REGULAR SESSION MINUTES APRIL 12, 2022 BOARD OF POLICE COMMISSIONERS NEW HAVEN, CONNECTICUT VIDEOCONFERENCE AND CONFERENCE CALL VIA ZOOM

PRESENT: Commissioners Darrell Brooks; Tracey Meares; Evelise Ribeiro; and Donald Walker

Interim Chief Dominguez: Department of Police Service Assistant Chief Karl Jacobson: Department of Police Service

Captain David Zannelli: Department of Police Service Lieutenant Manmeet Colon: Department of Police Service Sergeant Cherelle Carr: Department of Police Service Sergeant Paul Finch: Department of Police Service

Detective Christian Bruckhart: Department of Police Service

Eva Perry-Lambert: Administrative Assistant

Florence Cotto: President, Elm City Local

Michelle Duprey, Esquire: Deputy Corporation Counsel

Catherine LaMarr: Deputy Corporation Counsel

Daniel Hunt Ben Lambert - New Haven Register Miguel Pittman, Jr. SBA WTNH

OPEN SESSION

The meeting was called to order at 6:06 p.m., Evelise Ribeiro, Chair, presiding. Commissioner Ribeiro indicated that Commissioners Lawlor and Miranda were excused for the evening.

AGENDA

Approval of the Agenda for the Board of Commissioners

- Commissioner Ribeiro indicated she would entertain a motion to amend the agenda to include the meetings from March 29th, 2022.
- ** Commissioner Walker motioned to Approve the Revised Agenda
- ** Commissioner Brooks seconded
- ** Motion passed unanimously

DISCUSSION AND APPROVAL OF MINUTES

Discussion and Approval of the Regular Meeting Minutes of March 8, 2021. Discussion and Approval of the Special Meeting Minutes of March 29, 2021.

- ** Commissioner Brooks motioned to Approve the Regular Meeting Minutes for March 8, 2022
- ** Commissioner Walker seconded
- ** Motion passed unanimously
- ** Commissioner Walker motioned to Approve the Special Meeting Minutes for March 29, 2022
- ** Commissioner Brooks seconded
- ** Motion passed unanimously

PUBLIC COMMENTS

- Mr. Miguel Pittman, Jr. stated that his first comment had to do with the approval of 100 conditional offers from the Eligibility List #22-17. He has a copy of the list but was unsure if the list he had was a complete list or not. His list only has a 113 participants. He asked, "is there anymore that's on this list? And if not, why not approve a 113 versus leaving 13 out?"
- Mr. Pittman indicated that his number two comment had to do with the way that the agenda had been set up for the last six meetings. He noticed that the Board had changed the order of where public comment is. Public comment used to be after the Chief gave his or her report. If he had some concerns or something to shed light on regarding the Chief's report, he would not be able to comment until the Board's next regularly scheduled meeting.
- Furthermore, Mr. Pittman stated that after he went over the Eligibility List #22-17 with 113 cadets qualified to move forward in the process, he wanted to shed a little light on the history on the Department he had been experiencing especially when it comes down to some of the way the process is done with the background, psychological and with the whole process. If any cadet appears before the Board due to a recommendation for the cadet to be removed off of the list, hopefully the Board doesn't take everything that the background officers says as a grain of salt.
- The makeup of the Board currently is different. There are only two commissioners remaining from the previous Board. Hopefully, the Board would be open-minded and would not move toward the status quo. He had a lot to say, but he has to adhere to the three-minute time limit for public comments.
- Commissioner Ribeiro thanked Mr. Pittman for his comments. In response to Mr. Pittman's first comment regarding conditional offers, the Chief makes the decision regarding the number of conditional offers that should be made. There were discussions before the certification of the list regarding 100 conditional offers without knowing how many candidates would be on the list. So, the agenda was set. It does not mean that later on conditional offers could not be made to the other candidates on the list.
- Commissioner Ribeiro addressed Mr. Pittman's second comment regarding the positioning of "public comment " on the agenda for the Board's regular meetings by stating that she would take his point and review the issue. If there was a scrivener's error, then they would make the adjustment accordingly.
- Commissioner Ribeiro indicated that with respect to Mr. Pittman's third concern, they do take recruitment and selection very, very seriously. They are definitely looking at all things going forward to make sure that it is a fair and equitable process for everyone who has applied and wishes to apply in the future.

