  <div style="text-align: right;">Total:</div>	80 1920 760 520 2080 80 6114 160 40 120 160 3320 1720 880 120 40 40  18154

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Sample Number	Volume (liters)	Sample Description	Identification	Concentration spores/cubic meter
3	150	Room 117 * See Analytical Notes report for further details	Alternaria Ascospores Aspergillus / Penicillium Basidiospores Cladosporium Coprinus Curvularia Drechslera / Bipolaris group Hyphal / Spore Fragments Myxomycete / Rust / Smut Stachybotrys  <div style="text-align: right;">Total:</div>	60 140 180 480 540 20 220 260 780 260 60  3000

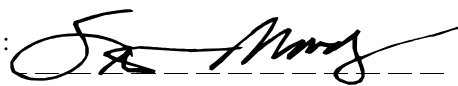
Results may not be reported except in full. Data contained in this test report relates only to the samples tested. This report does not express or imply interpretation of the results contained herein. Interpretation should be made by a qualified professional.

Steve Moody Micro Services assumes no responsibility for the manner in which these samples were collected or handled prior to being received at this laboratory. SMMS assumes no responsibility for the qualifications of personnel performing sampling and/or interpretations of this data.

Analyst(s): Rebecca Lutz

Lab Director: Steve Moody

Approved Signatory :



Thank you for choosing Steve Moody Micro Services

# IAQ Mold Report

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## Data Detail

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Sample ID:	1			2			3					
Location:	Exterior, Center South			Exterior, Southwest			Room 117					
Debris Rating:	5			5			5					
Media Expires On:	May 2013			May 2013			May 2013					
Notes Included?:	See Analytical Notes			See Analytical Notes								
Volume:	75			75			150					
	raw ct.	MDL	spores/m <sup>3</sup>	raw ct.	MDL	spores/m <sup>3</sup>	raw ct.	MDL	spores/m <sup>3</sup>			
Agrocyebe	2	40.00	80	2	40.00	80						
Alternaria	63	40.00	2520	48	40.00	1920	3	20.00	60			
Ascospores	29	40.00	1160	19	40.00	760	7	20.00	140			
Aspergillus / Penicillium	23	40.00	920	13	40.00	520	9	20.00	180			
Basidiospores	36	40.00	1440	52	40.00	2080	24	20.00	480			
Chaetomium				2	40.00	80						
Cladosporium	110	100.00	11000	107	57.14	6114	27	20.00	540			
Coprinus	3	40.00	120	4	40.00	160	1	20.00	20			
Curvularia				1	40.00	40	11	20.00	220			
Drechslera / Bipolaris group	4	40.00	160	3	40.00	120	13	20.00	260			
Epicoccum	1	40.00	40									
Fusarium	3	40.00	120	4	40.00	160						
Hyphal / Spore Fragments	99	40.00	3960	83	40.00	3320	39	20.00	780			
Memnoniella												
Myxomycete / Rust / Smut	65	40.00	2600	43	40.00	1720	13	20.00	260			
Non-specified Fungal Spore(s)	7	40.00	280	22	40.00	880						
Paecilomyces				3	40.00	120						
Peronospora				1	40.00	40						
Pithomyces				1	40.00	40						
Pollen												
Spegazzinia	1	40.00	40									
Stachybotrys							3	20.00	60			
<b>TOTALS</b>	<b>446</b>		<b>24440</b>	<b>408</b>		<b>18154</b>	<b>150</b>		<b>3000</b>			
Analyst	Rebecca Lutz			Rebecca Lutz			Rebecca Lutz					
Analysis Date	10/19/2012			10/19/2012			10/19/2012					



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Page 2 of 2

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### Debris Rating Key:

- 0 - No debris detected.
- 1 - Trace debris.
- 2 - Light debris.
- 3 - Moderate debris.
- 4 - Substantial debris.
- 5 - Extensive debris.
- 6 - Field blank.

NOTE: Debris defined as skin, fibers, pollen grains, insect parts, and/or other non-fungal particles.

# IAQ Mold Report

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## Analytical Notes

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Page 1 of 2

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## Samples Analyzed

Sample No: 1 : Exterior, Center South

Notes: 70% Occluded. Due to a high presence of Cladosporium, the Minimum Detection Limit is 100 spores / cubic meter for this fungal group. When comparing results to other samples, use calculated results, not raw numbers.

