



CUA

The better way to bank

Public Consultation Submission

In support of fairness and common sense, for Canadians and credit unions.

Halifax, Nova Scotia | September 28, 2017

Message *from* President & CEO

Since joining CUA as President & CEO in 2011, I have had the great pleasure of leading our team in order to improve the state of financial health for our members and their families. By strengthening our members, we further support the local community and the Canadian economy. We strive toward our vision of "Strong members and a strong community" through the delivery of financial products and services. CUA - *Credit Union Atlantic* - is a full-service banking institution that offers our members a better way to bank.

For this reason, CUA has taken exception to the notion that the Office of the Superintendent of Financial Institutions (OSFI) intends to suddenly enforce a century-old language limitation that is out of date and out of touch with consumer behavior and digital advances that have redefined banking as an activity that takes place beyond bricks and mortar.

We acknowledge the efforts of Minister Morneau and the Federal Department of Finance as they engaged, listened and considered the information put forth in support of credit unions' usage of these common terms. We also acknowledge that the Federal Government invited our national trade association, the Canadian Credit Union Association (CCUA), to identify a way forward that would be fair, focused on the consumer and on the overall health of our sector.

Despite these positive steps, we were disappointed to learn that a formal public consultation would be required to assess *if* and *how* credit unions should be able to use common terms and phrases such as "bank", "banking" and "to bank". As a small business with a lean operation, CUA has needed to re-allocate valuable internal resources to research, monitor, coordinate, communicate and engage our members in response to this situation. We have done so after completing a thorough analysis of the possible harm that will be realized by CUA if the Federal Government decides to impose restrictions on the usage of these terms.

Our position, which is outlined on the following pages, continues

to be clear. Credit unions should absolutely be able to use common terms and phrases in verb form to describe what we do - banking. We have also included information on who we are, the impact we have on the community, and several statements on behalf of our members.

CUA proudly serves over 20,000 members, primarily in the metro Halifax region of Nova Scotia. Of those members, 2,000 are organizations, non-profit associations, small and medium-sized businesses, community groups, unions, religious institutions and more. CUA knows the local marketplace and, because we are local, we can deliver service and decisions quickly.

In 2015, after significant research was conducted among our membership and within the local marketplace, CUA re-introduced itself to the local marketplace as *CUA - The better way to bank*. The response to our new brand and visual identity has been very positive. Focus has been placed on building a strong foundation, beginning with a shared understanding of who we are, who we serve and why we're a better banking option for many Nova Scotians. Now, more than ever, CUA is positioned as a full-service banking institution that makes a difference in the lives of individuals, families and communities.

CUA is working hard for our members and for Nova Scotians. We simply want to do what we do best: providing flexible banking products, personalized services and trusted advice to help open the door to our members' financial future. Let us continue this work by allowing us to talk freely about what we do - *banking*.

Sincerely,



Marie Mullally
President and CEO



CUA's Position

CUA has considered the Federal Government's position on this issue. Minister Morneau holds an immense responsibility to act in the best interests of Canadians and the national economy. More than 5.6 million Canadians - nearly 15% of the national population - do their banking with a credit union.

Credit unions are contributing to the economic well-being of the communities in which they operate. And, despite our national success, we face an enormous challenge: the majority of Canadian consumers do not understand that they can do their banking at a credit union.

Research conducted in 2016 confirmed the challenge. When asked, "When thinking of financial institutions, who do you think of?". The big banks were top of mind, where "Credit Union Atlantic" was only mentioned by two percent of respondents. As a region with close to 400,000 residents, Halifax is a vibrant market with great potential. This is why CUA re-branded in 2015, to focus on connecting with consumers and delivering one key message - you can do your banking at CUA.

