BEFORE THE POLICE BOARD OF THE CITY OF CHICAGO

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IN THE MATTER OF THE APPEAL BY [NAME REDACTED], APPLICANT FOR THE POSITION OF POLICE OFFICER, CITY OF CHICAGO.

No. 24 AA 60

(Candidate No. [redacted])

FINDINGS AND DECISION

[Name redacted] (hereinafter referred to as "Applicant") applied for a police officer position with the City of Chicago. In a letter dated July 16, 2024, the Office of Public Safety Administration ("OPSA") gave Applicant written notice of its decision to remove her from the list of eligible applicants for this position ("Eligibility List") due to the results of a background investigation, along with the reason(s) for the disqualification decision ("Notice").

On September 13, 2024 (supplemented on September 14, 2024), Applicant appealed this disqualification decision to the Police Board by filing a written request specifying why OPSA erred in the factual determinations underlying the disqualification decision and bringing to the Board's attention additional facts directly related to the reason(s) for the disqualification decision, pursuant to Section 2-84-035(b) of the Municipal Code of Chicago ("Appeal").

On October 31, 2024, OPSA filed with the Police Board a copy of the Notice and its response to Applicant's Appeal ("Response"). Applicant did not file a Reply. Police Board Appeals Officer Mamie Alexander has reviewed the Notice, Appeal, and Response.

APPEALS OFFICER'S FINDINGS, CONCLUSIONS, AND RECOMMENDATION

Appeals Officer Mamie Alexander, as a result of a review of the above material, submits the following findings of fact, conclusions of law, and recommendation to the Police Board.

Filings by the Parties

Applicant filed a timely appeal as provided by Section 2-84-035(b) of the Municipal

Code of Chicago, and the Response was filed within the time period allowed by the Police Board

Rules of Procedure.

According to the Notice, Applicant was removed from the Eligibility List for the

following reasons:

IV. PRE-EMPLOYMENT INVESTIGATION STANDARDS FOR APPLICANTS TO THE POSITION OF POLICE OFFICER

B. Disqualification Based on Criminal Conduct

- 1. One purpose of the pre-employment investigation is to determine whether the applicant has engaged in criminal conduct. This is important because the police hold a unique position of public trust and are tasked with protecting the public and enforcing the law. Even more than other City employees, Chicago Police Department officers are specifically tasked with and sworn to uphold the law. Therefore, an applicant I be disqualified from consideration for a police officer position if there is evidence that the applicant has engaged in criminal conduct, even if the applicant was never convicted of any criminal offense. Applicants with a history of criminal conduct that falls within the Department's disqualification standards are deemed unable to protect the public and its trust in the police. It is the conduct itself, not the fact that the applicant was convicted, that makes the applicant unsuitable for employment.
- 2. There are various types of proof which indicate criminal conduct, including a record of conviction or an admission that indicates the applicant engaged in criminal activities. A record of conviction or an admission will be prima facie evidence that the applicant engaged in criminal conduct.
- 3. Unlike a record of conviction or an admission, an arrest record merely indicates an allegation of criminal conduct and must be investigated further in order to be the basis for disqualification. When investigating an arrest record, the investigator must, to the extent reasonably possible, secure evidence, including but not limited to statements obtained from interviews with police officers, victims and witnesses, which will be used to determine whether the applicant engaged in disqualifying criminal conduct.
- 4. In describing examples of disqualifying conduct, these Standards may

refer to the Illinois Compiled Statutes. The references to the Illinois Compiled Statues are descriptive only. Any similar federal offense, military offense or offense in any other jurisdiction within the United States (state or local) or any foreign jurisdiction may serve as a basis for disqualification.

5. The Standards are as comprehensive as possible; however, as noted above, they cannot encompass every possible scenru.io. Failure to enumerate any particular offense does not exclude such offense from being the basis for disqualification. Commission of any criminal or quasi-criminal act may result in disqualification from employment as a Police Officer if it is determined that the acts or omissions of the applicant make him or her unsuitable for the position of Police Officer.

