

# Communicator (1984)

THE CALIFORNIA MOVING & STORAGE ASSOCIATION

#### One Year After Passage of AB 2118

## **Electronic Transmission Protocol For Moving Documents Established**

With the passage of the CMSA-sponsored AB 2118 household goods carrier bill almost one year ago, CMSA has provided the California Public Utilities Commission (CPUC) staff with additional tools required in leveling the playing

field for licensed movers in California and protecting consumers from being scammed by unlicensed moving companies. While most provisions in the bill have been effective January 1, 2013, a system of electronic transmission of moving documents was to be established by July 1, 2013. Since Governor Brown signed the bill into law. CMSA has been working with CPUC officials in getting the electronic document transmission section of AB 2118 ready for commercial use.

As of August 15, 2013, the California Public Utilities Commission had approved Resolution TL-19109, which

included the electronic transmission language from AB 2118. Now, California moving companies may add CPUC-approved electronic documents as an option for sending moving documents to consumers.

#### What does this mean for CMSA members?

CMSA members are able to transmit moving documents to the shipper electronically. To do this, movers must send Item 475 ( titled "Shippers Consent to Use of Electronic Docu-

ments and Electronic Signatures" and is on page 8 of this issue) to the shipper. Once this form has been signed by the shipper and returned to the moving company, movers would then be allowed to electronically send documents to its shippers.

There are a number of ways to follow this requirement. One option would be for moving companies to scan and send the documents to the shippers. The shippers then print the documents, and sign, scan and send the documents back to the companies to process. Another option would be for moving companies to create their own documents through fill-in-the-blank

software (for example, DocuSign) for shippers to electronically sign and transmit the signed documents back to the company. If supplier companies begin creating and selling electronic fillable forms, moving companies can buy these eforms and send them to their clients as well.

(AB 2118 continued on page 6)





#### Chairman's Corner By: PJ Welch

It's yet another steaming hot day in the Southern California desert as I sit down to write this article. While the temperature and humidity remain high, a quick check of the books confirms that this year's peak season is coming to

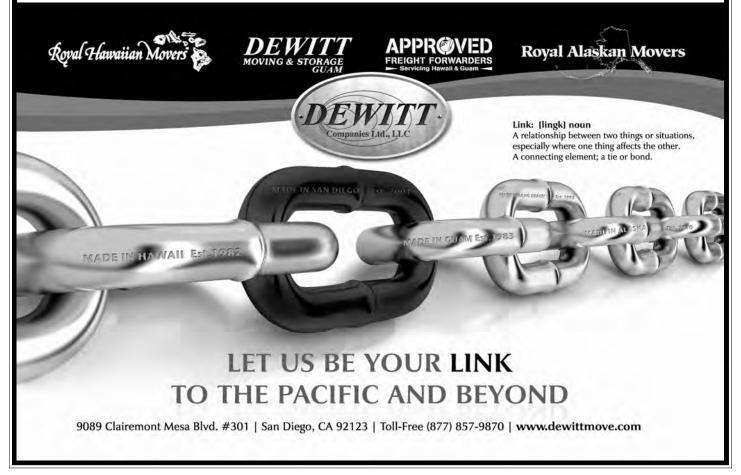
an end. As much as I would like to take a break or take a trip to put some distance between myself and the moving business, I always find the slow months to be much more stressful than the busy months. Summertime brings many challenges to my business. How to service an extra order when you are already overbooked? How to make space in crowded warehouses for another storage lot? Wintertime also brings many stresses. How do I keep my employees busy? And new for this winter: Is that truck worth investing in a CARB-compliant exhaust system and keeping it?

Fortunately, I was able to take a quick break

in August and attend the second-ever Executive Board Retreat in Napa. I must admit that last year I thought Chairman Rick Hosea and CMSA President Steve Weitekamp were crazy to organize a meeting during the middle of the season to discuss issues important to the CMSA and the moving industry. I could not have been more wrong. I would like to thank all of the Executive Board members who attended the retreat. As a group, we discussed strategies to not simply increase membership but how to increase participation of all members and what value is added to movers who are members of the CMSA. We discussed member expectations and what types of programs could be developed that would provide unique benefits to CMSA members. We discussed what we, as Board Members, could do to encourage and develop future leaders of the CMSA. We also agreed to support one another by attending as many chapter meetings and chapter events as possible and to encourage as many members in our chapters to also participate in other chapter events.

