

TEXAS ETHICS COMMISSION

IN THE MATTER OF
DIANNA D. PUC CETTI,
RESPONDENT

§
§
§
§
§

BEFORE THE
TEXAS ETHICS COMMISSION
SC-290103

ORDER and AGREED RESOLUTION

I. Recitals

The Texas Ethics Commission (the commission) met on August 6, 2009, to consider sworn complaint SC-290103. A quorum of the commission was present. The commission determined that there is credible evidence of violations of sections 254.001, 254.031(a)(1), 254.031(a)(3), and 254.036(h), of the Election Code, and credible evidence of a technical or *de minimis* violation of section 254.031(a)(6) of the Election Code, laws administered and enforced by the commission. To resolve and settle this complaint without further proceedings, the commission proposed this resolution to the respondent.

II. Allegations

The complaint alleged that the respondent failed to include required information in campaign finance reports and failed to execute an affidavit with a campaign finance report. The complaint also alleged that the respondent accepted cash contributions exceeding \$100 and failed to keep a record of political contributions. The complaint further alleged that the respondent accepted a political contribution from a labor organization.

III. Facts Supported by Credible Evidence

Credible evidence available to the commission supports the following findings of fact:

1. The respondent was a successful candidate in a special election held on May 12, 2007, to fill an unexpired term for city council of Galveston. The following year, the respondent was an unsuccessful incumbent candidate for city council in an election held on May 10, 2008.
2. The complaint alleged that the respondent failed to include required information in campaign finance reports and failed to execute an affidavit with a campaign finance report. The complaint also alleged that the respondent accepted cash contributions exceeding \$100 and failed to keep a record of political contributions. The complaint further alleged that the respondent accepted a political contribution from a labor organization.

3. The allegations were based on the respondent's 8-day pre-election report for the May 12, 2007, election; July 2007 and January 2008 semiannual reports; 30-day and 8-day pre-election reports for the May 10, 2008, election; and July 2008 semiannual report.
4. The respondent filed corrections to the reports at issue but did not include correction affidavits.
5. The respondent's 8-day pre-election report for the May 2007 election disclosed the following:
 - A blank field for total political contributions of \$50 or less (corrected to a line through the field)
 - \$6,800 in total political contributions
 - A blank field for total political expenditures of \$50 or less (corrected to a line through the field)
 - \$3,468.41 in total political expenditures
 - \$3,331.59 in total political contributions maintained as of the last day of the reporting period
 - \$0 in outstanding loans
6. The respondent's July 2007 semiannual report disclosed the following:
 - A blank field for total political contributions of \$50 or less (corrected to a line through the field)
 - \$9,875 in total political contributions
 - A blank field for total political expenditures of \$50 or less (corrected to a line through the field)
 - \$1,205.45 in total political expenditures
 - \$12,225.37 in total political contributions maintained as of the last day of the reporting period
 - "N/A" in the field for outstanding loans
7. The respondent's January 2008 semiannual report disclosed the following:
 - \$0 in total political contributions of \$50 or less
 - \$0 in total political contributions
 - \$0 in total political expenditures of \$50 or less
 - \$82 in total political expenditures
 - \$12,114.52 in total political contributions maintained as of the last day of the reporting period
 - \$0 in outstanding loans

8. The respondent's 30-day pre-election report for the May 2008 election disclosed the following:
 - A blank field for total political contributions of \$50 or less (corrected to a line through the field)
 - \$1,300 in total political contributions
 - A blank field for total political expenditures of \$50 or less (corrected to a line through the field)
 - \$7,350.16 in total political expenditures
 - \$6,064.37 in total political contributions maintained as of the last day of the reporting period
 - \$0 in outstanding loans

9. The respondent's 8-day pre-election report for the May 2008 election disclosed the following:
 - \$575 in total political contributions of \$50 or less
 - \$7,325 in total political contributions
 - A line through the field for total political expenditures of \$50 or less
 - \$10,148.21 in total political expenditures
 - \$3,241.16 in total political contributions maintained as of the last day of the reporting period
 - "N/A" in the field for outstanding loans

10. The respondent's July 2008 semiannual report disclosed the following:
 - \$1,126 in total political contributions of \$50 or less
 - \$3,426 in total political contributions (corrected to \$3,576)
 - A line through the field for total political expenditures of \$50 or less
 - \$2,515.73 in total political expenditures
 - \$4,121.43 in total political contributions maintained as of the last day of the reporting period
 - "NONE" in the field for outstanding loans

Political Contributions of \$50 or Less

11. The complaint alleged that the respondent failed to disclose the total amount of political contributions of \$50 or less in her 8-day pre-election report for the May 2007 election, July 2007 semiannual report, and 30-day pre-election report for the May 2008 election.

