STATE OF FLORIDA

OFFICE OF THE GOVERNOR EXECUTIVE ORDER NUMBER 11-216

(Executive Order of Suspension)

WHEREAS, Jada Woods Williams is currently serving as the Madison County Supervisor of Elections; and

WHEREAS, on November 1, 2011, the Florida Department of Law Enforcement arrested Jada Woods Williams on seventeen counts of neglect of duty, a violation of section 104.051(2), Florida Statutes; and

WHEREAS, a violation of section 104.051(2), Florida Statutes, constitutes malfeasance, misfeasance, or neglect of duty; and

WHEREAS, Article IV, Section 7, Florida Constitution, provides that the Governor may suspend from office any county officer for "malfeasance, misfeasance, [or] neglect of duty "; and

WHEREAS, it is in the best interests of the residents of the Madison County, and the citizens of the State of Florida, that Jada Woods Williams be immediately suspended from the public office that she now holds, upon the grounds set forth in this executive order.

NOW, THEREFORE, I, RICK SCOTT, Governor of Florida, pursuant to Article IV, Section 7, Florida Constitution, Florida Statues, find as follows:

- A. Jada Woods Williams is the Supervisor of Elections of Madison County.
- B. The office of Supervisor of Elections of Madison County is within the purview of the suspension power of the Governor, pursuant to Article IV, Section 7, Florida Constitution.
- C. The attached probable cause affidavit alleges that Jada Woods Williams committed offenses in violation of the laws of the State of Florida, which acts constitute malfeasance, misfeasance, or neglect of duty.

BEING FULLY ADVISED in the premises, and in accordance with the Constitution and the laws of the State of Florida, this Executive Order is issued, effective today:

Section 1. Jada Woods Williams is suspended from the public office that she now holds, to wit: Supervisor of Elections of Madison County.

Section 2. Jada Woods Williams is prohibited from performing any official act, duty, or function of public office; from receiving any pay or allowance; and from being entitled to any of the emoluments or privileges of public office during the period of this suspension, which period shall be from today, until a further Executive Order is issued, or as otherwise provided by law.



IN TESTIMONY WHEREOF, I have hereunto set my hand and have caused the Great Seal of the State of Florida to be affixed at Tallahassee, this 1st day of November, 2011.

GOVERNOR

ATTEST:

SEPRETARY OF STATE

ZIII NOV - I PH L: L-7

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT, IN AND FOR MADISON COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO:

-VS-

CLERK NO:

JADA WOODS WILLIAMS

AGENCY CASE NO: LV-32-0002

RACE/SEX: B/F DOB: 08/04/1977

AFFIDAVIT FOR ARREST

BEFORE ME, Vernon Douglas, a Judge of the above captioned court, personally appeared Special Agent Craig Riley of the Florida Department of Law Enforcement and Special Agent Teresa S. Gustafson of the Federal Bureau of Investigation, herein Affiants, who being first duly sworn, deposes and says:

On or about November 17, 2010, the Division of Elections (DOE) received a complaint regarding possible fraud in the 2010 Madison County General Election. This complaint was filed by District One School Board Candidate Richard "Ricky" Henderson, and pertained to his opponent, Abra "Tina" Johnson, allegedly winning the school board race by what appeared to be a disproportionate amount of absentee votes. Per a Memorandum of Understanding (MOU), the DOE referred the complaint to the Florida Department of Law Enforcement (FDLE) for investigation. The FDLE in turn contacted the Federal Bureau of Investigation (FBI). The election results were as follows:

VOTES		ABSENTEE VOTES			% ABSENTEE VOTE		
District 1 District 2 District 3 District 4 District 5	2163 2516 1689 2193 2902	308 224 150 225 164			14.25 8.9 8.8 10.2 5.6		
EARLY VOTES		POLL VOTES			ABSENTEE VOTES		
Henderson	240	58%	321	53%	86		28%
Johnson	173	42%	285	47%	21	7	72%