It is our hope that the Federal Government will agree with our fundamental belief that Canadians have a right to know of their options, and that no sector is served well by being monopolized by a few, powerful entities. With this in mind, we provide the following response to the two questions being posed as part of this public consultation process:

1. Should credit unions be allowed to use the terms "bank" and "banking" in verb form to describe their activities?

Absolutely, yes. Credit unions should be able to use words and phrases such as "bank", "banking" and "to bank" in verb form as they describe our business activities in a way consumers understand. Credit unions are provincially-regulated financial institutions, and as such should be entrusted to use these words responsibly, as

we have been doing for decades without issue. CUA does not call itself a bank; we use the phrase "The better way to bank" similarly to "The better food to eat", where "to eat" and "to bank" are activities. Banking is simply what we do.

2. What limitations, if any, should be established on the use of these terms by credit unions "to avoid marketplace confusion and ensure appropriate protection of consumers"?

CUA recommends that disclosure, defined as having the words "CREDIT UNION" placed prominently, be required on all official banking documents that require the signature of the consumer in order to access banking products and/or services.

Examples of banking documents might include an application to open a membership account, to obtain a deposit product, or to apply for a loan.

CUA's existing processes, paperwork and protocols make clear to consumers who they are dealing with - Credit Union Atlantic. Most unique to CUA and to the credit union system as a whole is the account opening process, whereby new members must provide \$5.00 to purchase a share, which is held in a separate account and refunded if ever they decide to leave. This is not something that takes place at a bank. In short, we believe our current practices are suitable and effective in disclosing our status as a credit union.

CUA stands firm in our position AGAINST any requirements to incorporate a disclosure statement in marketing or advertisement material such as television or radio advertisements, brochures or other material that exists for the sole reason of connecting with consumers to inform them that there is another option when it comes to doing their banking.

CUA'S POSITION (CONTINUED)

Credit unions are not deceiving consumers by advertising their products and services in their current practice. In fact, we have heard from many new members that our advertising has made what we do more clear - which is banking products and services such as mortgages. Requiring a disclosure on these materials will certainly cause consumer confusion in the marketplace; advertisements for a "no-fee student banking account" with a fine-print disclaimer stating "we are a credit union" (read: "we are not a bank")? It's reminiscent of pharmaceutical industry commercials that leave viewers feeling torn between having found a solution, but also knowing there is a sense of risk that comes along with it.

Requiring credit unions to place what can only be described as a disclaimer on such marketing materials will result in reputational damage and unwarranted speculation, suggesting credit unions are less secure, less credible and offer lesser quality services and products to Canadian consumers. Perhaps most of all, consumers will be left with a large question mark, "What is a credit union?" And, as we know with consumer behaviour, they will quickly move on based on not understanding who we are, instead of focusing on what we do - *banking*.

The motivation and intention for CUA is to connect with consumers who we can help along their journey to being financially strong. Paying down debt, purchasing their first home, growing their business, helping their child save for university, or saving for their own retirement - those are the ways that we help strengthen our members and the economy. It is worth mentioning that, of course, 100 percent of CUA's profits are put back into the business to better serve our members through products, rates, improvements and experiences. Our advocacy is not self serving nor altruistic - we are a small, successful business. Our goal is to grow and help Haligonians and Nova Scotians be financially well. Why on earth would the Federal Government want to get in the way of that?

For 13 consecutive years, credit unions have received top honours and awards in customer service excellence. We are a relevant and important part of the banking sector in Canada and our marketing efforts are simply presenting the facts. And, by showing the facts - and using the phrase "to bank", people are starting to recognize CUA because we offer banking. Nora Burkey, a student from Saint Mary's University, moved to Halifax from the United States

and discovered CUA based on our new visual identity and tagline, which focuses on our products and services. She needed a place to do her banking, and she found CUA.

"I was walking down Spring Garden Road - my first day in Halifax, actually - and I saw the sign that said 'CUA - The better way to bank' so I went in and said, 'Why is this the better way to bank?' and one of the women at the branch said it was a credit union. She told me about their relationship with the local community and I thought, these are exactly my values, so I signed up immediately."

