Special Committee on Impeachment Inquiry

Report Addressing
Franklin County State's Attorney John Lavoie

Pursuant to House Resolution 11 of 2023

Prepared by the Office of Legislative Counsel

August 25, 2023

Table of Contents

A. Charge of the Special Committee on Impeachment Inquiry

2023 House Resolution 11

House resolution relating to establishing the Special Committee on Impeachment Inquiry and granting it investigatory powers

Offered by: Representatives LaLonde of South Burlington and McCarthy of St. Albans City

Whereas, the results of an independent investigation completed in April 2023 substantiated allegations that Franklin County State's Attorney John Lavoie has engaged in a pattern of harassment and discriminatory conduct toward his employees and others, and

Whereas, recent concerns regarding financial improprieties in office have been raised regarding Franklin County Sheriff John Grismore, who was previously captured on video while a captain in the Franklin County Sheriff's Department kicking a handcuffed prisoner who was being held by the Department, now therefore be it

Resolved by the House of Representatives:

That the Special Committee on Impeachment Inquiry is established to investigate whether sufficient grounds exist for the House of Representatives to exercise its constitutional power to impeach Franklin County State's Attorney John Lavoie or Franklin County Sheriff John Grismore, or both, and be it further

Resolved: That the Special Committee shall be composed of seven members of the House of Representatives, not all from the same political party, who shall be appointed by the Speaker of the House, and be it further

Resolved: That the Special Committee is authorized to meet during the 2023–2024 biennium, including during adjournment thereof, shall adopt rules of procedure, and shall report to the House of Representatives such resolutions, articles of impeachment, or other recommendations as the Special Committee deems proper, and be it further

Resolved: That the Special Committee is authorized to require, by subpoena or otherwise, the attendance and testimony of any person and the production of documents and other items of any kind, and be it further

Resolved: That the Special Committee or any member so designated by the Special Committee may administer oaths or affirmations to any witness, and be it further

Resolved: That the Special Committee may hire investigators and may request assistance from other governmental entities as needed to assist the Special Committee in conducting its investigations.

B. Members of the Special Committee on Impeachment Inquiry

Rep. Martin LaLonde, Chair, Chittenden-12

Rep. Michael McCarthy, Vice Chair, Franklin-3

Rep. Matthew Birong, Addison-3

Rep. Carolyn Branagan, Franklin-1

Rep. Thomas Burditt, Rutland-2

Rep. Karen Dolan, Chittenden-22

Rep. Kelly Pajala, Windham-Windsor-Bennington

C. Background of Impeachment Investigation

In March of 2023, the Vermont Department of State's Attorneys and Sheriffs (Department) hired a law firm to investigate the Franklin County State's Attorney's Office after several employees at the Office filed complaints with the Department regarding workplace conditions related to the actions or behavior of Franklin County State's Attorney John Lavoie. The law firm Paul Frank + Collins interviewed multiple employees of the Franklin County State's Attorney's Office to review and verify the allegations against State's Attorney Lavoie. On April 27, 2023, Paul Frank + Collins issued a memorandum to the Department summarizing the results of its investigation (see Attachment A).

The Paul Frank + Collins Report found that State's Attorney Lavoie engaged in a pattern of disparaging remarks and offensive conduct in the Franklin County State's Attorney's Office, much of which targeted individuals based on legally protected characteristics. The report further concluded that employees found the conduct to be offensive and unwelcome. The report also found that State's Attorney Lavoie's behavior negatively impacted the terms and conditions of employment in the Franklin County State's Attorney's Office. Based on these findings, the Executive Committee of the Department of State's Attorneys and Sheriffs, with the concurrence of those State's Attorneys who are not on the Executive Committee (with the exception of State's Attorney Lavoie), asked Mr. Lavoie to resign. Upon Mr. Lavoie's refusal to resign, the Department of State's Attorneys and Sheriffs asked the General Assembly to initiate impeachment proceedings to investigate the allegations against State's Attorney Lavoie.

On May 11, 2023, the Vermont House of Representatives adopted House Resolution 11 establishing a Special Committee on Impeachment Inquiry. House Resolution 11 cited the results and conclusion of the Paul Frank + Collins investigation. The Resolution then granted

the Special Committee powers to investigate whether sufficient grounds exist for the House of Representatives to exercise its constitutional power to impeach Franklin County State's Attorney John Lavoie.

