EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

EXHIBIT 4

EXHIBIT 5

EXHIBIT 6

CITY COURT: NEW ROCHELLE
COUNTY OF WESTCHESTER: STATE OF NEW YORK

----------x

THE PEOPLE OF THE STATE OF NEW YORK,

-against-

MICHAEL MOLINA,

Defendant.

----------x

NOTICE OF OBJECTION TO CERTIFICATE OF COMPLIANCE PURSUANT TO CPL §30.30(1)(b) and §170.30(e)

DOCKET 3495-21

PLEASE TAKE NOTICE, that upon the annexed affirmation of Steven Epstein, dated the 28th day September, 2021, the accusatory instrument filed herein, and upon all proceedings had in this matter to date, the undersigned, on behalf of the Defendant, MICHAEL MOLINA, will move this Court, located at 475 North Avenue, New Rochelle, New York, on the 28th day of October 2021, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order dismissing the accusatory instrument pursuant to sections 30.30(1)(b) and 170.30(e) of the Criminal Procedure Law and the Sixth and Fourteenth Amendments to the United States Constitution.

Dated: Garden City, New York 11530
September 28th, 2021

Respectfully submitted by:

Steven Epstein, Esq.
Barket Epstein Kearon Aldea & LoGurco, LLP
666 Old Country Road, Suite 700
Garden City, New York 11530
(516) 745-1500

To: ADA Sarah Martinez
Westchester County District Attorney's Office
New Rochelle Branch
475 North Avenue, 2nd Floor
New Rochelle, NY 10801

Clerk of the Court – Via EDDS
City Court New Rochelle
475 North Avenue
New Rochelle, NY 10801

CITY COURT: NEW ROCHELLE
COUNTY OF WESTCHESTER: STATE OF NEW YORK

----------x

THE PEOPLE OF THE STATE OF NEW YORK,

-against-

MICHAEL MOLINA,

Defendant.

----------x

AFFIRMATION IN SUPPORT OF MOTION OBJECTING TO CERTIFICATE OF COMPLIANCE PURSUANT TO CPL §30.30(5)

DOCKET 3495-21

I, STEVEN EPSTEIN, an attorney duly admitted to practice law in the Courts of this State, affirm under penalty of perjury that the following statements are true:

1. I am an attorney associated with Barket Epstein Kearon Aldea & LoTurco, LLP, counsel to the Defendant, MICHAEL MOLINA, and I am familiar with the facts of this case and with the proceedings that have been had in the matter to date.

2. I make this Affirmation in support of an application for an Order determining the People have not met their obligations pursuant to CPL §245.20 and pursuant to CPL § 30.30(5).

3. Unless otherwise specified, the information in this affirmation is based upon an inspection of the records in this case, upon communications between defense counsel and prosecutors, and upon information derived from relevant legal authorities.

Introduction

4. Section 30.30(5) provides that when the People state ready for trial the court "shall make inquiry on the record as to their actual readiness. If, after conducting its inquiry, the court determines that the people are not ready to proceed to trial, the prosecutor's statement or notice of

readiness shall not be valid for purposes of this section. Any statement of trial readiness must be accompanied or preceded by a certification of good faith compliance with the disclosure requirements of section 245.20 of this chapter and the defense shall be afforded an opportunity to be heard on the record as to whether the disclosure requirements have been met." CPL §30.30(5). In essence, if the certificate of compliance is filed in the absence of meeting their discovery obligations, any statement of readiness must be rejected by the court.

Procedural History

5. The Defendant was arraigned on July 6, 2021, on the charge of violating Section 1192(3) of the Vehicle and Traffic Law. The Defendant entered a plea of not guilty and the matter was adjourned to July 27, 2021, for the People to comply with their discovery obligations. The Defendant did not consent to this adjournment.

6. On July 27, 2021, the People were not ready and had not yet filed a certificate of compliance pursuant to C.P.L. §245.20 and C.P.L. 30.30(5). The People appeared for a conference and advised the court that they could not file a certificate of compliance. The matter was adjourned to August 10, 2021. The Defendant did not consent to this adjournment.

7. On July 28, 2021, the People filed a certificate of readiness for trial along with a certificate of compliance pursuant to C.P.L. §245.20 and C.P.L. 30.30(5). See Exhibit "A" attached.