12. The field for total political contributions of \$50 or less, unless itemized, in the totals section was left blank on each report. Out of 23 political contributions itemized on the 8-day report for the May 2007 election, there were seven contributions totaling \$350 that in the aggregate

did not exceed \$50 to one person. Out of 29 political contributions itemized on the July 2007 semiannual report, there were two contributions totaling \$75 that in the aggregate did not exceed \$50 to one person. Out of three political contributions itemized on the 30-day pre-election report for the May 2008 election, none were less than \$50 to one person.

13. In response to the allegation, the respondent swore that all donations, including all donations of \$50 or less, were itemized in the reports at issue. The respondent corrected the reports at issue to replace the blank field in the totals section with a line marked through the field.

Failure to Properly Disclose Total Political Contributions

14. The complaint alleged that the respondent disclosed an incorrect amount of total political contributions accepted in her July 2008 semiannual report.
15. The report at issue disclosed the following contribution totals: \$1,126 in total political contributions of \$50 or less, and \$3,426 in total political contributions accepted. The calculated total of all political contributions itemized on Schedule A (used to disclose political contributions) in the report is \$2,450. The correct total of political contributions accepted should be \$3,576 (calculated by adding \$1,126 + \$2,450). The discrepancy between the amount of total political contributions disclosed on the report and the actual total is \$150.
16. In response to the allegation, the respondent swore that a mathematical calculation error could have occurred or that one entry of \$150, which was disclosed on the last page of the contribution schedule, was not added to the calculated total. The respondent corrected the report to disclose \$3,576 as the amount of total political contributions.

Failure to Timely Disclose Political Contributions

17. The complaint alleged that the respondent failed to timely report certain political contributions because the dates of the contributions fall outside of the reporting periods covered by the reports in which the contributions were disclosed.
18. The respondent filed her July 2007 semiannual report on July 16, 2007, covering a period from May 3, 2007, through July 15, 2007. Out of 29 total political contributions, the report disclosed the following three political contributions with dates that fall outside of the reporting period:
 - \$250 from John & Susan Eckel on April 26, 2007;
 - \$100 from Leo & Jeanette Ritzler on May 1, 2007; and
 - \$500 from GMPA-PAC on May 1, 2007.
19. The respondent did not make corrections to the political contributions at issue. In response to the allegation related to the July 2007 semiannual report, the respondent swore:

All three donations are dated close to the end date of the previous reporting period, which was 5/3/07, and I most likely did not receive these donations until after that date. When I list a contribution I use the date on the check and not the date I received to record on the reporting Schedule. I make copies of all donation checks before depositing them and matching the date on the check with the date listed on the report allows them to be clearly matched and accounted for which keeps the paper trail as simple as possible.

20. The respondent filed her 8-day pre-election report for the May 2008 election on May 2, 2008, covering a period from April 11, 2008, through May 2, 2008. Out of 14 total political contributions, the report disclosed the following political contribution with a date that falls outside of the reporting period:

- \$2,000 from GMPA-PAC on March 28, 2008.

21. The respondent did not make corrections to the political contribution at issue. In response to the allegation related to the 8-day pre-election report for the May 2008 election on May 2, 2008, the respondent swore:

The reporting period prior to this report ended on 4/10/08. I assume, although I do not directly recall, that either I received this check after the 4/10/08 report was filed or that I erred in not getting it processed and recorded on the prior report.

22. The respondent filed her July 2008 semiannual report on July 15, 2008, covering a period from May 3, 2008, through July 15, 2008. Out of six total political contributions, the report disclosed the following four contributions with dates that fall outside of the reporting period:

- \$1,000 from Responsible Government PAC on April 10, 2008;
- \$500 from Russel Walla on April 2, 2008;
- \$400 from W.A. Kilpatrick on April 9, 2008; and
- \$150 from Bettijane Schoeffler on April 15, 2008.