Sample No: 2 : Exterior, Southwest

Notes: 30% Occluded. Due to a high presence of Cladosporium, the Minimum Detection Limit is 57 spores / cubic meter for this fungal group. When comparing results to other samples, use calculated results, not raw numbers.

Sample No: 3 : Room 117

Notes: 30% Occluded.

## Field Blanks

No discernable field blanks were submitted with this set of samples.

## Methods

Method: ASTM D7391-09: Categorization and Quantification of Airborne Fungal Structures in an Inertial Impaction Sample by Optical Microscopy.

Calculation: Spores/cubic meter = (Raw spore count)\*(MDL)

Note: MDL (Minimum Detection Limit) is calculated based upon 1 raw spore count.

Steve Moody Micro Services recommends two significant figures for calculated values based on ASTM D7391-09.

# IAQ Mold Report

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2051 Valley View Lane

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## Analytical Notes

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Page 2 of 2

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LAB # 102577

Chain of Custody

Page 1 of 1



Lab Job #	<u>12F-12393</u>	AOC: <u>83</u>
Lab Job #	<u>12F-12394</u>	AOC: <u>4</u>
Lab Job #	<u>12F-12395</u>	AOC: <u>3</u>

Please call in advance for immediate, after-hour, & weekend pricing & availability.\*\*  
 Turnaround of Culture Samples subject to Culture Growth\*

**ASBESTOS PLM**

Bulk  1 day  2 day  3 day  5 day  Immediate  
 Analyze All  Positive Stop

**LEAD** Paint / Soil / Wipe  1 day  2 day  3 day  5 day  Immediate  
**PCM** Air (7400)  1 day  2 day  3 day  5 day  Immediate  
**TOTAL DUST** (0500/0600)  1 day  2 day

**MOLD**

Non-culture (Tape / Bulk / Air)  1 day  2 day  Immediate  
 Air Standard Profile  Air Expanded Profile  
 Analyze Blanks  Yes  No  
 Culture (Swab / Bulk / Plate)  7-14 day

**ASBESTOS TEM**

Air AHERA Method  6 hr  12hr  24 hr  
 Air 7402 (Modified)  1 day  2 day  3 day  
 Bulk/Wipe/Micro Vac  1 day  2 day  3 day  
 Water  1 day  2 day  3 day  
 Analyze Blanks  Yes  No

**BACTERIA**

Heterotrophic Plate Count (HPC)  3 day  
 HPC + Gram Stain  3 day  5 day  
 HPC + 3 Gram Neg ID  6-8 day  
 HPC + 5 Gram Neg ID  6-8 day  
 Fecal Coliform (MPN)  3 day  
 Total Coliform & E Coli (P/A)  2-3 day

Billing Company / City: SWG  
 Submitter / Company: Clinton S. JELH  
 Project: Lekeview Middle School  
 Contact Information: Name: Clint JELH  
 E-mail Results to: Clint / Darren / Veronica  
 Invoice Address: Veronica

# of Samples: 2  
 Sample Date: 10/17/2012  
 Project #: 0112247/0112273  
 Phone #: \_\_\_\_\_  
 Mobile #: (972) 989-1031  
 P.O. #: \_\_\_\_\_

— Please review paperwork and samples before submitting to lab. Unsealed / improperly packaged samples or excessive administrative requests may incur additional fees—

Notes: \_\_\_\_\_

Sample #	Sample Description	Vol. / Area if applicable	Location / Notes
<u>1</u>	<u>Exterior, Center South</u>	<u>75</u>	<u>H = 38.5% T = 77.3°</u>
<u>2</u>	<u>Exterior, Southwest</u>	<u>75</u>	<u>H = 33.6% T = 86.3°</u>

Released By: <u>[Signature]</u>	Date / Time: <u>10/17/2012 16:14</u>	Received By: <u>[Signature]</u>	Date / Time: <u>10-17-12 4:14PM</u>
Released By:	Date / Time:	Received By:	Date / Time:

Chain of Custody

Page 1 of 1



Lab Job # 12F-12393
Lab Job #
Lab Job #

Please call in advance for immediate, after-hour, & weekend pricing & availability.\*\*
urnaround of Culture Samples subject to Culture Growth\*