8. On August 10, 2021, the People consented to Huntley/Dunaway/Refusal hearings and the matter was adjourned to September 30, 2021 for pre-trial hearings and for the Defendant to review the discovery provided by the People.

Discussion

9. On January 1, 2020, Article 245 of the CPL became effective, conferring upon prosecutors the obligation to make broad discovery disclosures to the defense, without any demand from the defense. See CPL §245.10 and §245.20. Further, the statute provides, absent exceptional or special circumstances, the People's compliance with the discovery obligations enumerated in §245.20 is a precondition to a valid statement of readiness, see CPL §245.50(3), and once initial discovery is fulfilled, the People are required to affirm their compliance by filing a "certificate of compliance on the defense and the court. CPL §245.50(1). Here, the People failed to disclose to the defense as part of their initial discovery obligation all that was required by them *before* they could make a valid statement of trial readiness -- and there is no cognizable basis under the current law by which the People's failure to meet their discovery obligations can be excused.

10. Pursuant to C.P.L. §245.20(1)(k) the people have not turned over sufficient information related to evidence and information known to police that tends to impeach the credibility of Trooper Angelo Fortune.

11. C.P.L. §245.20(1)(k)(Iv) in pertinent part requires the disclosure of: "[a]ll evidence and information, including that which is known to police or other law enforcement agencies acting on the government's behalf in the case, that tends to...(iv) impeach the credibility of a testifying prosecution witness.... Information under this subdivision shall be disclosed whether or not such information is recorded in tangible form and irrespective of whether the prosecutor credits the information. The prosecutor shall disclose the information expeditiously upon its receipt and shall

not delay disclosure if it is obtained earlier than the time period for disclosure in subdivision one of section 245.10 of this article."

12. CPL § 245.20(7) provides, "There shall be a presumption in favor of disclosure, when interpreting sections 245.10 and 245.25, and subdivision one of section 245.20, of this article."

13. "There have been a number of published decisions addressing the manner in which the People may comply with their affirmative discovery obligations when it comes to compliance with CPL §245.20(a)(k)(iv)" *People v. Herrera*, 71 Misc3d 1205A (Nassao Co. Dist. Ct. Engel. J. April 5, 2021) (Slip Op.).

14. While files involving allegations that have been determined to be unfounded or exonerated are not required to be disclosed (*see People v. Cooper*, 2021 WL 728983, 2021 NY Slip Op 21039 (County Ct. Erie Co. 2021), files that have been substantiated or even unsubstantiated must be produced.

15. *Herrera* is helpful to an understanding of what records must be turned over.

16. The definition of law enforcement disciplinary records under Public Officers Law §86(6) is any record created in furtherance of a law enforcement disciplinary proceeding including but not limited to: (a) the complaints, allegations, and charges against an employee; (b) the name of the employee complained of or charged; (c) the transcript of any disciplinary trial or hearing, including any exhibits introduced at such trial or hearing; (d) the disposition of any disciplinary proceeding; and (e) the final written opinion or memorandum supporting the disposition and discipline imposed including the agency's complete factual findings and its analysis of the conduct and appropriate discipline of the covered employee.

17. What is clear is that actual documentation is required. What limited information has been provided so far by the People divulges that there were investigations against Trooper Fortune that were founded and involved his conduct related to law enforcement investigations – one of which was a DWI investigation – the other involved improper handling of evidence. The only documentation provided by the People is a summary report entitled "Member Resume." A copy is attaches as Exhibit "B." The People have provided no information at all except the summary and disposition of each allegation.

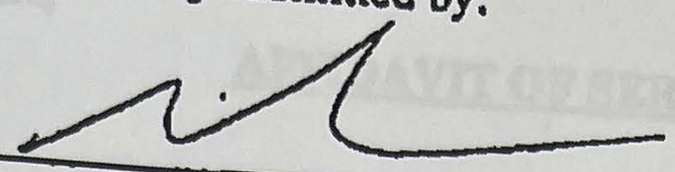
18. Notwithstanding the sweeping statutory changes encompassed in Article 245, the well-established principle remains that statements of readiness, or "certificates of compliance" as they are now called, may become invalid due to changed circumstances or where representations of readiness are challenged as illusory. *See People v. Sibblies*, 22 N.Y.3d 1174, 1181 (Graffeo J., concurring) (a statement of readiness may be considered illusory "where the People do not provide an explanation for the change in circumstances between the initial statement of readiness and the subsequent admission that the People were not ready to proceed" such that the prior statement of readiness did not accurately reflect the People's position). Furthermore, under the new framework, statements of readiness are not simply presumed to be truthful and accurate. Rather, whenever the defense challenges a certificate of compliance, the court must make an immediate inquiry into the validity of the People's representation. CPL §30.30(5).

