

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF POLICE COMPLAINTS**

FINDINGS OF FACT AND MERITS DETERMINATION

Complaint No.:	19-0682
Complainant:	COMPLAINANT
Subject Officers, Badge No., District:	SUBJECT OFFICER #1 SUBJECT OFFICER #2
Allegation 1:	Unnecessary/Excessive Force (SUBJECT OFFICER #2 and SUBJECT OFFICER #1)
Allegation 2:	Language or Conduct (SUBJECT OFFICER #2)
Complaint Examiner:	Rebecca Goldfrank
Merits Determination Date:	October 29, 2020

Pursuant to D.C. Official Code § 5-1107(b-1), the Office of Police Complaints (OPC) has the sole authority to adjudicate citizen complaints against members of the Metropolitan Police Department (MPD) that allege abuse or misuse of police powers by such members, as provided by § 5-1107(a). This complaint was timely filed in the proper form as required by § 5-1107, and the complaint has been referred to this Complaint Examiner to determine the merits of the complaint as provided by § 5-1111(e).

I. SUMMARY OF COMPLAINT ALLEGATIONS

Complainant COMPLAINANT (COMPLAINANT) filed a complaint with the Office of Police Complaints on August 8, 2019. COMPLAINANT alleges that on August 6, 2019, SUBJECT OFFICER #1 (SUBJECT OFFICER #1) used unnecessary or excessive force against him when SUBJECT OFFICER #1 stood on COMPLAINANT's shackled ankle. COMPLAINANT additionally alleges that SUBJECT OFFICER #2 (SUBJECT OFFICER #2) used unnecessary or excessive force against him when SUBJECT OFFICER #2 1) unnecessarily tightened the shackles on his ankles, 2) stood on the shackle on his left ankle and 3) removed his shoes by using a knife and forcefully dragging him several feet across the floor. COMPLAINANT also alleges that SUBJECT OFFICER #2 used language and engaged in conduct toward him that was threatening, insulting, demeaning or humiliating when he used language including profanity, and behaved unprofessionally during the incident.¹

¹ COMPLAINANT made several other allegations that were ultimately dismissed by the Office of Police Complaints. He alleged that WITNESS OFFICER #1 and WITNESS OFFICER #2 harassed him when they unlawfully stopped him, and that WITNESS OFFICER #2 harassed him when he unlawfully arrested him for unlawful entry and assaulting a police officer (APO). The complainant also alleged that WITNESS OFFICER #1, WITNESS OFFICER #2 and WITNESS OFFICER #2 harassed him when they mishandled his property. COMPLAINANT further alleged that WITNESS OFFICER #1 and WITNESS OFFICER #2 used unnecessary or

Specifically, COMPLAINANT stated that on August 6, 2019, he was arrested at AN ADDRESS IN NE, WASHINGTON, DC. During the incident, the officers at the scene placed shackles on his ankles. After applying the shackles, officers tightened the restraints, which caused pain and scarring to the complainant's ankles. OPC identified these officers from body-worn camera footage as subject officers SUBJECT OFFICER #2 and SUBJECT OFFICER #1. COMPLAINANT furthered that SUBJECT OFFICER #2 "roughed [him] up," and used a knife to remove his shoelaces at the AN MPD District police station.

COMPLAINANT also told OPC that SUBJECT OFFICER #2 was rude to him throughout the interaction and that the officer's behavior made him "feel like [SUBJECT OFFICER #2] was bullying [him]." He also alleged that SUBJECT OFFICER #2 used profanity toward him.

II. EVIDENTIARY HEARING

No evidentiary hearing was conducted regarding this complaint because, based on a review of OPC's Report of Investigation, including the BWC footage, the objections submitted by the officers on September 17, 2020, and OPC's response to those objections, the Complaint Examiner determined that the Report of Investigation presented no genuine issues of material fact in dispute that required a hearing. *See* D.C. Mun. Regs. tit. 6A, § 2116.3.