23. The complaint also alleged that the respondent failed to disclose the dates for the following two political contributions out of the six contributions itemized on the July 2008 report:

- \$300 from Barry Goodman with no date (corrected date to be April 23, 2008); and
- \$100 from Scott Rice with no date (corrected date to be on April 20, 2008).

24. In response to the allegations related to the July 2008 semiannual report, the respondent corrected the report to disclose dates that fall outside the reporting period for the two

political contributions originally reported without dates.

25. The respondent swore that the omission of the dates of the contributions at issue was an error and not intentional. The respondent made no changes to the remainder of the political contributions at issue and swore:

I do not know why these checks were not listed until the July 15 report. The previous reporting period closed on May 2, 2008[.] I do know that thank you notes were generated on or very near to the date that donations were received.

Cash Political Contributions

26. The complaint alleged that the respondent accepted cash political contributions of unknown amounts during the reporting period for the July 2007 semiannual report.
27. The allegation is based on a political contribution of \$300 on May 12, 2007, for which the respondent disclosed the name of the contributor as “Misc Cash Donations,” with no address.
28. In response to the allegation, the respondent swore that the entry represents “the aggregate of multiple small cash donations received during that period and placed in [a] donation bowl at a fund raiser.”
29. The respondent corrected other errors in the report at issue but did not make any correction to the political contribution at issue.

Political Contribution from a Labor Organization

30. The complaint alleged that the respondent unlawfully accepted a political contribution from a labor organization during the period covered by the 8-day pre-election report for the May 2008 election.
31. The allegation is based on a political contribution of \$1,000 from “Int’l Union of Operation Eng.” on April 10, 2008, that was disclosed in the report at issue.
32. In response to the allegation, the respondent swore that, “The contribution accepted from the International Union of Operating Engineers O.P.E.R.A.T.E. [sic] Fund was not in violation.”
33. The respondent submitted a copy of a check from “International Union of Operating Engineers, Local Union 450, O.P.E.A.T.E. Fund” payable to the respondent for \$1,000. The respondent also submitted a copy of the cover letter, which accompanied the check. The cover letter stated that the “O.P.E.A.T.E. Fund is a voluntary political fund dedicated to furthering the objectives of [the International Union of Operating Engineers] Local 450, and is funded by voluntary contributions from the members of Local 450.”

34. There is a general-purpose political committee registered with the commission named Operator's Political Educational and Recruitment Awareness Towards Elections (O.P.E.R.A.T.E.) with the same address as the organization at issue.
35. The respondent corrected the political contribution at issue in her 8-day pre-election report for the May 2008 election to disclose the full name of the contributor as "Int'l Union of Operation Eng., OPERATE Fund".

Political Expenditures of \$50 or Less

36. The complaint alleged that the respondent failed to disclose the total amount of political expenditures of \$50 or less in her 8-day pre-election report for the May 2007 election, July 2007 semiannual report, and 30-day pre-election report for the May 2008 election.
37. The field for total political expenditures of \$50 or less, unless itemized, in the totals section was left blank on each report. Out of 11 political expenditures itemized on the 8-day report for the May 2007 election, there was one expenditure of \$44 to one payee. Out of eight political expenditures itemized on the July 2007 semiannual report, there were five expenditures totaling approximately \$112 that in the aggregate did not exceed \$50 to one person. Out of 11 political expenditures itemized on the 30-day report for the May 2008 election, there were three expenditures totaling approximately \$112 that in the aggregate did not exceed \$50 to one person.
38. In response to the allegation, the respondent swore that all expenditures, including all expenditures of \$50 or less, were itemized in the reports at issue. The respondent corrected the reports at issue to replace the blank field in the totals section with a line marked through the field.

Failure to Fully Disclose Political Expenditures

39. The complaint alleged that the respondent failed to disclose the purpose of a political expenditure in her 8-day pre-election report for the May 2007 election. The report at issue disclosed a payment of \$46.55 to Speedy's Printing on April 27, 2007, but did not describe the purpose of the expenditure.
40. The respondent corrected the report at issue to disclose the purpose of the expenditure as "plastic door hanger bags."