*- Nora Burkey, CUA Member
Student, Saint Mary's University*

Earlier this year, CUA placed advertisements on television, billboards, transit and digital media to promote our mortgage offerings. The creative featured a diverse array of doors with the words, "The right mortgage for the right home." The commercials read, "With flexible products and terms that fit your life, CUA can help you get into your home faster - no matter what you're looking for. CUA - the better way to bank." The message was clear: If you're looking at purchasing a home and you need a mortgage, CUA can help you. That is a fact. It is not deceiving the customer in any way. We have gained many new members as a result of the campaign, and they have indicated that they are glad they were introduced to us - finally - as a banking institution. In most cases, people simply didn't know we were an option.

Now, consider the consumer's experience if they hear and see these advertisements with disclosure added to the message. It simply causes confusion. Consumers who engage with us to either open an account or to borrow funds will have to go through a formal process which will absolutely provide both verbal and written disclosures to the consumer. There is a fine line between disclosure and disclaimer. Disclaimers are placed on ads and cause skepticism. Disclosure is shared in a personal exchange, leading to better informed parties. Disclosure is what we support in its current form.

About CUA

CUA (Credit Union Atlantic) is proud of its unique position in the Halifax market. In 2018, CUA will celebrate its 70th year in business, a milestone that we hope will be marked by continued growth and community impact.

Who is CUA?

Established in 1948, CUA is a full-service banking institution with seven branch locations, a Commercial Centre, a Wealth Management Services division, a Customer Contact Centre, and a Corporate Office in Halifax. CUA is a member of the largest branch network in Canada and has over 20,000 customers and total assets in excess of \$460 million. The CUA Difference is a blend of flexible products, personalized services and a nimble approach to decision-making that gets customers the answers they're looking for, fast.

CUA offers personal and business banking through many channels, including its retail branch network and Commercial Centre, online banking, deposit anywhere service, a mobile banking app, an extensive network of ATMs, phone and text banking, banking abroad, and mobile banking specialist services that bring CUA's financial advisors to the customer. At CUA, 100 percent of profits are put back into the business to positively impact members and the local economy.

CUA offers the **same types of products** as the big banks, including: chequing and savings accounts; RRSPs, TFSAs, term deposits; mortgages; loans and lines of credit; credit cards; insurance; wealth management and investments; and, tax preparation services.

What does CUA uniquely offer?

Products

CUA also provides financing to small and medium-sized businesses through the Nova Scotia Small Business Loan Guarantee Program, which is only available to credit unions. It ensures that

entrepreneurs

with strong business cases

but lacking in assets can be funded to start up or grow.

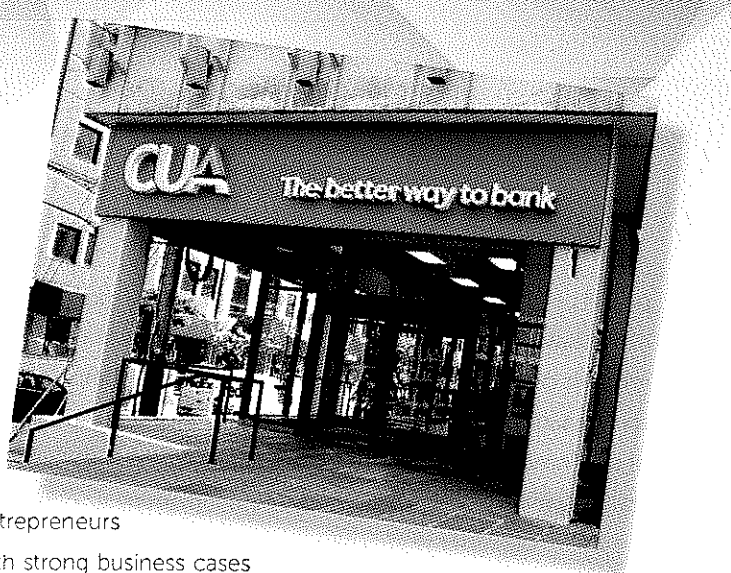
CUA also offers microloans between \$500 and \$5,000 to assist new or growing businesses or individuals looking to establish or re-establish credit. It is a unique product within the local market as it is not offered by other banking institutions.