The Executive Board Retreat, like every oth-

(Chairman's Corner cont. on page 4)



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#### President's Comments

By: Steve Weitekamp

CMSA chapter meetings and the Chairman's chapter visits are off to a strong start. Our recent visits to both the Twin Counties Chapter and the San Diego Chapter were greeted by record attendance and enthusiastic participation. Below are updates on

several of the projects on which CMSA is currently working.

We are finalizing a draft of the Association bylaws changes and, pending approval by the Board of Directors at our Fall Board meeting in late October, drafts will be mailed out to all members for a vote. Our bylaws have not been modernized, and it has been many years since they were reviewed. This has been a project that has been reviewed over two years and utilized outside counsel to complete.

At the direction of the Executive Board, we have developed a CMSA promotional postcard that will be mailed to all permitted carriers, including CMSA members. The purpose of this mailer is to remind all carriers that CMSA is their Association. Those who aren't members should join and those members who are not active should take a more active role.

CMSA has received several inquiries regarding the Department of General Services (DGS) Office Moving Services Master Service Agreement (MSA) and the opportunity to participate in the program. Some members will recall that CMSA played an active role in the original development of the MSA a little over five years ago. It was our goal to be a part of any changes in the revised program. Unfortunately, it was determined that input from CMSA and other parties that provide the service was not necessary. As a result, we shared our concerns with the revised program once information was made public, resulting in delaying changes and later withdrawal of the MSA. The process has been put on a brief hold as DGS reviews the agreement. Thankfully, this process has resulted in a reevaluation of the value of industry input and an opportunity for CMSA and several members to meet with DGS with the goal of establishing a dialogue

(President's Comments cont. on page 5)

#### (Chairman's Corner cont. from page 2)

er CMSA event I have ever attended, would not have been as successful without the support of our Associate Members. While I could never thank all of the Associate Members for their dedication and service to both the moving industry and the CMSA, I would like to point out a few

members for their contributions to the CMSA and to me personally. I would like to thank Lisa Paul and Paul Hanson Partners Specialty Insurance for helping to find an incredible meeting space in Napa and for sponsoring the Saturday night dinner at the retreat. I would like to thank Mark Hildreth and New Haven Moving Equipment for spon-

soring the retreat's Friday night dinner. On a more personal note, I would also like to thank Mike Blower and Jason Blower of Pioneer Packing for taking my father and I on an incredible trip to San Clemente Island aboard the Pacific Pioneer. I feel that I am fortunate to be able to part-

ner with many Associate Members for the goods and services provided so that I may keep my moving business running smoothly and efficiently. I feel even more fortunate to have become great friends with our Associate Members and would like to thank all of them for the good times!

As summer turns to fall, I would like to encourage all CMSA members to begin attending

chapter meetings. The CMSA finds its strength in its members and their participation. As Chairman, I look forward to meeting with as many members as possible as I visit each chapter. I have the responsibility of listening to your concerns and presenting those concerns to the CMSA Board. I encourage all of you to work with your

all of you to work with your Chapter Presidents and help them as they plan meetings and fundraisers that support the CMSA Scholarship Fund. Please join me at your local meeting as I travel to each chapter, making new friends and having a great time.



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#### (President's Comments cont. from page 3)

that might improve the program for both the state and service providers. At the same time, we will be addressing the Standard State Rates for household goods that has

not been adjusted since 2009.

Our publication frequently speaks to the positive benefits of technology in our business and personal lives. However, below is a warning that I wish to share, which was provided by my friend and colleague Patricia McLaughlin, executive director of the Illinois Movers' and Warehousemen's Association:

"NEW BANK FRAUD WARNING: Technology can make life slicker and quicker, and TV commercials sure do try to lure you in with the latest mobile app. But it also opens the door for people to stick it to you. [I'm sharing this with all of you not to encourage anyone getting the same 'bright idea,' but to

urge caution in your everyday transactions! This could happen to anybody who writes checks!

