

TENNESSEE BOARD OF FUNERAL DIRECTORS AND EMBALMERS

MINUTES OF BOARD MEETING

OCTOBER 10, 2023

President Anthony Harris called the meeting to order at 10:00 a.m. The meeting was conducted in Conference Room 1-B, Davy Crockett Tower, Nashville, Tennessee.

Board members physically present: Anthony Harris, President; Fred Berry, Christopher Lea, Pamela Stephens, and Wendell Naylor.

Board member(s) absent: Tonya Scales Haynes and Scottie Poarch

Staff physically present: Robert Gribble, Executive Director; Troy Bryant, Associate General Counsel; and Lisa Bohannon, Regulatory Board Administrative Manager.

ADOPTION OF AGENDA:

A motion was made by Fred Berry to approve the agenda as published.

Seconded by Christopher Lea

Adopted by Voice Vote

APPROVAL OF MINUTES:

A motion was made by Fred Berry to approve the Minutes of the August 29, 2023, Board Meeting.

Seconded by Christopher Lea

Adopted by Voice Vote

President Harris announced that the minutes of the September 15, 2023, board meeting will be presented for review/approval at the next board meeting.

LEGAL REPORT: **TROY BRYANT, ASSOCIATE GENERAL COUNSEL**

Abbreviations:

GPL – General Price List

CPL – Casket Price List

OBCPL – Outer Burial Container Price List

SFGSS – Statement of Funeral Goods and Services Selected

1. Case No.: 2023035051 – Funeral Establishment

This complaint was administratively opened on July 19, 2023, following an inspection conducted by the Department on July 13, 2023. The inspection occurred at the Department's request one month after being notified that Respondent's manager had resigned effective June 13, 2023. At the time of the inspection, an application for Change of Establishment Manager had not been received by the Department nor had the change of manager fee been paid. The inspector stated that during the inspection, they met with a licensed funeral director at the establishment who stated that he was the new manager of the location. The inspector inquired as to whether the proper documentation had been submitted to the Department and the funeral director replied that the application was to be submitted by his supervisor and provided the inspector with a copy of the application to be submitted. The funeral director then contacted the supervisor for an update on the application. The supervisor stated that they were in the process of uploading the application to CORE.

Respondent ultimately remitted the change of manager fee and application as of July 13, 2023 (the day of the inspection).

Recommendation:

- \$250.00 civil penalty. Authorize via Consent Order and formal hearing if necessary.

A motion was made by Pamela Stephens to accept Counsel's recommendation.

Seconded by Christopher Lea

Adopted by Voice Vote

2. Case No.: 2023043181 – Funeral Establishment

This complaint was administratively opened on September 6, 2023, following a routine inspection conducted on August 28, 2023. During the inspection, the investigator determined that Respondent establishment did not have a licensed funeral director serving as manager. Specifically, via email dated August 1, 2023,

the former manager notified the Department that they were no longer employed by Respondent establishment. As of the date of the inspection, Respondent establishment had not appointed a new manager. Furthermore, during the course of the inspection, the investigator noted that there were approximately ten caskets in the selection room, and that none of the caskets in the selection room displayed price cards. As of September 5, 2023 the manager change application and fee were received.

Respondent replied stating that the former manager was not officially terminated until August 15, 2023 and that while the former manager stated they were no longer employed as of August 1, 2023, she was not formally terminated until the 15th. Respondent stated following the termination, they began looking for a new manager immediately and found one soon after. Respondent stated that they attempted to change the information online but stated they “could not figure out how to print out the application for change of manager” but contends that they had been trying to get the information updated. Regarding the price cards of caskets, Respondent stated that they had removed the prices because they were in the process of redoing the caskets to make them nicer and that each casket had a price on it prior to redoing them but admits that at the time of the inspector’s visit, they were not price tagged.

Based on the above, regardless of whether the former manager left employment on August 1, 2023 or August 15, 2023, applicable rules state that following a change of manager, a new manager must be appointed within ten days. Thus, to abide by the rule, making the date of a new manager appointment either August 11, 2023 or August 25, 2023. The inspector was present at the establishment on August 28, 2023; the application and payment were not received until September 5, 2023.

Recommendation:

- \$500.00 civil penalty. Authorize via Consent Order and formal hearing if necessary.

A motion was made by Fred Berry to accept Counsel’s recommendation.