III. FINDINGS OF FACT

Based on a review of OPC's Report of Investigation, the body-worn camera footage of WITNESS OFFICER #2, WITNESS OFFICER #1, WITNESS OFFICER #4, SUBJECT OFFICER #1 and SUBJECT OFFICER #2 and the photos of COMPLAINANT's ankles, the Complaint Examiner finds the material facts regarding this complaint to be:

1. On August 6, 2019, at approximately 9:45 p.m., COMPLAINANT, was arrested on the rooftop of the building at AN ADDRESS IN NE, WASHINGTON, DC. WITNESS OFFICER #2 and WITNESS OFFICER #1 were involved in this arrest. COMPLAINANT did not comply with the officers' requests throughout their interaction.

excessive force against him when they slammed him to the ground and squeezed the handcuffs as they escorted him from AN ADDRESS IN NE, WASHINGTON, DC. COMPLAINANT also alleged that WITNESS OFFICER #4 forcibly shackled his ankles. COMPLAINANT asserted that WITNESS OFFICER #2, SUBJECT OFFICER #2 and WITNESS OFFICER #5 "lifted him like a hog-tied pig" when they placed him into a transport vehicle and that WITNESS OFFICER #6, WITNESS OFFICER #2 and SUBJECT OFFICER #2 did so again when they removed him from the transport vehicle and carried him into the MPD DISTRICT police station. Lastly, COMPLAINANT alleged that WITNESS OFFICER #2 "pinned" him to the ground as WITNESS OFFICER #4 shackled him and that WITNESS OFFICER #2 later "pinned" him to the floor at the MPD DISTRICT POLICE station. Pursuant to D.C. Code §5-1108(1) on September 1, 2020, a member of the Police Complaints Board dismissed these allegations concurring with the August 19, 2020 determination made by OPC's executive director. *See* Exhibit 2, Dismissal.

2. After COMPLAINANT and the officers exited the building, WITNESS OFFICER #1 attempted to have COMPLAINANT enter a police vehicle but he refused. WITNESS OFFICER #1 then directed COMPLAINANT to sit on the sidewalk. Throughout the encounter COMPLAINANT asked for his “art” or “artwork” repeatedly. In response to the officers several questions, COMPLAINANT asked for his art.
3. While awaiting a different vehicle for transport to AN MPD DISTRICT POLICE STATION, COMPLAINANT is forced by the officers to lie down on the sidewalk in front of THE ADDRESS IN NE, WASHINGTON, DC. COMPLAINANT continually verbally engaged with the several officers surrounding him and appeared to physically resist them. COMPLAINANT continued to ask for his “art” numerous times which he asserted he had with him on the rooftop premises of THE ADDRESS IN NE, WASHINGTON, DC prior to being arrested. COMPLAINANT was placed in ankle shackles by WITNESS OFFICER #4 and SUBJECT OFFICER #2. SUBJECT OFFICER #2 tightened the shackles and remarked, “nice and tight.”
4. As COMPLAINANT lay still in a supine position on the sidewalk with the ankle shackles newly applied and tightened, SUBJECT OFFICER #2 stood on the shackle on COMPLAINANT’s left ankle. COMPLAINANT in response kicked his feet toward SUBJECT OFFICER #2.
5. Seconds thereafter, SUBJECT OFFICER #1 to the immediate right of COMPLAINANT’s right leg stood on COMPLAINANT’s shackled right ankle. SUBJECT OFFICER #1 appeared to maintain his foot on COMPLAINANT’s ankle. COMPLAINANT complained about “Black people” stepping on his feet.
6. After SUBJECT OFFICER #2 stood on COMPLAINANT’s left ankle, COMPLAINANT requested that SUBJECT OFFICER #2 tell him his name. SUBJECT OFFICER #2 responded “Don’t worry about it, COMPLAINANT.”
7. Four officers held COMPLAINANT down on the sidewalk. COMPLAINANT was directed to stop resisting. COMPLAINANT then agreed to sit up. There were approximately six officers surrounding him.
8. During this exchange, WITNESS OFFICER #1 said, “Why am I sweating?” and SUBJECT OFFICER #2 responded, “cause we had to deal with an idiot” referring to COMPLAINANT.
9. For a period of approximately two minutes while awaiting transport and after application of the ankle shackles and after SUBJECT OFFICER #2 stood on COMPLAINANT’s ankle, SUBJECT OFFICER #2 stood to the left of COMPLAINANT’s left leg. There are at least six officers surrounding COMPLAINANT. Throughout these two minutes, SUBJECT OFFICER #2 repeatedly moved his arms back and forth audibly palming his fist within a few feet of COMPLAINANT’s face. SUBJECT OFFICER #2 clenched and unclenched his hands multiple times, as he stood next to COMPLAINANT.