"One of our moving company owners asked me to share this important warning:

'We just caught one of our employees in a fraud situation.
Get this: Our accountant noticed the same check number being debited from our bank account. So when I called Bank of America, after investigating, they said the check was negotiated twice, meaning, once on a mobile device through a different bank and then the second time went to Bank of America and physical-

ly deposited it in their personal bank account. Isn't this scary? Now we're watching our bank account like a hawk, same applies for business checks that are deposited on mobile phones and then they could go to another bank and deposit the check. I hope every business owner's bank statement is being reconciled monthly. This is how our accountant caught this scammer."

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**Program Administrator** 

#### (AB 2118 continued from page 1)

All signed electronic documents have the same legal standing and require the same retention requirements as its hard copy counterparts.

#### How did CMSA get involved with AB 2118?

This journey has been a tough, but worthwhile endeavor for CMSA, to the benefit of its members and potential consumers.

In December 2011, John Skoglund, then-Assemblymember Betsy Butler's staffer in Sacramento, was first to contact CMSA for an industry outlook on the proposed AB 2118. With what was expected to be a few comments or issues to add to the existing bill, John Skoglund entered into a full-scale industry discussion with CMSA President Steve Weitekamp for almost an hour. Floored by the number of issues that were raised, Skoglund asked Weitekamp to meet Assemblymember Butler in Sacramento to brief her on the current issues of the Public Utilities Code inflexibility and illegal operators.

After accepting the invitation to Sacramento, Weitekamp assembled a CMSA-member group to help represent these concerns to Assembly-member Butler. With Weitekamp, 2012-2013

CMSA Chairman Dennis Doody of Blue Chip Moving & Storage Inc., Chris Higdon of California Moving Systems (who referred Skoglund to CMSA for industry input), CMSA Legislative Advocate Chuck Cole and CMSA Legal Counsel Mark Hegarty traveled to Assemblymember Butler's office to address licensed moving companies' concerns with the industry code and items that should be incorporated in the AB 2118 bill.

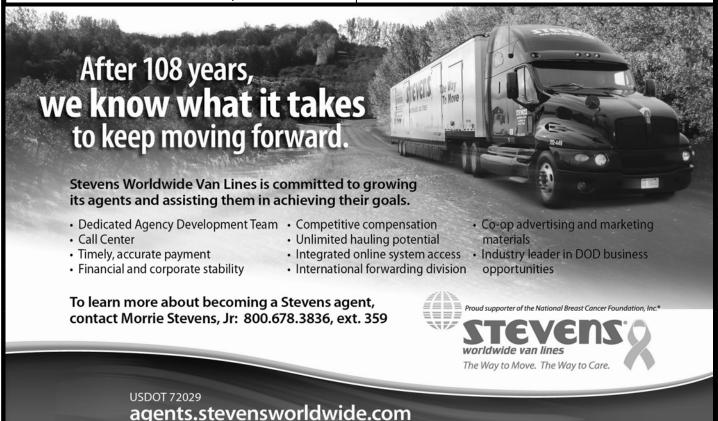
Weitekamp had to make a few extra trips to Sacramento for the redevelopment of the bill. Some were good meetings and some were difficult meetings. In order to keep the important industry changes in the bill, some of the non-essential parts had to be withdrawn.

After many conference calls, extra work hours and some concessions, AB 2118 passed the state Legislature and was signed by Gov. Jerry Brown.

#### **AB 2118 Highlights**

Below are the main highlights of AB 2118 that will benefit not only CMSA members but all licensed moving companies and consumers for intrastate moves.