■ Sergeant Finch stated that there are 120 candidates on the list because there are multiple candidates that scored number one. So, that number does increase. There are other candidates on the list with tie scores as well.

CHIEF'S REPORT

Assistant Chief Karl Jacobson

- Assistant Chief Jacobson indicated that Chief Dominguez was out of state.
- At this time last year there were nine homicides and 24 shootings. Currently, there are three homicides and 20 shootings. This includes the homicide on April 11th, 2022. A 22-year-old young man was found in a car unresponsive. It was discovered he had multiple gunshot wounds. The young man who is from Waterbury (originally from New Haven) succumbed to his injuries. The investigation is ongoing.
- There were several rounds shot in front of Reginald Mayo School this afternoon. None of the children were at risk at any time. The shots were aimed at 200 Gulf Street which is across from the school. Assistant Chief Jacobson commended the principal and her staff because they immediately locked down the school. Officers arrived and secured the scene. And when it was safe, the children were released to their parents and onto busses. There will be added police presence in that area for the next coming week or so. Nobody was struck. Investigation are also ongoing
- Last year at this time there 49 guns seized with 52 arrests and one ghost gun. To date, 63 guns have been seized of which seven are ghost guns with 51 arrests.
- Just this morning the US Marshals and the Intel Unit arrested an individual for murder one stemming out of New York. Four guns and an AK-47 style machine gun were sized on Melrose Drive.
- So, officers are working very hard to keep the city safe. They are seeing a lot of lower violence. There is much more work to do.
- Five recruits graduated from POST. They will begin their field training on Friday, April 15, 2022.
- Mayor Elicker swore in two more recruits on April 11, 2022. They will begin the academy on Monday, April 18, 2022
- The conditions for getting a 10,000-dollar bonus for laterals are still in the works.
- The Department does not have anyone out due to COVID. The Department has 69 percent of its sworn members vaccinated.
- Utility Communications will install the cameras.
- Commissioner Meares stated that two years of data does not indicate a trend. She did, however, notice an increase in Assistant Chief Jacobson's report of ghost guns. She wondered how the Department was strategizing to deal with that, if at all. She asked if it was going to be a federal partnership. Detecting these guns are harder. Her thought on this is that addressing ghost guns is akin to addressing trafficking. She was not sure.
- They have been tracking ghost guns for about three years. The Department is working with ATF. The Gun Crime Intel Center has put aside funds for the Department to help with that. A search warrant was just executed dur materials for making ghost guns were found. It is still an open investigation. ATF will also go through the Department. The Board will be kept updated on the issue of ghost guns.

■ Commissioner Ribeiro commented that she was glad to know that the young people at the school were safe, no one was harmed, and that there was a quick response and that there was an ongoing effort to make sure that the students, faculty and parents were safe. That is much appreciated.

PERSONNEL MATTERS

- 1. Chief Dominguez is requesting approval by the Board of Police Commissioners to send up to 100 Conditional Offers of employment for the position of Police Officer from Eligibility List #22-17.
- Assistant Chief Jacobson indicated that Chief Dominguez was requesting 100 conditional offers for the position of Police Officer. As was alluded to earlier, the Department will get to the 120 number at some point. To clarify, the list encompassing 120 candidates is complete. If an applicant is not on the list, it means they did not score high enough to move forward in the process.
- ** Commissioner Walker motioned to approve the recommendation by the Chief's to make a conditional offer to 100 candidates that are currently approved on the Eligibility List #22-17
- ** Commissioner Meares seconded
- ** The motion passed unanimously

REQUEST TO RETURN TO POLICE OFFICR

Detective Christian Bruckhart - Request for Voluntary Reduction in Rank to Police Officer

