STATE OF RHODE ISLAND
COMMISSION FOR HUMAN RIGHTS

RICHR No. H17 HFS 642 HUD No. 01-17-5292-8

In the matter of

JONATHAN DUPONT and SAMANTHA DUPONT
Complainants

v. **DECISION AND ORDER**

CHRISTINE E. HARWOOD, *alias*, Agent
Respondent

INTRODUCTION

On April 27, 2017, a charge of discrimination which had previously been filed by Jonathan Dupont and Samantha Dupont (Complainants) with the Rhode Island Commission for Human Rights (Commission) was amended to name as a respondent Christine E. Harwood, *alias*, Agent (Respondent). The amended charge alleged that Respondent discriminated against Complainants by making housing unavailable to them, refusing to rent or to negotiate for rent, and otherwise subjecting them to discriminatory refusal of housing because of their familial status. This amended charge was investigated.

On June 19, 2017, Preliminary Investigating Commissioner John B. Susa assessed the information gathered by a Commission investigator and ruled that there was probable cause to believe that Respondent had discriminated against Complainants as alleged, and thereby violated the provisions of the Rhode Island Fair Housing Practices Act (FHPA), Title 34, Chapter 37 of the General Laws of Rhode Island. On July 7, 2017, the Commission issued a Complaint and Notice of Hearing which alleged that Respondent had discriminated against Complainants with respect to refusal to rent or negotiate for rent, and otherwise denying and making housing unavailable to

them because of their familial status. Respondent failed to file an Answer in accordance with Commission Rules and Regulations.

A hearing on the Complaint was held on December 5, 2017 before Commissioner Cynthia Hiatt. The Commission's Civil Prosecutor presented evidence in support of the Complaint. Neither Respondent nor a representative of the Respondent appeared at the hearing. The Civil Prosecutor made an oral closing argument. At the direction of the Commissioner, Commission Staff Attorney Marissa Janton sent a letter to Respondent on December 26, 2017, stating that the Commission had held a hearing on December 5, 2017 at which the Respondent failed to appear, that the Respondent had until January 31, 2018 to respond in writing with a justification for her absence, and if she did not provide a justification or if the Commission found that the reason given did not excuse her absence, the case would be decided based on the record that was before the Commission on December 5, 2017. Respondent did not respond to the letter.

JURISDICTION

At the time in question, Respondent was the agent of the owners of the property in question at 2 Camac Street, Pawtucket, Rhode Island, and thus she was an "owner" within the meaning of the FHPA (R.I. Gen. Laws § 34-37-3(12)) and is subject to the FHPA and the jurisdiction of the Commission.

FINDINGS OF FACT

1. The Respondent was the broker for rental of an apartment at 2 Camac Street, Pawtucket, Rhode Island (the premises). Hearing Transcript, December 5, 2017 (Trans.) 8:7-9.
2. Complainants were the parents of two sons who were six or seven and eleven years old at the time of the events in question. Trans. 7:14-22, 8-2.

3. Complainants were seeking an apartment for themselves and their two sons. Trans. 7:14-17.

4. On or around October 29, 2016, Complainants texted Respondent inquiring about a two-bedroom apartment that she had advertised for rental at 2 Camac Street, Pawtucket, Rhode Island. Complaint (Comp.) ¶ 5b.

5. Respondent texted the Complainants stating that the property was available and asking how many people would be moving in. Complainants indicated that they were looking to move in on November 1, 2016, that they had the money to move and that it would be for them and their two children. Respondent asked for the ages of the children and Complainants told the Respondent that their children were six and eleven years old. Respondent replied that "there are only adult professionals in the bldg. & it's a 2nd fl. Someone would be under you. The prop. owner doesn't want noise complaints". Comp. ¶ 5c.

6. Complainants texted Respondent: "Thank you for discriminating against a family because your [*sic*] afraid of 'noise complaints'". Respondent texted back "Your [*sic*] welcome! This tiny apt [*sic*] is not suitable for a family". Comp. ¶ 5d. Trans. 10:14-24.

7. Subsequent to the communications above, Complainants arranged for a family member and a friend to inquire about the apartment. Respondent told both that the apartment was still available. She told the family member that she believed that one of the apartment's bedrooms would fit a king-sized bed and the other would fit a queen-sized bed and a desk. Comp. ¶ 5e, f, g; Trans. 9, 10:1-6.