(AB 2118 continued on page 7)



#### (AB 2118 continued from page 6)

- Brokers will be required to be permitted and follow all the same rules and regulations as permitted carriers.
- Any individuals or companies that are proven to falsify a CPUC permit, CMSA membership or place of business will be a direct Public Utilities Code violation and can be punishable with daily fines up to \$2,500.
- CPUC must develop a program (which is to send shippers the Item 475 form to fill out and submit to moving companies) to allow carriers to transmit moving documents electronically.
- Other areas of the code have been modified to assure that there will be minimum fines for non-permitted carriers and that no scenarios will exist where the fines for the activities of non-permitted carriers would be less than what they would be for legal operators.

For questions about AB 2118 or the procedure to electronically transmit moving documents to consumers, please contact the CMSA office at (562) 865-2900.

## CARB Conducts Truck Inspections in LA



The California Air Resources Board (CARB) worked with the California Highway Patrol to conduct inspections Tuesday, August 11, on heavy-duty trucks traveling in and around the Los Angeles area. The goal was to check for truck compliance of state air pollution laws.

Inspections took place in the parking lot of the historic Sears Building, near the intersection of 12th Street and Soto Street in Los Angeles.

Earlier this year, CARB has also conducted truck inspections in the Fresno and Salinas areas.



Note: Referenced in this issue's cover article, Item 475 form below can be found on page 11 of the CPUC Resolution TL-19109. Please read the form instructions on pages 7-10 in the resolution.

Resolution TL-19109

DRAFT

August 15, 2013

#### **EXHIBIT 4**

#### Item 475 is added to the MAX 4 Tariff as follows:

#### **ITEM 475**

#### SHIPPER'S CONSENT TO USE OF ELECTRONIC DOCUMENTS AND ELECTRONIC SIGNATURES

The California Public Utilities Commission ("Commission"), pursuant to Item 10 of the MAX 4 Tariff, requires carriers to provide shippers with this consent form (Item 475) in order to obtain the shipper's consent to conduct business with the carrier using electronic means in lieu of traditional paper documents. This form advises you (shipper) that the use of electronic documents, including forms, and electronic signatures is optional. The Commission requires that you acknowledge and consent to the use of electronic documents, forms, and electronic signatures in lieu of paper copies. You must agree and sign this form for your consent to be valid. The carrier is required to present you with an electronic copy of Item 475, "Shipper's Consent To Use of Electronic Documents and Signatures," at the time of your first contact with the carrier and prior to you entering into an Agreement for Moving Services with the carrier.

Item 10 of the MAX 4 Tariff provides that you (shipper) have the option and right to withdraw your consent to conduct business with the carrier by electronic means provided you give the carrier written notice of your withdrawal before you sign the Agreement for Moving Services (Item 450). Carriers are prohibited from charging you a fee in the event of such withdrawal. Under Item 10 of the MAX 4 Tariff, you have the right to request paper copies of any and all electronic documents related to your business with the carrier at any time, not to exceed a period of three years from the date the you signed Item 475, and the carrier is required to provide you with paper copies without charge either in person at carrier's place of business, or through fax or U.S. mail within two (2) business days of your request.

Do you (shipper) agree to conduct business by electronic means with the carrier and to accept electronic documents and to use electronic signatures in lieu of paper copies?

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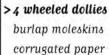
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## Truck and Bus Regulation Compliance Requirements Summary

Fleets have flexibility to comply

On December 12, 2008, the California Air Resources Board approved the Truck and Bus regulation to significantly reduce particulate matter, or PM, and oxides of nitrogen emissions from existing diesel vehicles operating in California. This fact sheet describes the regulatory requirements consistent with the amendments considered by the Board in December 2010.

#### What vehicles are affected by the truck and bus regulation?

The regulation applies to nearly all diesel fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds that are privately or federally owned and for privately and publicly owned school buses. Other public fleets, solid waste collection trucks and transit buses are already subject to other regulations and are not part of the truck and bus regulation. Trucks that transport marine containers must comply with the drayage truck regulation.

