

July 10, 2023

Final Investigative Report

Case Name: Pulido, Carolyn v Isle of Sand Key Condominium Association Inc. et al

Case Number: 04-23-4677-8

I. Jurisdiction

A complaint was filed with the Pinellas County Office of Human Rights on April 03, 2023 alleging that the complainant(s) was injured by a discriminatory act. It is alleged that the respondent(s) was responsible for: Failure to make reasonable accommodation. It is alleged that the respondent(s)'s acts were based on Disability. The most recent act is alleged to have occurred on December 09, 2022, and is continuing. The property is located at: 1621 Gulf Blvd., Unit 1108, Clearwater, FL 33767. The property in question is not exempt under the applicable statutes. If proven, the allegation(s) would constitute a violation of Chapter 70 of the Pinellas County Code of County Ordinances.

The respondent(s) receive no federal funding.

II. Parties and Aggrieved Persons

A. Complainant(s)

Carolyn Pulido
1621 Gulf Blvd.
Apt. 1108
Clearwater, FL 33767

Complainant Representative(s)

Complainant Allegations

Complainant Carolyn Pulido (CP Pulido) belongs to a class of persons whom the Fair Housing Act (the Act) protects because she is involved in a protected activity. CP Pulido owns the property located at 1621 Gulf Boulevard unit 1108 Clearwater, FL 33767. The property is governed by Isle of Sand Key Condominium Association Inc. (RP Isle) and managed by Progressive Management Inc. (RP Progressive). CP Pulido states she requested a reasonable accommodation to park a tricycle inside the bicycle storage and her request was denied.

CP Pulido states that she has a disability that prevents her from driving. On or around May 2022, CP Pulido contacted Cascie Savage (RP Savage) Association Manager to ask for an accommodation to park a tricycle inside the bicycle storage building. CP Pulido advised that due to her disability, she was unable to use a bicycle, and wanted to confirm that there would be space inside the storage facility for the tricycle. RP Savage advised her that she would contact

Joe (last name unknown) to look into the bike room and see if there was space inside. On or around the last week of July 2022, CP Pulido went with Joe to look at the storage facility, and they identified potential spaces and advised her that he would speak with RP Savage and present the matter to the board. Joe also advised her that she might have to pay for two spaces, as the tricycle was too big to fit in one space.

On August 6, 2022, August 19, 2022, and August 30, 2022, CP Pulido sent several requests for updates to RP Savage regarding the reasonable accommodation request to have a space designated for her tricycle and was advised that the request was forwarded to the board. On December 7, 2022, CP Pulido sent RP Savage an email asking for an update as she had not received any communication regarding this matter. On December 9, 2022, CP Pulido received an email from RP Savage advising that the bicycle storage was full and that she would not be able to use the space. RP Savage then advised her that she spoke with RP Isle, and they would grant her the opportunity to store the tricycle in her parking space. CP Pulido states that storing the tricycle in her parking space is not an option as it would be open to the elements and anyone could steal it. CP Pulido states that RP Savage's delay is a denial of her reasonable accommodation request.

B. Other Aggrieved Persons

C. Respondent(s)

Steven H Mezer Esquire
Isle of Sand Key Condominium Association Inc.
Registered Agent:
1511 N. Westshore Boulevard
Suite 1000
Tampa, FL 33607

Cascie Savage
Isle of Sand Key Condominium Association INC.
1621 Gulf Boulevard
Office
Clearwater Beach, FL 33767

Maureen Reardon
Progressive Management Inc.
Registered Agent:
4151 Woodlands Parkway
Palm Harbor, FL 34685

Respondent Representative(s)

Steve Mezer
Becker & Poliakoff
111 N. Orange Avenue

1400
Orlando, FL 32801

Representing: Isle of Sand Key Condominium Association Inc., Cascie Savage (Isle of Sand Key Condominium Association INc.)

Notes:

Respondent Defenses

Respondent acknowledges that CP made a reasonable accommodation request to store her three-wheel bike in the storage room. There were communications in August 2022 to that effect.

