

Lynden Symons, Candice Symons
Symons Farm & Ranch
Lava Hot Springs, Idaho 83246
Telephone (208) 776-5316

RECEIVED

APR 07 2011

Department of Water Resources
Eastern Region

COPY

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

**IN THE MATTER OF APPLICATION FOR
TRANSFER NO. 76779 IN THE NAME OF
THE CITY OF POCATELLO**

**PROTESTANT LYNDEN SYMONS
AND CANDICE SYMONS
SYMONS FARM & RANCH
RESPONSES TO APPLICANT
CITY OF POCATELLO'S FIRST
DISCOVERY REQUESTS**

COMES NOW Protestant Lynden Symons, Candice Symons ("Protestants") on the land of Idaho, and pursuant to the Idaho Department of Water Resources ("IDWR" or "Department") *Order Authorizing Discover and Notice of Status Conference*, dated February 8, 2011 (the "Order"), and hereby answers and responds to Applicant, City of Pocatello's ("Applicant" or "City") First Set of Discovery Request to Protestant. Protestants object to having lawyers invade this common law venue. Protestants are also regarding all Attorneys and/or Lawyers as counselors. Answers and Responses to *Applicant City of Pocatello's First Discovery Requests to Lynden and Candice Symons* are as follows:

GENERAL OBJECTIONS

Protestants have not completed their own investigation and/or discovery.

Accordingly, the responses that follow are based upon the best first hand knowledge, information and reasonable and prudent belief of the Protestants at this time.

Protestants reserve the right to make further responses if it appears that any omissions or error has been made in connection with these responses or that more accurate information is or has become available. These responses are made without prejudice to Protestant's rights to use in later discovery and/or to present at hearing, evidence as may later be discovered or evaluated, as common sense, and common law allows.

Protestants also objects to the City's discovery requests and the Instructions and Definitions to the extent they seem to require discovery responses beyond that required under the Department's Rules of Procedure, the Department's Order, or the Idaho Rules of Civil Procedure and common law. These responses are provided in accordance with the Department's Order, the Department's Rules of Procedure, and the Idaho Rules of Civil Procedure irrespective of any instructions and definitions that may accompany these discovery requests.

These responses are made subject to all objections as to competence, relevance, materiality and admissibility. These responses are subject to all objections that would require the exclusion of any statement, material, or information herein provided if such interrogatory were asked of or any statement, material, or information provided by witnesses present and testifying in any common law venue. All such objections are reserved and may be interposed at the time of the hearing.

Protestants specifically objects to the discovery requests to the extent they seek information protected by the rules governing the discovery of facts of experts as set forth in Rule 26(b)(4), Idaho Rules of Civil Procedure. This objection is intended to apply to all of the discovery requests that seek such information and will not necessarily be repeated for each request to which it applies. Protestants have, to the extent possible, construed each request as requiring only information and/or documents not subject to and applicable protection.

No incidental or implied admission intended. The fact that Protestants have responded to any discover request, or any part thereof, should not be mistaken as an admission that Protestant accept that the discovery request or the response or objection thereto constitutes admissible evidence. Protestants answers to any discovery requests do not constitute a waiver of Protestants rights to object to any future, additional, or supplemental discovery requests the same matter.

II

ANSWER TO INTERROGATORIES AND RESPONSES TO REQUESTS FOR PRODUCTION

INTERROGATORY NO. 1: Please identify each and every ground for your protest of the Application that you may present at the hearing in this matter.

ANSWER TO INTERROGATORY NO. 1: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waving my objection, Protestant, in good faith responds to the first part of the Interrogatory only. In my opinion, being reasonable and prudent, common sense tells me, the loss of recharge has the potential to negatively affect many of the

people, on the land of South Bannock County, who have no direct connection with the water that the City is applying for the Transfer of.

The proposed changes may establish unforeseen problems to the storage water and the delivery system. The Chesterfield Reservoir was made for the purpose of storing water for irrigation and agricultural use. This storage water is beneficial and decreed to the land. Changes made to the nature of use of storage water automatically changes the criteria of the entire water system. (Idaho Constitution Article 3, 4, 15) (Idaho Code Section 42 - 214 through 244)

INTERROGATORY NO. 2: For each and every ground for your protest identified in your response to Interrogatory No. 1 above, please identify each fact, and each document, that supports, contradicts, or in any material way pertains to it.