10. WITNESS OFFICER #4 loosened and double locked COMPLAINANT's shackles twice, noting that one of the shackles was tight.
11. After several attempts, the group of officers was able to get COMPLAINANT into a vehicle to transport him to the MPD DISTRICT STATION.
12. COMPLAINANT appeared to have fallen asleep during the ride to the station. After being woken up, COMPLAINANT refused to exit the vehicle. COMPLAINANT again inquired about his art and refused to exit the vehicle. WITNESS OFFICER #6 stated "cowabunga it is then" just before physically removing COMPLAINANT from the vehicle. This officer escorted COMPLAINANT into the station from the area where the police vehicle was parked. SUBJECT OFFICER #2 helped carry COMPLAINANT into the hallway area of the cellblock.
13. As WITNESS OFFICER #6, SUBJECT OFFICER #2 and WITNESS OFFICER #2 carried COMPLAINANT into the station, SUBJECT OFFICER #2 called COMPLAINANT a "fool" and a "stupid fool". WITNESS OFFICER #2 then searched COMPLAINANT while on the floor of the hallway. COMPLAINANT asked why SUBJECT OFFICER #2 called him a fool and SUBJECT OFFICER #2 replied "because you are a fool." COMPLAINANT continued to lie on the floor in the cellblock hallway area.
14. COMPLAINANT again asks SUBJECT OFFICER #2 his name and said, "you don't want me to know you?" SUBJECT OFFICER #2 replied, "I know enough, fool." SUBJECT OFFICER #2 also said, "I don't care."
15. COMPLAINANT again requested SUBJECT OFFICER #2's name as SUBJECT OFFICER #2 attempted to take COMPLAINANT's shoelaces off of his left shoe using his gloved hand. SUBJECT OFFICER #2 replied "don't worry about it." As SUBJECT OFFICER #2 took out a knife, he placed his foot on COMPLAINANT's shoe. SUBJECT OFFICER #2 then took the knife and cuts COMPLAINANT's shoelaces and removed the cut laces with his hands. He placed the knife on the floor and stated "Why are your shoelaces so fucking tight?" SUBJECT OFFICER #2 removed COMPLAINANT's left shoe and COMPLAINANT's left foot falls hard to the floor.
16. SUBJECT OFFICER #2 then grabbed COMPLAINANT's right foot and pulled on the shoe without loosening his shoelaces causing COMPLAINANT's body to slide on the floor. SUBJECT OFFICER's knife was on the floor by COMPLAINANT's ankles when he began pulling COMPLAINANT. COMPLAINANT complained: "That shit hurt, yo. This man fucking me over, yo. Damn, yo." SUBJECT OFFICER #2 grabbed COMPLAINANT's right foot again; COMPLAINANT slid further on the floor. COMPLAINANT screamed in response. SUBJECT OFFICER #2's knife is next located to the immediate left of COMPLAINANT's waist where his pants met his shirt. SUBJECT OFFICER #2 changed position but is not able to remove the shoe. WITNESS OFFICER #2 said to cut COMPLAINANT's shoelaces. SUBJECT OFFICER #2 again pulled on COMPLAINANT's

foot/shoe. COMPLAINANT inquired, “What the fuck is you doing?” Another officer attempted to remove his shoe unsuccessfully. A third officer held COMPLAINANT’s left leg down with his foot. SUBJECT OFFICER #2 continued pulling COMPLAINANT’s right foot. COMPLAINANT complained the “cuffs are super tight.”

17. After additional attempts to remove COMPLAINANT’s right shoe, SUBJECT OFFICER #2 stated, “I’ll cut it. I don’t give a fuck. Don’t move.” SUBJECT OFFICER #2 used his knife to cut COMPLAINANT’s shoe cutting toward COMPLAINANT’s Achilles tendon. The blade of the knife faced toward COMPLAINANT’s heel as SUBJECT OFFICER #2 cut in a sawing motion. COMPLAINANT loudly stated, “What the fuck is you doing, yo?” WITNESS OFFICER #2 suggested using scissors. SUBJECT OFFICER #2 shortly thereafter removed the shoe, threw it on the ground, and said, “fuck your shoe.”
18. COMPLAINANT requested SUBJECT OFFICER #2’s name as he was moved into the cellblock by the officers. No one responded to this request. After the cell is closed, COMPLAINANT asked again for the officer’s name.