However, Respondent asserts that there is insufficient space at this time. R provided a list of residents and the spaces in which bikes are stored. R states that there is one open space at this time, but CP's three-wheeler does not fit in this space.

R states that it is willing to allow CP to store her three-wheeler in the room when space becomes available.

D. Witnesses

Joe Forish

III. Case Summary

A. Interviews

Complainant: Pulido, Carolyn
Date of Interview: April 24, 2023
Type of Interview: Telephone
Interviewer: Genova, Peter J.

CP said that the board did not ask for a doctor's note or a note from a health professional.

CP was asked if any other residents have put their bikes in the storage building since she made her request. She said she has no idea.

CP went with Joe (last name unknown), a resident, to see the layout of the bike storage building. He's not on the board. CP said that he was striping the area and putting bikes on the ceiling. Joe showed CP an area by the door. CP isn't sure if they were trying to get the room in order and give people specific spaces.

CP communicated with Cascie Savage, the Association Manager. CP understood that Ms.

Savage was taking information to the board. CP sent emails in August that went unanswered. Finally, on 12/9 she received an email stating that there was no room for her tricycle.

CP said that after she filed the complaint, a board member contacted her on April 10. He wanted to see if there was anything he could do.

Respondent: Savage, Cascie
Date of Interview: May 15, 2023
Type of Interview: In-Person
Interviewer: Genova, Peter J.

Ms. Savage explained that in order to store bicycle in the storage room, the resident would have to fill out an agreement. The association needs to know the type of bike and how many bikes need to be stored. There are different fees for different types of bikes, and it is less expensive to hang bikes in the upper space. Residents are assigned a spot if one is available. Ms. Savage said that the current list is from July to July.

Ms. Savage stated that CP only verbally asked about storage space. She states that CP asked around the 1st of December if the board would approve a tricycle. CP wanted Ms. Savage to bring it to the board's attention. Ms. Savage took it to the board at their December 12 meeting. They didn't think that there would be room. There was only one spot open and the tricycle wouldn't fit. Ms. Savage stated that she emailed CP with other options, including storing it in her covered parking space. According to Ms. Savage, she asked CP if she wants to use her carport, they could provide her with a lock. Ms. Savage said that CP never got back to her.

Ms. Savage denies that CP spoke to her last summer.

Ms. Savage was asked about Joe, a resident who may have been striping the bike room. She said that Joe did it before she arrived at the property. He took care of the bike room and put in all the numbers. When asked when this happened, Ms. Savage said before July of last year. Ms. Savage said that she has no idea if CP met with Joe. She states that Joe's last name is Forish.

Ms. Savage was asked if Joe Forish ever spoke to her about CP's request, and she said no.

Ms. Savage was asked when the last three tenants began storing their bikes in the bike room. She said that the Erwins began storing them in June 2022. The Gielows began storing their bikes there on March 14, 2023. The Martins began storing their bikes there in August of 2022. Ms. Savage said that she knows that this was after CP asked, but that the CP never gave an answer or said what she was going to do.

Ms. Savage was asked if any owners gave up their spots. She said that two in the upper spaces (hanging) gave theirs up. They sent a request for renewal in their most recent newsletter. Going forward, they will pay from January to December.

Ms. Savage was asked if there's a waiting list and if anyone was on it. She said that the CP recently asked to be on the waiting list.

We walked the parking lot and then went to the bike room. Ms. Savage showed me CP's parking space (145). There was a vehicle in the space.

The spaces in the bike room are about 15" wide, about 72" long, and approximately 48" high. The door to enter the bike room is about 33" wide. Space 54 is open, but it is not wide enough for the bike that CP wants to purchase.

Complainant: Pulido, Carolyn
Date of Interview: May 15, 2023
Type of Interview: Telephone
Interviewer: Genova, Peter J.