8. Due to Complainants' time constraints, they were forced to move into an apartment on Benefit Street, Pawtucket, Rhode Island. Complainants did not find this neighborhood to be safe; Complainants often heard gunshots and an individual was shot in that

neighborhood while Complainants lived there. Complainants put restrictions on their sons' outside playing. Jonathan Dupont taught his sons to immediately lie on the floor if they heard gunshots to minimize their chances of being hit by a stray bullet. Trans. 12:1-3, 17-24, 13:1-21. Complainants lived in the Benefit Street apartment for approximately six months. Trans. 13:22-24.

9. The Camac Street apartment was close to Slater Park where Complainants' sons would have had the opportunity to play. Jonathan Dupont considered the Camac Street apartment to be in a safe and quiet neighborhood. Trans. 12:4-16, 16:3-9.
10. Jonathan Dupont was upset and humiliated by Respondent's discrimination. Trans. 11:7-12, 19-20. He was also disheartened and embarrassed. Trans. 15:4-5, 14-15.

CONCLUSIONS OF LAW

Complainants proved by a preponderance of the evidence that Respondent discriminated against them in violation of R.I. Gen. Laws § 34-37-4 with respect to refusal to rent or negotiate for rent, and otherwise denying and making housing unavailable to them because of their familial status.

DISCUSSION

STANDARDS FOR EVALUATING THE EVIDENCE OF DISCRIMINATION

The FHPA prohibits discrimination on the basis of familial status with respect to housing accommodations. R.I. Gen. Laws § 34-37-2 provides that "[t]he right of all individuals in the state to equal housing opportunities regardless of . . . familial status . . . is hereby recognized as, and declared to be, a civil right." It is unlawful to interfere with that civil right. *See* R.I. Gen. Laws § 34-37-4(a), which provides in relevant part:

> (a) No owner having the right to sell, rent, lease, or manage a housing accommodation as defined in § 34-37-3(10), or an agent of any of these, shall, directly or indirectly, make, or cause to be made, any written or oral inquiry concerning the ... familial status ... of any prospective ..., occupant, or tenant of the housing accommodation; directly or indirectly, refuse to sell, rent, lease, let, or otherwise deny to or withhold from any individual the housing accommodation because of the ... familial status of the individual or the ... familial status of any person with whom the individual is or may wish to be associated ..... Nor shall an owner having the right to sell, rent, lease, or manage a housing accommodation as defined in § 34-37-3(10), or an agent of any of these, , ... directly or indirectly, discriminate against any individual because of his or her ... familial status, ..., in the terms, conditions, or privileges of the sale, rental, or lease of any housing accommodation or in the furnishing of facilities or services in connection with it. Nothing in this subsection shall be construed to prohibit any oral or written inquiry as to whether the prospective purchaser or tenant is over the age of eighteen (18).

The FHPA defines "discriminate," in relevant part, as "segregate, separate, or otherwise differentiate ..." § 34-37-3(5).

The Rhode Island Supreme Court has held that when interpreting state civil rights laws, it will look to cases interpreting federal civil rights law as a guide. "In construing these provisions [of the Fair Employment Practices Act], we have previously stated that this Court will look for guidance to decisions of the federal courts construing Title VII of the Civil Rights Act of 1964. *See Newport Shipyard, Inc.*, 484 A.2d at 897-98". *Ctr. for Behavioral Health, Rhode Island v. Barros*, 710 A.2d 680, 685 (R.I. 1998).

The standards for assessing evidence of discrimination under Title VII of the Civil Rights Act of 1964 are utilized in assessing evidence of discrimination in the housing context.

> The familiar *McDonnell Douglas/Burdine* analysis applies to federal housing-discrimination claims, whether they are brought under the FHA [Fair Housing Act, 42 U.S.C. § 3601 *et seq.*] or 42 U.S.C. §§ 1981 or 1982. *Mencer v. Princeton Square Apts.*, 228 F.3d 631 (6th Cir. 2000) (applying the *McDonnell Douglas* burden-shifting framework to claims brought under the FHA and §§ 1981 and 1982); *Selden Apts. v. U.S. Dep't of Housing and Urban Dev.*, 785 F.2d 152, 159 (6th Cir. 1986) (same). First, a plaintiff who alleges discrimination on the basis of race must make out a prima facie case by showing "(1) that he or she is a member of a racial minority, (2) that he or she applied for and was qualified to rent or purchase certain