ASBESTOS PLM

Bulk [ ] 1 day [ ] 2 day [ ] 3 day [ ] 5 day [ ] Immediate
[ ] Analyze All [ ] Positive Stop

LEAD Paint / Soil / Wipe [ ] 1 day [ ] 2 day [ ] 3 day [ ] 5 day [ ] Immediate

PCM Air (7400) [ ] 1 day [ ] 2 day [ ] 3 day [ ] 5 day [ ] Immediate

TOTAL DUST (0500/0600) [ ] 1 day [ ] 2 day

MOLD

Non-culture (Tape / Bulk / Air) [ ] 1 day [x] 2 day [ ] Immediate
[x] Air Standard Profile [ ] Air Expanded Profile

Analyze Blanks [ ] Yes [ ] No

Culture (Swab / Bulk / Plate) [ ] 7-14 day

ASBESTOS TEM

Air AHERA Method [ ] 6 hr [ ] 12hr [ ] 24 hr

Air 7402 (Modified) [ ] 1 day [ ] 2 day [ ] 3 day

Bulk/Wipe/Micro Vac [ ] 1 day [ ] 2 day [ ] 3 day

Water [ ] 1 day [ ] 2 day [ ] 3 day

Analyze Blanks [ ] Yes [ ] No

BACTERIA

Heterotrophic Plate Count (HPC) [ ] 3 day [ ] 5 day

HPC + Gram Stain [ ] 3 day [ ] 5 day

HPC + 3 Gram Neg ID [ ] 6-8 day

HPC + 5 Gram Neg ID [ ] 6-8 day

Fecal Coliform (MPN) [ ] 3 day

Total Coliform & E Coli (P/A) [ ] 2-3 day

Billing Company / City: SWC # of Samples: 1
Submitter / Company: Clinton S. Jech Sample Date: 10/17/2012
Project: Lakeview Middle School Room # 117 Project #: 0112273
Contact Information: Name: Clint Jech Phone #:
E-mail Results to: Clint/Darren/Veronica Mobile #: (972) 989-1031
Invoice Address: Veronica P.O. #:

Please review paperwork and samples before submitting to lab. Unsealed / improperly packaged samples or excessive administrative requests may incur additional fees-

\* For Report.
Notes: Leaky Sewer Line From Adjacent Closet seeped under the mat 2 separate times.

Table with 4 columns: Sample #, Sample Description, Vol. / Area if applicable, Location / Notes. Row 1: 3, Room # 117, 150, H= 40.9 % T= 77.0 C, M= 12-14, Walls = wall covering / Drywall

Released By: [Signature] Date / Time: 10/17/2012 10:14 Received By: Chelsea [Signature] Date / Time: 10-17-12 4:14 PM

Mold Services Definitions & Limitations/  
Standard of Care and Reliance

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## Mold Services Definitions & Limitations

*"Mold" defined.* Mold is a general term used to describe various types of single-celled naturally occurring biological organisms occurring worldwide. For purposes of this report (and the Texas Mold Assessment & Remediation Rules), the term "mold" is broadly defined to include any living or dead fungi or related products or parts, including spores, hyphae, and mycotoxins.

*Limited Scope of Mold Assessment.* The scope of SWG's mold assessment services as reflected in the Proposal and this report are limited in that (i) they were physically limited to certain portions of the building structure (e.g., the Client identified Investigation Areas); and (ii) limited by accessibility to building materials or components within the Investigation Area(s). In contrast to a Limited Assessment" is a comprehensive assessment, which involves destructive sampling methods and the scope of the assessment typically extending to the entire building structure.

*Time sensitive.* Mold assessments are essentially a "snap shot in time," and the results are only relevant at the time of site reconnaissance. Because mold, when biologically active, is a living organism, its presence is influenced and controlled by environmental conditions. Mold assessments, therefore, are "time sensitive" in that the presence and concentration of mold and similar organisms in building structures or in the air is directly influenced by environmental conditions (such as humidity, moisture, nutrients and substrates), whether natural or caused by man, which conditions may vary significantly over relatively short periods of time.