Conclusion

19. In sum, the People filed a certificate of compliance prior to completing their obligations under CPL §245.20 and the Defendant requests the Court enter an Order rejecting its certificate of compliance and statement of readiness.

Dated: Garden City, New York 11530
September 28, 2021

Respectfully submitted by:



Steven Epstein, Esq.
Barket Epstein Kearon Aldea &LoTurco, LLP
666 Old Country Road, Suite 700
Garden City, New York 11530
(516) 745-1500

CITY COURT: NEW ROCHELLE
COUNTY OF WESTCHESTER: STATE OF NEW YORK

----------x

THE PEOPLE OF THE STATE OF NEW YORK,

-against-

MICHAEL MOLINA,

Defendant.

----------x

AFFIDAVIT OF SERVICE

DOCKET 3495-21

STATE OF NEW YORK)
) ss:
COUNTY OF NASSAU)

Suzanne O'Donoghue, being duly sworn, deposes and says, under the pains and penalties of perjury, the following is true:

1. I am over eighteen (18) years of age, not a party to the above-captioned case, and reside in Suffolk County, New York.

2. On September 28, 2021, I served a true copy of our **NOTICE OF OBJECTION TO CERTIFICATE OF COMPLIANCE PURSUANT TO CPL §30.30(1)(b) and §170.30(e)**, by depositing same in a postpaid properly addressed wrapper, in a post office or official depository of the United States Postal Service within the State of New York, addressed to the last known address of the addressee as follows:

ADA Sarah Martinez
Westchester County District Attorney's Office
New Rochelle Branch
475 North Avenue, 2nd Floor
New Rochelle, NY 10801

Suzanne O'Donoghue

Subscribed and sworn to before me
this 28th day of September, 2021.

Notary Public

LENORA NOORDSIEK
NOTARY PUBLIC, State of New York
No. 01RO6147482
Qualified in Suffolk County
Commission Expires June 5, 2022

City COURT: New Rochelle
COUNTY OF WESTCHESTER : STATE OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

- against -

Michael Molina Defendant

LOCAL CRIMINAL COURT
CERTIFICATE OF
COMPLIANCE
CPL 245.50 (1)

DKT: # 3495-21

SCI/IND: #

CERTIFICATE OF COMPLIANCE

I, Assistant District Attorney S.Martinez, exercising due diligence and making reasonable inquiry to ascertain the existence of material and information subject to discovery, except for those items and information that are the subject of an order pursuant to CPL 245.70, the People have disclosed and made available to defendant all known material and information subject to discovery, which material and information is identified and/or attached in the accompanying Disclosure Index and Discovery Addendum, certify pursuant to CPL 245.50(1), that, after

With the exception of materials or information withheld pursuant to CPL 245.70, the materials and information provided with this form are those that are in the actual possession of, or known to, the People. The People's disclosures may include documents, information, and materials that are not required to be disclosed under CPL 245.20(1) but which have been disclosed in an exercise of the People's discretion.

245.20(1)(k) disclaimer - The People reserve the right, at a future date, to object to or to move *in limine* to prevent the admission into evidence of, or questioning of witnesses about, these matters. Furthermore, there may be materials and information disclosed pursuant to other sections of CPL 245.20(1), and not separately highlighted under this section, that could constitute responsive materials under this section.

STATEMENT OF READINESS

X The People confirm and announce their readiness for trial on all counts charged. The People hereby certify that all counts charged in the accusatory instrument meet the requirements of sections 100.15 and 100.40 of this chapter and those counts not meeting the requirements of sections 100.15 and 100.40 of this chapter have been dismissed.

Dated: 7/28/ 2021

Respectfully submitted,

Miriam E. Rocah
District Attorney of Westchester County
Westchester County Courthouse
111 Dr. Martin Luther King Jr. Blvd.
White Plains, New York 10601

BY: _____
Assistant District Attorney

Doc. # 1055279 (1/3/20)

RECIPROCAL DISCOVERY FOR THE PROSECUTION

PLEASE TAKE NOTICE, the District Attorney reminds defendant and counsel for defendant of defendant's reciprocal discovery obligations pursuant to the provisions of Article 245 of the Criminal Procedure Law.