property or housing, (3) that he or she was rejected, and (4) that the housing or rental property remained available thereafter." *Mencer,* 228 F.3d at 634–35. However, the Supreme Court has instructed that "the precise requirements of a prima facie case can vary depending on the context and were 'never intended to be rigid, mechanized, or ritualistic.' " *Swierkiewicz v. Sorema N.A.,* 534 U.S. 506, 512, 122 S.Ct. 992, 152 L.Ed.2d 1 (2002) (quoting *Furnco Constr. Corp. v. Waters,* 438 U.S. 567, 577, 98 S.Ct. 2943, 57 L.Ed.2d 957 (1978)).

If the plaintiff satisfies the prima facie requirements, the burden shifts to the defendant to produce evidence of a legitimate, non-discriminatory reason for rejecting the plaintiff. *Mencer,* 228 F.3d at 634. Finally, the burden shifts back to the plaintiff to show that the defendant's proffered non-discriminatory reason is a pretext. *Id.* "Although the burden of production shifts between the parties, the plaintiff bears the burden of persuasion throughout the process." *Dixon v. Gonzales,* 481 F.3d 324, 333 (6th Cir. 2007).

Lindsay v. Yates, 498 F.3d 434, 438–39 (6th Cir. 2007). *See also Cmty. Servs., Inc. v. Wind Gap Mun. Auth.*, 421 F.3d 170, 176 (3d Cir. 2005*); Rhode Island Comm'n for Human Rights v. Graul*, 120 F. Supp. 3d 110, 122 (D.R.I. 2015).

FAILURE TO FILE AN ANSWER

It should be noted that in this case, the Commission may not only take into account the Complainant Jonathan Dupont's testimony but also may consider the allegations of the Complaint to be admitted by Respondent. Commission Rules and Regulations, Rule 8.04, provided in relevant part that: "Any allegation in the complaint which is not denied or admitted in the answer, unless respondent shall state in the answer that the respondent after due investigation is without knowledge or information sufficient to form a belief on the allegation, shall be deemed admitted."[1] Respondent did not file an Answer to the Complaint and therefore did not deny the

[1]Rule 8.04 was in effect at the time of the hearing. The current regulation has similar language. 515-RICR-10-00-2 § 2.10(D) provides in relevant part: " Any allegation in the complaint which is not denied, unless respondent shall state in the answer that the respondent after due investigation is without knowledge or information sufficient to form a belief on the allegation, shall be deemed admitted."

allegations in the Complaint and did not claim that she was without knowledge or information sufficient to form a belief on the allegations. Therefore, in determining whether discrimination was proved, the Commission can consider the allegations of the Complaint as admitted.

COMPLAINANTS PROVED THAT RESPONDENT REFUSED TO RENT OR NEGOTIATE FOR RENT, AND OTHERWISE DENIED AND MADE HOUSING UNAVAILABLE TO THEM BECAUSE OF THEIR FAMILIAL STATUS IN VIOLATION OF THE FHPA

In this case, Complainants proved their case under both the disparate treatment standard discussed above and under the overt discrimination standard. Complainants made a prima facie case of familial status discrimination. Complainants proved protected class status (they sought housing for themselves and their minor children). Complainants applied for the apartment in question and were qualified to rent. Respondent did not deny the allegation in the Complaint that the Complainants told them that they had the money to move. Comp. ¶ 5c. Complainants were rejected and others who called later were told that the apartment was still available. Respondent did not provide a legitimate, non-discriminatory reason for the rejection of Complainants and Complainants' prima facie case of discrimination was credible and established discrimination.

In addition, due to the failure to answer the Complaint, the Respondent admitted that she said that the apartment was not suitable for a family, that the building contained only adult professionals, and that the owner did not want noise complaints. Comp. ¶¶ 5c and d. This is sufficient to prove overt discrimination. "Evidence that the author or speaker intended his or her words to indicate a prohibited preference obviously bears on the question of whether the words in fact do so. ... Thus, if such proof exists, it may provide an alternative means of establishing a violation of the [Fair Housing Act]." *Jancik v. Dep't of Hous. & Urban Dev.*, 44 F.3d 553, 556 (7th Cir. 1995).