Seconded by Christopher Lea

Adopted by Voice Vote

3. Case No.: 2023037821 – Funeral Establishment

This complaint was administratively opened August 4, 2023, following a routine inspection conducted by the Department on July 31, 2023. During the inspection it was determined that the previous manager has resigned from Respondent establishment effective June 22, 2023. At the time of the inspection, the application for Change of Establishment Manager and the accompanying fee had not been received by the Department. During the inspection, the inspector met with a new employee at the Respondent establishment who stated that they were the new manager. The inspector inquired as to whether the proper documentation had been submitted to the Department for change of establishment manager. Respondent replied stated that they were under the impression that the owner of the established had submitted the application and fee.

Respondent provided that ultimately upon the original manager's resignation, the owner already had plans to sell the establishment. Respondent stated that any appointed manager would effectively have been appointed for roughly thirty (30) days prior to the official date of sale and change of ownership, and then would have been changed again once the new owners formally took ownership. Respondent stated that the new employee that the inspector spoke to was the individual the new owners had identified they would be appointing manager, and that they were already on the premises essentially functioning as manager during this interim period when no manager was officially appointed.

The application and fee were submitted as of September 19, 2023.

Recommendation:

- \$500.00 civil penalty. Authorize via Consent Order and formal hearing if necessary.

A motion was made by Fred Berry to accept Counsel's recommendation.

Seconded by Christopher Lea

Adopted by Voice Vote

4. Case No.: 2023039511 – Funeral Establishment

This complaint was administratively opened August 15, 2023, following a routine inspection conducted by the Department on July 31, 2023. The inspector met with the owner/manager of the establishment. Currently, the funeral

establishment is only an open area consisting of one large warehouse type room and a restroom. The inspector stated that various items are stored in the open room, some items are on shelves and other items are on the floor throughout the establishment with an office work area in one corner of the room. The inspector further stated that the area does not appear to have a clearly defined public area, nor appears to be in a good state of repair. Additionally, the inspector noted that there is no preparation or embalming room at the establishment and that it does not appear as if there is any work being performed to install a preparation or embalming room. This Notice of Violation/Citation follows a Notice of Violation/Warning issued to Respondent on October 4, 2022, concerning requirements for a fixed place of business and public areas. Following the issuance of this Notice of Violation/Warning, it was requested that the owner provide to the Board, as soon as possible, specific instances of work that was being completed via documentation (invoices, executed agreements, etc.) and for work that had not yet begun but was scheduled to begin at a later date in order to comply. No further communication, updates, or documentation have been received from the owner since the October 2022 Notice of Violation.

Included in the file was an email from the owner dated December 7, 2022 that states in part the following, "Thanks for the update, I will take care of the additional info needed for the timeliness and other things on the list for the prep room completion and regular updates . . . I will provide the documents requested in the future . . . Again, sorry my establishment not up to compliance [sic] on initial inspection it will be by time for reinspection."

Regarding the violation of fixed place of business, Respondent stated that at the time of both inspections (October 2022 and July 2023) they were in the process of moving their funeral supply company out of the establishment building into a newly acquired building. Respondent explained that since their establishment license was issued, the Respondent establishment and the funeral supply company had been sharing the facility. Respondent stated the funeral supply company will be moved out by August 31, 2023. Regarding the violation of available public areas, Respondent stated that upon being issued the establishment license, they have been utilizing a separate funeral home for the preparation and care of decedents. Respondent stated that they received their establishment license in August of 2021, and due to COVID, supplier and contractor issues have slowed the construction process. Respondent stated that they were able to purchase a building and began to secure the necessary permits to begin the construction process in October of 2022. Respondent stated that their electricity and plumbing are completed with walls up. Respondent

further stated that according to their contractor, the project is expected to be completed as of November 1, 2023.

Recommendation:

- \$750.00 civil penalty with a follow up inspection 90 days after the Board makes a determination. Authorize via Consent Order and formal hearing if necessary.

A motion was made by Christopher Lea to assess a \$750.00 civil penalty with a follow-up inspection on or soon after November 1, 2023. Authorize via Consent Order and formal hearing if necessary.