#### What are the compliance requirements for heavier trucks and buses?

Engine Model Year Schedule for Heavier Trucks					
Engine Year	Requirement from January 1				
Pre-1994	No requirements until 2015, then 2010 engine				
1994-1995	No requirements until 2016, then 2010 engine				
1996-1999	PM filter from 2012 to 2020, then 2010 engine				
2000-2004	PM filter from 2013 to 2021, then 2010 engine				
2005-2006	PM filter from 2014 to 2022, then 2010 engine				
2007-2009	No requirements until 2023, then 2010 engine				
2010	Meets final requirements				

Heavier trucks and buses with a GVWR greater than 26,000 pounds would have two primary ways to comply. Fleets could comply with the compliance schedule by engine model year or could use a phase-in option that is more flexible.

Starting January 1, 2012, heavier trucks would be required to meet the engine model year schedule shown to the left. Fleets that comply with the schedule would install the best available PM filter on 1996 model year and

newer engines and would replace the vehicle 8 years later. Trucks with 1995 model year and older engines would be replaced starting 2015. Replacements with a 2010 model year or newer engines meet the final requirements, but fleets could also replace with used trucks that would have a future compliance date on the schedule. For example, a replacement with a 2007 model year engine complies until 2023. By 2023 all trucks and buses must have 2010 model year engines with few exceptions. No reporting would be required if complying with this schedule.

Phase-In Option for Heavier Trucks					
Compliance Date	Vehicles with PM Filters				
January 1, 2012	30%				
January 1, 2013	60%				
January 1, 2014	90%				
January 1, 2015	90%				
January 1, 2016	100%				

In addition, there would be a phase-in option that allows fleets to decide which vehicles to retrofit or replace, regardless of engine model year. Fleets must report information about all of their heavier trucks starting January 31, 2012, to use this option.

Fleets could comply by demonstrating they have met the percentage requirement each year as shown in the table. For example, by 2012 the fleet would need to have PM filters on 30 percent of the heavier trucks and buses in the fleet. This option counts 2007 model year and newer engines originally equipped with PM filters toward compliance and would reduce the overall

number of retrofit PM filters needed. Any engine with a PM filter regardless of model year would be compliant until at least 2020. Beginning January 1, 2020, all heavier trucks and buses would need to meet the requirements specified in the Compliance Schedule for Heavier Trucks.

#### Are there any credits or exemptions fleets can use?

Starting January 1, 2012, fleets that report and use the phase-in option for heavier trucks, could take advantage of credits to delay requirements for other heavier trucks in the fleet until 2017 for the following:

- PM filters installed before July 2011
- Early purchase of cleaner engines before 2012 (originally equipped with PM filters)
- Reducing the number of trucks since 2006
- · Adding fuel-efficient hybrids or alternative fueled engines to the fleet

All fleets could make any vehicle equipped with a PM filter prior to 2014 compliant until 2020, or could make all heavier vehicles in the fleet exempt from meeting the replacement requirements until 2023 if all heavier trucks in the fleet are equipped with PM filters prior to 2014. Fleets would need to report by January 31, 2014 to take advantage. Vehicles operated less than 1000 miles per year can also be exempt from the general requirements but must be reported in the compliance year.

#### What are the requirements for lighter trucks and buses?

Engine Model Year Schedule for Lighter Trucks				
Engine Year	Replacement Date			
1995 and older	January 1, 2015			
1996	January 1, 2016			
1997	January 1, 2017			
1998	January 1, 2018			
1999	January 1, 2019			
2003 and older	January 1, 2020			
2004-2006	January 1, 2021			
2007-2009	January 1, 2023			

Lighter trucks and buses with a GVWR of 14,001 to 26,000 pounds would not have compliance requirements until 2015. The Engine Model Year Schedule for Lighter Trucks table lists the compliance dates that would apply by engine model year for lighter trucks. Starting January 1, 2015, lighter trucks with engines that are 20 years or older would need to be replaced with newer trucks. Starting January 1, 2020, all remaining trucks and buses would need to be replaced so that they would all have 2010 model year engines or equivalent emissions by 2023. No reporting would be required.

> Fleets would also have the option to install a PM filter retrofit on a lighter truck by 2014 to make the truck exempt from replacement until January 1, 2020, and any

lighter truck equipped with a PM filter retrofit prior to July 2011 would receive credit toward the compliance requirements for a heavier truck or bus in the same fleet.