- Commissioner Ribeiro indicated that Detective Bruckhart's letter was sent to the Board on this day. Detective Bruckhart had requested to return to the Rank of Police Officer as it would be more conducive to his personal life and family life. He indicated that he would still continue to be an asset to the Department working as a Field Training Officer and looking for other places to serve in the Department.
- Commissioner Meares asked, just for visibility and transparency, what does that mean other than the fact that somebody is reduced in rank? Do they get less money?
- Assistant Chief Jacobson replied by saying, such a reduction in rank would necessarily lead to a reduction in income. In addition, this reduction meant the officer would be transferred to the Patrol Division. He added that the Department does not really want an officer to do this. However, in all honesty, Detective Bruckhart has been an excellent detective and excellent patrol officer. The fact that the Department is keeping Detective Bruckhart and the reduction would help his schedule is great because he is very good with people. He is from New Haven and resides in New Haven. This is not a reduction the Department has a problem with.
- Commissioner Meares asked what would happen if Detective Bruckhart changed his mind again? Assistant Chief Jacobson indicated that he would have to retest.
- Commissioner Meares asked how the Department views someone who changes his or her mind again. Assistant Chief Jacobson responded by saying that he thought it would depend on the circumstances. He would hope that Detective Bruckhart takes the supervisor test in the future as he now has patrol and detective experiences.

- Commissioner Meares indicated that if Detective Bruckhart wants to move up, he wouldn't necessarily have to be a detective again. Assistant Chief Jacobson replied by saying he could go right to the rank of sergeant.
- Commissioner Brooks asked if this was a negative precedent since it is rarely done or has not been done before. He also asked if there was any way the Department could work with Detective Bruckhart to resolve the challenges that he's experiencing personally.
- Assistant Chief Jacobson indicated that he, other supervisors and Detective Bruckhart had had conversations regarding this issue. He was not of the opinion that this would set a precedent. This is only the second time this has been requested in 15 years. The first such request had to do with an officer who was a better fit for the training academy. There are not detectives in the training academy. So, it was a good fit at that time as well. It's a case-by-case scenario.
- Commissioner Brooks said he assumed the reduction in rank would put Detective Bruckhart in a higher seniority position in the Patrol Division. Assistant Chief Jacobson replied that it would.
- Commissioner Ribeiro commented that in her experience as a commissioner this the second such request for a reduction in rank at last in the last 15 years or so. The Board did approve the first such request as well.
- Commissioner Meares asked, is it fair to say that the reason why this is happening has to do with the structure of ranks and such? In other words, the only way Detective Bruckhart can get a schedule change is to change the rank as opposed to just having more flexibility with the schedule? So, it's a work structure issue rather than a rank issue? It just seems odd that is the way that an officer has to address this problem.
- Assistant Chief Jacobson replied by saying, no, he wouldn't say that. The officer retains his or her seniority within your rank, but you retain your on-the-job seniority. So, even though an officer is promoted to the detective rank, he or she would still have the same seniority he or she would have in Patrol. In addition, there are more senior people who are sergeants. This request puts an officer with more experience back in Patrol which is what is needed as there are a lot of younger officers in Patrol.
- ** Commissioner Meares er motioned to approve the request from Detective Christian Bruckhart for a Voluntary Reduction in Rank
- ** Commissioner Walker seconded
- ** The motion passed unanimously
- ■Commissioner Ribeiro wished Officer Bruckhart the best of luck.

INTERNAL AFFAIRS REPORT

Captain David Zanelli and Lieutenant Manmeet Colon

- Captain Zannelli introduced Sergeant Cherelle Carr to the Board. She is the newest addition to Internal Affairs. She will helping Internal Affairs with its caseload.
- Captain Zanelli further stated that Sergeant Carr's reputation precedes her. He had the luxury of supervising Sergeant Carr for a short period of time in the Bureau. She is a ball of energy. She is from the community. She has comes with experience. He indicated he had been hounding the chiefs for some time about getting Detective Carr to Internal Affairs.

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- Commissioner Ribeiro asked what she would be doing exactly. Captain Zannelli indicated that Sergeant Carr would be investigating civilian complaints and any Chief-ordered investigations.
- Sergeant Carr was congratulated.
- Commissioner Brooks asked about the staffing in Internal Affairs. Captain Zannelli indicated that the addition of Sergeant Carr would bring the number of officers in Internal Affairs up to five who all have the rank of sergeant.
- Lieutenant Colon indicated she had been hounding Captain Zannelli for Sergeant Carr to join Internal Affairs as well. She thanked Captain Zannelli. She is aware of Sergeant Carr's work ethic. She is good to go.
- Lieutenant Colon reported that to date there have been zero Taser usage compared to the same time in 2019 of 12. In 2020 at the same time there were nine. In 2021 at the same time there were five. Although, Taser usage is zero, hard hands are up. This is due to the new use-of-force policy and the progressive reporting for use of force between the Patrol Division and Internal Affairs getting the documentation on time and IA entering this in real time.
- Lieutenant Colon indicated that in addition OC was down. Firearm display was down to 22 this year compared to 50 last year at the same time. There was one use of the baton which was not a strike but used for an extraction.
- The Department currently have 27 complaints of which 25 are open and two were recently closed.