ANSWER TO INTERROGATORY NO. 2: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waving my objection, Protestant, in good faith responds to the first part of the Interrogatory only. In my opinion, being reasonable and prudent, common sense tells me, changes to the period of use to year round would increase natural flows thus dramatically increasing seasonal flows. This may be an issue during winter when freezing and ice jams may create flooding.

INTERROGATORY NO. 3: If you contend that the Transfer will cause or exacerbate flooding of your property, please describe the basis for this contention and identify each fact, and each document, that supports, contradicts, or in any material way pertains to it, including all dates of such flooding, all known or estimated river flows at the time of such flooding, and the extent and duration of any flooding of your property that has occurred historically.

ANSWER TO INTERROGATORY NO. 3: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waving my objection, Protestant, in good faith responds to the first part of the Interrogatory only. In my opinion, being reasonable and prudent, common sense tells me, the potential flooding caused by these proposed Transfer changes could damage our property making our land unusable and unproductive causing harm to our farming and ranching operation. The Applicant has the burden of proof that the Transfer will not flood our property.

INTERROGATORY NO. 4: If you contend that the Transfer will impair or adversely impact water quality in the Portneuf River, please describe the basis for this contention and identify each fact, and each document, that supports, contradicts, or in any material way pertains to it.

ANSWER TO INTERROGATORY NO. 4: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waving any objection, Protestant, in good faith hereby responds to the first portion of the Interrogatory only. In my opinion, being reasonable and prudent, common sense tells me, if the Transfer is approved there is no quantitative research data addressing the water quality issues that could occur. Therefore, studies need to be addressed.

INTERROGATORY NO. 5: If you contend that the Transfer would injure your water rights, please describe the basis for this contention and identify each fact, and each document, that supports, contradicts, or in any material way pertains to it.

ANSWER TO INTERROGATORY NO. 5:Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waiving any objection Protestant, in good faith hereby responds to the first portion of the Interrogatory only. In my opinion, being reasonable and prudent, common sense tells me, the Transfer will exacerbate shrinkage and cause less water for our historical water right (our water right before the Reservoir was created). Also, our pre (April 1) and post (Oct 31) season irrigation waters.

INTERROGATORY NO. 6: If you contend that changing the season of use of the Transfer Water Rights will adversely affect your property, please describe each fact, and identify each document, that supports, contradicts, or in any material way pertains to such contention.

ANSWER TO INTERROGATORY NO. 6: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waiving any objection, Protestant, in good faith hereby responds to the first portion of the Interrogatory only. The applicant has not identified the amount of water discharged and time of use within the season to be used making it undiscoverable in regards to the Transfer adversely affecting our property.

INTERROGATORY NO. 7: If you contend that a suitable measuring device does not exist above the Reservoir to accurately measure inflows to be passed through the Reservoir, please describe what kind of measuring device(s) you believe would be suitable.

ANSWER TO INTERROGATORY NO. 7: In our option, it would be prudent to have an approved Idaho Department of Water Resource measuring device that is modern, with technological advances that does not allow human interpretation or error. Also, the same

measuring device is needed at the discharge of the Reservoir and at the Utah Bridge.

INTERROGATORY NO. 8: Please describe all causes of physical impairment or interference with channel capacity that affect the free flow of water in the Portneuf River reach adjacent to and/or traversing your property, and in so doing please identify each fact, and each document, that supports, contradicts, or in any material way pertains to your answer.

ANSWER TO INTERROGATORY NO. 8: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waiving any objection, Protestant, in good faith hereby responds to the first portion of the Interrogatory only. In our opinion, aquatic plant growth affects the free flow of water which has been a chronic problem. **See exhibit "A."**

INTERROGATORY NO. 9: If you contend that the Transfer, if approved, would conflict with the local public interest, please describe each and every basis for this contention and identify each fact and each document that supports, contradicts, or in any material way pertains to your answer.