Seconded by Fred Berry

Adopted by Voice Vote

5. Case No.: 2023039951 – Funeral Establishment

Complainant, wife of the decedent alleged unprofessional conduct and failure to follow proper next of kin determination on behalf of Respondent. Specifically, Complainant stated that their husband passed away on November 4, 2022, and that they were not notified by either the decedent's sister or Respondent establishment. Ultimately, Complainant did not learn about her husband's passing, and the decedent's presence at Respondent establishment until 7:30 p.m. that same night. Complainant called Respondent the following day, explaining who she was and that she did not want Respondent to plan for the decedent's arrangements or embalm the decedent. However, Complainant contends the receptionist informed them that the decedent had been embalmed the day before due to arrangements made by the sister. Soon after the manager of Respondent establishment called Complainant where Complainant explained that she was the legal next of kin. Respondent stated that the sister had a power of attorney document, but in a letter dated November 7, 2022, from Complainant's attorney, Complainant communicated that the power of attorney was not valid upon death. Complainant alleges that Respondent did not do their due diligence regarding their next of kin determination, specifically by failing to contact the children of the decedent (Respondent purportedly knew of the children due to including them in the published obituary). Complainant acknowledges that Respondent was deceived but stated that deception should not negate their responsibility to approach the next of kin and verify as to whether the information given is correct.

Respondent apologized for any grievance and hardship caused to Complainant. Respondent stated that they received a call from hospice for the removal in home of the decedent on November 4, 2022. Respondent stated while making the removal, they spoke with who they understood to be the next of kin and received permission to embalm. Respondent stated that during this process there was no mention of a living wife. Soon after, Respondent was contacted by Complainant explaining her relation to the decedent. Soon after that conversation, Respondent was contacted by Complainant's attorney stating that Complainant had full decision power over any final arrangements to be made for the decedent, which Respondent stated they agreed with. Respondent stated they communicated to the attorney that they would not move forward with any arrangements until Complainant was alright with proceeding. Following this conversation, Respondent received a letter from Complainant's attorney stating, "my client is okay with his side of the family moving forward with their planned receiving of friends and funeral services tomorrow on the condition that the body is kept at the funeral home afterward. This letter will confirm our agreement that [Respondent] will not proceed with the disposition of remains until authorized to do so by [Complainant]." Respondent stated they conducted the rest of the arrangements in accordance with the wishes of the Complainant. Respondent further provided that they ultimately trusted and relied upon the information given by the family and hospice staff initially, and that they have implemented changes to their next of kin information process to ensure this issue doesn't happen again in the future.

Legal spoke with Respondent who indicated that due to unusual circumstances, the wife was not present at the home during the hospice home call. Upon arrival to the decedent's home, the hospice staff introduced the decedent's sister as the next of kin, and the sister presented a power of attorney document. While it does seem like in this instance the Respondent was, to use Complainant's word, "deceived," the hospice staff, the power of attorney document, and the representations of the family as a whole, was sufficient to create reasonable reliance information for Respondent to rely upon. Likewise, upon learning of the existence of the Complainant as the next of kin, Respondent halted all further arrangements and waited for the Complainant's permission and approval to move forward.

Recommendation:

- Letter of Warning

A motion was made by Fred Berry to accept Counsel's recommendation.

Seconded by Christopher Lea

Adopted by Voice Vote

6. Case No.: 2023039471 – Funeral Director

Complainant alleged unprofessional conduct on behalf of Respondent. Specifically, Complainant stated that as of August 2023, they are enrolled in classes and have reinstated their student and student embalmer registrations. Complainant stated that in July of 2023 new owners bought the establishment and added new employees including a new general manager (the Respondent). Complainant stated one day she came into the establishment and was told by Respondent that it was “illegal” for a student to be in the prep room. Complainant stated they had been in the prep room for the past five years, did not embalm, and only performed cosmetics and hairdressing. Complainant alleges that Respondent has singled them out and their actions does not allow Complainant to complete their apprenticeship hours.

Respondent stated that Complainant would represent that they were an apprentice and that they were in mortuary school. However, Respondent stated no apprenticeship papers were ever filled out monthly and none were ever signed by a funeral director or sent to the State for the hours to be logged. Respondent stated after checking with the State of Tennessee, she discovered that Complainant had only been registered as a student, which had expired in September of 2022. Respondent stated that regarding the embalming, they made the decision to centralize the embalming for their locations which has resulted in having two different embalmers with two other part time employees to help during the day and night visitation hours. Respondent stated that Complainant is likely upset that due to these staffing changes, their job and responsibilities have changed.