7. Other Criminal Conduct

- b) Conduct Indicating Dishonesty
 - 1. Credibility, honesty and veracity are extremely important characteristics for a police officer to possess on and off duty. Honesty is required to ensure the integrity of police operations and investigations and to protect the public and maintain its trust in the police. The pre-employment investigation therefore looks for information that shows that the applicant has a reputation or propensity for truthfulness, is believable and has a personal history free from deceit or fraud.
 - 2. Any conduct demonstrating a reputation or propensity for dishonesty will be grounds for disqualification. Conduct demonstrating a propensity for dishonesty includes but is not limited to conduct that would constitute theft; embezzlement; forgery; false impersonation; identity theft; bribery; eavesdropping; computer crimes; fraud; money laundering; deceptive practices; or perjury.
 - 3. As noted above, an applicant who has engaged in any act falling within the scope of this section that constitutes a felony will be found unsuitable for employment. An applicant who has engaged in any act falling within the scope of this section that constitutes a misdemeanor within the last three (3) years (from the date of PHQ submission), or more than one (1) time in his or her life, will be found unsuitable for employment.

c) Conduct Indicating Violent Tendencies

Police officers are required to act reasonably and professionally at all times and to maintain control over their emotions in the exercise of their duty. These qualities are vital to a police officer's ability to protect the public and its trust in the police. Applicants who have demonstrated a propensity for violence do not meet those requirements. Therefore, any conduct demonstrating a propensity for violence will be grounds for disgualification. Conduct demonstrating a propensity for violence includes but is not limited to, conduct which would constitute murder; kidnapping: sex offenses; assault; battery; aggravated battery; offenses against property; robbery; domestic violence; stalking; disorderly conduct; and mob action. As noted above, an applicant who has engaged in any act falling within the scope of this section that constitutes a felony will be found unsuitable for employment. An applicant who has engaged in any act falling within the scope of this section that constitutes a misdemeanor within the last three (3) years (from the date of PHQ submission), or more than one (1) time in his or her life, will be found unsuitable for employment.

C. Disqualification Based on Driving Record

1. Police officers are regularly required to operate motor vehicles in dangerous situations. They are thus required, to the extent reasonable, to operate vehicles in a careful manner protective of the public. Applicants with a poor driving history are deemed unable to meet this requirement. Therefore an applicant who has a single incident involving reckless driving or driving under the influence of alcohol or other mood altering substances within the last five (5) years (from the date of PHQ submission); more than one DUI or reckless driving incident, regardless of the date of the incident; or any driving-related incidents which resulted in the suspension or revocation of a driver's license on two or more occasions, will be found unsuitable for employment.

D. Disqualification Based on Prior Employment History

1. Police officers are required to work well with other officers, public officials, and members of the public, as well as maintain a professional work ethic. Further, a police officer's ability and willingness to obey orders is critical to the proper functioning and administration of the Chicago Police Department, which, in turn, is vital to the Chicago Police Department's ability to protect the public. A steady employment history is an indication that, among other things, an applicant has the ability to work well with others; follow workplace rules; perform his or her work to acceptable standards; and come to work on time and on a regular basis.

- 2. A poor employment history will result in disqualification for the position of Police Officer. An applicant who has been discharged or disciplined for offenses which include any act of dishonesty, incompetence, insubordination, absenteeism tardiness, or failure to follow regulations will be found unsuitable for employment.
- 3. Further, an applicant who, during previous employment, has engaged in any conduct that would have violated the Chicago Police Department's Rules and Regulations had the applicant been a Chicago Police Department employee, may be found unsuitable for employment. In addition, an applicant with a history of sporadic employment evidenced by frequent changes in employment of short duration may be found unsuitable for employment.

E. Disqualification Based on Membership or Association with Criminal Organizations

- 1. Police officers are charged with upholding the law and defending the public from criminal activity. An applicant who is a member or affiliate of any criminal organization, including but not limited to a street gang, will therefore be found unsuitable for employment.
- 2. Prior membership or affiliation in a criminal organization may be grounds for disqualification. An applicant who is a former member or affiliate of a criminal organization will be required to produce acceptable evidence to show that the membership in or affiliation with the criminal organization ceased for a period of five (5) years (from the date of PHQ submission) or more prior to the date of application, and that the applicant has no current membership or affiliation with any criminal organization at the time of processing or hire.