*Methodologies.* Currently, mold assessment methodologies and protocols in Texas are governed by persuasive guidelines (rather than promulgated federal/state or local regulations). Presently, there is no data that supports a threshold limit or dose-response relationship for exposure to mold aeroallergens, individual pathogens, opportunistic pathogens and/or mycotoxins. The Occupational Safety and Health Administration (OSHA), the National Institute of Occupational Safety and Health (NIOSH) and other non-governmental associations, have not yet established permissible exposure limits (PELs), recommended exposure limits (RELs), or other limit values for aeroallergens. Because no limit values presently exist, SWG will not and cannot represent that the site contains no harmful microbes, mold, fungi, or their metabolites, or other latent conditions beyond those identified by the limited scope of this mold assessment.

*Findings limited.* Findings from a limited mold assessment are limited because of the nature of the information obtained (e.g., visual reconnaissance of readily accessible areas of building structures, interview information, anecdotal information, and limited sampling data derived from one or more specific sampling events). SWG cannot warrant the accuracy of prior or subsequent information/data, reports and services performed by other firms at the Site. SWG assumes no responsibility or liability for errors in information or data provided by or through the client or third party sources. SWG's services are not to be construed as legal or medical interpretation or advice.

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*Moisture Intrusion Limitation.* SWG performs mold assessment services and is not a moisture intrusion, HVAC, roofing, plumbing or building envelope specialist. However, during the course of conducting its mold assessment services, SWG will report observed areas of apparent moisture intrusion. SWG does not and will not investigate the cause or causes of such observed moisture intrusion. In the event apparent moisture intrusion is observed, SWG will recommend that the client contact a specialist (i.e., plumbing contractor, building envelope specialist, HVAC contractor, water intrusion specialist, etc.) to assist the client in determining the specific cause or causes of the moisture intrusion and remedial options.

*Texas Licensing Requirements.* SWG (and/or its personnel) will render the services set forth in this proposal in the capacity of a Texas licensed Mold Assessor. SWG is not licensed as a Mold Remediation Contractor and does not perform mold remediation. As of January 1, 2005, Texas law has required that Mold Assessors and Mold Remediation Contractors be licensed.

*Mold Remediation Certificate.* For mold remediation projects (above certain size thresholds), applicable Texas law (i.e., Texas Occupation Code Section 1958.54 and T.A.C. Section 295.397 (the Texas Mold Assessment and Remediation Rules), requires that a "Certificate of Mold Remediation" be issued by the Mold Remediation Contractor upon successful completion of the project. This certificate must be provided to property owners no later than the 10<sup>th</sup> day after the date on which the mold remediation is completed at a property. The Mold Remediation Certificate issued by the Mold Remediation Contractor must include a certification by the Mold Assessor that the mold remediation project has been successfully completed in accordance with the mold remediation protocol.

Be advised that SWG's issuance of a Mold Remediation Certificate upon successful completion of a Mold Remediation project does not mean, warrant or otherwise guarantee that mold will not be subsequently found in any portion of the Investigation Area or the Site. In the event that SWG is engaged to render services in connection with a mold remediation project, SWG will require *Client to provide to SWG a signed certificate prepared by Client's moisture intrusion specialist or appropriate contractor stating that all sources of moisture which resulted in the presence of mold in the Investigation Area have been fully remediated and corrected.*

#### **Standard of Care**

SWG performed its Services in accordance with generally accepted practices of the profession undertaken in similar services at the same time and in the same geographical area. No other warranties, expressed or implied, apply to the Services hereunder or this report.

#### **Reliance**

SWG's proposal for this project, services and this report have been prepared on behalf of and for the exclusive use of Lewisville Independent School District solely for their use and reliance in assessing the presence of mold in the Investigation Areas of the site. Lewisville Independent School District is the only party to which SWG explained the risks and limitations of the services and was solely involved in shaping the scope of services. Accordingly, reliance on this report by any other party may involve assumptions leading to an unintended interpretation of findings and opinions. With the consent of the client, SWG may offer reliance to third parties

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or contract with other parties to develop findings and opinions related to such party's unique risk management concerns. Notwithstanding the foregoing, reliance by any and all third parties upon the proposal, the Services or this report shall be limited in the aggregate to all relying parties to the fair market value of the Services provided by SWG.

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