Realtors and real estate agents are liable under fair housing laws when they engage in discriminatory conduct.

> In applying these principles to this case, we have no difficulty in affirming the portion of the magistrate judge's decision that held King, Munoz, Scarpiniti, and Walker [real estate agents] liable for punitive damages. Defendants argue that they should not be liable for punitive damages because they did not act maliciously towards the defendants and treated them politely. Appellants' Brief at 44. Good manners, however, do not insulate individuals from punitive damages. Although these four agents may have been courteous to the testers, their behavior demonstrates that they actively discriminated against the black testers because of their race in violation of Sections 1982 and 3604. The law does not tolerate this behavior and punitive damages are an appropriate remedy when real estate agents engage in such blatantly obvious racial discrimination.

City of Chicago v. Matchmaker Real Estate Sales Ctr., Inc., 982 F.2d 1086, 1099–1100 (7th Cir. 1992). *See also* HUD Fair Housing Regulations 24 C.F.R. §§ 100.7 and 100.60, which provide in relevant part:

> **§ 100.7 Liability for discriminatory housing practices.**
>
> **(a)***Direct liability.*
>
> **(1)** A person is directly liable for:
>
> **(i)** The person's own conduct that results in a discriminatory housing practice.
>
> ...
>
> **(iii)** Failing to take prompt action to correct and end a discriminatory housing practice by a third-party, where the person knew or should have known of the discriminatory conduct and had the power to correct it. The power to take prompt action to correct and end a discriminatory housing practice by a third-party depends upon the extent of the person's control or any other legal responsibility the person may have with respect to the conduct of such third-party.
>
> **§ 100.60 Unlawful refusal to sell or rent or to negotiate for the sale or rental.**
>
> **(a)** It shall be unlawful for a person to refuse to sell or rent a dwelling to a person who has made a *bona fide* offer, because of ... familial status ... or to refuse to negotiate with a person for the sale or rental of a dwelling because of ... familial status....
>
> **(b)** Prohibited actions under this section include, but are not limited to:

> **(1)** Failing to accept or consider a *bona fide* offer because of ... familial status ....
>
> **(2)** Refusing to sell or rent a dwelling to, or to negotiate for the sale or rental of a dwelling with, any person because of ... familial status ....

Real estate agents are liable for unlawful housing practices that they commit.

Complainants proved, under both the disparate treatment standard and the overt discrimination standard, that Respondent discriminated against them because of their familial status in violation of the FHPA.

DAMAGES

R.I. Gen. Laws § 34-37-5(a) empowers and directs the Commission to prevent any person from violating any provisions of the chapter. Discrimination is broadly defined. In support thereof, the Commission is empowered, after determining that an unlawful housing practice has occurred, to issue orders ". . . requiring the respondent to cease and desist from the unlawful housing practices, and to take such further affirmative or other action as will effectuate the purposes of this chapter." R.I. Gen. Laws §34-37-5(h)(1). The Commission has the power to award damages, costs, attorney's fees and civil penalties. R.I. Gen. Laws §34-37-5(h)(2). The General Assembly mandated that the provisions of the FHPA were to be construed liberally for the accomplishment of the purposes outlined. R.I. Gen. Laws §34-37-9.

The federal Fair Housing Act, 42 U.S.C. § 3601 *et seq.*, (FHA) provides for the award of compensatory damages to a prevailing plaintiff. 42 U.S.C. § 3613(c)(1). "Compensatory damages [in an FHA case] can include those for emotional distress." *Rhode Island Comm'n for Human Rights v. Graul*, 120 F. Supp. 3d 110, 131 (D.R.I. 2015) (citing *Steele v. Title Realty Co.*, 478 F.2d 380, 384 (10th Cir. 1973)). Moreover, a "number of courts have construed 'actual' damages in the

remedial provisions of [the FHA] to include compensation for mental and emotional distress." *F.A.A. v. Cooper*, 566 U.S. 284, 292–93 (2012).

The Commission has awarded compensatory damages for pain and suffering in previous cases and has indicated that it will be guided by federal cases interpreting federal civil rights laws and by state case law on damages for pain and suffering.