ANSWER TO INTERROGATORY NO. 9: Objection. This Interrogatory exceeds the parameters of the Department's Order because it contains subparts. It also calls for potential legal conclusions which are not discoverable. Without waving my objection, Protestant, in good faith responds to the first part of the Interrogatory only. In my opinion, this Transfer is trying to supercede the Bannock County Comprehensive Plan as adopted April 16, 2008 pg. 41 "Support for Continued Agriculture and Retention of Water Rights." **See exhibit "B."**

INTERROGATORY NO. 10: Please state the name and address of each person you

intend to call as lay witness at the trial of this matter, and for each such person describe the substance of the facts and opinions to which he or she is expected to testify and identify the underlying facts and data and documents upon which the opinion and testimony is based.

ANSWER TO INTERROGATORY NO. 10:

Dan Dimick
87425 So. Sunnyside
Lava Hot Springs, ID 83246
(208)776-5834

INTERROGATORY NO. 11: Please identify each person you intend to call as an expert witness pursuant to the Discovery Order, by stating the name and address of each such witness and including for each such witness, as provided in Idaho Rule of Civil Procedure 26(b)(4)(A)(i), a complete statement of all opinions to be expressed and the basis and reasons therefore, the data or other information considered by the witness in forming the opinions, any exhibits to be used as a summary of or support for the opinions, any qualifications of the witness including a list of all publications authored by the witness within the preceding ten years, the compensation to be paid for the testimony, and a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

ANSWER TO INTERROGATORY NO. 11: No expert witnesses at this time.

INTERROGATORY NO. 12. Please identify the person(s) providing the answers to the above Interrogatories.

ANSWER TO INTERROGATORY NO. 12: The Protestant, Lynden Symons and
Candice Symons

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce copies of all decrees, partial decrees, permits, and licenses evidencing or confirming your water rights.

ANSWER FOR NO.1: See Exhibit "C."

REQUEST FOR PRODUCTION NO. 2: Please produce all documents that evidence the time, nature or extent of historical flooding of your property by the Portneuf River.

ANSWER FOR NO.2: Not at this time.

REQUEST FOR PRODUCTION NO.3: Please produce all documents, exhibits, and/or other items of tangible evidence you expect to introduce or use, or may use, at the hearing in this matter. If such documents, exhibits, and/or other items of tangible evidence have been produced in response to any of these Discovery Requests, please identify the documents, exhibits, and/or other items of tangible evidence which you expect to introduce or use, or may use, at the hearing in this matter but please do not produce any of it more than once.

ANSWER FOR NO.3: "Water Information Bulletin No. 16: A Reconnaissance of the Water Resources in the Portneuf River Basin, Idaho." is a document for Protestant research that can be found at:

www.idwr.idaho.gov/waterInformation/.../wib16-water_res_protneuf_basin_id.pdf. Protestant has a copy available upon request.

REQUEST FOR PRODUCTION NO. 4: To the extent not produced in response to Request for Production Nos. 1 through 3, please produce all documents on which you relied, or which you identified, in responding to these Discovery Requests.

ANSWER FOR NO. 4: Protestants' research is not complete at this time, future discovery

and/or evidence may be forthcoming, therefore, we reserve the right to amend this statement at any time, including up to the time of the hearing.

Exhibit "A"

PORTNEUF RIVER WATER-USERS DISTRICT #29

96003603

Minutes of the ANNUAL MEETING of the PORTNEUF RIVER WATER-USERS DISTRICT#29 held at the COMMUNITY BUILDING in Lava Hot Springs, Idaho, March 4, 1996 at 2:00 P.M. All Board members present except Roger Johnson, Dale Hatch came to represent Roger .

Chairman K.V. HANSEN welcomed those that came. There were 29 present.

The minutes of the last year's meeting were read and approved- - There were no additions.

K.V. asked Tim Luke to tell us about that meeting concerning the measuring devices. Tim Luke said it will probably be held sometime in April. Tim Luke talked about the expansion of the Reservoir and water loss from the Reservoir to the steel bridge. Howard Hall commented about the survey made by the SCS. Tim Luke said they wanted to supplement the survey by the end of this year.