Following the receipt of the aforementioned complaint, assigned agents conducted a thorough, independent investigation pertaining to the fraud allegations. This included, but was not limited to extensive subject interviews and requesting, compiling, and analyzing pertinent data. Investigative findings pertinent to this probable cause are as follows:

Agents interviewed Dale Sowell, Precinct One Poll Supervisor, who advised that there were several instances wherein voters showed up to the polls to vote, but had already voted absentee. She remembered that one elderly black male stated that Ernest Johnson (Tina Johnson's husband) told him to just vote for Tina Johnson and that he could vote for the other candidates later. Dale Sowell has been working the polls for 30 years and this is the first time she has seen individuals show up at the polls after already voting. Dale Sowell also advised that on Election Day, no representative from the Supervisor of Election's (hereafter SOE) office called to apprise Precinct One poll workers of absentee ballots turned in on Election Day so the poll worker could update their poll register books. Updating the poll register books is essential to ensure an individual who has already cast an absentee ballot will not be allowed to cast a second ballot at the polls.

Dale Sowell and two poll workers identified Marlon Tillman as one individual who came to the polls with his grandfather and attempted to vote after already casting an absentee ballot. The ladies described Marlon Tillman as "slow," and advised that when they tried to question him as to whether or not he already voted, Marlon Tillman stated he couldn't remember. In an interview of Marlon Tillman, he initially stated that he didn't remember filling in a ballot, but then stated Tina Johnson brought him the ballot and helped him vote because he didn't understand it.

A review of the absentee ballot request forms reveals that there are several methods by which a voter can request an absentee ballot. The two methods most pertinent to this case both require a form. One form is titled, "Absentee Ballot Request Form" and may only be used if the requester is the voter, the voter's immediate family, or legal guardian. This form allows the voter to select individual elections that they wish to vote absentee, or all elections. It also provides a space for the voter to request that the ballot be mailed to a different address; however, under Florida Statute 101.62(4)(b)(1), the SOE shall only mail the ballot to an address other than the registered address if the voter is absent from the county, temporarily unable to occupy the residence, or in a hospital. The second form is titled, "Affidavit to Obtain an Absentee Ballot" and can be submitted by an authorized designee who must swear in writing that they are authorized to pick up a certain voter's ballot, show identification, and sign and date. This affidavit must be accompanied by written authorization from the voter authorizing the SOE to provide his/her ballot to the designee (F.S.S. 101.62(4)(b)(4)). Under Florida Statute, a designee can only obtain two absentee ballots for friends in addition to their own. A designee can pick up an unlimited number for immediate family members as defined by Florida Statute.

Upon review of the Absentee Ballot Request Forms detailed above, it appeared that numerous voters "requested" their ballot go to a third party address within Madison County. Agents noted that many of these ballots were sent to one of nine (9) common third-party addresses. A total of eighty (80) ballots were mailed to these nine (9) addresses. Of the eighty (80) ballots, seventy (70) were for individuals who did not reside at the residence. Agents interviewed sixty four (64) of the seventy (70) voters. Only two (2) voters recognized the address where their ballot was sent. Agents interviewed a majority of the Deputy Supervisors at the SOE office. Some stated that they did notice that they were mailing several ballots to a common address, but the SOE

advised them (contrary to Florida Statute 101.62(4)(b)(1)) to mail the ballots to whatever address was listed on the form.

Furthermore, agents noted that individuals were allowed to pick up more absentee ballots than entitled by statute. Agents verified through interviews that some of the voters did not know the person who signed to pick up their ballot. Those that helped with the campaign stated that Tina and Ernest Johnson knew that they could only pick up a few ballots for non-family members and therefore, asked others to pick them up. The affidavit one must sign to pick up a ballot for someone else explicitly states that the individual signing for the ballot has been authorized by the voter to pick up the ballot. Only one Deputy Supervisor interviewed knew the statutory limit on picking up ballots for friends. None of the Deputy Supervisor's interviewed knew the definition of a "family member" as it relates to absentee ballots. Deputies stated there is no tracking mechanism in place to document how many ballots a person (designee) has picked up.