D. Summary of the Special Committee Authority and Actions

The Vermont Constitution authorizes the House of Representatives to "order impeachments" and "impeach state criminals," and it makes "[e]very officer of State, whether judicial or executive, … liable to be impeached by the House." The Vermont Constitution also requires "[e]very officer, whether judicial, executive, or military, in authority under this State, before entering into the execution of office," to take an oath or affirmation of allegiance to the State and an oath or affirmation of office. The oath or affirmation of allegiance requires the officer to swear or affirm that the officer "will be true and faithful to the State of Vermont, and that [the officer] will not, directly or indirectly, do any act or thing injurious to the Constitution or Government thereof." The oath or affirmation of office requires the officer to swear or affirm that the officer "will faithfully execute" the duties of the office "and will therein do equal right and justice to all persons, to the best of [the officer's] judgment and ability, according to law."

On May 16, 2023, pursuant to House Resolution 11 and the Constitutional Authority of the House of Representatives, Speaker of the House Jill Krowinski appointed the members of the Special Committee on Impeachment Inquiry (see section B of this report). On May 23, 2023, the Special Committee convened. At that meeting, the Special Committee reviewed the impeachment process and its authority under House Resolution 11 and the Constitution. The Special Committee also adopted procedures and rules for its operation as authorized by House Resolution 11.

After convening on May 23, the Special Committee met 13 times to investigate the allegations against State's Attorney John Lavoie. The Special Committee first reviewed the results of an investigation of the Franklin County State's Attorney's Office conducted by the law firm Paul Frank + Collins for the Department of State's Attorneys and Sheriffs. The Special Committee then took testimony from 31 witnesses regarding the allegations and findings in the Paul Frank + Collins report, the conduct of State's Attorney Lavoie, and the management and functioning of the Franklin County State's Attorney's Office.

E. Recommendations and Final Action

On August 22, 2023, State's Attorney Lavoie informed John Campbell, the Executive Director of the Department of State's Attorneys and Sheriffs, that he will resign his position as Franklin County State's Attorney effective September 1, 2023. Governor Scott was informed of Mr. Lavoie's notice of resignation. The Governor accepted Mr. Lavoie's resignation on August 22, 2023.

Although the Special Committee has authority under both House Resolution 11 and the Vermont Constitution to continue to pursue impeachment of State's Attorney Lavoie, the Special Committee concludes that, due to his resignation, the Special Committee should terminate its investigation and halt any further impeachment actions against State's Attorney Lavoie. During its investigation, the Special Committee took extensive testimony and expresses deep gratitude to the many witnesses who were willing to participate in this difficult process. Because Mr. Lavoie has chosen to resign, the Special Committee finds that it would not be in the best interests of the State to impose additional burdens and stress on witnesses, nor to expend additional State resources involved in continuing the investigation. Therefore, the Special Committee

recommends to the Vermont House of Representatives that no further action should be taken against Mr. Lavoie at this time.

The Special Committee encourages the Department of State's Attorneys and Sheriffs to expeditiously implement a succession plan for the leadership of the Franklin County State's Attorney's Office until the Governor appoints a person to fill the vacant State's Attorney position for that Office. The Department also should provide the additional resources to the Franklin County State's Attorney's Office necessary to reduce the disruption during the transition period and to support the staff of the Office.

The Special Committee also concludes that it will maintain the confidentiality of the testimony and documents received in executive session to protect the privacy of individuals involved.

Attachment A: Paul Frank + Collins FCSA Office Investigative Report (Redacted)

PAUL FRANK + COLLINS ATTORNEYS

802.658.2311
802.658.0042

[redacted]

MEMORANDUM

To: John Campbell & Annie Noonan

From: Kristina R. Brines & Kerin E. Stackpole

Re: FCSAO Investigative Report

Date: April 27, 2023

Several employees of the Franklin County State's Attorney Office (FCSAO) brought concerns regarding State's Attorney John Lavoie to the attention of Annie Noonan, Labor Relations & Operations Director. The concerns primarily related to SA Lavoie's conduct and comments in the workplace.

We were engaged to conduct a fact investigation regarding the complaints about SA Lavoie. Below is a summary of the investigative process, the employees' allegations, and our findings.

I. Investigative Process

During the course of the investigation, we interviewed the following individuals on the following dates.