CUA offers a unique No Down Payment Mortgage, in which CUA customers can access up to 5% of the purchase price in the form of a loan or line of credit. On closing day, customers receive 5% of the mortgage amount back in cash, which can be used to help repay the borrowed down payment. CUA is one of a few financial institutions to offer this type of product.

Consumers who have equity in their home often access CUA's Home Equity Line of Credit product in which they can qualify for up to 80% of their home's value as a line of credit. Also related to home financing, and in conjunction with Canada Mortgage and Housing Corporation (CMHC), CUA offers the Chattel Loan Insured Program (CLIP) Mortgage for mobile homes. Only one other financial institution in the region offers this product.

Service

CUA employs close to 100 staff who collectively deliver an exceptional member experience that rates #1 among the reasons why members join and stay. CUA's Member Experience Model (MEM) places the customer at the centre of every interaction. Staff take the time to understand where individuals and businesses are, and where they want to be, and deliver a solution that is tailored to their needs. The two articles on the following pages feature The Floatation Centre and North Brewing Company, CUA members who value CUA's service.



ABOUT CUA (CONTINUED)

Elevate Your Quality of Life and Go Float Yourself

How Lindsay MacPhee went from working 9-to-5 to starting her own business.

Published in *The Coast* | Content by CUA

Lindsay MacPhee enters the dark, sensory deprivation tank to get cozy with her intuition. She experiences discomfort, sits with her thoughts, and starts to make sense of what she's feeling and why. Floating is a way to enhance her meditation practice, to be able to feel her body, get a sense for her physical awareness and listen.



"I'm actually showing up, even if I don't want to be there, because floating isn't a task. You don't have to do it, you want to do it to be your best self," says Lindsay. This is Lindsay's goal and the centre's purpose: "To provide a springboard for happiness and elevated levels of consciousness." Lindsay aims for everyone around her to feel calm, loved, and to enter her judgement-free centre with ease. But The Floatation Centre wasn't her original "plan," nor did Lindsay come from a business background. It was going to take work. "When I wanted to open the business, the 'big bank' wouldn't even look at me. I had too many student loans for the amount that I needed to startup to be available to me." Lindsay

says that from there it was an easy decision. "I remembered having such good memories of Credit Union Atlantic. When I was a kid I had one of those booklets from their children's banking program that you got stamped each time you put money into your savings account." CUA is a member-owned business that is committed to helping local entrepreneurs in strengthening their financial health and keeping the power in the people.

CUA believed in Lindsay, and understood that she found happiness in helping her local community just as they do. With their help, Lindsay left her nine-to-five environmental engineer job to elevate her own quality of life, and enable those around her to do the same. Lindsay's first CUA accounts manager was with her every step of the way, and made the whole transition and process seem effortless. "He had experience with the C.E.E.D (Centre for Entrepreneurship Education and Development) program and did all of the paperwork for me," she says. Now, almost three years later, her current accounts manager frequently checks in with her, and continues to nominate The Floatation Centre for local awards.

"He and his wife even came into float before their wedding just to relax and unwind, and they are still active floaters. It feels like I'm working with friends and less like a transaction," Lindsay says about her ongoing relationship with CUA. With their help, Lindsay was able to expand just after her first year of business, and continues to expand with her recent addition to the company with her "Compassion Float Program." This program pays it forward, and provides the chance to nominate someone for a month of free floats, and for them to continue to receive 50% off for the rest of their lives. Lindsay understands that so many people could benefit from the floatation tanks but may be financially limited. This is the kind of freedom that Lindsay maintains with her business: in being able to run it in her own way, and by following her own roadmap.

"I'm so proud of the kinds of people that we've attracted, and we have 19 people currently working directly with us. I really want to celebrate that connection." Lindsay's heart-led mission stretches out to her team, who she's able to empower and celebrate.



ABOUT CUA (CONTINUED)

Who to tap?

Posted on September 5, 2017 | By Chet Wesley

Atlantic Business Magazine

If you're a small business looking for a loan, your approval may be tied to the type of financial institution you approach



Soon after opening in downtown Halifax, North Brewing Company was taxed with an enviable problem: they needed to grow—fast. Company president Peter Burbidge knew that his fledgling business had to expand if he wanted to keep filling the demanding tankards of thirsty Haligonians. He also knew that if he grew too quickly he risked overextending the company. But if he didn't take advantage of the opportunity, someone else would.