#### Are there any other provisions for exemptions or delays?

The regulation has special provisions that delay some or all of the compliance requirements, but fleets must report to take advantage of them. By April 29, 2011, fleets would need to report to qualify for lower use and specialty agricultural truck exemptions until 2017 or 2023 and must report hour meter readings for sweepers with auxiliary Tier 0 engines. Fleets would need to report by January 31, 2012 to take advantage of delays until 2014 for small fleets with one to three vehicles, log trucks, lower use construction trucks, and vehicles operating in parts of the state with less polluted air.

#### What are the requirements for school buses?

School buses with a GVWR more than 14,000 pounds would need to meet PM filter requirements from 2012 to 2014. School bus fleets would need to demonstrate that 33 percent of their buses have PM filters by 2012, 66 percent by 2013 and 100 percent by 2014. If an engine cannot be equipped with a PM filter it will need to be replaced by January 1, 2018. Pre-1977 model year school buses must be replaced by 2012. No reporting is required, but fleets must keep records.

#### If I decide to sell my vehicle, do I have to notify the buyer of the requirements of this regulation?

Yes. Any person selling a vehicle subject to the Truck and Bus Regulation must provide a specific disclosure statement in writing to the buyer on the bill of sale, sales contract addendum, or invoice. See Regulatory Advisory 416 at www.arb.ca.gov/enf/advs/advs416.pdf.

#### For more information

Other fact sheets and additional information are available at: www.arb.ca.gov/dieseltruck or by calling ARB's diesel hotline at (866) 6DIESEL (866-634-3735). To obtain this document in an alternative format or language, please contact (866) 634-3735.TTY/TDD/ Speech to Speech users may dial 711 for the California Relay Service.

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REVISED 03/23/11

#### **Calendar of Events**

Fri., October 4 **Monterey Bay Chapter** Thurs., November 14 Central Coast Golf & Bocce Chapter Meeting Tues., October 8 Ventura/S. Barbara Tues., December 17 North Bay **Chapter Meeting Chapter Meeting** Wed., October 9 **Greater Los Angeles** Thurs., December 19 Sacramento Chapter **Chapter Meeting** Meeting Tues., October 15 North Bay Chapter Tues., February 11 Ventura/S. Barbara Meeting Chapter Meeting Thurs., October 17 OC/Beach Cities Wed., February 12 Greater Los Angeles **Chapter Meeting** Chapter Meeting Thurs., October 17 Sacramento Chapter Wed., February 19 Northern Region **Chapter Meeting** Meeting Wed., October 23 San Diego Chapter Wed., March 19 San Diego Chapter **Golf Tournament** Meeting Tues.. November 12 Mid Valley Chapter Wed., April 9 **Greater Los Angeles Chapter Meeting** Meeting Wed., November 13 Monterey Bay 96th Annual CMSA Convention Chapter Meeting April 29 - May 4, 2014

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## CMSA Leaders Attend 2013-2014 Chapter Presidents Orientation

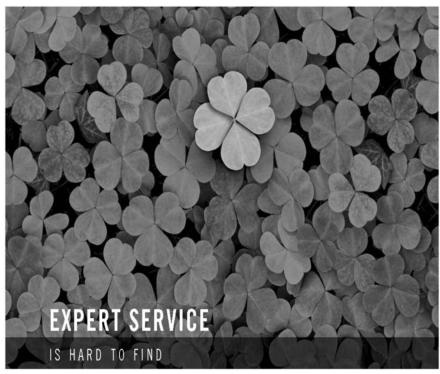
The CMSA Chapter Presidents and other chapter leaders attended the annual Chapter Presidents/Leadership Orientation to discuss new industry information and marketing techniques to enhance chapter activity. Two meetings were hosted — one in Southern California at the CMSA office and the other in northern California at Chipman Relocations' Sacramento office. CMSA Chairman PJ Welch also attended the orientation meeting at the CMSA office.