Dean Day asked how that will affect us. Tim Luke said it would mainly affect the Portneuf Marsh Valley Canal. Tim Luke said this river is a gaining river and it is probably not gaining as much as it used to.

Max Hall said it is impossible to run water down a ditch without a loss. The water is measured at the steel bridge.

Tim Luke discussed measuring the water before and after it leaves the reservoir. Measuring the loss is nearly impossible. Howard Hall said that he had some measurements.

Dean Day said there are so many different ways to look at this problem, we need to keep more of the water back up in the hills.

Max Hall asked how the Moss problem was this year? Thayne Thompson told about Ted Sorenson bringing his Moss cutting machine down from Idaho Falls last August, and demonstrating how it works. It was tried in the River at Ellis Christiansen's place. Thayne said it would work well in canals.

STEVE HEDDON said the vegetation in the River will probably get worse every year.

Chairman asked if there was anything anybody wanted to take up- - - no response

Mr. Hansen gave the finance report: Total expenses for the year: \$12,168.84
Ervin Gilbert made a motion that we accept the report, Seconded by Dean Day, Voting unanimous

Mr. Hansen read the only bid for Watermaster, from Arlin Olson, Lynn Bowman made a motion that we accept Arlin's Bid. Val Davids Seconded the motion. voting unanimous
\$14,400 RAISED TO \$14,900.

Mr. Hansen presented the budget for next year. \$14,000. Kenneth Andrus made motion that we accept this budget, seconded by Dale Hatch. voting unanimous

Max Hall made motion - -no pay no water- -seconded by Byron Allen
Mr. Hansen asked about the board for the coming year? Dale Hatch made motion that we retain the same board, Seconded by Gordon Olson- -voting Unanimous

Kenneth Andrus asked when will this Water re-adjudication process be completed in our area? Tim Luke said, Probably in your lifetime, there will probably be some examinations within two years. Bancroft and Lund area will be having some this year. Tim Luke explained about the creation of ground water measurement Districts being organized.

Mr. Hansen asked if they approved the actions of the board this year? Dean Day made a motion that we do. seconded by Val Davids. na one opposed

ADJOURNED: 2:50 P.M.

Grant H. Egley Sec.
G. H. Egley

Notary *James W. McBride* Exp 5
Date March 6 1996

DRW/CC000000

Exhibit "A" cont.

PORTNEUF RIVER WATER-USERS DISTRICT #29

96003603

Board Meeting held March 4, 1996, at City Hall in Lava Hot Springs, Idaho 12:30 P.M.

PRESENT: K.V. HANSEN, THAYNE THOMPSON, HOWARD HALL, JIM ANDRUS, ARLIN OLSON, GRANT EGLEY,
AND TIM LUKE, Roger Johnson excused

K.V. HANSEN (CHAIRMAN) conducting

Reviewed applications for Watermaster- - - only one received- - - it was from Arlin Olson. His bid was for \$11,400 for the coming season. Thayne Thompson made a motion that we accept his bid and raise it by \$500 to a total for the year to \$11,900. Howard Hall seconded the motion. Voting was unanimous. K.V. Hansen reviewed the budget, and suggested we approve a budget of \$14,000 for the coming year. All approved

There was a discussion about the meeting that was to be held at 10:00 A.M. today in the Church Wagon Cafe, it was to be about measuring devices. Tim Luke said it had been canceled and would probably be held sometime in April. Tim Luke said there will probably be ground water Districts organized in the future.

K.V. HANSEN asked Arlin if he had anything to take up in this meeting or in the meeting coming at 2:00 P.M. Arlin said Brett Casperson can't get his water past Moose Hollow. Brett Casperson and Calvin Rowsell are the only ones that haven't paid. Jim Andrus said the person who uses the water should pay. K.V. Hansen said The \$20.00 fee should stand.

K.V. HANSEN asked if all the board members were willing to serve another year? all agreed

The minutes of the last year's board meeting were read and approved.

The board discussed water at Toponce, and about the 24-inch pipe in King Creek. Jim Andrus said there would be water in Toponce this year.