F. Disqualification Based on Indebtedness

1. Police officers are occasionally required to handle significant amounts of currency in the execution of their duties. Further, police officers with significant indebtedness are considered particularly susceptible to co1Tuption and coercion. Therefore, any applicant who has current personal debts not related to a business, mortgage loans, student or auto loans, or medical bills the total of which is in excess of fifty percent (50%) of the annual starting salary of a Chicago Police Officer at the time of application, or at any point during the hiring process, will be found unsuitable for employment. Regardless of the source of debt, an applicant who has defaulted on any loan or has an inconsistent payment pattern may be found unsuitable for employment. 2. Any applicant who owes a debt to the City of Chicago at any time during processing will be given a reasonable amount of time to clear those debts. Any applicant who owes a debt to the City of Chicago at the time of hire will be found unsuitable for employment.

G. Disqualification Based on Other Conduct

- 1. Police officers are required to show respect for authority, uphold the law, and defend the dignity and rights of the public. Therefore, any applicant who has engaged in conduct that exhibits a pattern of repeated abuse of authority; lack of respect for authority or law; lack of respect for the dignity and rights of others; or a combination of traits disclosed during the pre-employment investigation that would not by themselves lead to a finding that an applicant is unsuitable for employment, but when taken as a whole, exhibit that the applicant is not suited for employment as a police officer, will be found unsuitable for employment.
- 2. Any applicant who has engaged in conduct including but not limited to solicitation, conspiracy or attempt will be held to the same standard with respect to any criminal offense, which if committed, would result in disqualification.
- 3. Any applicant who has engaged in conduct indicating discrimination or bias based on race, color, sexual orientation, gender identification, age, religion, national origin, ancestry, marital status, parental status, disability or any other protected class will be found unsuitable for employment.
- 4. Any applicant who has engaged in conduct affecting public health, safety and decency, including but not limited to disorderly conduct, illegal gambling, child endangerment or other offenses may be found unsuitable for employment.
- 5. Any applicant who engages in conduct which could constitute an aggravated offense, including but not limited to, deception involving certification of disadvantaged business enterprises; contributing to the delinquency of a minor; conduct involving public contracts or other conduct will be found unsuitable for employment.

H. Disqualification Based on False Statements or Omissions and/or Failure to Cooperate in the Application Process

1. Honesty and credibility are vital characteristics for a police officer to possess in order to ensure the integrity of police operations and investigations and to protect the public and maintain its trust in the police. Honest and complete answers to background questions asked of applicants during the application process, as well as full cooperation with the application process, are thus extremely important to

the maintenance of the Chicago Police Department's force and the integrity of its hiring process. Therefore, applicants are required to cooperate with the City of Chicago and the Chicago Police Department in all matters relating to the processing of their applications for the position of Police Officer. Any applicant who fails to cooperate with the City of Chicago and its Police Department in processing his or her application for the position of Police Officer shall be disqualified. Prohibited conduct within this category includes, but is not limited to: failure to provide any required information; failure to respond to requests for information in a timely manner; failure to respond to requests for interviews in a timely manner; failure to fully disclose all known information requested, whether it is beneficial or prejudicial to the applicant; making false or misleading statements in connection with any part of the application process; failing to include any material or relevant information requested by the City of Chicago or the Chicago Police Department; or failing to appear for scheduled appointments or processing sessions as directed.

2. Once employed, any employee who is found to have engaged in any conduct prohibited in the paragraph above will be subject to discipline, up to and including discharge.

I. Disqualification Based on Polygraph Results

Honesty and credibility are vital characteristics for a police officer to possess in order to ensure the integrity of police operations and investigations and to protect the public and maintain its trust in the police. Honest and complete answers to background questions asked of applicants during the application process, as well as full cooperation with the application process, are thus extremely important to the maintenance of the Chicago Police Department's force and the integrity of its hiring process. Applicants may therefore be given a polygraph examination. The polygraph examination is used as a tool to elicit information and verify responses elicited during the application process and to verify information collected during the pre-employment investigation. The results of the polygraph examination will be used as part of the hiring process in determining an applicant's suitability for the position of Police Officer. Admissions made during a polygraph examination, or an indication of deception, along with other factors, may be used as a basis for disqualification.

CPD Rules and Regulations:

Rule 1: Violation of any law or ordinance.

Rule 2: Any action or conduct which impedes the Department's efforts to achieve its policy and goals or brings discredit upon the Department.

Rule 9: Engaging in any unjustified verbal or physical altercation with any person, while on or off duty.

Rule 47: Associating or fraternizing with any person known to have been convicted of any felony or misdemeanor, either State or Federal, excluding traffic and municipal ordinance violations.