PLEASE TAKE NOTICE, that subject to constitutional limitations and the statutory provisions of CPL 245.10 (2) and CPL 245.20(4)(c), no later than thirty calendar days after being served with the prosecution's CPL 245.50(1) certificate of compliance, defendant shall disclose to the prosecution, and permit the prosecution to discover, inspect, copy, or photograph, any material and relevant evidence within the possession or control of defendant or counsel for defendant, which defendant intends to introduce at trial or a pretrial hearing and which is discoverable under:

CPL 245(1)(f) – Relating to Expert Opinion Evidence

CPL 245(1)(g) – Relating to Tapes or Other Electronic Recordings

CPL 245(1)(h) – Relating to Photographs and Drawings Made or Completed by a Witness

CPL 245(1)(j) – Relating to Examinations, Tests, Experiments or Comparisons

CPL 245(1)(l) – Relating to Promises, Rewards, Inducements, and Requests for Consideration

CPL 245(1)(o) – Relating to Tangible Property

FURTHER BE REMINDED, that subject to constitutional limitations and the statutory provisions of CPL 245.10 (2) and CPL 245.20(4)(b), no later than thirty calendar days after being served with a certificate of compliance by the People, pursuant to CPL 245.50 (1), defendant shall disclose to the prosecution:

(1) The names, addresses, and birth dates of those persons other than defendant, whom defendant intends to call as witnesses at trial or a pretrial hearing; and

(2) All statements, written or recorded or summarized in any writing or recording, of those persons, other than defendant, whom defendant intends to call as witnesses at trial or a pretrial hearing.

Respectfully submitted,

Miriam E. Rocah
District Attorney
Westchester County
111 Dr. Martin Luther King, Jr. Boulevard
White Plains, New York 10601

Doc. # 1048636

WESTCHESTER COUNTY DISTRICT ATTORNEY'S OFFICE
DISCOVERY DISCLOSURE INDEX PURSUANT TO CPL 245.20 AND 245.50

[redacted]

PEOPLE v Michael Molina

DOCKET NO. CR-3495-21

DISCOVERABLE ITEM	PAGES	ATTACHED HERETO	INSPECTION CONSENTED	SENT VIA PORTAL	N/A	NONE PRESENTLY KNOWN
Accusatory Instruments	5					
A) CPL § 710.30 Statement/Identification Notices				✓		
B) Civilian Witness List					✓	
C) Law Enforcement Witness List					✓	
D) Witness Statements/Relevant Information	1	✓				
E(1) Police Reports	4					✓
E(2) Supporting Depositions English and Spanish				✓		
E(3) Owner's Depositions						✓
E(4) Supplemental Reports						✓
E (6) Detective Reports						✓
E (7) Ballistics Report/ Rosario						✓
E (10) P.O./Det. Handwritten notes						✓
E (11) Property/Evidence Forms						✓
E (12) HIPPA Forms	2			✓		
E (13) Consent Forms						✓
E) Expert Opinion Evidence- See Portal						✓
G(1) 911 call						✓
G (2) Radio Transmissions + Sprint.						✓
G (3) Surveillance Video				✓		
G (4) Booking Video						✓
G (5) City Camera Video						✓
G (6) Body Camera Video						✓
H (1) Photographs-CSU and Precinct						✓
H (2) Photographic Arrays/Single Photo ID						✓
H (3) Booking Photographs						✓
I) 450.10 Photographs						✓
J) Lab Reports/ Lab Rosario						✓
K) Impeachment Material on Civilian Witnesses						✓
K) Impeachment Material on Police Witnesses	42			✓		
L) Promises/Inducements to Witnesses						✓
M) Property/Evidence Possessed by Defendant						✓
N) Search warrant Documents						✓
O) List of Tangible Evidence for Trial						✓
P) Judgments of Conviction – Civilian Witnesses						✓
P) Judgments of Conviction – Police Witnesses						✓
Q) Pending Cases Against Civilian Witnesses						✓
Q) Pending Cases Against Police Witnesses						✓
R) Bill of Particulars – see Accusatory Instrument						✓