As of September 17, 2011, agents interviewed over one hundred (100) voters plus additional sources of information. Of those interviewed, all stated that either Ernest Johnson, Tina Johnson, or "a candidate" fitting the description of Tina Johnson, brought them the request form and then later, the ballot. (Note: Tina Johnson was the only black female running for District One local office). The voters described that Ernest Johnson and/or Tina Johnson stood there while they voted and then collected the ballots. Most voters stated that they only signed the Absentee Ballot Request Form, but did not fill in the portion of the form specifying the address where their ballot was to be mailed. Some voters could not recall whether the form was filled out when they signed or if it was blank. Some stated that they did not recognize the form at all and did not ask anyone to pick up their ballot. Of the ballots that were picked up, most voters did not recognize the name of the individual who signed for their ballot if that individual was someone other than Tina Johnson or Ernest Johnson. Of the 64 voters whose ballots were mailed to addresses other than their own, only two (2) recognized the address. Seven (7) voters stated that they did not vote their ballot, they only signed the signature envelope. One (1) of the seven (7) further stated that Ernest Johnson offered him extra lawn care in return for his vote. Three (3) stated that Tina Johnson filled in their ballot for them or helped them fill in their ballot by helping them choose for whom to vote. One (1) voter stated that he felt intimidated as Ernest Johnson first "chased him down" at the bank and then stood there while he voted.

PROBABLE CAUSE SPECIFICALLY RELATED TO JADA WOODS WILLIAMS

104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES - 17 COUNTS

Florida Statute 98.015(1) states that a SOE must take an oath prescribed in Section Five (5), Article II, of the Florida State Constitution, prior to performing any of his or her duties. As the Madison County SOE, Jada Woods Williams swore to support, protect, and defend the Constitution and Government of the United States and of the State of Florida, and that she would well and faithfully perform the duties of the SOE. Jada Woods Williams was elected in 2006 and has served as the SOE through many elections. Part of the duties she has sworn to perform is to apply the election laws of the State of Florida, and all other pertinent laws, rules and guidelines to each election.

Deputy SOEs are employees hired by the SOE, who take an oath in writing, pursuant to Florida Statute 98.015(8), that he or she will faithfully perform the duties of the Deputy SOE's office. Deputy SOEs have the same powers and their acts have the same effect as the acts of the SOE.

Between the dates of September 4, 2010, and October 28, 2010, 71 absentee ballots were mailed by the SOE office to ten (10) third-party addresses in violation of Florida Statute 101.62(4)(b)(1). Normally, and in accordance with state statute, the ballots would have been mailed to the voter's current address on file with the SOE. Instead, the deputies manually overrode the voter's registered address. Interviews of three (3) of the Deputy SOEs revealed that two (2) noticed ballots being mailed to common addresses. Deputies stated that Jada Woods Williams told them to mail the ballots to whatever address was listed on the Absentee Ballot Request Form. Therefore, Jada Woods Williams knew or should have known that 71 absentee ballots were mailed by the SOE office to ten (10) third party addresses in violation of Florida Statute 101.62(4)(b)(1).

Likewise, seven (7) unauthorized individuals were allowed to pick up absentee ballots for eleven (11) voters in violation of Florida Statute 101.62(4)(b)(4). These seven (7) unauthorized individuals completed affidavits in order to pick up these ballots. Florida Statute requires voter consent for this, but the required voter consent form was not submitted. Hence, the SOE illegally distributed these absentee ballots without voter authorization.

Count 1: On or about September 21, 2010, the SOE allowed Voter Anthony Curcio's absentee ballot to be mailed to 247 NE Country Kitchen Road, a third party address within Madison County, FL, in violation of Florida Statute. Anthony Curcio's address on file with the SOE is 1041 E US 90.