Witness	Position	Date	Interviewer
[redacted]			

ONE CHURCH STREET P.O. BOX 1307 BURLINGTON, VT 05402-1307
KENDALL SQUARE 945 FIRST STREET, SUITE 1800 CAMBRIDGE, MA 02142 | 186 US OVAL PLATTSBURGH, NY 12903

[redacted]

Interviews were primarily held via videoconference, but those of [redacted] and John Lavoie were conducted in person. All witnesses were asked (but not required) to keep the interview confidential, and all witnesses were informed that retaliation, by or against them, based on participation in the investigation was strictly prohibited. All witnesses were instructed that retaliation should be reported to Ms. Noonan.

[redacted]

II. Allegations & Findings

Certain FCSAO employees collectively brought concerns forward in a telephone call with Ms. Noonan. The allegations can generally be grouped into the following descriptions:

- Discriminatory comments attributed to SA Lavoie;
- SA Lavoie's general poor treatment of [redacted]; and
- [redacted] poor treatment of staff.

Based on the initial reports and information gathered during the course of this investigation, there was no allegation that [redacted] engaged in discriminatory or other unlawful conduct. This report is accordingly focused on SA Lavoie's conduct.

The allegations raised regarding SA Lavoie's conduct relate to a number of FCSAO employees, and to a wide range of characteristics protected by State and Federal anti-discrimination laws. Specific allegations and findings are grouped below based on the related protected characteristic.

Some allegations were made in the initial report to Ms. Noonan, and some were made during witness interviews.

As an initial matter, witnesses who have been employees for a longer period of time noted that conduct of the nature reported below has been occurring for years. Certain witnesses have even participated in the behavior in the past. The prior State's Attorney, who held office until Fall of 2022, allowed some of it to go on, but he did limit the behavior and made it stop at some point. Since SA Lavoie has taken office, the conduct has gotten much worse, and there is no limitation on it. In addition, some newer and younger employees have joined the office, and it is clear to the longer term employees that the conduct is having a much more significant impact on them. Those employees who had participated in the past have begun to feel much more uncomfortable in the past several months. Banter that had been accepted to a degree has felt more targeted, prevalent, and damaging.

a. Sex

Allegation: SA Lavoie regularly refers to [redacted] as "[redacted]whore" or some variation thereof.

Finding: We find that SA Lavoie regularly uses the name "[redacted]whore" to refer to [redacted] Various witnesses described particular instances in which he has said it. He will say "where's [redacted]whore" or "when [redacted]whore gets here, don't let her leave." SA Lavoie admitted that this is his nickname for [redacted], but he considers the use of it to be playful.

In January of this year, when he was looking for [redacted], SA Lavoie entered the office common area and asked loudly "where is that fucking slut bag?" SA Lavoie denies saying this phrase, but indicates that he is "not sure" whether he has called [redacted] a slut.

Allegation: SA Lavoie has used the "c word" in the office.

Finding: We find that this has happened, but not on a regular basis. SA Lavoie denied using the term, stating that it would be past a line he would not cross. However, two credible witnesses have specifically heard him use this term.

Allegation: SA Lavoie picked up a picture of [redacted] boyfriend and wiped it on his backside after laughing and saying that her boyfriend looks like a woman.

Finding: SA Lavoie indicated that [redacted] was complaining about the fact that her boyfriend was away, and he picked up a framed photo of her boyfriend and said that it was a poor photo and that [redacted] boyfriend looked like an old woman. He does not recall wiping the photo on his backside, but [redacted] was credible on this point. We find that the incident occurred as alleged. In addition, [redacted] asked him to stop and said "enough" even before SA Lavoie wiped the photo on himself.

Allegation: On March 13, SA Lavoie pulled on [redacted] badge, which was on a lanyard around her neck. Her badge broke off and he stuffed it down the top of her dress.

Finding: This was confirmed by SA Lavoie and other witnesses. [redacted] indicated that she did not react outwardly at the time, but it was upsetting and humiliating to her.

Allegation: The day before [redacted] was scheduled to have her braces removed, SA Lavoie stated "I bet your boyfriend is happy you are getting them off."

Finding: We find that this likely occurred. There were no witnesses to the conversation, and SA Lavoie denied making the comment, but [redacted] was credible in her description of the interaction.