41. The complaint also alleged that the respondent failed to disclose the full addresses of payees in her July 2007 semiannual report, January 2008 semiannual report, 30-day and 8-day pre-election reports for the May 2008 election, and July 2008 semiannual report.
42. The respondent itemized eight political expenditures in her July 2007 semiannual report. Four of those expenditures, totaling approximately \$918, did not disclose the payee's complete address. The report failed to disclose the entire address for one expenditure of \$344 to The Islander Magazine on May 5, 2007, for "Advertising." The report failed to disclose the street address for one expenditure of \$511 to Tim Day – Stitch House on May 6, 2007, for "T-shirts." The remaining two expenditures at issue, totaling approximately \$63, also failed to disclose the street address but did not in the aggregate exceed \$50 to one person.
43. The respondent itemized one political expenditure of \$82 to the U.S. Postal Service on November 19, 2007, for "postage stamps" in her January 2008 semiannual report. The report did not disclose the payee's street address.
44. The respondent itemized 11 political expenditures in her 30-day pre-election report for the May 2008 election. Ten of those expenditures, totaling approximately \$6,650, failed to disclose the entire address. Three of the expenditures at issue, totaling approximately \$112, failed to disclose the street address but did not in the aggregate exceed \$50 to one person.
45. The respondent itemized 12 political expenditures in her 8-day pre-election report for the May 2008 election. The report did not disclose the payee's street address and zip code for one expenditure of \$300 to Matt Fleming on April 21, 2008, for "database/labels."
46. The respondent itemized four political expenditures in her July 2008 semiannual report. The report failed to disclose the payee's entire address for one expenditure of \$2,343.73 to Galveston Co. Daily News on May 9, 2008, for political advertising.
47. In response to the allegations, the respondent swore:

All expenditures were with local Galveston businesses on Galveston Island who are clearly identified as to the business, purpose of the expenditure, and amount as recorded on Schedule F. Each of these businesses are separate and distinct entities who are readily identifiable by the name of the business. With the exception of the United States Postal Service which has two locations in Galveston, all businesses have only one location on the Island.
48. The respondent filed corrections to the reports at issue to disclose the complete addresses of the payees of the political expenditures at issue.

Failure to Properly Execute an Affidavit with a Report

49. The complaint alleged that the respondent failed to execute a notary affidavit with her July 2007 semiannual report.
50. The report at issue was date stamped as received in the City Secretary's Office, City of Galveston, on July 16, 2007. The affidavit section of the report included the respondent's signature but was not notarized.
51. In response to the allegation, the respondent swore:

The stamp on the front of the report for the City Secretary's office was stamped and signed as received by Nellie (Manuela) De la Fuente, who is Assistant City Secretary and notary. I signed the affidavit, and I cannot speak as to why the notary affidavit was not completed, but Ms. De la Fuente took the report directly from me and stamped it as received.
52. The respondent's corrected report includes a properly executed notary affidavit.

IV. Findings and Conclusions of Law

The facts described in Section III support the following findings and conclusions of law:

Political Contributions of \$50 or Less

1. Each campaign finance report must include the total amount or a specific listing of the political contributions of \$50 or less accepted during the reporting period. ELEC. CODE § 254.031(a)(5).
2. The respondent disclosed all contributions of \$50 or less in an itemized listing rather than disclosing the contributions as a lump sum total amount in the reports at issue.
3. Although the respondent left blank the field for disclosing political contributions of \$50 or less, unless itemized, it is apparent when viewing the report that the respondent detailed all of her contributions, even those of \$50 or less. Therefore, there is credible evidence that the respondent did not violate section 254.031(a)(5) of the Election Code.

Failure to Properly Disclose Total Political Contributions

4. Each campaign finance report must include the total amount of all political contributions accepted and the total amount of all political expenditures made during the reporting period. ELEC. CODE § 254.031(a)(6).

5. The respondent did not correctly calculate the amount of total political contributions accepted during the reporting period.
6. The respondent disclosed the contributions she received during the reporting period, but entered an incorrect total on the report's cover page. The amount of the discrepancy was \$150 and the respondent corrected the total amount in the report at issue. Therefore, there is credible evidence that the respondent committed a technical or *de minimis* violation of section 254.031(a)(6) of the Election Code.