IA Case No. 21I-083: This case ordered by Chief Dominguez on October 24, 2021. On October 24, 2021 an officer notified his supervisor that he was a victim of a domestic violence assault and described a fellow New Haven police officer as the perpetrator. This incident occurred when both officers were off duty in Wallingford. The officer (victim) explained that he and the Officer Ofiara had been in a romantic relationship for several years. This was reported to the Wallingford Police Department. The victim and the police officer provided verbal statements to the officer in Wallingford. Officer Ofiara admitted to striking the victim in the face during the incident. And at that point Officer Ofiara was placed on Administrative Leave per Chief Dominguez's order. On November 5th, 2021 an arrest warrant was signed for Officer Ofiara for the charges of Disorderly Conduct, Assault 3rd. A protective order was subsequently issued for Officer Offiara as the respondent. The protective order was ultimately removed but it prohibited Officer Ofiara from owning and possessing any firearms from the date range of November 8th, 2021 to January 28th, 2022. This impacted the officer's ability to perform her duty as a New Haven police officer. On January 27th, 2022 all charges were dismissed against Officer Ofiara by the Meriden GA 7. However, based on Officer Ofiara's actions during the incident and subsequent admissions she was found to be in violation of the NHPD General Order, Rules of Conduct for law abiding. This case was sustained. It was closed on March 2, 2022.

IA Case No. 22C-006: The complainant, Ms. Rhonda Brockenberry, filed a complaint with the Office of the Internal Affairs. The handwritten complaint was illegible. After a phone conversation with Sergeant Canning, the complainant claimed that she was harassed by Officer Wityak, and that he was acting in a retaliatory manner because she told him that she would notify his supervisor or file an IA complaint against him. On January 18, 2022 Officer Wityak met with the complainant after she called the police dispatch regarding a domestic dispute

involving her boyfriend who she said had slashed her tires. She told Officer Wityak that she was at Sam's Mart on Whalley Avenue when the incident occurred. She went there to purchase cigarettes around three or four a.m. when her boyfriend drove into the parking lot in a gold Honda Accord. According to the complainant her boyfriend got out of his vehicle and approached her. He took out a knife and slashed her jacket and her purse. He even reached into her bag and took money. Ultimately, she claimed that she was robbed by her boyfriend.

Officer Wityak made contact with the manager at Sam's Mart to corroborate her account of what occurred since there was a significant allegation about her boyfriend robbing her. The video footage showed the complainant coming into the parking lot of Sam's Mart around 12:46 a.m. She was there until 1:09 a.m. and exited the lot. She never exited her vehicle to enter the store to purchase cigarettes as she claimed she did. While she was in the lot no gold-colored Honda entered the lot. Two men were seen walking up to her vehicle.

After reviewing the footage, Officer Wityak decided to follow-up with the complainant and address her about the false information she provided to him. He met her and told her that the information she provided conflicted with the physical evidence of the video. When confronted about the discrepancy and falsely reporting an incident, Ms. Brockenberry became defensive. She claimed that the officers were jumping her. And as they were trying to issue her a misdemeanor summons, she refused to accept the summons, and the officers tried to place her under custodial arrest. She broke free from the officers and grabbed Officer Reiser in the face. Officer Reiser's body worn camera fell off at which time Ms. Brockenberry punched her in the face. She was eventually calm enough to receive the summons after the altercation with the officers. Ms. Brockenberry made several appointments to provide IA with a statement but did not show up.

A review of the body-worn camera footage, police report and Officer Wityak's interview, it was determined that Officer Wityak acted within the New Haven Police Department, Procedure and General Orders. This case was unfounded and closed on March 5, 2022.