Allegation: SA Lavoie made a comment about "magnificent boobs" in front of other employees.

Finding: In January, SA Lavoie and [redacted] were having a conversation about SA's [redacted] As [redacted] walked through the office common area, SA Lavoie said to [redacted] "for all of [redacted] issues, she has magnificent boobs." While SA Lavoie initially denied making any comments at all about breasts, he then retracted and said that he perhaps has made comments abou[redacted] breasts.

Allegation: When [redacted] asked SA Lavoie what she should have for lunch one day, he responded by pinching her midsection and saying "I don't think you need to eat lunch today."

Finding: [redacted] is a [redacted] year old woman who is considering a legal career. During her interview, [redacted] credibly relayed that on January 3, 2023, she was discussing what to have for lunch.[1] She reports that she was very hungry so was excited to think about which option to get. She turned to SA Lavoie and said "What should I get for lunch today – KFC or Taco Bell?" SA Lavoie stood in front of [redacted], reached with his right hand to her left side underneath her armpit, about two ribs from her breast area and grabbed her. As he did that, he said "I don't think you need to eat lunch today." [redacted] first went to [redacted] office crying, and later went to [redacted] very upset because she thought that she was fat. When she did get lunch, she chose a healthier option and then threw it away. She cried through lunch and later saw a school counselor about the incident. SA Lavoie denied that that this incident occurred.

[1] [redacted]

[redacted]

[redacted]
ril 27, 2023
Page 5

Allegation: In response to a conversation about Peloton treadmills, SA Lavoie stated to [redacted] "oh yeah, those are for fat people like you."

Finding: We find that SA Lavoie likely made this statement while [redacted] was speaking with [redacted] about getting a Peloton treadmill. [redacted] went to [redacted] the next day and said "he made me cry again." SA Lavoie denied that this interaction occurred.

Allegation: [redacted] had back pain, and she informed SA Lavoie that [redacted] had offered to walk on it. SA Lavoie responded "oh, you don't want that."

Finding: [redacted] and [redacted] had a conversation privately earlier in the day, when [redacted] offered to walk on her back to help with the back pain. [redacted] said that she was going to see [redacted] r, but that she would otherwise accept that offer. Later that day, [redacted] and SA Lavoie were discussing [redacted] back, and SA Lavoie said "why don't you have [redacted] walk on your back?" [redacted] responded by saying that [redacted] had already offered, and SA Lavoie said "oh, you don't want that." SA Lavoie confirmed that he made the comment, but he does not remember who he was referencing. In his interview, he stated that he was trying to make a joke by saying "you don't want a normal size person, you want a small Asian woman." He explained that this mirrors the stereotypes about massage.

SA Lavoie's comments regarding [redacted] body have had a significant impact on her. On one occasion, SA Lavoie started to say something about [redacted] body, and [redacted] stopped him. [redacted] went outside and cried, and [redacted] came to comfort her.

Allegation: SA Lavoie made a comment that [redacted] takes a while to get places because she is a large woman.

Finding: During a jury trial in February 2023 regarding sexual assault, SA Lavoie was in the State's Attorney's room at the courthouse. The victim and [redacted] were in the room. SA Lavoie asked the victim where [redacted] was and was told that she was filing something and would be back shortly. SA Lavoie said to the victim "she is a larger woman so it takes her longer to get places." He then said "she is not small like you." SA Lavoie indicated that he meant that [redacted] is tall, but we did not find this to be credible. He did not recall comparing her size to that of the victim.

Allegation: SA Lavoie made a motion like an elephant's trunk in reference to [redacted]

Finding: [redacted] confirmed that SA Lavoie made this gesture when he was speaking about [redacted]. SA Lavoie denied doing so, but we find [redacted] version more credible.

Allegation: SA Lavoie referred to two women named [redacted] as "the Double D's."

Finding: In February, [redacted] was in her office speaking with [redacted], a therapist who works in the space next door to the FCSAO office. SA Lavoie walked in and said "oh look, it's the double D's." [redacted] later relayed the incident to [redacted], and was very upset. SA Lavoie indicated that he did not recall saying it, but that if he did, he was not referring to bra sizes.

b. Sexual Orientation

Allegation: SA Lavoie called [redacted] a "carpet muncher" when he learned that she had taken a vacation cruise with a female friend.