Based on the above, the complaint is based entirely upon workplace disputes. Legal confirmed that Complainant had at one time been a student, apprentice funeral director, and apprentice embalmer, but those registrations have all expired as of September 16, 2022.

Recommendation:

- Closure

A motion was made by Christopher Lea for closure of the complaint.

Seconded by Pamela Stephens

Adopted by Voice Vote

7. Case No: 2023041981 – Funeral Establishment

Complainant stated that on August 16, 2023, they received a call that their mother had passed away and that later that day Respondent called them and informed them that they had picked up the decedent. Complainant stated that they asked who gave the consent to do that, but claimed that they never received an answer to this question. Complainant provided that he, his wife, and his brother traveled to Tennessee and arrived on August 18th. Complainant contends that they contacted Respondent and were “given the run around” and thus did not meet until August 20th. Complainant stated that during this meeting, he communicated with a funeral director from Respondent establishment and stated that the decedent did not wish to be at Respondent establishment and that she had wished to be cremated. Complainant alleges that the funeral director called the manager of the establishment and communicated this information to him. Complainant alleges that the owner “laughed” at Complainant stating they “didn’t believe that was true” and that they had been friends with the decedent. Complainant also purported that the funeral director at Respondent establishment represented that she had been the decedent’s power of attorney during the healthcare process for the decedent. Complainant then claimed that Respondent proceeded as if they were going to move forward with a transfer, but that they asked that Complainant pay for the services already rendered, such as embalming, preparation for viewing, etc. Complainant contends that they had informed Respondent over the phone that the decedent wished to be cremated and that there would be no viewing, and as Complainant contends, those services had been done without anyone’s consent. Complainant said ultimately after discussing the cost of transfer, they decided to cremate the decedent at Respondent establishment instead. Complainant stated that Respondent then dropped all the charges of the previously incurred services and only charged for the cremation. Complainant stated that Respondent then explained the cremation process and the decedent would be taken to the crematory the following day. Complainant then provided that they updated their brother who had not attended the arrangement conference. Complainant then stated that their brother “proceeded to then involve himself” to see if the meeting would be more beneficial. Complainant claimed that the funeral director communicated to the brother that Complainant and their wife were difficult to deal with, but that they

would continue to deal with the brother regarding payment. The following day on August 21 the brother met with Respondent, Complainant admits that they were not present and waited in the car during this meeting. Complainant contended that the brother said that Respondent let the brother see the will, but claimed that he was not allowed to take photographs of it, flipped through the pages quickly, and was not allowed to leave with the will. Complainant claimed their brother said that he could not gather much information from it because of "how fast [the employee] was pushing him through it like she was hiding something." Complainant claimed they asked the brother what had been discussed and purportedly he communicated that the employee stated, "they felt like [they] should get a vault for her, and [that they] should not get her ashes and that they would give us a vault as a gift." Complainant only provided that this was not what their mother had wanted but did not provide any information or any detail where they spoke to Respondent regarding this being inconsistent with their or the decedent's wishes. Finally, Complainant stated that a week later of August 28, 2023, their wife called Respondent establishment and spoke with the employee again. Complainant alleged that the employee refused to speak with the wife and stated that all communications should be done through the brother. Respondent did however inform them during this call that they had not yet received the cremains.

Respondent replied first with the names of nine individuals and their date of deaths dating as far back as 1996 to show that Respondent establishment has serviced this family for deathcare services for many years, and that the decedent was the last of her immediate family. Complainant stated that on July 6, 2023, the decedent called her personal cell and asked her to come to the hospital to mail letters for her and to complete the Power of Attorney and Last Will and Testament documents. Respondent explained that she and the decedent had been long time friends and routinely socialized together over the years. Respondent stated that the decedent's son (the brother referenced in the complaint) and a daughter had both expressed how they knew Respondent had been there for the decedent. Respondent stated that due to this long friendship and professional familiarity with her family, the decedent had asked her to be the POA, especially since her two sons lived out of town and it would take them time to travel to Tennessee. Respondent provided further details regarding their assistance in the healthcare of the decedent and that due to her close relationship and consistent help with the decedent, Respondent knew Complainant's statement that the decedent did not want to be at Respondent establishment to be untrue. Respondent stated that as soon as Complainant and his wife arrived they informed the employee at Respondent establishment that