Not surprisingly, he opted to grow—but he didn't do it alone. He partnered with the owners of Ace Burger to create Battery Park, a new restaurant and beer bar on the once gritty, now hip Ochterloney Street in downtown Dartmouth.

"We started out with the brewery super small, with just \$120,000 and from day one we were overwhelmed with demand. We added tanks and increased volume the best we could, but it's a very capital intensive business," says Burbidge. "We decided to take the next step to get a bigger brew house, a second store, and beer bar."

It sounds like a natural progression, but it wasn't without its hurdles—especially when it came to borrowing the money

Burbidge needed to make it work. Like many small business owners, most of his was capital tied up in production and sales, and with only a few years under his belt, he needed financing to expand. Burbidge's first stop was to his bank. To his dismay, the bank wasn't as interested in his plans as much as his numbers. His old, outdated numbers.

"Originally, we were with (one of the big banks), but when it came time to expand, and we were looking for financing, they were only interested in our previous year-end statements," says Burbidge. "They were able to give us some money, but not what we needed. They just looked at the numbers and pretty much wanted us to wait a year."

According to Jenelle Sobey, managing partner of Halifax-based digital design and app developer Code + Mortar, big banks and small business expansion are not a natural fit. "Banks are not forward thinking. They don't do forecasting," she says. "You're looking for financing for growth, numbers that don't exist yet. You can only borrow on what you've built so far. They take zero risks. If you get a manager on your side who believes in your vision, it is an exception."

That's what North Brewing was searching for: a lender with vision. They found it in their local credit union.

"When I had the meeting, I was impressed that the superiors were right down the hall, where the decision would be made. They were much more receptive and excited about our plan," Burbidge says.

The credit union Burbidge is referring to is CUA. Like all credit unions, CUA is a local, community-focused full service financial institution owned by the same people and companies it does business with.

"A lot of businesses don't realize that we offer this service (small business financing)," says Scott Durling, vice president of



ABOUT CUA (CONTINUED)

member services at CUA. "We look at their business plan, financial statements, potential cash flow and projections about what the company is planning to do. We don't approve everybody, but we do give them a plan on how to get to a 'yes.'"

"Our interest rates are extremely competitive as well," says Durling. "It's very rare we lose a deal to an interest rate. And the vast majority of decisions stop with me." In other words, they were exactly the kind of lender Burbidge was looking for.

"They knew our location was up and coming and that there was nothing like it in Dartmouth, that it was going to be successful," says Burbidge. "(Our bank) would never consider that. The fact the credit union was willing to come up with significant funding meant that we didn't have to delay and lose the location. Plus, our bank representative was always changing or moving to Toronto."

Renzo Ranalli, vice president, business bank credit products group at TD Bank in Toronto, says one of the reasons why bankers are often on the move is because, as an employer, they want their staff to advance and grow. "We want people who are curious and want to expand their career and encourage them to seek out opportunities to grow. We maintain the story of customers through our customer relationship software. When someone takes over a portfolio, subject to the customer not opting-out for privacy reasons, they can access all previous documentation."

"A person's personal credit history goes a long way and is the most important at the start-up level for micro lending," says Ranalli. "Provided the application is in order, having a business plan and the capacity to pay on the personal side is evident, we have an answer (to a loan request) in one or two minutes."

While CUA has a similar approach when it comes to considering a client's past financial performance and ability to guarantee debt repayment, Durling says the decision-making process doesn't stop there. "We put a lot of weight on the character of the individual, which has been lost in the (banking) industry. We look at their

reputation in the community. How entrepreneurial they are. If someone can demonstrate that they are really trying to help the community and has a good reputation, a decision that could easily be a 'no' can turn to a 'yes' because of their character."

Sobey offers a third alternative to borrowing. If you are a small business looking for something more flexible and negotiable than a credit union or bank, you can consider borrowing from other high net-worth entrepreneurs, or what she terms "network lenders."