Finding: We find that this occurred as alleged. While SA Lavoie denied using the phrase, [redacted] reported the interaction contemporaneously to other employees. She was very upset, and for some witnesses, this conduct had the most impact on their perception of the workplace.

Allegation: Prior to the 2022 State's Attorney election, SA Lavoie said to [redacted] that his opponent would not win if farmers "find out what he is." When [redacted] responded, "what, a defense attorney?," SA Lavoie said "no – gay."

Finding: This alleged statement was made while SA Lavoie and [redacted] were driving together, with no other passengers in the vehicle. [redacted] was credible in her recounting of the event. SA Lavoie denied making the statement. We find that it more likely occurred than not based on the credibility of the witnesses.

c. Race

Allegation: SA Lavoie has used the "n word," including on one occasion in which he walked out of [redacted] office and yelled "fucking [n word] bitch."

Finding: Two witnesses confirmed that SA Lavoie has used the "n word," although SA Lavoie specifically denied it. We did not find support for the allegation that he yelled "fucking [n word] bitch" in the office.

Allegation: SA Lavoie has made derogatory remarks about Native Americans.

Finding: SA Lavoie does use the phrase "woo woo Indians" to refer to Native Americans. We find that there were discussions between SA Lavoie and [redacted] about Native Americans, but we are unable to reach a conclusion as to whether SA Lavoie made derogatory remarks during those discussions. [redacted] was unable to think of a specific example, other than that he would compare Abenakis and Cherokees.

d. National Origin

Allegation: SA Lavoie uses an Indian accent in a mocking manner.

Finding: Multiple witnesses confirmed this allegation, and SA Lavoie specifically admitted this conduct. He mimics an Indian accent and pretends he works in a convenience store. SA Lavoie explained it by indicating that it is a reference to the television show "The Simpsons."

e. Disability

Allegation: SA Lavoie has used the words "fucktard" and "retard" on several occasions.

Finding: Multiple witnesses confirmed that these words are regularly used by SA Lavoie, and SA Lavoie admitted to using them. He sometimes will mimic cognitively delayed speech in conjunction with saying the word. We specifically find that the following instances occurred:

- In January, SA Lavoie came back to the office angry about the state of files that he had taken to court. He came through the door to the office and said "you are all a bunch of fucktards."
- SA Lavoie said to [redacted] I guess you aren't the office retard, maybe you are just autistic or maybe it is just Asperger's." SA Lavoie confirmed saying this, and indicated that he was angry and had real concerns about how she receives information because she had not followed his directive. He stated that he was not seriously suggesting autism or Asperger's.
- SA Lavoie referenced a victim with cognitive limitations as a "retard." This occurred during a conversation with [redacted], but she indicated that she was not offended because "it is not a word that bothers" her.
- SA Lavoie described a "joke" that dates back several years in the office. A series of letters and words, including "sofa king," are arranged in such a way that the person reading them thinks that the sentence is nonsensical, but anyone hearing it will hear "I am so fucking retarded." Witnesses confirmed that this has been a repeated joke in the office.

While the above list relates to specific examples, we find that SA Lavoie uses the word "retard" regularly.

Allegation: SA Lavoie referred to a victim with disabilities as a "gimp."

Finding: We find that this did occur with respect to a victim who is paralyzed from the waist down. SA Lavoie has referred to the victim as a "gimp."

Allegation: SA Lavoie will mimic a deaf person and speak in a mocking manner when he does not understand or hear another person.

Finding: This is confirmed by multiple witnesses and SA Lavoie himself. If SA Lavoie cannot hear or understand something that another person says, he will speak in a way that others cannot understand the words, and in a way that he believes imitates how a deaf person speaks. While doing so, he will use sign language. Witnesses understood the sign language to be made up, but SA Lavoie indicated in his interview that it is accurate sign language.

[redacted] takes particular offense to SA Lavoie's conduct with respect to deafness. Her mother is hearing impaired; she is employed at the Franklin County courthouse, so SA Lavoie knows her. [redacted] has expressed to SA Lavoie that she does not like it when he mocks deaf people, but the conduct has continued.

Allegation: SA Lavoie makes derogatory comments about defense attorneys who have disabilities.