CP called to discuss the status of the case. She states that she has not purchased the tricycle yet. She isn't going to buy one until she knows that she can store it in the bike room.

Other Witnesses: Forish, Joe
Date of Interview: May 22, 2023
Type of Interview: Telephone
Interviewer: Genova, Peter J.

Mr. Forish is not on the association board. He's an owner who volunteered to organize the bike storage. He said that it was a mess previously. He striped the inside of the bike room and added numbers to each space. There's an upper berth and lower berth for bicycles, and there is additional space for E-bikes, which are larger than average sized bikes. There's also a price differential based on the size of the space and where it's located.

Mr. Forish was asked if he remembers speaking to Carolyn Pulido last year. He said he had a conversation with her. He can't remember if it was in person or by telephone. Initially, he thought that the conversation took place in May, June, or July of 2022, but he looked at his notes and said that he spoke to Carolyn in July. Mr. Forish states that Ms. Pulido expressed that she needed to store a tricycle. He didn't think that she had the tricycle at the time. Mr. Forish said that he looked online at tricycle sizes to try to figure out how much space would be needed to store one.

Mr. Forish said that a day or two after his conversation with Ms. Pulido, he spoke to Terry Jones, President, and Cascie Savage, the Property Manager. He said that he asked them if they could accommodate her request, even though they might not have space. Mr. Forish states that they asked him some questions, but he didn't have the answers, so he referred them to Ms. Pulido. He remembers Ms. Pulido saying that she didn't drive, so he understands that they explored the possibility of using her covered parking space to store the tricycle. Mr. Forish said that he didn't take part in any other conversations because he only deals with the bicycle room. Any discussion about parking spaces would be handled by the board and property manager.

Mr. Forish was asked if Mr. Jones or Ms. Savage followed up and contacted him regarding the request, and he said no.

Other Witnesses: Forish, Joe
Date of Interview: July 05, 2023
Type of Interview: Telephone
Interviewer: Genova, Peter J.

Mr. Forish was interviewed again on 7/5/2023. He recalled that the CP told him that she was unable to ride a conventional 2-wheel bicycle. He recalled that the CP may have said that it was because of a medical condition. Mr. Forish said that he didn't pry because his career was in Human Resources.

Mr. Forish states that he relayed the CP's request to Cascie Savage, the property manager, and Terry Jones, the president. He recalls dropping by the office to speak to Cascie. Mr. Forish said that he ran into Terry and informed him.

Mr. Forish was asked how new residents are informed of the bicycle room. He states that there was an orientation process and welcoming committee when he moved in twelve years ago. Mr. Forish doesn't know if they do the same thing now. New homeowners and renters are given the rules and regulations, and they're informed of the features such as the grills, fitness center, pool, mail room, club room. When Mr. Forish moved in, there was a tour. He recalls that the bicycle room was vaguely mentioned when he moved in.

Mr. Forish was asked how much space would be needed to store the CP's tricycle that she wanted to buy. He states that he checked online to see the width. Mr. Forish said that he may have told Terry and Cascie that it would be two to three times wider than the regular bicycles.

B. Documents

Nature of Document: Intake Questionnaire
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: December 13, 2022
Date Obtained: December 13, 2022

CP's intake questionnaire, in which she alleges that her condo association delayed getting back to her on her request to store her tricycle in the bike room. CP said that she does not drive and that her disability prevents her from riding a bike. The property manager did not respond to her August 2022 emails, and then informed her on December 9, 2022 that there was no room in the bike room for her tricycle.

Nature of Document: Photo in Bike Room
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: January 09, 2023
Date Obtained: January 09, 2023

Photo showing the bikes in the bike room. CP said that she got the photo from Zillow, so it is unclear if it is current.

Nature of Document: Email from Property Manager
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: December 09, 2022
Date Obtained: January 09, 2023

Property Manager stated that she checked the bike room and it is full. PM suggested that CP park her bike in her assigned parking space.