Applicant was disqualified by OPSA based on criminal conduct, criminal conduct indicating dishonesty, conduct indicating violent tendencies, driving record, prior employment history, membership or association with criminal organizations, indebtedness, other conduct, false statements or omissions and/or failure to cooperate with the application process, and polygraph results.

Applicant signed a sworn affidavit stating that she had not engaged in any criminal conduct. However, Applicant is the named suspect in police reports alleging assault, obstructing identification from a police officer, child abandonment, domestic battery, and telephone harassment, with the most recent allegation occurring in 2023.

In addition, Applicant's driving abstract revealed that her license was suspended from 2014-2019, and she received eight citations. Several of the citations were for driving on a suspended license and driving without insurance. Applicant was also arrested and admitted to providing a police officer with false identification to avoid a traffic warrant.

Applicant has been in relationships and has children with three known gang members, and two of her children's fathers are convicted felons. Four of Applicant's eight children are in foster care, and a judgment for removal of two of Applicant's sons (ages 5 and 7) was entered after they were found home alone in an apartment with trash and debris scattered on the floor and in the sink.

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Furthermore, Applicant has filed for bankruptcy five times, her nursing license was suspended for failure to pay income taxes, and she was terminated from her employment at Care Initiatives in Lantern Park. Applicant has two evictions on her record and revealed to the R/I in January, 2024 that she was currently pregnant by her ex-boyfriend, a self-admitted gang member.

Appeal and Response

Applicant appeals the decision, stating that several of the case reports never amounted to criminal charges and were therefore not punishable by law. She states that the one case where she was criminally charged (domestic battery) occurred due to her actions being influenced by an abusive partner. Applicant states that her driving citations were due to financial hardship, which was the result of raising two small children and working as a healthcare professional in a poverty-stricken neighborhood.

Applicant claims that her termination while working as a nurse at Lantern Park was voluntary, and she resigned due to racial disparities. Applicant acknowledges her past relationships with felons and says that she is no longer affiliated with them. Applicant denies abandoning her children, stating that there was a miscommunication with her mother who was babysitting them at the time. Applicant asserts that all of her bankruptcy cases were settled, and that she is currently on a payment plan for her tickets.

OPSA's Response states that the appeal was reviewed, and OPSA relies upon the facts and evidence relating to the disqualification contained in Applicant's file. OPSA maintains that the pre-employment disqualification standards under which Applicant's disqualification decision were based upon are clear (namely, Disqualification based on Criminal Conduct, Other Criminal Conduct Indicating Dishonesty, Conduct Indicating Violent Tendencies, Driving Record, Prior

Employment History, Membership or Association with Criminal Organizations, Indebtedness, Other Conduct, False Statements or Omissions and/or Failure to Cooperate with the Application Process, and Polygraph Results). OPSA states that the evidence in Applicant's file supports its decision to disqualify Applicant from hiring, and OPSA is within its right to do so, citing Apostolov v. Johnson, 2018 IL App (1st) 173084; ¶¶ 24, 31 and Johnson v. O'Connor, 2018 IL App (1st) 171930, ¶¶ 16-17, 20.

OPSA adds that Applicant's multiple instances of violence, neglect, traffic convictions, and court interventions, along with her repeated personal interactions with members of Criminal Organizations are extremely troubling and grounds for disqualification. OPSA stresses that Applicant's past actions revealed that had she been in their employ, she would have been in violation of multiple CPD Rule violations and state laws, each of which would serve by themselves as grounds for disqualification.

Findings of Fact

Filings were timely.

OPSA provided the factual basis for its decision to disqualify Applicant and remove her name from the eligibility list. It determined that Applicant's criminal conduct, other criminal conduct indicating dishonesty, conduct indicating violent tendencies, driving record, prior employment history, membership or association with criminal organizations, indebtedness, other conduct, false statements or omissions and/or failure to cooperate with the application process, and polygraph results were grounds for disqualification.

OPSA articulated the Standards by which the conduct was assessed by section and paragraph, and articulation of the Standard gives reasonable notice as to the basis for

disqualification.