IV. DISCUSSION

Pursuant to D.C. Code § 5-1107(a), (b-1), OPC has the sole authority to adjudicate “a citizen complaint against a member or members of the MPD . . . that alleges abuse or misuse of police powers by such member or members, including “...unnecessary or excessive use of force and the use of language or conduct that is insulting, demeaning or humiliating.”

A. USE OF FORCE

“The policy of the Metropolitan Police Department (MPD) is to value and preserve the sanctity of human life at all times, especially when lawfully exercising the use of force. Therefore, MPD members shall use the minimum amount of force that the objectively reasonable officer would use in light of the circumstances to effectively bring a person or incident under control, while protecting the lives of the member or others. When using force, members shall continuously reassess the perceived threat in order to select the reasonable use of force response, or one that is proportional to the threat faced by him [...] or others.” MPD General Order 901.07 Use of Force, (effective November 3, 2017), Part II.

During arrest at THE ADDRESS IN NE, WASHINGTON, DC

When SUBJECT OFFICER #2 stood on COMPLAINANT’s shackled ankle he used unnecessary and disproportionate force against him. COMPLAINANT hadn’t reacted to the ankle shackles being placed on him and tightened when SUBJECT OFFICER #2 stood on his ankle. SUBJECT OFFICER #2 acknowledged that he stood on COMPLAINANT’s ankle. He

asserted that he did so to prevent COMPLAINANT from kicking him. Such use of force was not necessary to bring COMPLAINANT under control as COMPLAINANT lay on the ground, handcuffed, legs shackled and surrounded by at least six armed police officers. Although COMPLAINANT was uncooperative, his legs were still and he was objectively not engaged in assaultive behavior at the time that SUBJECT OFFICER #2 stood on his ankle.² COMPLAINANT's only kicked immediately after SUBJECT OFFICER #2 put his foot and weight on COMPLAINANT's shackled ankle. SUBJECT OFFICER #2's use of force was not reasonable or necessary.

Further, SUBJECT OFFICER #2 failed to double-lock the shackles and tightened them to the extent that WITNESS OFFICER #4 needed to loosen them and another officer had to lock them. This examiner cannot conclude that SUBJECT OFFICER #2's actions were intentional or an act of force however they do demonstrate a disregard for COMPLAINANT consistent with his other actions that night. Per the MPD Use of Force General Order, this failure dictates that an official shall "provide counseling and conduct an administrative investigation as appropriate for policy violations..."

SUBJECT OFFICER #1 stood on COMPLAINANT's right shackled ankle within a minute after SUBJECT OFFICER #2 stood on COMPLAINANT's left ankle. Although SUBJECT OFFICER #1 indicated in his interview with the Office of Police Complaints that he did not recall whether he stood on COMPLAINANT's ankle, he acknowledged his presence on the scene and interaction with COMPLAINANT. The body worn camera footage of WITNESS OFFICER #4 and WITNESS OFFICER #2 captures his action of standing on COMPLAINANT's ankle and appearing to continue to do so. SUBJECT OFFICER #1's actions were not reasonably necessary to control the situation. Again, COMPLAINANT was on the ground, handcuffed, ankles shackled and surrounded by at least six police officers. There were appropriate actions that SUBJECT OFFICER #1 could have taken such as use of his hands to restrain COMPLAINANT. SUBJECT OFFICER #1's use of force was not reasonable or necessary.

At the MPD DISTRICT STATION

SUBJECT OFFICER #2 used a knife to remove COMPLAINANT's shoelaces, pulled on COMPLAINANT's feet/shoes to remove his shoes causing COMPLAINANT to slide several feet on the floor, and attempted to remove COMPLAINANT's right shoe by using a knife cutting toward COMPLAINANT's Achilles tendon. SUBJECT OFFICER #2 took this action while COMPLAINANT was on the floor handcuffed, shackled, and being held by another officer.

² Even if force were needed to bring COMPLAINANT under control at that time, standing on COMPLAINANT's shackled ankle was not a reasonable or proportional use of force.