they did not have any money, that the brother had the money, and asked whether they knew anything about an insurance policy. Respondent stated that the brother came in the following day and apologized for Complainant's behavior. The employee stated during this conversation she expressed to the brother that she had hoped both brothers would have come together to handle the affairs, but that the Complainant did not come into the office that day, and that he willingly set in the car while the brother paid the funeral bill. The employee stated she gave the brother the will. The employee further stated that as of the day of the response (September 22, 2023) the cremains of the decedent are still at Respondent establishment. The employee stated that they have texted the brother asking when he would be back in Tennessee to receive the cremains, and that the brother stated that he had been in the process of moving but was hopeful to be back soon to receive the cremains.

Respondent provided a copy of the power of attorney document properly signed and notarized by the decedent naming the employee the power of attorney, dated July 6, 2023. On October 2, 2023, Legal contacted the brother to attempt to corroborate the events as described by either party; however the brother was unavailable to speak at that time, and despite several attempts, Legal has not been able to speak to Complainant's brother regarding this matter.

Based on the above, a large portion of the complaint comes down to conflicting stories regarding the will. In short, Complainant contends that Respondent only allowed the brother to see the will but never provided it to him to take with him, while Respondent states that they would have preferred to have gone over the will with both brothers present, but as the Complainant was waiting in the car (because the will was provided at the same time payment was rendered), they moved forward only with the brother present and gave him the will at the conclusion of the meeting. Additionally, Respondent provided a valid POA document and allowed Complainant to make determinations and arrangements as they saw fit, ultimately moving forward with cremation per Complainant's wishes and waiving other charges that had been incurred prior. Finally, during their complaint, Complainant alleged that the long-term unmarried partner of the decedent had communicated that Respondent was not a trustworthy establishment. Specifically, Complainant stated that he had been informed by the partner that Respondent establishment had previously stolen items from decedents who they had served. However, in rebuttal, Respondent provided a sworn affidavit from the long-term partner (significant other to the decedent for the past 25 years). In the affidavit, the partner denied ever telling Complainant that Respondent had ever stolen or taken anything, referred to that claim as "a

total lie” and an example of Complainant and his wife’s dishonesty. While this matter ultimately is still a case of conflicting testimonies, Respondent has provided documentation (POA document and affidavit) that refute or at least call into question Complainant’s version of events. As such, Complainant has not carried their burden to show that a violation of applicable rules or statutes has occurred.

Recommendation:

- Closure

A motion was made by Fred Berry to accept Counsel’s recommendation.

Seconded by Wendell Naylor

Adopted by Voice Vote

RE-PRESENT

8. Case No.: 2021065521 – Funeral Director

This complaint was originally presented to the Board at the October 2021 board meeting.

This complaint was opened by a member of the Vital Records and Statistics division of the Department of Health alleging unprofessional conduct on behalf of the Respondent and alleging that Respondent failed to complete and file the death certificates of several cases. Complainant states that Respondent is often rude to members of their staff. Likewise, Complainant alleges that Respondent has yet to have the death certificates of decedents dating back to June 2, 2021 at one location and decedents dating back to May 16, 2021 at another location, in their VRISM queue and not yet certified by a physician as to the cause of death/filed with the Department of Health.

Respondent contends that it is difficult to have doctors sign death certificates at this time and stated that Complainant acknowledged that the death certificates had been sent to doctors for them to sign. Respondent did not deny that they may have been rude with Complainant but asserts that a member of Complainant’s staff was rude initially, causing Respondent to respond in kind.

Recommendation: *\$250 civil penalty for unprofessional conduct for an unreasonable delay in filing death certificates and for failing to treat members of the public in a respectful manner. Authorize settlement via consent order and a formal hearing if necessary.*

Board Decision: *\$500 civil penalty for unprofessional conduct for an unreasonable delay in filing death certificates and for failing to treat members of the public in a respectful manner. Authorize settlement via consent order and a formal hearing if necessary.*

UPDATE: In correspondence with Respondent's attorney, the attorney detailed the difficulty that Respondent had had with a number of the death certificates and receiving the physician's certification. Respondent asserted that many of these deficiencies had been corrected very soon after, if not before in some cases, receipt of the Consent Order in 2021 (Complainant confirmed that this was the case). None of the certificates that were outstanding at the time this case was originally presented are still outstanding.