Nature of Document: CP emails to Property Manager
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: August 06, 2022
Date Obtained: January 09, 2023

CP provided three emails from August 2022 in which she requested an update on her request for reasonable accommodation. The property manager did not respond.

Nature of Document: Photo of Buildings
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: January 09, 2023
Date Obtained: January 09, 2023

CP provided overhead photo of buildings. It showed where the book room was in relation to her building.

Nature of Document: Signed Complaint
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Mail
Date of Document: March 29, 2023
Date Obtained: March 31, 2023

Signed complaint, alleging that CP was denied a reasonable accommodation in the form of allowing her to store her tricycle in the bicycle room.

Nature of Document: Emails to CP to schedule interview
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: April 18, 2023
Date Obtained: April 18, 2023

CP sent two emails requesting a phone interview. CP did not see the emails and did not respond.

Nature of Document: Extension Request
Who Provided: Mezer, Steve
How Transmitted to HUD: Email
Date of Document: April 18, 2023
Date Obtained: April 18, 2023

R attorney requested extension until 5/1 to submit answer. Extension granted by Mark Esparza.

Nature of Document: Email to R attorney re conciliation
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: April 24, 2023
Date Obtained: April 24, 2023

R attorney asked if their client is interested in conciliation.

Nature of Document: Notes from CP phone call
Who Provided: OHR
How Transmitted to HUD: Handwritten Notes
Date of Document: April 24, 2023
Date Obtained: April 24, 2023

CP said that the board did not ask for a doctor's note or a note from a health professional.

CP was asked if any other residents have put their bikes in the storage building since she made her request. She said she has no idea.

CP went with Joe (last name unknown), a resident, to see the layout of the bike storage building. He's not on the board. CP said that he was striping the area and putting bikes on the ceiling. Joe showed CP an area by the door. CP isn't sure if they were trying to get the room in order and give people specific spaces.

CP communicated with Cascis Savage, the Association Manager. CP understood that Ms. Savage was taking information to the board. CP sent emails in August that went unanswered. Finally, on 12/9 she received an email stating that there was no room for her tricycle.

CP said that after she filed the complaint, a board member contacted her on April 10. He wanted to see if there was anything he could do.

Nature of Document: Emails with R Attorney
Who Provided: Mezer, Steve
How Transmitted to HUD: Email
Date of Document: April 25, 2023
Date Obtained: April 25, 2023

R attorney was asked if his client was interested in conciliation.

In response, R's attorney posed several questions about the legitimacy of the allegations and questioned why we accepted the complaint. R attorney provided with general information about the next steps, which will likely include an onsite visit.

Nature of Document: Respondent Answer
Who Provided: Mezer, Steve
How Transmitted to HUD: Mail
Date of Document: May 01, 2023
Date Obtained: May 03, 2023

Respondent acknowledges that CP made a reasonable accommodation request to store her three-wheel bike in the storage room. There were communications in August 2022 to that effect.

However, Respondent asserts that there is insufficient space at this time. R provided a list of residents and the spaces in which bikes are stored. R states that there is one open space at this time, but CP's three-wheeler does not fit in this space.

R states that it is willing to allow CP to store her three-wheeler in the room when space becomes available.

Nature of Document: Request for Rebuttal
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: May 03, 2023
Date Obtained: May 03, 2023

CP asked to submit a rebuttal to R's answer. CP also asked if she is aware of anyone who began storing their bicycles in the room since she first made her request. CP also asked if she knows the contact information for the person who maintains the storage room.

Nature of Document: Request for Onsite Visit
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: May 04, 2023
Date Obtained: May 04, 2023

Asked CP attorney to schedule an onsite visit to view bicycle room.

Nature of Document: CP Rebuttal
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 07, 2023
Date Obtained: May 07, 2023

CP disputes R's assertion that there was room for her three-wheeler when she made her request. CP states that other residents moved in after she made her request, and that their bicycles are in the storage room. CP also states that she was not unresponsive. She was waiting for the property manager's answer from the board. The decision needed to be approved by the board.