A special thanks goes to Jeff Nadeau of DEWITT Companies, current CMSA Associate Board Member, for sponsoring the orientation lunch in Cerritos and to Len Gollnick of Pioneer Packaging for sponsoring the orientation lunch in Sacramento. CMSA also thanks Jim Weiant for allowing the Association to use Chipman Relocations' conference room for the Sacramento meeting.

CMSA President Steve Weitekamp began the meeting with introductions and reviewed the expectations and responsibilities of the Chapter President and other chapter leaders' roles in the development of chapter events.

Weitekamp reviewed major industry information developments since the 2013 Convention that chapter leadership should review with members or incorporate in their meeting programs during the year. One topic that Weitekamp discussed (and that the CMSA office continues to receive calls for) is CARB compliance schedule information. (In response, CMSA will publish the CARB regulation schedules in various Communicator issues this year.) Attendees learned of the CMSA-sponsored AB 2118 update since Gov. Jerry Brown signed the bill last year. The protocol for legal electronic transmission of moving documents is now established. (More details on the topic are on page 1 of this issue.) Chapter Presidents were also briefed on the new recordkeeping requirements for raising funds in their local chapters.

(Chapter Presidents continued on page 15)



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#### (Chapter Presidents continued from page 14)

New this year, CMSA will be generating press releases for Chapter Presidents on new or continuing duties to thank them for all the hard work and commitment these professionals devote to the organization as well as to the industry.

Weitekamp also emphasized the need for

Chapter Presidents and chapter leaders to make personal calls to chapter members to attend the meetings. A chapter's success is based on the level of member participation it has, so Chapter Presidents must be tuned in to their



members' interests and persuade them to participate in their local chapter. In turn, Chapter Presidents should focus on scheduling worthwhile chapter programs throughout the year that would benefit members to attend the meetings.

Although meeting planning is essential for the health of the chapter, chapter leadership should host fundraisers with the primary goal of raising funds for college- and vocational-bound students of CMSA members. Chapter fundraisers are the primary contributions made to the CMSA Scholarship Fund, so they are essential to allowing the CMSA to award \$51,000 in scholarships each year to students. CMSA also

leaders who attended these orientation meet-

to remain active by regularly attend meetings

and helping shape their Association.

ings and wishing them a successful 2013-2014

year. CMSA members are strongly encouraged



donates \$5,000 to the Special Olympics every year to help individuals with mental or physical impairments to learn social skills, and build long-term friendships and connections.

CMSA thanks all Chapter Presidents and chapter

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## **New Member Spotlight**



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#### MEMORIAL BULLETIN

#### Robert "Bob" Coelho November 7, 1941 — August 10, 2013

Robert "Bob" Coelho passed away peacefully on August 10, 2013, at his home in San Jose. Coelho worked for Corovan Moving & Storage for many years.

Coelho was born in Honolulu, Hawaii. A 1959 graduate of Saint Louis School in Honolulu, Coelho attended Southern Oregon State and later Foothill college. He served in the U.S. Army from 1964 to 1966. Coelho worked for more than 50 years in the moving and storage industry at Corovan Moving & Storage. He began his career as a driver and worked in many positions including sales (earning Northern California

Salesman of the Year), Branch Manager and V.P. of Operations. He enjoyed mentoring many people in the industry.

Coelho and his family moved to Almaden in 1977. He cherished his family and friends, and lived life to the fullest. A doting father and grand-

father, he loved attending his children's and grandchildren's sporting events, school activities and performances. He also served on multiple boards for youth programs. He also enjoyed

traveling abroad with Gretchen, completing crossword puzzles in pen, solving the daily works jumble in seconds, playing cards with family, and playing countless games of scrabble with Gretchen. On August 7, the couple celebrated their 48th wedding anniversary in Seattle with friends.

Coelho is survived by his wife, Gretchen; brother Russell Coelho; sister Miriam Chipp (Rob); son Rob Coelho (Jennifer); daughter Erin

Blodgett (Bill); son Darren Coelho (Shannon); beautiful grandchildren Samantha, Alyssa, Jared, Madison, Jackson, Matthew and Michael.

Source: Darling & Fischer Chapel of the Hills



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#### **EMPLOYMENT OPPORTUNITY**

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