To begin, SUBJECT OFFICER #2 unnecessarily used a knife to remove COMPLAINANT's shoelaces rather than requesting that one of the at least three other officers locate scissors or otherwise try to de-escalate and reconsider the situation. There was no urgency to remove COMPLAINANT's shoes such that SUBJECT OFFICER #2 had to act quickly and with force. When the first shoe came off, there was nothing creating risk to any officer to justify SUBJECT OFFICER #2's use of force to remove COMPLAINANT's right shoe. Nor did SUBJECT OFFICER #2 attempt other less aggressive tools or measures to remove COMPLAINANT's shoe or attempt to reposition himself or COMPLAINANT. Instead, SUBJECT OFFICER #2 aggressively and in a menacing manner while using unprofessional language, pulled COMPLAINANT several feet across the floor to attempt to remove his right shoe. SUBJECT OFFICER #2 unnecessarily instilled fear in COMPLAINANT's when he took the knife and used a cutting motion toward COMPLAINANT's Achilles tendon and yelled at him "I'll cut it. I don't give a fuck. Don't move."

SUBJECT OFFICER #2 did not place value in the sanctity of COMPLAINANT's life or welfare. He admitted that he was "annoyed" and "ticked off" with COMPLAINANT from the beginning of their interaction at THE ADDRESS IN NE, WASHINGTON, DC, and also at the station. Reasonably, COMPLAINANT perceived that SUBJECT OFFICER #2 was bullying him. Indeed, SUBJECT OFFICER #2 insulted him, stood on his shackled ankle, clenched his hands and palmed his fists in close proximity to his body. SUBJECT OFFICER #2's aggressive behavior culminated in profane language, pulling of COMPLAINANT's body across the floor and use of knife cutting toward COMPLAINANT's body to remove a shoe. While COMPLAINANT was clearly challenging to work with³, SUBJECT OFFICER #2's actions

³ COMPLAINANT's behavior should have triggered an inquiry into whether he was intoxicated or suffered from mental illness and required distinct treatment by the officers. Unfortunately, it does not appear that the subject officers or others actively involved at THE ADDRESS IN NE, WASHINGTON, DC, or the MPD DISTRICT police station considered whether COMPLAINANT had mental health challenges or diagnoses and whether a different approach would have been more appropriate to de-escalate the night's events. Although WITNESS OFFICER #5 suspected that COMPLAINANT was intoxicated and WITNESS OFFICER #7 similarly suspected possible mental health concerns these observations were not apparently communicated to or acted upon by the subject officers.

MPD offers guidance for interacting with people with mental health concerns. *See* MPD General Order 308.04, Interacting with Mental Health Consumers (effective February 9, 2015). Part V. A. provides for a Crisis Intervention Officer to work with a person known or suspected to have mental health concerns.

The General Order further explains that, "[m]ental health consumers may display conduct that is irrational, unpredictable, or threatening. They may not receive or comprehend commands or other forms of communication in the manner that members may expect. They often do not respond to authoritative persons or the display of force."

In this instance, COMPLAINANT exhibited many of these behaviors that should have caused the officers to question his mental health. COMPLAINANT was described as fidgety and fixated on his art. For over an hour, he was non-responsive to most questions replying with an inquiry about his art. He was

cannot be justified. Officers are to be calm in the face of provocation. There was no exigency at that time. SUBJECT OFFICER #2 could have de-escalated his own emotions, taken a brief reprieve, asked a colleague to step in, or chosen a less aggressive alternative. Instead, SUBJECT OFFICER #2 demonstrated a flagrant disregard for COMPLAINANT's person and violation of the standards of conduct of the Metropolitan Police Department. In conclusion, SUBJECT OFFICER #2 used excessive and unreasonable force against COMPLAINANT.

B. LANGUAGE OR CONDUCT

MPD "members shall: [...b]e courteous and orderly in their dealings with the public." Specifically, "[m]embers shall perform their duties quietly, remaining calm regardless of provocation to do otherwise." MPD General Order 201.26 (effective April 5, 2011) Duties, Responsibilities and Conduct of Members of the Department, Part V, Section C Conduct Toward the Public, No. 1. Further, "all members shall [r]efrain from harsh, violent, coarse, profane, sarcastic, or insolent language. Members shall not use terms or resort to name-calling, which might be interpreted as derogatory, disrespectful, or offensive to the dignity of any person." *Id.* at Part V, Section C, 3. Additionally, when requested, members shall give their first and last name and badge numbers in a respectful and polite manner. *Id.* at Section C(1)(e). These principles are also adopted in the standards used for arrest procedures: "prisoners and suspects shall be treated in a fair and humane manner; they shall not be humiliated, ridiculed, taunted, or embarrassed." *Id.* at Part V, Section D Conduct in Arrest Procedures, No. 1(a)(1).