Failure to Timely Disclose Political Contributions

7. Each campaign finance report must include the amount of political contributions from each person that in the aggregate exceed \$50 and that are accepted during the reporting period by the person or committee required to file a report, the full name and address of the person making the contributions, and the dates of the contributions. ELEC. CODE § 254.031(a)(1).
8. A determination to accept or refuse a political contribution that is received by a candidate, officeholder, or political committee shall be made not later than the end of the reporting period during which the contribution is received. ELEC. CODE § 254.034(a).
9. The date of a political contribution is the date a candidate or officeholder accepts the contribution.
10. The respondent failed to timely disclose three political contributions totaling \$850, which remain on the July 2007 semiannual report; one political contribution of \$2,000, which remains on the 8-day pre-election report for the May 2008 election; and six political contributions totaling \$2,450, which remain on the July 2008 semiannual report.
11. The respondent failed to disclose any date at all for two of the contributions totaling \$400 on the July 2008 semiannual report. The respondent corrected the July 2008 semiannual report to disclose dates for those contributions that are outside the reporting period of the report at issue.
12. Based on the respondent's sworn statements, it appears that the respondent disclosed the date of each political contribution at issue as the date printed on the contributor's check rather than the date she accepted each contribution.
13. Although the respondent corrected other errors on the reports at issue, she did not correct the dates of the political contributions at issue or move the contributions to reports covering different reporting periods. Therefore, there is credible evidence that the respondent violated section 254.031(a)(1) of the Election Code in connection with the contributions.

Cash Political Contributions

14. A candidate, officeholder, or specific-purpose committee may not knowingly accept from a contributor in a reporting period political contributions in cash that in the aggregate exceed \$100. ELEC. CODE § 253.033(a).
15. Each campaign finance report must include the amount of political contributions from each person that in the aggregate exceed \$50 and that are accepted during the reporting period by the person or committee required to file a report, the full name and address of the person making the contributions, and the dates of the contributions. ELEC. CODE § 254.031(a)(1).
16. Each candidate and each officeholder shall maintain a record of all reportable activity. ELEC. CODE § 254.001(a). The record must contain the information that is necessary for filing required campaign finance reports. *Id.* § 254.001(c).
17. The respondent disclosed a political contribution of \$300 from an unnamed source on her July 2007 semiannual report.
18. While the respondent swore that the contribution at issue is an aggregate total of multiple small cash donations received at a fundraiser, the evidence did not indicate whether the amount of cash contributed by any one individual exceeded \$100. Therefore, there is insufficient evidence that the respondent violated section 253.033(a) of the Election Code.
19. A candidate or officeholder is required to keep a record of all reportable activity.
20. A political contribution that in the aggregate exceeds \$50 from a person must be itemized on a campaign finance report to disclose contributor information, including the contributor's full name and address.
21. The evidence did not indicate that the respondent attempted to obtain any of the contributors' names or addresses when the \$300 political contribution at issue was received, and the respondent does not have the contribution information for the \$300 at issue. Therefore, there is credible evidence that the respondent violated section 254.001 of the Election Code in connection with the contribution.

Political Contribution from a Labor Organization

22. A corporation or labor organization may not make a political contribution or political expenditure that is not authorized by subchapter D of title 15 of the Election Code. ELEC. CODE § 253.094(a). That subchapter does not authorize corporations or labor organizations to make political contributions to a candidate.
23. A person may not knowingly accept a political contribution the person knows to have been made in violation of chapter 253 of the Election Code. *Id.* § 253.003(b).

24. The \$1,000 political contribution disclosed on the report at issue was from the International Union of Operating Engineers' general-purpose political committee, O.P.E.R.A.T.E., and not from the labor organization itself.
25. Therefore, there is credible evidence that the respondent did not violate section 253.003(b) of the Election Code by accepting a political contribution that is illegal under section 253.094(a) of the Election Code.

Political Expenditures of \$50 or Less

26. Each campaign finance report must include the total amount or a specific listing of the political expenditures of \$50 or less made during the reporting period. ELEC. CODE § 254.031(a)(5).
27. The respondent disclosed all expenditures of \$50 or less in an itemized listing rather than disclosing the expenditures as a lump sum total amount in the reports at issue.
28. Although the respondent left blank the field for disclosing political expenditures of \$50 or less, unless itemized, it is apparent when viewing the report that the respondent detailed all of her expenditures, even those of \$50 or less. Therefore, there is credible evidence that the respondent did not violate section 254.031(a)(5) of the Election Code.