Criminal Conduct

Applicant signed a sworn affidavit stating that she has not engaged in any criminal

activity. However, Applicant was a named subject in the following case reports:

- RD#: [Redacted] Date: 06 Apr 2023 UCR: 0560 - Assault – Simple
- RD#: [Redacted]
 Date: 26 Jun 2015
 UCR: 3731 Interference with Public Officer Obstructing Identification
- RD#: [Redacted]
 Date: 11 Feb 2012
 UCR: 1755 Offense Involving Children Child Abandonment
- RD#: [Redacted]
 Date: 25 Feb 2010
 UCR: 0486 Battery Domestic Battery Simple
- RD#: [Redacted] Date: 17 Jan 2006 UCR: 2825 - Other Offense - Harassment by Telephone

Applicant states that being named in police reports is not the same as being criminally

charged, and says that no evidence was submitted for those cases. However, Applicant admits

that she was charged in the domestic battery case, and states that she was being influenced by a

physically and mentally abusive partner.

Criminal Conduct Indicating Dishonesty

Applicant admitted during her polygraph examination that she provided the police with

false identification to avoid an arrest warrant in the following matter:

720 ILCS 5.0/31-4.5A

- RD#: [Redacted]
 - Date: 26 Jun 2015
 - UCR: 3731 Interference with Public Officer Obstructing Identification

Charge:	Obstructing Identification
Arrest Date:	June 26, 2015
Agency:	Chicago Police Department
Case #:	[Redacted]
Disposition:	Stricken with Leave to Reinstate

Conduct Indicating Violent Tendencies

Applicant was a named subject in the following case reports:

- RD#: [Redacted]
 Date: 06 Apr 2023
 UCR: 0560 Assault Simple
- RD#: [Redacted]
 Date: 25 Feb 2010
 UCR: 0486 Battery Domestic Battery Simple
- RD#: [Redacted]
 Date: 17 Jan 2006
 UCR: 2825 Other Offense Harassment by Telephone

Driving Record

A search of Applicant's driver's license and plate numbers revealed that Applicant has

eight driving citations which include driving on a suspended license and driving without

insurance:

Driving Citation #1-2:07/27/2005 - No Valid Regis/Operate Uninsured Motor Vehicle, Cook County, IL Ticket#: TG531235/TG531236

Issuing Agency: Chicago Police Department Result: Terminated Satisfactorily

Driving Citation #3-4:10/23/2006 - Improper Land Usage/Driving on Suspended License, Cook County, IL Ticket#: YJ192627/YJ192628

Issuing Agency: Oak Lawn Police Department Result: Plea of Guilty, Supervision and paid fine.

Driving Citation #5: 02/17/2014- Violation of Operating Uninsured Motor Vehicle. Cook County, IL
Ticket#: TH022378
Issuing Agency: Chicago Police Department
Result: Plea of Guilty, Supervision, Failure to Appear Suspension.

Driving Citation #6: 03/16/2015 Driving on Suspended License Ticket#: YB552136 Issuing Agency: Chicago Police Department Result: Plea of Guilty, Supervision (Terminated Unsatisfied), Candidate currently has an outstanding balance of \$247.

Driving Citation #7-8:12/06/2016 - Driving During a Suspension- Revocation Violation of Operating Uninsured Motor Vehicle Cook County, IL

Ticket#: 39218934/39218933 Issuing Agency: Unknown Result: Candidate paid fine and obtained SR22.

Suspension #1:	SR22 Insurance Required.
Date Suspended: Date Reinstated:	07/06/2014 04/20/2019
Conviction #1:	Driving During a Suspension/Revocation
Arrest Date:	12/06/2016
I most Dute.	12/00/2010
Sup Date:	02/23/2017

Applicant asserts that the citations accumulated due to financial hardship.

Prior Employment History

Applicant was terminated from her role as a nurse at Care Initiatives Lantern Park in Coralville, Iowa, but failed to disclose the termination. In her Appeal, Applicant claims that her termination from Lantern Park was voluntary, and she resigned due to racial disparities.

Membership or Association with Criminal Organizations

Applicant has been in a relationship and had children with two convicted felons and one individual with a misdemeanor conviction. All individuals are affiliated with street gangs. Applicant admitted in her polygraph examination that her ex-husband [Name redacted] is a member of the Black P. Stone Nation street gang. Another ex-boyfriend, [Name redacted], also has gang ties, indicated by a Black P. Stone tattoo. A third ex-boyfriend, [Name redacted], has admitted to being part of the New Breed street gang. Applicant states that she was unaware of their criminal history at the time, and that she is no longer affiliated with them. She also adds that [Name redacted] is currently serving a sentence for murder, and that she and [Name redacted] (the father of her last three children) are not currently in a relationship.