ADJOURNED: 8:25 P.M.

Grant H. Egley Sec.
Jim Andrus

NO 96003603
RECORDED AT REQUEST OF
PORTNEUF RIVER WATER-USERS DISTRICT #29
96 MAR 6 PM 1 11
OFFICIAL RECORD BOOK NO 660
BANNOCK COUNTY IDAHO
LARRY W CHAN RECORDER
FEE \$6.00 DEPUTY NC

Notary James McBride Exp. 5-31-2000
Date March 6, 1996

NOTARY SEAL

DMV/CORR001

Exhibit "B"

To: Board of County Commissioners
From: Planning and Development Council
Clarion Associates and Steve Ernst, County Planner
Date: April 16, 2008

**Re: FINAL RECOMMENDED Changes to Bannock County Comprehensive Plan
December 21, 2007 Draft as adopted April 16, 2008**

Text Note: ~~red highlight - deletion~~ Green highlight added

We recommend the following changes to the **December 21, 2007 DRAFT PLAN** to respond to comment at the Planning and Development Council hearings on January 16, February 20, March 12, 2008, and other comments by technical advisors and public. Changes are listed in sequential order by page number.

p. "ii"

Table of Contents

Inventory Maps (Appendix A) *(add note)*

"The following Inventory Maps are available on the County's web site and in the Bannock County Planning Department Office."

p. 7/8

Chapter 2: Visions and Guiding Principles

Promote Stewardship of Natural Resources

Continue to be responsible stewards of the land and resources to sustain and enhance the beauty, health, and economic benefit of our natural environment for current and future generations. Protect citizens of Bannock County by ~~avoiding~~ discouraging building in hazardous areas such as steep slopes and wildfire-prone areas.

p. 10

1. Orderly Land Use and Growth with Urban Development in Cities

(third paragraph):

~~This plan promotes cooperation with incorporates by reference portion of the City of Chubbuck and Pocatello on future land use patterns within their ACIs. 2002 Comprehensive Plan, including "Model Community & Neighborhoods" (page 4.12) and "Functional Class Road System" (page 5.5), as well as its Future Land Use designations, for areas that are within the city's ACI.~~

p. 11

3. Appropriate Development Patterns in Rural Areas

As noted above, the plan promotes continuing agricultural uses and rural economic activities in areas outside of cities and towns and their ACIs. Where development occurs in rural areas, it should occur only At very low densities (e.g., one dwelling per 40 acres). ...

4. Water Resource Protection for Clean Water

Clean water is one of the most important aspects of livability in

Exhibit "B" cont.

areas and to adjacent properties, and without adverse impacts on surrounding areas.

p. 41:

Support for Continued Agriculture and Retention of Water Rights – "Support continuation of agriculture, including non-prime agricultural lands (as classified by NRCS). Acknowledge the benefits of agriculture and irrigated lands as wildlife habitat, and to recharging of aquifer (from irrigation water). Discourage transfer of water rights to municipal uses or outside county boundaries. Water rights transfer should demonstrate measurable economic improvements to wildlife, natural resources, and recreation and ensure safe and reliable drinking and industrial water sources to current and future residents and businesses of Bannock County."

p. 41 (number 8.6 remains same since 8.4 was removed)

~~8.6 New Feedlot Operations Discouraged~~ – Do not allow additional Confined Animal Feeding Operations (CAFOs), or agricultural industries where animals are raised in confined areas, where they may create hazardous discharge conditions for surface water and groundwater or impact air quality aesthetics."

p. 45 (subsection heading not needed since no policy)

~~Pocatello and Chubbuck and ACl Areas~~

p. 50

~~2.3 Variety of Housing Types~~ - New neighborhoods ~~in within City's Urban Service Boundary and their Area of City Impact~~ cities and towns will have a variety of housing types in quality neighborhoods designed to protect long term property values and to provide safe and healthy places for different members of the community to live, including families, seniors, youth, singles, and couples.

p. 51

~~3.3 Multi-Family Housing Location and Design~~ - Multifamily or attached housing types in ~~cities and towns and their or~~ neighborhoods within City's Urban Service Boundary and their Area of City Impact ~~and towns~~ will be accessible to major transportation corridors and services and jobs. Such housing will be of high quality and integrated into community neighborhoods with access to amenities.