Failure to Fully Disclose Political Expenditures

29. Each campaign finance report must include the amount of political expenditures that in the aggregate exceed \$50 and that are made during the reporting period, the full name and address of the persons to whom the expenditures are made, and the dates and purposes of the expenditures. ELEC. CODE § 254.031(a)(3).
30. Each campaign finance report must include the total amount or a specific listing of the political expenditures of \$50 or less made during the reporting period. *Id.* § 254.031(a)(5).
31. The respondent failed to disclose on her 8-day pre-election report for the May 2007 election the purpose of a political expenditure of \$46.55 to Speedy's Printing. The report discloses two other political expenditures, totaling approximately \$265, made to the same payee during the reporting period. The information was required because the expenditure at issue in the aggregate exceeded \$50 made to one person during the reporting period. Therefore, there is credible evidence of a violation of section 254.031(a)(3) of the Election Code in connection with the expenditure.
32. In the five reports at issue, the respondent failed to disclose the full payee addresses for a total of approximately \$10,119 in political expenditures to payees to which she made political expenditures exceeding \$50 during the respective reporting periods. The

respondent corrected each of the reports at issue to disclose the full payee addresses for the political expenditures at issue. Therefore, there is credible evidence of a violation of section 254.031(a)(3) of the Election Code in connection with the expenditures.

Failure to Properly Execute an Affidavit with a Report

33. Each report that is not filed by electronic transfer must be accompanied by an affidavit executed by the person required to file the report. The affidavit must contain the statement: "I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code." Each report filed by electronic transfer must be under oath by the person required to file the report and must contain, in compliance with commission specifications, the digitized signature of the person required to file the report. A report is considered to be under oath by the person required to file the report, and the person is subject to prosecution under Chapter 37, Penal Code, regardless of the absence of or a defect in the affidavit. ELEC. CODE § 254.036(h). The respondent failed to include a properly notarized affidavit on her July 2007 semiannual report. Therefore, there is credible evidence of a violation of section 254.036(h) of the Election Code.

V. Representations and Agreement by Respondent

By signing this order and agreed resolution and returning it to the commission:

1. The respondent neither admits nor denies the facts described under Section III or the commission's findings and conclusions of law described under Section IV, and consents to the entry of this order and agreed resolution solely for the purpose of resolving this sworn complaint.
2. The respondent consents to this order and agreed resolution and waives any right to further proceedings in this matter.
3. The respondent acknowledges that each campaign finance report must include the amount of political contributions from each person that in the aggregate exceed \$50 and that are accepted during the reporting period by the person or committee required to file a report, the full name and address of the person making the contributions, and the dates of the contributions. The respondent acknowledges that each report must include the total amount of all political contributions accepted during a reporting period. The respondent also acknowledges that each campaign finance report must include the amount of political expenditures that in the aggregate exceed \$50 and that are made during the reporting period, the full name and address of the persons to whom the expenditures are made, and the dates and purposes of the expenditures. The respondent further acknowledges that each candidate and each officeholder shall maintain a record of all reportable activity and the record must contain the information that is necessary for filing required campaign finance reports. The respondent acknowledges that each report that is not filed by electronic transfer must be accompanied by an affidavit executed by the person required to file the report, and the

affidavit must contain the statement: "I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code." The respondent agrees to comply with these requirements of the law.

VI. Confidentiality

This order and agreed resolution describes violations that the commission has determined are neither technical nor *de minimis*. Accordingly, this order and agreed resolution is not confidential under section 571.140 of the Government Code and may be disclosed by members and staff of the commission.

VII. Sanction

After considering the seriousness of the violations described under Sections III and IV, including the nature, circumstances, and consequences of the violations, and after considering the sanction necessary to deter future violations, the commission imposes a \$1,000 civil penalty.

VIII. Order

The commission hereby orders that if the respondent consents to the proposed resolution, this order and agreed resolution is a final and complete resolution of SC-290103.

AGREED to by the respondent on this _____ day of _____, 20____.

Dianna D. Puccetti, Respondent

EXECUTED ORIGINAL received by the commission on: _____.

Texas Ethics Commission

By: _____
David A. Reisman, Executive Director