Indebtedness

Applicant filed bankruptcy five times and has two evictions on her record. In addition, Applicant's nursing license(s) was suspended in 2023 for failing to pay income taxes, and she accumulated five unpaid municipal tickets totaling \$563.00.

Applicant stated that she filed bankruptcy in her adult life to "escape traffic debt" and get a fresh start so that she could drive legally. Applicant stated that she currently has a valid driver's license and her vehicle is insured. Applicant also shared that she is no longer in litigation with her landlord, as the eviction case settled, and she moved out.

Other Conduct

Four of Applicant's eight children are in foster care. On February 11, 2012, Applicant was reported for child abandonment after her five-and seven-year-old sons were found alone in her apartment with trash and debris on the floor and in the sinks. Additionally, a 2018 legal

notice to Applicant was published in the Chicago Tribune regarding the termination of her parental rights for three of her children.

Applicant maintains that she did not abandon her children, and says that after returning home late from work, her mother, who had to leave for work, called the police. Applicant stated that she does not remember the condition of her home but recalls that two young children can be messy.

Applicant argues that the termination of her rights was solely due to her ex-husband's violent tendencies. She stresses that the children were never harmed, and in fact, her 17-year-old son has recently returned to live with her.

False Statements and/or Omissions to Cooperate in the Application Process

Applicant was asked to provide several documents including proof of a valid city sticker and vehicle insurance for her vehicle on April 30, 2024. As of May 13, 2024, Applicant had not provided a valid city sticker or proof of vehicle insurance.

Polygraph Results

In her polygraph examination, Applicant admitted to providing false identification to police during a traffic stop because she had a pending warrant.

Conclusions of Law

Section IV. of the Bureau of Support Services Special Order contains the Pre-Employment Investigation Standards for Applicants to the Position of Police Officer ("Standards") that are applicable to this Appeal.

Based on the details provided in the Notice and Response, Applicant's past conduct contains numerous grounds for disqualification based on Sections B(1-5), B(7)(b)(1-3), B(c),

C(1), D(1-3), E(1-2), F(1-2), G(1-5), H(1-2), and I of OPSA's Standards, along with at least four CPD Rules and Regulations and numerous local and state laws.

No additional facts, evidence or arguments were submitted in Applicant's Appeal that support her contention that OPSA erred in disqualifying Applicant based on her criminal conduct, criminal conduct indicating dishonesty, conduct indicating violent tendencies, driving record, prior employment history, membership or association with criminal organizations, indebtedness, other conduct, false statements or omissions and/or failure to cooperate with the application process, and polygraph results.

In considering and weighing the numerous grounds for disqualification that were presented, Applicant has failed to show, by a preponderance of the evidence, that the decision to remove her from the Eligibility List was erroneous.

Recommendation

Based on my findings and conclusions set forth above, I recommend that the decision to remove Applicant from the list of eligible applicants for the position of probationary police officer be **affirmed**.

Respectfully Submitted, /s/ Mamie A. Alexander

Mamie Alexander Appeals Officer

Date: January 13, 2025

POLICE BOARD DECISION

The members of the Police Board of the City of Chicago have reviewed the Appeals Officer's findings, conclusions, and recommendation.

The Police Board hereby adopts the Appeals Officer's findings, conclusions, and recommendation by a vote of 6 in favor (Kyle Cooper, Claudia Badillo, Steven Block, Kathryn Liss, Andreas Safakas, and Justin Terry) to 0 opposed.

NOW THEREFORE, IT IS HEREBY ORDERED that the decision to remove [Name

redacted] from the list of eligible applicants for the position of probationary police officer is

affirmed.

This decision and order are entered by a majority of the members of the Police Board:

Kyle Cooper, Claudia Badillo, Steven Block, Kathryn Liss, Andreas Safakas, and Justin Terry.

DATED AT CHICAGO, COUNTY OF COOK, STATE OF ILLINOIS, THIS $16^{\rm th}$ DAY OF JANUARY 2025.

Attested by:

/s/ KYLE COOPER President

/s/ MAX A. CAPRONI Executive Director