In Rhode Island, the determination of the appropriate amount of compensatory damages should not be influenced by sympathy for the injured party nor should the damages be punitive in nature. *Soares v. Ann & Hope of R.I., Inc.*, 637 A.2d 339, 349 (R.I. 1994). *See also Hough v. McKiernan*, 101 A.3d 853, 857 (R.I. 2014) (Jury verdict of $1.75 million for medical expenses and pain and suffering resulting from an assault of the Plaintiff was reduced to $925,000 to counteract the sympathy and prejudice of the jury). The decision makers should determine the damages for pain and suffering "by an exercise of ... judgment and an application of ... experience in the affairs of life and ... knowledge of social and economic matters. [Cites omitted.]" *Wood v. Paolino*, 112 R.I. 753, 758, 315 A.2d 744, 746 (1974) *accord Kelaghan v. Roberts*, 433 A.2d 226, 230 (R.I. 1981).

The federal Equal Employment Opportunity Commission (EEOC) has issued Policy Guidance on "Compensatory and Punitive Damages Available Under Section 102 of the Civil Rights Act of 1991," 1992 WL 1364354 (EEOC Guidance 1992) (Enforcement Guidance). The Enforcement Guidance relates to employment discrimination cases, but the principles can be applied to fair housing cases. The Enforcement Guidance provides that compensatory damages are available for pecuniary and non-pecuniary losses caused by discriminatory acts. Non-pecuniary losses include damages for pain and suffering, inconvenience and loss of enjoyment in life. "Emotional harm may manifest itself, for example, as sleeplessness, anxiety, stress, depression,

marital strain, humiliation, emotional distress, loss of self-esteem, excessive fatigue, or a nervous breakdown." *Id.* at 5.

Both state and federal cases relating to damages for discrimination have upheld awards based on a plaintiff's testimony. *See Shoucair v. Brown University*, 917 A.2d 418, 432-33 (R.I. 2007) (upholding jury's compensatory damages award in employment discrimination case based on plaintiff's testimony); *Merriweather v. Family Dollar Stores of Indiana, Inc.*, 103 F.3d 576, 580 (7th Cir.1996) ("[a] plaintiff's testimony about emotional distress may, in certain instances, of itself suffice to support an award for nonpecuniary loss"); *Turic v. Holland Hospitality, Inc.*, 85 F.3d 1211, 1215 (6th Cir.1996) ("It is well settled that Title VII plaintiffs can prove emotional injury by testimony without medical support").

Damages for the pain and suffering which result from discrimination fall within a wide range. *See Snyder v. Bazargani,* 241 Fed. Appx. 20 (3rd Cir. 2007) (affirming compensatory damages award of $40,000 flowing from mental and emotional distress to two plaintiffs in a housing discrimination case; the prospective tenant plaintiffs were asked about their religion and the landlord denied them the opportunity to rent on the basis of their religion); *Matarese v. Archstone Pentagon City*, 795 F. Supp.2d 402 (E.D. Va. 2011) *affirmed in part, vacated in part on other grounds by Matarese v. Archstone Communities, LLC*, 468 F. App'x 283 (4th Cir. 2012) ($50,000 in compensatory damages for pain and suffering awarded to primary plaintiff; the landlord had refused to renew the lease once he concluded that the plaintiff had a disability, put the plaintiff on a month-to-month lease at a much higher rent, and failed to renew the lease of plaintiff's mother, for whom the plaintiff provided care, all causing the plaintiff stress and anxiety which warranted the damages for pain and suffering); *Shoucair,* 917 A.2d at 432-33 (upholding

jury's compensatory damages award of $175,000 based on plaintiff's testimony that he suffered from a variety of physical and emotional ailments including sleep and back problems and anxiety).

In the circumstances of the instant case, the Commission finds that $10,000 compensates Complainants for their compensatory damages.[2] Complainant Jonathan Dupont testified that he was upset and humiliated by Respondent's discrimination. Trans. 11:7-12. He was also disheartened and embarrassed. Trans. 15:4-5, 14-15. Complainant Jonathan Dupont was eloquent on the stress caused by the comparative lack of safety in the neighborhood in which Complainants were constrained to live with their young children, after Respondent denied them housing. Trans. 12:1-24, 13:1-21, 16:4-9. It is the Commission's decision that the Respondent's acts caused Complainants to suffer substantial pain, suffering, and inconvenience and that $10,000 is the proper amount to compensate them for those harms.