Finding: This allegation was confirmed by multiple witnesses, and SA Lavoie admitted to making such comments. Specifically, SA Lavoie gestures with his hands like "claws" when he talks about one particular attorney. To reference another attorney, who has one arm shorter than the other, SA Lavoie uses the name "T-Rex." On at least one occasion in the courthouse, SA Lavoie pulled one hand into his jacket sleeve while saying "where's you know" as a way of asking where the attorney was. A court employee reported the instance to [redacted] and was very upset. The employee indicated that SA Lavoie had done this in the courtroom. When asked about this, SA Lavoie stated that he recalls making the gesture in the entrance way to the courthouse, but did not remember whether he did so in the courtroom. He explained it as a way of asking where the attorney was.

SA Lavoie reported in his interview that he has made comments on "maybe three" occasions that another defense attorney is "on the spectrum."

Allegation: [redacted] has an eating disorder and SA Lavoie regularly ridicules her food, including one day when he told her that her chili looked like vomit.

Finding: We find that this conduct occurs fairly regularly. SA Lavoie admitted that he comments on [redacted] food.

f. Religion

Allegation: SA Lavoie calls [redacted] a Jew.

Finding; On at least one occasion, SA Lavoie has commented on [redacted] religion. On March 17, she was wearing a green scarf and SA Lavoie said "there's nothing worse than an an

Irish Jew." He has also made various comments to her about her being Jewish, but she was not offended by it until the incident on St. Patrick's Day this year.

g. Other

Allegation: SA Lavoie has threatened employees' jobs, particularly after he won the State's Attorney election.

Finding: [redacted] who holds a temporary position, asked SA Lavoie whether her position make become permanent at some point. He responded "no" and informed her that she should look for another job. We find that this conversation most likely occurred as alleged.

On November 9, 2022, the day after the election, [redacted], and [redacted] were standing together when SA Lavoie came in. [redacted] extended her congratulations to SA Lavoie, and asked if her job was safe. He answered affirmatively, and then said to Ms. [redacted] "you, however, are not." Mr. Lavoie later said that he was joking, but his demeanor during the conversation was not joking.[2]

Allegation: When [redacted] informed SA Lavoie that she was going to be unavailable for a while because she was attending a union meeting, he jabbed her in the chest with his finger and farted.

Finding: Witnesses, including SA Lavoie, confirmed that this occurred as described.

h. Retaliation

Allegation: Following commencement of this investigation, SA Lavoie continued to make discriminatory comments and he and [redacted] would laugh and make a buzzing noise, indicating that the comment was not permissible.

Finding: SA Lavoie has made jokes on multiple occasions about the fact that his comments are inappropriate. On April 6, John was telling a story to the admin staff and called someone a "retard." He made a buzzing noise and said "I can't say that." This was confirmed by multiple employees. On the same day, he was speaking with [redacted] in her office. Other witnesses did not hear the comment, but they heard [redacted] make a buzzing noise and say "you can't say that." Both SA Lavoie and [redacted] were laughing. The following week, SA Lavoie called [redacted] a slut, and [redacted] put her finger to her lips and "shushed" SA Lavoie, saying "you can't say that."

[2] During his interview, SA Lavoie indicated that he was "just joking" with respect to many of the comments that he admitted making. We find that he makes the comments without regard for whether the people hearing the comments find them amusing, or whether they are objectively funny.

i. Impact

We heard from several employees about the impact that SA Lavoie's conduct has had on them. One employee reported that she has a stomach ache every morning when she reports to work. She says that when she parks her car, it is the hardest task that she has all day. It is hard to watch SA Lavoie hurt her co-workers. She has difficulty focusing because she is always listening for what might be happening. She often leaves the office with a headache, and has cried on her way home.

Another employees reported that she cries regularly because of the comments made to and about her by SA Lavoie.

We heard from two witnesses that they have sought therapy based on SA Lavoie's conduct and its impact on them.

As noted above, one employee has cried multiple times because SA Lavoie has made comments, or engaged in conduct, indicating that she is overweight. Other employees have comforted her in the workplace.

III. Summary

As specified above, we find that SA Lavoie has made various comments and engaged in various conduct that is based on a wide range of protected characteristics in the FCSAO office. Employees have found the conduct to be unwelcome and offensive. We find that SA Lavoie's behavior has negatively impacted the terms and conditions of employment, and that it makes employees regularly uncomfortable and upset.

Thank you for the opportunity to assist in this investigation.

8848063_1:12714-00005