Count 2: Between the dates October 7, 2010 and October 13, 2010, the SOE allowed ten (10) voters' absentee ballots to be mailed to 141 SE Woodlawn Street, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Angela Cooks, 764 NE Rocky Springs Church Road Gerry Cooks, 764 NE Rocky Springs Church Road Henry Holton III, 141 SW Arbour Circle, #101 Kelvin Kegler, Sr., 360 NE Country Kitchen Road Whitney Lee, 202 SW Arbour Circle, #101 Thelma Pearson, 218 NE Betty Street Malicia Robinson, 294 SW Arbour Circle, #102 Henry Straughter, 800 NE Rocky Springs Church Road Henry J. Straughter, 4876 NE Colin Kelly Highway Jewell Straughter, 800 NE Rocky Springs Church Road

Count 3: On or about September 17, 2010, the SOE allowed four (4) voters' absentee ballots to be mailed to 202 SW Arbour Circle, #203, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Cierra Jividen, 202 SW Arbour Circle, #103

Solita McCray, 209 SW Safari Drive, #506 Tameka McKnight, 209 SW Safari Drive, #501 Wanda McQuay, 209 SW Safari Drive, #506

Count 4: Between the dates of September 30, 2010 and October 13, 2010, the SOE allowed twelve (12) voters' absentee ballots to be mailed to 215 NE Boxwood Drive, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Marva Davis, 234 NE Meadow Run Drive
Michael Fields, Jr., 234 NE Meadow Run Drive
Reuben L. Graham, Jr., 550 NE Country Kitchen Road
H.M. Haynes, 177 NW Limesink Church Road
Jesse Jackson, 120 NE Merchant Street
Larry Smith, 743 NE Country Kitchen Road
Travis Strickland, 1520 NE Dill Street
Sharon Taylor, 302 SW Safari Drive, #1203
Artis Woods, Jr., 141 NW Limesink Church Road
Bruce Woods, 141 NW Limesink Church Road
Jenethel Woods, 141 NW Limesink Church Road
Johnny Woods, 141 NW Limesink Church Road

Count 5: Between the dates of September 22, 2010 and September 28, 2010, the SOE allowed four (4) voters' absentee ballots to be mailed to 227 SW Safari Drive, #404, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Gloria Christian, 287 SW Sumatra Avenue, #10 Tricia Gillyard, 269 SW Sumatra Avenue, #4 Antonio Hiers, 246 SW Arbour Circle, #102 Jeremy Malone, 315 SW Lawson Circle

Count 6: Between the dates of September 22, 2010 and September 29, 2010, the SOE allowed five (5) voters' absentee ballots to be mailed to 2348 NW St. Thomas Church Road, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Norman Aikens, Jr., 4565 N State Road 53 Fadra Glee, 302 SW Safari Drive, #1206 Tabby Graham, 302 SW Safari Drive, #1204 Tamekia Hampton, 274 SW Safari Drive, #1304 Kenyata Jennings, 302 SW Safari Drive, #1208

Count 7: Between the dates of September 30, 2010 and October 7, 2010, the SOE allowed ten (10) voters' absentee ballots to be mailed to 330 NE Ford Court, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Jovonte Arnold, 759 SW Bunker Street George Brinson, 789 NW St. Thomas Church Road Posey Brinson, 789 NW St. Thomas Church Road Reuben Graham, Sr., 550 NE Country Kitchen Road Clarissa Robinson, 861 SW Pinckney Street Jeremy Scott, 1769 N State Road 53 Lucile Tyson, 174 NW Anaconda Trail Rosa Tyson, 174 NW Anaconda Trail Crystal Washington, 209 SW Miller Street Freddie Weatherspoon, 591 NE Country Kitchen Road

Count 8: Between the dates of September 28, 2010 and October 15, 2010, the SOE allowed six (6) voters' absentee ballots to be mailed to 3591 SW State Road 14, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