Nature of Document: Warranty Deeds
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 07, 2023
Date Obtained: May 07, 2023

One warranty deed is dated June 1, 2022.
Another warranty deed is dated August 16, 2022.
Another warranty deed is dated September 8, 2022.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: May 10, 2023
Date Obtained: May 10, 2023

Respondent was asked for dates of when certain residents arranged to have their bikes stored in the bike building. Respondent was also asked if the property manager would be available for questions.

Nature of Document: Association Newsletter
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 10, 2023
Date Obtained: May 10, 2023

CP provided the association's latest newsletter, which contains a section on bicycle storage renewals. CP informed the manager that she wished to be added to the wait list if she wasn't already on it.

Nature of Document: Photos from Onsite
Who Provided: OHR
How Transmitted to HUD: Photographs from Investigator
Date of Document: May 15, 2023
Date Obtained: May 15, 2023

Photos taken from the bicycle room. First photo is from the door, then going counter-clockwise throughout the inside of the room.

Nature of Document: Emails with CP
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 20, 2023
Date Obtained: May 20, 2023

Emails from the CP, including doctor's note, updates on the bicycle room storage list.

Nature of Document: Doctor Note
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 20, 2023
Date Obtained: May 20, 2023

CP's doctor states that she suffers from poor balance due to a disability. Doctor recommends that CP obtain a tricycle to help with her balance and exercise. Doctor also recommends that it be placed in storage close to her unit in a dry, safe location.

Nature of Document: Bike Room Update
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: May 01, 2023
Date Obtained: May 20, 2023

Updated list of residents who store bikes in the storage room, including spaces numbers.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: May 24, 2023
Date Obtained: May 24, 2023

Requests for documentation of three other owners' requests to store bikes in bicycle room. Also, trying to find out if R is interested in conciliation.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 09, 2023
Date Obtained: June 09, 2023

Informed R attorney that we need his response by Monday. I also want to interview the board president. Also, is client interested in conciliation?

Nature of Document: Response to RFI
Who Provided: Mezer, Steve

How Transmitted to HUD: Email
Date of Document: June 14, 2023
Date Obtained: June 14, 2023

R provided documentation of residents who began storing their bikes in the storage room since June of 2022.

The Erwins' agreement is dated June 3, 2022.
The Gielows' agreement is dated March 14, 2023.
The Martins' agreement is dated August 17, 2022.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 15, 2023
Date Obtained: June 15, 2023

Investigator requested to interview association president, and potential dates were provided.

Nature of Document: Response to RFI
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: June 15, 2023
Date Obtained: June 15, 2023

CP was asked to forward copies of emails that she sent to the property manager in August of 2022. CP had previously provided copies, but the text of emails was not included. CP provided this information.

Nature of Document: Emails from CP
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: June 16, 2023
Date Obtained: June 16, 2023

CP explained that there was no waiting list for the bicycle storage room until after my onsite. CP maintains that owners who bought after her have gotten into the bike room.

Nature of Document: Reply to R attorney
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 16, 2023
Date Obtained: June 16, 2023

Advised R attorney that I would be continuing the investigation.

Nature of Document: Emails with R Attorney
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 20, 2023
Date Obtained: June 20, 2023

Explained to R attorney that I'm completing a thorough investigation and that I'm also scrubbing the CP's information.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 26, 2023
Date Obtained: June 26, 2023

CP asked to submit additional information regarding her reasonable accommodation request, including when she communicated that it was a disability-related request, if there were any communications prior to December 9, and if she responded to the December 9 email.

Nature of Document: Response to RFI
Who Provided: Pulido, Carolyn
How Transmitted to HUD: Email
Date of Document: June 26, 2023
Date Obtained: June 26, 2023

CP states that she did not respond to Cascie Savage's email of December 9. When Cascie asked if she received the email, CP turned and walked away. CP states that she was upset that Cascie had not responded to her earlier requests.