Legal spoke with Complainant regarding this matter. First, Complainant, agreed that Respondent's delinquency regarding certifying death certificates had been corrected. Complainant provided that Respondent appears to have largely corrected this behavior and noted that the state of Respondent's queue was substantially better.

Furthermore, due to the nature of the VRISM system, Legal is unable to access the database and information themselves, creating an unusual reliance on Complainant for pertinent information in this matter. In a conversation with Complainant, they indicated that they felt as if the matter had been resolved since they felt as if the Respondent's queue has improved so significantly and were happy with the result.

Based on the above, Complainant appears to be satisfied with the outcome of the complaint (that is, the behavior of Respondent has been corrected). Due to the unique situation in where legal cannot gather further evidence without substantial effort on behalf on Complainant, and Complainant's satisfaction with the resolution of the matter, Legal recommends a letter of warning.

New Recommendation:

- Letter of Warning

A motion was made by Fred Berry to assess a \$250 civil penalty. Authorize via Consent order and formal hearing if necessary.

Seconded by Anthony Harris

Adopted by Voice Vote

LICENSEE REPORT:

REPORT OF LICENSES ADMINISTRATIVELY APPROVED BY EXECUTIVE DIRECTOR PURSUANT TO BOARD AUTHORITY FOR THE PERIOD OF AUGUST 24, 2023 – OCTOBER 6, 2023

<u>Establishment(s)</u>	<u>Type of Action(s)/Change(s)</u>
Circle of Life Cremation LLC Seymour, TN	Initial Establishment
Cremation Services of Knoxville, LLC Knoxville, TN	Initial Establishment
Bartlett-Heritage Funeral Home & Cremation Center Bartlett, TN	Change of Ownership
Cremation and Funeral Services of Tennessee Pegram, TN	Change of Ownership
High Point Funeral Home & Crematorium Memphis, TN	Change of Ownership
Mid South Crematory Memphis, TN	Change of Ownership
Mid South Mortuary Service Memphis, TN	Change of Ownership
<u>Individuals</u>	<u>Type of License(s)</u>
Alizah Rose Bishop Memphis, TN	Funeral Director and Embalmer
Jon Samuel Habersetzer Knoxville, TN	Funeral Director and Embalmer
Paul Daniel Ptak	Funeral Director and Embalmer

Cookeville, TN

Earl Ray Scales
Nashville, TN

Funeral Director and Embalmer

Kandace Nicole Wilson
Athens, TN

Funeral Director and Embalmer

Annie Kate Vanlandingham
Water Valley, MS

Funeral Director and Embalmer
Reciprocity – Mississippi

Randall Lynn Weagley
Vero Beach, FL

Funeral Director and Embalmer
Reciprocity – Virginia,
Pennsylvania, and Florida

Esperanza Annabell King
Memphis, TN

Funeral Director

Vince Lee Smith
New Market, TN

Funeral Director
Reciprocity – Indiana

CLOSED ESTABLISHMENT REPORT:

One (1) establishment has reported closing since the last board meeting:

- Collierville Funeral Home, 534 West Poplar Avenue, Collierville, TN

DISCIPLINARY ACTION REPORT:

There are no disciplinary actions to report.

OPEN COMPLAINT REPORT:

As of October 5, 2023, there were 44 open complaints.

A motion was made by Fred Berry to accept the Executive Director's Report.

Seconded by Christopher Lea

Adopted by Voice Vote

NEW BUSINESS:

RE-REGISTRATION OF APPRENTICE FUNERAL DIRECTOR:

A motion was made by Fred Berry to approve a pending request for an individual to re-register as an apprentice funeral director.

Seconded by Wendell Naylor

Adopted by Voice Vote

PAST PRESIDENT LUNCHEON:

A luncheon to honor Past President Charles A. Rahm will be held on Tuesday, November 14, 2023.

PUBLIC COMMENTS:

President Anthony Harris asked if anyone desired to make public comments related to Agenda items.

Nobody made public comments made at this time.

ADJOURN:

A motion was made by Fred Berry to adjourn.

Seconded by Christopher Lea

Adopted by Voice Vote

The meeting was adjourned by President Anthony Harris at 11:19 a.m.

Respectfully submitted,

Robert B. Gribble

Robert B. Gribble, CPM, CFSP
Executive Director