William Alexander, 500 NW Adelie Trail Albert Davis, 360 NW Adelie Trail Shirley McGee, 2891 NE Rocky Ford Road Michael Mobley, 119 NE Merchant Street Wallace Monlyn, 159 NE Country Kitchen Road Marlon Tillman, 2891 NE Rocky Ford Road

Count 9: Between the dates of September 28, 2010 and October 15, 2010, the SOE allowed nine (9) voters' absentee ballots to be mailed to 3789 S State Road 53, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Charles Brown, 1469 N State Road 53
Justin Brown, 1469 N State Road 53
Christopher Cooks, 332 NE Ford Court
Henry Hamilton, 806 SW Bunker Street or P.O. Box 353
Jarquez Jackson, 120 NE Merchant Street
Eddie Knight, 160 NW Limesink Church Road
Lula Moore, 531 NE Cornsilk Drive
Vera Watkins, 251 Safari Drive, #302
Raven Williams, 141 SW Arbour Circle, #203

Count 10: Between the dates of September 21, 2010 and September 27, 2010, the SOE allowed ten (10) voters' absentee ballots to be mailed to P.O. Box 1000, a third party address within Madison County, FL, in violation of Florida Statute. Voters include the following:

Angelia Akins, 324 SW Lawson Circle, #7A Shionte Davis, 759 SW Bunker Street Twanikki Dobson, 324 SW Lawson Circle, #7F Tasheki Ghent, 362 SW Lawson Circle, #6D Shaquella Haynes, 324 SW Lawson Circle, #7B Ernest Kitchen, 759 SW Bunker Street Linda Kitchen 759 SW Bunker Street Sheronda Stephens, 324 SW Lawson Circle, #7L Tommy Tumer, Jr., 180 SW Miller Street Willie Williams, 202 SW Arbour Circle, #201

Count 11: On or about November 1, 2010, Ernest Johnson signed an affidavit to obtain an absentee ballot and submitted the written affidavit to the SOE office, claiming to have been authorized by Voter Kenya Ellick, to obtain her absentee ballot for the 2010 General Election. Ernest Johnson, however, did not submit the required voter consent form, nor did the SOE

require a voter consent form. Kenya Ellick did not authorize Ernest Johnson to obtain her absentee ballot.

Count 12: On or about October 29, 2010, Ora Rivers signed three (3) affidavits to obtain absentee ballots and submitted the written affidavits to the SOE office, claiming to have been authorized by Voters Shajuan Smith, Teresa Stephens, and Kimberly Morris, to obtain their absentee ballots for the 2010 General Election. Ora Rivers, however, did not submit the required voter consent forms, nor did the SOE require voter consent forms. Shajuan Smith, Teresa Stephens, and Kimberly Morris did not authorize Ora Rivers to obtain their absentee ballots.

Count 13: On or about October 29, 2010, Raven Williams signed two (2) affidavits to obtain absentee ballots and submitted the written affidavits to the SOE office, claiming to have been authorized by Voters Bridgett Jackson and Annette Arnold, to obtain their absentee ballots for the 2010 General Election. Raven Williams, however, did not submit the required voter consent forms, nor did the SOE require voter consent forms. Bridgett Jackson and Annette Arnold did not authorize Raven Williams to obtain their absentee ballots.

Count 14: On or about November 2, 2010, Montollis Roberson signed an affidavit to obtain an absentee ballot and submitted the written affidavit to the SOE office, claiming to have been authorized by Voter Ursula McQuay, to obtain her absentee ballot for the 2010 General Election. Montollis Roberson, however, did not submit the required voter consent form, nor did the SOE require a voter consent form. Ursula McQuay did not authorize Montollis Roberson to obtain her absentee ballot.

Count 15: On or about November 2, 2010, Robert Demps signed an affidavit to obtain an absentee ballot and submitted the written affidavit to the SOE office, claiming to have been authorized by Voter Talicia Hickman, to obtain her absentee ballot for the 2010 General Election. Robert Demps, however, did not submit the required voter consent form, nor did the SOE require a voter consent form. Talicia Hickman did not authorize Robert Demps to obtain her absentee ballot.