COMPLAINANT alleged that SUBJECT OFFICER #2's conduct toward him was threatening, offensive and humiliating. COMPLAINANT asserted that he felt SUBJECT OFFICER #2 was "bullying" him throughout the evening. COMPLAINANT's assertions are corroborated by SUBJECT OFFICER #2's own body-worn camera footage as well as footage of other officers and the statement of SUBJECT OFFICER #2.

During arrest at THE ADDRESS IN NE, WASHINGTON, DC

SUBJECT OFFICER #2 acknowledged that shortly after his arrival on the scene of COMPLAINANT's arrest that he was "a little upset" and that he believed COMPLAINANT to be "bad news" because he had resisted arrest and caused trouble for his fellow officers. SUBJECT OFFICER #2 described COMPLAINANT as a combative suspect. While at THE ADDRESS IN NE, WASHINGTON, DC, the evidence does not support the conclusion that SUBJECT OFFICER #2 used inappropriate language. However, SUBJECT OFFICER #2 failed to remain calm in the face of COMPLAINANT's provocation or SUBJECT OFFICER #2's perception of him. SUBJECT OFFICER #2 stepped on COMPLAINANT's shackled ankle

uncooperative for an extended period of time. SUBJECT OFFICER #2, exasperated after the hours with COMPLAINANT, described COMPLAINANT as "the most extra dude I've ever dealt with." At no point did the over ten officers involved with COMPLAINANT raise mental health concerns or seek to engage a Crisis Intervention Officer or other mental health professional. Had such a professional been engaged, this complaint might not be before the OPC.

without cause or justification (see discussion above on Use of Excessive or Unnecessary Force). After stepping on his shackled ankle SUBJECT OFFICER #2 along with several other officers encircled COMPLAINANT standing over him as he lay on the ground. For over two minutes SUBJECT OFFICER #2 stood to the left of COMPLAINANT's left leg clenching his hands, swinging his arms in an aggressive motion, palming his fist, and appearing to gesture as though he might hit COMPLAINANT. In conclusion, while at THE ADDRESS IN NE, WASHINGTON, DC, SUBJECT OFFICER #2 violated standards of conduct toward the public and during arrest procedures when he became upset at COMPLAINANT, stepped on COMPLAINANT's shackled ankle, and threatened him through physical gestures.

At the MPD District Police Station

While at the MPD District police station, SUBJECT OFFICER #2 resorted to calling COMPLAINANT "fool" on multiple occasions and refused to respond to COMPLAINANT's several requests for his name. SUBJECT OFFICER #2 also used profanity when he said the word "fuck" on at least three separate occasions. SUBJECT OFFICER #2 used profanity while aggressively pulling on COMPLAINANT's leg and shoe and physically cutting COMPLAINANT's shoelaces and shoe off using his personal knife and cutting toward COMPLAINANT's body (see discussion above on Use of Excessive or Unnecessary Force). SUBJECT OFFICER #2 treated COMPLAINANT in an aggressive, cruel, and inhumane manner. As the General Order on the Duties and Responsibilities of members of the MPD states, "the personal conduct and attitude of the police officer is of paramount importance" to strengthen the relationship between police and the community. Here, SUBJECT OFFICER #2 abused his position of authority and demonstrated a wanton disregard for COMPLAINANT's safety and humanity. In conclusion, SUBJECT OFFICER #2 engaged in conduct and used language toward COMPLAINANT that was insulting, demeaning or humiliating in violation of D.C. Code § 5-1107 and MPD General Order 201.26.

V. SUMMARY OF THE MERITS DETERMINATION

SUBJECT OFFICER #1

Allegation 1: Unnecessary/Excessive Force	Sustained
--	-----------

SUBJECT OFFICER #2

Allegation 1: Unnecessary/Excessive Force	Sustained
Allegation 2: Language or Conduct	Sustained

Submitted on October 29, 2020

Rebecca Goldfrank
Complaint Examiner