S) VEHICLE & TRAFFIC OFFENSES

	PAGES	ATTACHED HERETO	INSPECTION CONSENTED	SENT VIA PORTAL	N/A	NONE PRESENTLY KNOWN
S(1)DWI Supporting Deposition/BOP/710.30 Notice	2			✓		
S(2) Report of Refusal	1					
S (3) Refusal Warnings	1			✓		
S (4) DWI Investigative Notes	1			✓		
S (5) BAC Report	2			✓		
S (6) Operational Checklist				✓		
S (7) Calibration & Maintenance Records	41					✓
S (8) Operator Certification	2			✓		
S (9) DMV Abstract Documents				✓		
S (10) MV-104 Accident Report						✓
T) Computer crime evidence						✓
U) Electronically created or stored information - cell phone downloads						✓
						✓
EJustice Report						
N/A @ N/A						✓
DAT						✓
Driver's License/Registration	2			✓		✓
RAP Sheet	6			✓		
Miranda Warnings	1			✓		
Store Receipt						✓
Impound Form/ Tow Receipt	1			✓		
Order of Protection						✓
IK Responses – Civilian Witnesses						✓
IK Responses – Police Witnesses	2			✓		
Return to Court Reminder						✓

OTHER Drager Printout 2 ✓

Communications/background	12			✓		
Dall / Rall	4			✓		
Third Party ID	1			✓		
Mugshot	2			✓		

Completed by: Sarah Martinez

Date: 7/28/21

[1] "Attached discovery materials," includes all information and material send electronically via the defense counsel portal.

- Please contact the White Plains Branch to schedule an appointment during which time items will be made available for inspection and copy subject to any protective order, Please bring a thumb drive or alternate means to copy the above referenced digital evidence.
- To the extent that the statement notices reference recordings that have not previously been provided, the Office of the District Attorney hereby consents to their inspection. Please contact the White Plains Branch at 914-422-6265 to schedule an appointment during which time the items will be made available for inspection and copy subject to protective order. Please bring a thumb drive or alternate means to copy the above referenced digital evidence.

WESTCHESTER COUNTY DISTRICT ATTORNEY'S OFFICE
DISCOVERY ADDENDUM CPL § 245.10 & 245.20

PEOPLE v Michael Molina DOCKET NO. 3495-21

245.20(1)(C). In addition to those names referenced in the attached discovery materials[1], the people may call the following non-law enforcement witnesses during the prosecution of this case, who can be reached at the below telephone numbers:

Name	Contact Information
1.	
2.	
3.	
4.	
5.	

245.20(1)(D). In addition to those names referenced in the attached discovery materials, the people may call the following law enforcement witnesses in during the prosecution of this case:

Name	Agency
1. Tpr. Fortune	NYSP
2. Tpr. McMahon	
3.	
4.	
5.	

245.20(1)(F). The information about the expert witness is unknown for disclosure at this time. This information will be disclosed when it is received.

245.20(1)(M). The following tangible property was possessed or obtained from the defendant or co-defendants:

Item	Location of Item	(Actual/Constructive/Abandoned)
1.		
2.		
3.		
4.		
5.		

245.20(1)(O). The prosecution intends to introduce all tangible property referenced in the discovery materials and the above list.

245.20(1)(P). The People hereby consent to inspection of any judgements of conviction for all defendants and persons designated as potential prosecution witnesses. Please contact the respective branch office to schedule an appointment during which time the items will be made available for inspection and copying subject to any protective order.

245.20(1)(R). See attached discovery materials for the approximate date, time and place of the charged offenses, arrest of the defendant, and seizure of the defendant if applicable. If additional information is required, it is as follows:

245.20(1)(U). The People hereby consent to the inspection of any electronically created or stored information including cellular telephone downloads. Please contact the respective Branch Office and schedule an appointment when the materials will be made available for copying. Please bring a thumb drive or alternate means to copy the above evidence.

---

[1] "Attached discovery materials," includes all information and material send electronically via the defense counsel portal.