Count 16: On or about October 29, 2010, Robert Hicks signed an affidavit to obtain an absentee ballot and submitted the written affidavit to the SOE office, claiming to have been authorized by Voter Eddie Taylor, to obtain his absentee ballot for the 2010 General Election. Robert Hicks, however, did not submit the required voter consent form, nor did the SOE require a voter consent form. Eddie Taylor did not authorize Robert Hicks to obtain her absentee ballot.

Count 17: On or about November 1, 2010, Laverne Haynes signed two (2) affidavits to obtain absentee ballots and submitted the written affidavits to the SOE office, claiming to have been authorized by Voters Latoya Cuthbertson and Joshua Gamble, to obtain their absentee ballots for the 2010 General Election. Laverne Haynes, however, did not submit the required voter consent forms, nor did the SOE require voter consent forms. Latoya Cuthbertson and Joshua Gamble did not authorize Laverne Haynes to obtain their absentee ballots.

WHEREFORE, your affiants pray that an arrest warrant be issued according to law commanding the Executive Director of the Florida Department of Law Enforcement or any of his duly authorized special agents, the Executive Director of the Federal Bureau of Investigation or any of his duly authorized special agents, and all Sheriffs of the State of Florida or any of their duly appointed deputies, or police officers acting within their jurisdiction, with any assistance deemed necessary to forthwith arrest the said Jada Woods Williams, and bring her before the court to answer the charge(s) of:

. :1/

1. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES - 17 COUNTS

AFFIANT

AFFIANT

SWORN AND SUBSCRIBED before me this 3/5 day of October, 2011.

C. VERNON DOUGLAS

JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT, IN AND FOR MADISON COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO:

-VS-

CLERK NO:

JADA WOODS WILLIAMS

AGENCY CASE NO: LV-32-0002

RACE/SEX: B/F DOB: 08/04/1977

ARREST WARRANT

IN THE NAME OF THE STATE OF FLORIDA, TO THE EXECUTIVE DIRECTOR OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT OR ANY OF HIS DULY AUTHORIZED SPECIAL AGENTS, THE EXECUTIVE DIRECTOR OF THE FEDERAL BUREAU OF INVESTIGATION OR ANY OF HIS DULY AUTHORIZED SPECIAL AGENTS, AND ALL SHERIFFS OF THE STATE OF FLORIDA OR ANY OF THEIR DULY APPOINTED DEPUTIES, OR POLICE OFFICERS ACTING WITHIN THEIR JURISDICTION, WITH ANY ASSISTANCE DEEMED NECESSARY:

Having received and considered the sworn affidavit of FDLE Special Agent Craig Riley and FBI Special Agent Teresa S. Gustafson, dated October 3/2, 2011, said affidavit alleging Jada Woods Williams, committed the following violation(s) of law:

COUNTS 1 - 17:

- 1. 104,051(2) NEGLECT OF DUTY: CORRUPT PRACTICES
- 2. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 3. 104.051(2) NEGLECT OF DUTY: CORRUPT PRACTICES
- 4. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 5. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 6. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 7. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 8. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 9. 104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 10.104,051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 11. 104.051(2) NEGLECT OF DUTY: CORRUPT PRACTICES
- 12.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES
- 13.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES

14.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES

15.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES

16.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES

17.104.051(2) NEGLECT OF DUTY; CORRUPT PRACTICES

THESE ARE THEREFORE TO COMMAND YOU TO FORTHWITH ARREST AND BRING THE ABOVE NAMED DEFENDANT BEFORE ME TO BE DEALT WITH ACCORDING TO LAW.

GIVEN UNDER MY HAND AND SEAL this 3/5/day of October, 2011, at Madison County, Florida.

G, VERNON DOUGLAS

JUDGE OF THE ABOVE COURT

BAIL BOND IS FIXED AT \$ 35,000