"You don't get to negotiate with your bank, but you can with your network," says Sobey. "Select someone who's within your industry and understands your business. People are apprehensive about loaning money to businesses when they don't know how the business works."

That's something North Brewing might find useful as a secondary source of capital as they prepare for their next expansion. "We have already increased our capacity to a point where we need to add more capacity already," says Burbidge. "We've started selling our product in liquor stores, and the new beer bar has been very well received by the community."

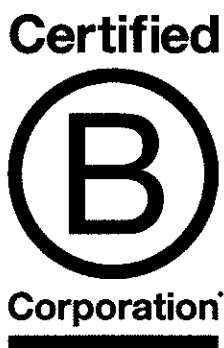
But Burbidge says he already knows who he'll turn to as his investment partner for his next expansion—and he's encouraging others to do the same. For this entrepreneur, credit unions are his perfect brew.

Read the full article: <http://www.atlanticbusinessmagazine.net/article/who-to-tap/>

Community Impact

CUA is proud to be a strong contributor to the community, first and foremost through the products and services we offer to our members. Our vision of strong members and a strong community, starts by improving our members' financial health, which will have a positive impact on their families and the broader community - not just socially, but economically. Everything we do is grounded in a desire to help our members and neighbours live a better life. In addition to supporting our growing community of members, CUA supports local businesses, non-profit and community organizations through its various programs and initiatives.

Additionally, CUA was the second financial institution in Canada to be internationally recognized as a B Corp Organization. B Corp (the "B" stands for benefit) is a measure of a company's commitment and results in supporting a strong community, work force, economy and the environment. Certified B Corporations meet high standards of social and environmental performance, transparency and accountability.



Unlike traditional corporations, Certified B Corporations are required to consider the impact of their decisions not only on their shareholders, but also on their stakeholders (e.g. workers, suppliers, community, consumers and the environment). CUA has been recognized internationally as an organization dedicated to providing benefits to its employees, community and the environment.

Banking Products

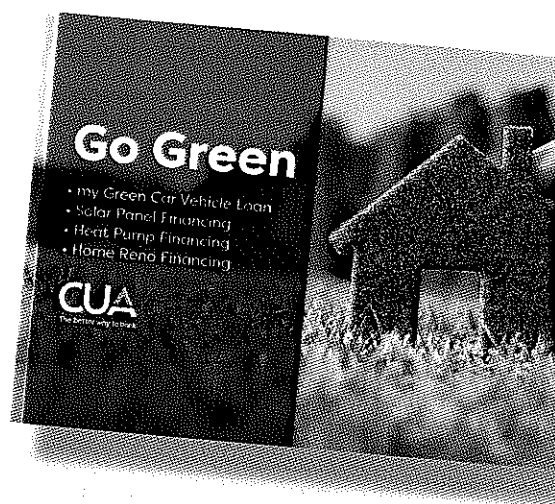
CUA's *No Down Payment Mortgage* assists individuals who may not otherwise be able to afford home ownership. In 2016, CUA helped hundreds of individuals and their families become financially healthier by starting to build equity in a home they call their own. CUA is proud to offer *Responsible Investing* products to customers looking to invest in mutual funds. Responsible Investing

refers to the process of making investment decisions using traditional financial analysis, while also evaluating performance on environmental, social and governance factors. Investors can choose to achieve their financial goals while also making a positive impact on people, companies and the environment. In fact, 100% of CUA's mutual fund offerings are Socially Responsible Investments. Customers have confidence they can *do well while doing good*.

In 2016, CUA developed a specialized "Go Green" financing program, inviting consumers to consider the long-term return on making an investment in energy-efficient upgrades.

CUA offers special financing rates for customers who are borrowing funds to pay for a heat pump, solar panels, energy-efficient renovations and fuel-efficient vehicles. As a result, CUA developed dozens of new relationships with local businesses, vendors and new CUA members who are making a smart investment while also having a positive impact on the environment.