INTEREST

The Commission awards interest consistently with the rate used for tort judgments. *See* R.I. Gen. Laws § 9-21-10(a):

> In any civil action in which a verdict is rendered or a decision made for pecuniary damages, there shall be added by the clerk of the court to the amount of damages interest at a rate of twelve percent (12%) per annum thereon from the date the cause of action accrued, which shall be included in the judgment entered therein....

The Commission determines that the date when the cause of action accrued was October 29, 2016.

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[2] In addition to Complainant Jonathan Dupont's testimony regarding the emotional and mental impact that Respondent's discrimination caused him and his family, he also testified that the family incurred unanticipated costs due to the difference in price of the rental unit they wanted, but were denied, 2 Camac Street, and the one they ultimately had to settle with located on Benefit Street. (Trans. 16:5). Since there was no testimony on the amount of the difference in price, the Commission could not calculate that component of damages.

CIVIL PENALTIES

The Commission has the authority to award a civil penalty under R.I. Gen. Laws § 34-37-5(h)(2) which provides in relevant part that:

> (2) The commission may also order the respondent to pay ... civil penalties, any amounts awarded to be deposited in the state treasury. The civil penalty shall be (i) an amount not exceeding ten thousand dollars ($10,000) if the respondent has not been adjudged to have committed any prior discriminatory housing practice; ...When determining the amount of civil penalties, the commission shall consider as a mitigating factor whether the respondent has acted in good faith and whether the respondent has actively engaged in regular antidiscrimination educational programs. ....

Administrative law judges assessing civil penalties under the FHA consider the following factors under 24 C.F.R. § 180.671(c)(1):

> (1) In determining the amount of the civil penalty to be assessed against any respondent for each separate and distinct discriminatory housing practice the respondent committed, the ALJ shall consider the following six (6) factors:
>
> i. Whether that respondent has previously been adjudged to have committed unlawful housing discrimination;
> ii. That respondent's financial resources;
> iii. The nature and circumstances of the violation;
> iv. The degree of that respondent's culpability;
> v. The goal of deterrence; and
> vi. Other matters as justice may require.

Respondent has no previous known history of fair housing violations. There is no evidence on Respondent's financial resources. The Respondent committed overt discrimination and, as a real estate broker, should have had the knowledge that familial status discrimination is unlawful. As real estate brokers generally deal with multiple individuals during their careers, it is particularly important that they be deterred from discrimination. There was no evidence that Respondent ever participated in an antidiscrimination educational program. There is no evidence Respondent was

acting in good faith. Respondent's conduct was a clear violation of the FHPA. When Complainants texted: "Thank you for discriminating against a family because your [*sic*] afraid of 'noise complaints'", Respondent texted back "Your [*sic*] welcome!". Comp. ¶ 5d, Trans. 10:14-24. *See Ho v. Donovan*, 569 F.3d 677, 681 (7th Cir. 2009), in which the court held that the property owner's agent was properly assessed a civil penalty when she decided to discriminate against a renter in violation of the Fair Housing Act and was also "truculent after being told of the conduct's illegality". The Commission finds that Respondent must pay a civil penalty of $1,000.

ORDER

I. Violations of R.I. Gen. Laws § 34-37-4 having been found, the Commission hereby orders:

A. That Respondent cease and desist from all unlawful housing practices under the FHPA;

B. That Respondent receive training on fair housing laws on or before two months from the date of this Decision, and that she send a certification of when she was trained, who the trainer was, and the syllabus of the training to the Commission on or before three months from the date of this Decision;

C. That Respondent pay Complainant $10,000 in compensatory damages together with statutory annual interest of 12% from the date of the cause of action accrued, October 29, 2016, until paid;

D. That Respondent submit to the Commission proof of payment to Complainant, in accordance with Paragraph I(C) of this section within 45 days of the date of this Decision and Order;

E. That Respondent send to the Commission a check made payable to the State of Rhode Island Treasury in the amount of $1,000 as a civil penalty within 45 days of this Decision and Order;

F. That a copy of this Decision and Order be sent to the Rhode Island Department of Business Regulation.

Entered this 7th day of October, 2019.

Cynthia M. Hiatt

Cynthia M. Hiatt, Esq.
Hearing Officer

I have read the record and concur in the judgment.

Rochelle Lee

Rochelle Bates Lee
Commissioner

Angelyne E. Cooper

Angelyne E. Cooper, Esq.
Commissioner