IA Case No. 21C-094: The complainant alleged that Officers Deleo and Jacques used excessive force to place her in handcuffs. The officers were dispatched to 81 Orange Street for a harassment complaint which was later determined to be a complaint involving an emotionally-disturbed person. The complainant told the officers that her ex-husband had hired a hitman to kill her. She also told the officers that her electronics, to include her cellphone, were being hacked. The complainant's nurse told the officers that the complainant suffers from paranoid schizophrenia and is on medication. The nurse told the officers that the complainant was delusional and becoming worse over time. According to the nurse, the complainant was not taking all her prescribed medications. The nurse told the officers that the complainant would become combative when they mention her going to the hospital for an evaluation. The nurse was concerned with the complainant's behavior and her well-being. It was decided at this time that the complainant would be going to the hospital for an evaluation. Officer Deleo was the only officer on scene initially as he waited for back up to arrive

Meanwhile, the complainant was becoming increasingly agitated as Officer Jacque and the medical personnel were enroute. When AMR arrived, the complainant became uncooperative and refused to go to the hospital. She started walking around reaching for items. Officer Deleo got a hold of her arm to prevent her from reaching the scissors that were on her nightstand. The complainant resisted as she pulled her arm and dropped her weight to avoid

being handcuffed. Officer Deleo was able to handcuff her in front, eventually. The complainant was then placed on a stretcher where she continued to pull away and kick in an attempt to prevent the officers from moving her. Officers noticed abrasions on her wrist at this time. In the body-worm camera video it could be seen that the complainant was wearing bracelets on her wrist while she was struggling which appeared to have rubbed against her wrist while she was resisting. The complainant was sent to the hospital for psychological evaluation.

This investigation based on the body-worn camera footage, incident report. supplemental report, statements obtained from the officer and a use-of force instructor, it was determined that there was force used to place the complainant in handcuffs, however, it was within policies, procedures and General Orders. The officers involved were exonerated. The case was closed on March 5, 2022.

IA Case No. 21C-082: The complainant, Anne Marie Rivera-Berrios, filed a complaint with the Office of the Internal Affairs against Sergeant Evarts who was a front desk supervisor when she went to the lobby of One Union Avenue to make a police report regarding the contractor who did work on her home. Allegedly, Sergeant Evarts was cursing and was slamming his hands on the front desk when she was in the lobby. He told her that no police action would be taken on her complaint but she can call dispatch to make a complaint. When she called dispatch, they told her that there was nothing an officer could do, and that Sergeant Evarts told them not to take her complaint.

According to the Milestone footage of the lobby area which has no audio, the Ms. Rivera-Berrios could be seen entering the lobby area on October 27, 2021 at about 2:05 p.m. She approached the front desk where Sergeant Evarts was seated. He can be seen talking on the front desk phone. The video skips from 2:06 to 2:08 p.m. And then Sergeant Evarts can be seen talking to her. At 2:08 p.m. Ms. Rivera-Berrios walked up and then walked away from the front desk toward to the phone located in the lobby area. Sergeant Evarts does not appear to be slamming his hands on the desk. This interaction between Ms. Rivera-Berrios and Sergeant Evarts was very brief.

In her recorded interview with Internal Affairs, Ms. Rivera-Berrios alleged that Sergeant Evarts did not allow to make a police report. Eventually, a police report was filed at her request. Officer Salvati was the initial officer who took her complaint, submitted a warrant for the contractor for numerous charges. However, the warrant was only signed for one charge of working as an unlicensed contractor.

In his recorded interview, Sergeant Evarts explained that he did refuse Ms. Rivera-Berrios to make her complaint. He stated that this is something the police wouldn't typically investigate because Department of Consumer Protection would handle it. And it was determined via PSAP and radio transmissions that Sergeant Evarts was not the supervisor who called dispatched and told them not to take Ms. Rivera-Berrios' complaint.

Based on the Milestone footage, the Verint record which is PSAP transmissions, interviews with Ms. Rivera-Berrios, Officer Acosta who works the front desk area and also Sergeant Evarts, the investigation was unable to determine by the preponderance of the evidence whether or not misconduct or malfeasance occurred, and it was committed by subject of this investigation. This complaint was not sustained. It was closed out on March 24, 2022.