CUA is the largest distributor of funds through the Nova Scotia Small Business Loan Guarantee Program (SBLGP), which is designed to help small businesses by providing CUA a 90% guarantee up to \$500,000 in the form of term loans, working capital and lines of credit. In 2016, a total of 82 loans were disbursed in the amount of \$4.4 million to small business members through this Program. CUA remains an advocate of the program and it remains a product differentiator for us and for other credit unions in the region. In total, there are over 200 companies that have benefitted with over \$14 million in financing.



COMMUNITY IMPACT (CONTINUED)

Financial Literacy

Helping to educate our members and those within the broader community is at the core of everything we do. CUA takes an active leadership role in the area of financial literacy programming, to ensure that individuals have the financial knowledge and tools they need in order to lead financially healthy lives. CUA staff volunteers reach over 1,500 individuals per year through its various education programs that foster personal financial well-being for students and adults.

CUA is a major sponsor of Junior Achievement of Nova Scotia, an organization that focuses on financial literacy among youth aged 5-25. Our staff volunteer hundreds of hours every year to visit high school classrooms to deliver JA's curriculum, answering questions about banking, credit, debt, fraud protection, financial planning and money management. In addition to providing educational workshops, CUA delivers one-on-one counselling sessions to Habitat for Humanity Nova Scotia clients who are struggling financially. Our dedicated advisors assist them in managing their debt and credit issues, while helping to develop a plan to successfully manage their finances going forward.

And lastly, CUA makes a concerted effort to generate helpful and informative content related to financial topics and issues, to share on our website, monthly newsletters and social media platforms. CUA has a robust collection of "It's a Money Thing" videos, infographics and articles that break down complex topics into understandable money matters. Video topics range from buying a used car to student loans, earning money online, compound interest rates, demystifying mortgages, saving on groceries and more. (View the full list: <https://www.youtube.com/playlist?list=PLS4oOpFZsRVfjEgBg1VOtQRwtIFwyJhSq>)

In 2017, CUA launched its CUAAuthors Program, providing expert advice to readers from our trained financial advisors and senior staff. Topics range

from income tax facts and ways to spend your refund to choosing between leasing and mortgaging a retail location, assembling your home-buying team, paying off credit card debt, banking

for non-profit organizations, the basics about credit scores, and making your home more energy-efficient. The full list of articles, which continues to grow each month, can be found at cua.com/CUAAuthors.

Community Partners Program

CUA is a local business that supports local businesses. One of the ways we focus on supporting the local economy is through our unique Community Partners Program. More than 220 local businesses, ranging from law firms to coffee shops and wellness centres, have signed up as a Community Partner, giving a discount to members of CUA when they purchase goods and services. In turn, CUA promotes these businesses to the more than 20,000 CUA members.

Community Giving

In 2016, CUA celebrated its 10th year as the title sponsor for the *CUA Lung Run*. Over the 10 years, CUA's leadership contributed over \$300,000 to this cause. Through sponsorships and donations, CUA supports worthy causes that enhance the overall quality of life of its members and the communities where they live and work.

CUA has contributed to the Halifax Central Library, Feed Nova Scotia, Junior Achievement, the Military Family Resource Centre, the International Business Trade Show, Phoenix House, BlogJam Atlantic, community festivals, children's events and contributed hundreds of volunteer hours with local charities and initiatives.

Social Investment

CUA's Community Investment Grant Program provides direct funding to individuals and organizations who are making a difference in their fields, their businesses or their community. Grants are awarded to recipients across five categories including New Canadian Venture, Local Business, Community/Non-Profit Organization, Social Enterprise and Youth.

According to Laura Poirier of Nova First Aid, "This grant gave me the confidence as a new business owner to continue through the struggles and learning curves to help make this idea of free first aid workshops a reality."



COMMUNITY IMPACT (CONTINUED)



"We opened the doors of our small business back in 2010, and at that time we were with another financial institution. Shortly after that, we realized we needed something extra to help us with our business and to help it to grow. If CUA had not taken on our business portfolio, and taken a look at what our true needs were, I'm not sure our doors would be open."

*- Donna Harding, Owner
Harding Real Estate*