- Please contact the White Plains Branch to schedule an appointment during which time items will be made available for inspection and copy subject to any protective order. Please bring a thumb drive or alternate means to copy the above referenced digital evidence.
- To the extent that the statement notices reference recordings that have not previously been provided, the Office of the District Attorney hereby consents to their inspection. Please contact the White Plains Branch at 914-422-8165 to schedule an appointment during which time the items will be made available for inspection and copy subject to protective order. Please bring a thumb drive or alternate means to copy the above referenced digital evidence

EXHIBIT B

New York State Police

Professional Standards

Member Resume

Trooper Angelo Y Fortune [4497/120108042]

Part I - Personal Information

Name: Trooper Angelo Y Fortune
Employee ID Number: 120108042 Badge No: 4497 Hire Dt: 12/01/2008

Troop or Detail: Troop T
Zone: Zone 1
Station: New Rochelle

Part II - Incidents

Personnel Complaint IA #: DCN2015-0100 Case #:

Received date: Mar 5, 2015 Occurred date: Feb 21, 2015

Classification: Personnel Complaint
Allegation(s):

Unprofessional Conduct - Unsubstantiated
Improper Police Action - Unsubstantiated

Disciplinary action(s)
<None>

Incident summary:

Synopsis: Complainant alleges that Trooper Angelo Fortune treated her rudely and issued her two UTTs because she requested he complete an accident report.

Notes: 4/14/15: Still being investigated. 4/29/15: Inv. on-going at Zone. 5/14/15: Inv. still on-going. 5/27/15: Mailed to IAB on 5/26/15. 5/28/15: At IAB-S for review. 6/1/15: Forwarded to IAB-Hq

---

Personnel Complaint IA #: DCN2018-0023 Case #:

Received date: Jan 12, 2018 Occurred date: Dec 17, 2017

Classification: Personnel Complaint
Allegation(s):

Unprofessional Conduct - Unsubstantiated May 15, 2018
Improper Police Action - Unsubstantiated May 15, 2018

Unlawful Search - Unsubstantiated May 15, 2018

Disciplinary action(s)
<None>

Incident summary:

Synopsis: Complainant alleges that following her arrest and while seated inside the patrol vehicle of SP New Rochelle Trooper Angelo Fortune, she was inappropriately touched in the genital area by the trooper. She additionally advised that her vehicle which had become disabled on the shoulder of I-95 had been forcibly entered by the trooper subsequently leading to the discovery of marijuana and a handgun.

Notes: 4/4/2018 at SRO under review - 04/06/18 sent to HQ

Personnel Complaint IA #: DCN2018-0456 Case #:

Received date: Oct 12, 2018 Occurred date: Sep 12, 2018

Classification: Personnel Complaint
Allegation(s):

Discredited Division - Founded Jul 18, 2019
Disobeyed Order/Directive/Instructions - Founded Jul 18, 2019
Improper Handling of Evidence - Founded Jul 18, 2019

Disciplinary action(s)

Censured Jul 18, 2019 Days/hrs suspended:
SWOP Jul 18, 2019 Days/hrs suspended: 7
Probation Jul 18, 2019 Days/hrs suspended: 180

Incident summary:

Synopsis: New York State Thruway Authority employee discovers a large quantity of drugs inside a motor vehicle which had been previously impounded by SP New Rochelle, Trooper Angelo Y. Fortune on 09/12/18.

Notes: Not Entered

IAB 9/6/19

Personnel Complaint IA #: DCN2020-0071 Case #:

Received date: Mar 3, 2020 Occurred date: Feb 19, 2020

Classification: Personnel Complaint
Allegation(s):

Poor Judgement - Founded Dec 16, 2020

Disciplinary action(s)

Censured Jan 7, 2021 Days/hrs suspended:
Vacation Days Penalized Jan 7, 2021 Days/hrs suspended: 3

Incident summary:

Complainant, along with his attorney, allege that following a DMV Refusal Hearing on February 19, 2020, Trooper Angelo Y. Fortune unlawfully took the complainant into custody, detained him and subsequently transported him to SP New Rochelle for the sole purpose of obtaining fingerprints relative to an associated DWI arrest which occurred on December 19, 2019 (original fingerprints rejected). Complainant additionally alleged that he believed that the unprofessional treatment had been motivated by a previous online connection between he and Trooper Fortune.

At SRO 10/8/20 - 10/20/2020 - Reviewed and approved by A/Insp. G.S. Thomas. Founded on Troopers Fortune and Grant. Relays to PSB HQ.

11/06/2020 - returned to PSB SRO for corrections. RBG

12/03/2020 - received from Troop. Approved by A/Insp. G.S. Thomas. Relays to PSB HQ

12/7/2020- Received at PSB in ADS INV.

Printed: Apr 23, 2021 13:14 By: Assistant Counsel Amanda Nissen