IA Case No. 21C-054: This complaint was ordered by retired Chief Reyes. The officer in this matter is unnamed and at this time is still unidentified. The Office of the Internal Affairs

received a complaint from Inspector Bolton from Orange County Corrections on behalf of Mr. Shawn Marshall. Mr. Shawn Marshall disclosed to Tris James, who is the PREA Coordinator, allegations of sexual abuse that occurred in New Haven Detention Facility. Mr. Marshall never directly made complaints to the New Haven Police Department. However, he disclosed to James that while in a holding cell in New Haven Detention officers touched his testicles five or six times. No dates were provided by Mr. Marshall for these alleged incidents. Mr. Marshall was arrested by NHPD in January of 2021. He was in New Haven Detention where he was uncooperative, refused to stand still for the booking procedure and the booking photo. He also failed to submit his fingerprints. When the officers brought him back to his cell. he threw himself on the ground and had to be carried.

Body-worn camera footage of this incident was reviewed. Mr. Marshall was uncooperative as he refused to answer the Intake questions. A pre-recorded PREA message was played for Mr. Marshall. He wished for the message to be played in Spanish and his wish was granted. As part of the Intake process, Marshall was searched. While being searched, he told the officers, "don't touch my testicle." A search is part of every Intake process and is performed consistently during all intakes. Mr. Marshall knelt and refused to get up from the ground. He struggled with the officers and was non-compliant as he tried to pull away from the officers. He refused to be fingerprinted and photographed and began dancing while doing so.

There was no Milestone footage available as this complaint brought to Internal Affairs' attention almost six months after the initial incident. Milestone video only retains for a period of fourteen days. Mr. Marshall's allegations were refuted by the interviews conducted and the body-worn camera footages of the officers involved. There was no evidence of sexual abuse or police misconduct according to the body-worn camera footage. This disposition was unfounded. The case was closed on March 24th, 2022.

■ Commissioner Brooks asked about IA Case No. 21I-083. It says all charges were dismissed on January 27, 2021. He asked if it was supposed to be 2022. Lieutenant Colon replied by saying that it was 2022. She apologized for the typo. All charged were dismissed January 27th of this year.

INTERNAL AFFAIRS REPORT

RETIREMENTS (For Board information only)

There were none.

RESIGNATION ((For Board information only)

There were none.

RECRUITMENT/SELECTION COMMITTEE REPORT

- Sergeant Finch indicated they went to Gateway Community College last week for a career fair. Out of the career fairs they had been to this year this was by far, he thought, the most eventful one because they received a lot of traction. There were a lot of people interested.
- Regarding the current eligibility list and conditional offers going out, they have been seeing an increase in attendance during their training sessions. The hope is that with the attendance they would have candidates that are ready for the physical agility test phase before they move

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forward to an opportunity at the academy and moving forward for those actually interested in the process of actually taking the physical agility test.

- Commissioner Walker asked if the physical agility training is on Saturdays over at the Bone Field.
- Sergeant Finch replied by saying that the training takes place on Wednesdays and Sundays. He implored those listening to provide the names and e-mail addresses of anyone they know who is interested in applying. The names provided would be added to the e-mail chain that goes out to interested persons. Sergeant Finch further added that he attends as many of these trainings as he can so he could share information.
- Commissioner Ribeiro indicated that Sergeant Finch could be followed on Facebook and Instagram. She indicated she is a follower and likes the posts.

EFFICIENCY COMMITTEE REPORT

■ Commissioner Meares indicated there was no Efficiency Committee Report as she had been busy doing a lot of recruitment-related work.

FINANCE COMMITTEE REPORT

■ Commissioner Walker indicated there was none.

OTHER BUSINESS

There were none.

- Commissioner Meares asked when the Board would get an update on the outstanding RFPs. She wondered if they could expand what they could be talking about during executive session.
- Attorney Duprey indicated that the issue of RFPs did not meet the criteria for it to be heard during executive session.
- Commissioner Ribeiro indicated she could follow-up on this and provide Commissioner Meares with the information.
- ** Commissioner Meares motioned to Enter Executive Session to Discuss Legal Matters
- ** Commissioner Brooks seconded
- ** Motion passed unanimously

The Board entered Executive Session at 6:57 p.m.

- ** Commissioner Meares motioned to Exit Executive Session
- ** Commissioner Walker seconded
- ** Motion passed unanimously

The Board exited Executive Session at 7:36 p.m.

- ** Commissioner Brooks moved to Adjourn the Regular Meeting
- ** Commissioner Walker seconded

** Motion passed unanimously

The next special meeting will be on April 18, 2022. The Board adjourned at 7:37 p.m.

Respectfully submitted,

Sotonye Otunba-Payne