CP provided photo of her sister's car to illustrate how the beach weather affects the body of the car. CP does not want this to happen to her tricycle.

CP states that she first brought up the issue in May 2022, when she was moving in.

Nature of Document: RFI to R attorney Spaces 59 and 60
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: June 30, 2023
Date Obtained: June 30, 2023

Respondent asked to provide documentation of who used spaces 59 and 60 prior to the Gielows and when.

Nature of Document: Response to RFI
Who Provided: Pulido, Carolyn

How Transmitted to HUD: Email
Date of Document: July 05, 2023
Date Obtained: July 05, 2023

CP guesses that the timeline of her move in date was when her sister usually comes down from Colorado. (she usually leave the day after Memorial Day - she drives down).

CP purchased her home at the end of April 2022. She had to wait for the close on the condo because it was an elderly lady who had to have someone read her the paperwork so she could sign it.

CP believes that she signed the paperwork the 28th of April with the understanding it may close later depending on the prior owner's needs. CP moved in the 12th of May. Within that week she had Roberta Palmer do a meet and greet with her. It was prior to that Friday the 20th, because Roberta told CP about happy hour and she said she would introduce CP to other residents at that time.

During the meet and greet with Roberta she had mentioned the bike room. CP states that Roberta actually stopped the meeting and went to Cascie's office to inquire if there was room in the bike room. Cascie told her she believed it was full but they were working on it (realigning it and adding upper spaces).

CP states that she did tell Roberta that she needed a tricycle, but CP is not sure if she told Cascie. CP said that she approached Cascie in next few days (before Memorial Day weekend) and told her that she wanted to get a tricycle and that after her sister comes down (May) and leaves in July (last week in July) that would be her only form of transportation. She said Cascie would see if there was room for it. CP states that she approached Cascie two more times at least before Marilyn (CP's sister) came down. CP states that she approached Cascie the two times because she needed to get Marilyn's dog situation taken care of before she came down. The first time was to ask Cascie what information she needed from Marilyn about her dog and the second time was to provide Cascie the information Marilyn gave her, and CP remembers that both times she asked about the tricycle.

Nature of Document: Request for Information
Who Provided: OHR
How Transmitted to HUD: Email
Date of Document: July 05, 2023
Date Obtained: July 05, 2023

CP asked when she purchased her condo, and when she spoke to the property manager about her desire to store a tricycle.

CP also asked how she learned about the storage room. Did the association or property manager inform her about it, or did she inquire?

Nature of Document: OHR letter to rp1
Who Provided: Intake
How Transmitted to HUD:
Date of Document: April 05, 2023
Date Obtained:

OHR letter sent to RP 1 sent to
Isle of Sand Key Condominium Association Inc.
C/O Steven H Mezer Esquire; Registered Agent
1511 N. Westshore Boulevard
Suite 1000
Tampa, FL 33607

Contains
Cover letter
Copy of signed 903
Conciliation form
RFI questions
100 day notice

Nature of Document: OHR letter to rp 3
Who Provided: Intake
How Transmitted to HUD:
Date of Document: April 05, 2023
Date Obtained:

Nature of Document: OHR letter to cp
Who Provided: Intake
How Transmitted to HUD:
Date of Document: April 05, 2023
Date Obtained:

OHR letter to CP Sent to
Carolyn Pulido
1621 Gulf Blvd.
Apt. 1108
Clearwater, FL 33767
Contains
Cover letter
903 signed copy
100 day notice

Nature of Document: Notification Letters
Who Provided: Intake

How Transmitted to HUD:
Date of Document: April 05, 2023
Date Obtained:

OHR letter sent to RP 2 sent to
OHR letter sent to RP 1 sent to

Contains
Cover letter
Copy of signed 903
Conciliation form
RFI questions
100 day notice

Contains
Cover letter
Copy of signed 903
Conciliation form
RFI questions
100 day notice

C. Interrogatories

D. Factual Observations

Betina Baron

Betina Baron, Compliance Manager