~~5.1 Balanced Neighborhoods~~ - Neighborhoods within cities and their ~~Urban Service Areas and~~ ACIs will be the building blocks of Bannock County, making it a livable place. Urban neighborhoods with access to jobs, recreation facilities, places of worship, civic centers, and other urban amenities. They also can be served by municipal water and sewer.

~~5.3 Suburban and Rural Residential Locations~~ - Plan for and direct Suburban ~~and Rural~~ Residential to appropriate locations near cities. Residential Suburban is located in areas with existing and future municipal water and sewer, (i.e., designated within Urban Service Area in

Exhibit "C"

IDAHO DEPARTMENT OF WATER RESOURCES
RECOMMENDED WATER RIGHTS ACQUIRED UNDER STATE LAW

RIGHT NUMBER: 29-13279

NAME AND ADDRESS: CANDICE SYMONS
PO BOX 604
LAVA HOT SPRINGS ID 83246

LYNDEN SYMONS
PO BOX 604
LAVA HOT SPRINGS ID 83246

SOURCE: PORTNEUF RIVER

TRIBUTARY: SNAKE RIVER

QUANTITY: 0.300 CFS

USE OF THIS RIGHT WITH RIGHT NO. 29-00032 IS LIMITED TO A TOTAL
COMBINED DIVERSION RATE OF 0.30 CFS.

23. *Symons, John W.:*
1889—July 1

.30 c.f.s.

37 EAST.

Said water to be diverted through the Dempsey and Topaz Canals. The Dempsey and Topaz Canals have a common heading from the River, the Topaz being a continuation of the Dempsey. The Dempsey Canal diverts in the Northeast quarter of the Southwest quarter of Section 28, Township 8 South, Range 38 East. From the South quarter corner of Section 28, the point of diversion bears North 34 degrees west, 2130 feet, for the irrigation of land described as follows:

Beginning at the Northeast corner of Lot 2, Section 4, Township 9 South, Range 38 East, running thence South 69 rods; thence West at right angles 160 rods to the East bank of the Portneuf River; thence running North following the meandering of said East bank of said River to the North line of Lot 3; running thence East on the Township line to the point of beginning, being the North 69 rods of Lots 2 and 3, Section 4, Township 9 South, Range 38 East.

DATED this 6 day of April, 2011.

Lynden Symons

Lynden Symons

Candice Symons

Candice Symons

CERTIFICATE OF SERVICE

We, Lynden and Candice Symons, certify that on the ____ day of April, 2011, a true and correct copy of *Protestant Lynden and Candice Symons' Answers and Responses to Applicant City of Pocatello's First Discovery Request* was served upon the following individuals by placing a copy of the same with the United States Postal Service, postage prepaid and properly addressed:

Givens Pursley
Michael Creamer
PO Box 2720
Boise, ID 83701
Attorney for City of Pocatello

IDWR
James Cefalo, Hearing Officer
900 N Skyline Dr., Ste. A
Idaho Falls, ID 83402

Moffatt Thomas Barrett Rock & Fields Chtd.
Scott L. Campbell
101 S. Capital Blvd., 10th Floor
PO Box 829
Boise, ID 83701-0829
Attorney for Portneuf Watershed Users Association Inc.

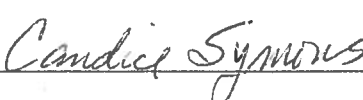
John Schwarz
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McCammon, ID 83250

Baker Rosholt & Simpson
Travis Thompson
PO Box 485
Twin Falls, ID 83303-0485
Attorneys for A&B Irrigation District, Burley Irrigation District, Milner Irrigation District, North side Canal Company and Twin Falls Canal Company

James Spinner
PO Box 6009
Pocatello, ID 83205-6009
Attorney for McCammon Ditch Co.

Racine Olson Nye Budge & Bailey
Randall C. Budge
PO Box 1391
Pocatello, ID 83204-1391


Lynden Symons


Candice Symons