

NEW YORK CITY
OFFICE OF ADMINISTRATIVE TRIALS AND HEARINGS
ENVIRONMENTAL CONTROL BOARD

BOARD MEETING

Office of Administrative Trials and Hearings
OATH Multi-Purpose Training Room
100 Church Street, 12th Floor, New York, New York

December 7, 2023

9:38 AM to 10:14 AM

MEMBERS PRESENT:

Asim Rehman, Esq. - Commissioner/Chief Administrative Law Judge, OATH, Chair/Executive Director, OATH ECB
Joseph Gregory, Esq. - New York City Fire Department (FDNY)
Elizabeth Knauer, Esq. - Appointed Member (Water)
Madelynn Liguori, Esq. - Department of Sanitation (DSNY)
Russell Pecunies, Esq. - Department of Environmental Protection (DEP)
Harminderpal Rana, Esq. - Department of Health & Mental Hygiene (DOHMH)
Matthew Schneid, Esq. - Appointed Member (Real Estate)
Thomas D. Shpetner, Esq. - Appointed Member (Business): Remote Presence
Lisa Urban, Esq. - Appointed Member
Jarrold Whittington - Appointed Member (Noise)

ALSO PRESENT:

Sola Best, Esq. - Assistant General Counsel, OATH
Cindy Chen - Analyst, Office of Management and Budget (OMB)
Kelly Corso, Esq. - Assistant Commissioner/Hearings Division
Amber Gonzalez, Esq. - Hearing Officer, OATH
Diana Haines, Esq. - Assistant General Counsel, OATH
Madeline Halimi, Esq. - Assistant General Counsel, OATH
Timothy Jones, Esq. - Senior Counsel, OATH
David C. Kim, Esq. - Assistant General Counsel, OATH
Peter Schulman, Esq. - Deputy Commissioner/Appeals Division, OATH
Frances Shine - Secretary to the Board, OATH
Amy Slifka, Esq. - Deputy Commissioner/Hearings Division, OATH
Tom Southwick, Esq. - Assistant Commissioner/Appeals Division, OATH
Olga Statz, Esq. - Deputy Commissioner/General Counsel, OATH

1 (The board meeting commenced at 9:38 a.m.)

2 COMMISSIONER ASIM REHMAN: Hi. Good morning.
3 It is December 7th, and we're meeting for the
4 Environmental Control Board's December meeting. I'd like
5 to call the meeting to order as chair. We will first
6 review the agenda and make some adjustments. Item number
7 2 on the agenda is welcoming new board Lisa Urban. I'm
8 going to move that down after the executive session, and
9 otherwise, why don't we start with a roll call to verify
10 quorum? GC's team, would you please take the lead?

11 MR. DAVID KIM: Good morning, all, we'll start
12 with Commissioner Asim Rehman.

13 COMMISSIONER ASIM REHMAN: Present.

14 MR. DAVID KIM: Shamonda Graham. Joseph
15 Gregory.

16 MR. JOSEPH GREGORY: Present.

17 MR. DAVID KIM: Elizabeth Knauer.

18 MS. ELIZABETH KNAUER: Present.

19 MR. DAVID KIM: Madelynn Liguori.

20 MS. MADELYNN LIGUORI: Present.

21 MR. DAVID KIM: Harminderpal Rana.

22 MR. HARMINDERPAL RANA: Present.

23 MR. DAVID KIM: Russell Pecunies.

24 MR. RUSSELL PECUNIES: Present.

25 MR. DAVID KIM: Matthew Schneid.

1 MR. MATTHEW SCHNEID: Present.

2 MR. DAVID KIM: Thomas Shpetner.

3 MR. THOMAS SHPETNER: Present.

4 MR. DAVID KIM: Matthew Smith. Douglas Swann.
5 Jarrod Whittington.

6 MR. JARROD WHITTINGTON: Present.

7 MR. DAVID KIM: Lisa Urban. We have a quorum,
8 eight out of 13.

9 COMMISSIONER ASIM REHMAN: Okay. Thank you very
10 much. Next order of business on the agenda are the
11 minutes from the October 12th, 2023 meeting. I hope
12 everyone has had a chance to review. Does anyone have any
13 corrections to the minutes? Okay. Hearing none. Seeing
14 none -- seeing none. Can we have a motion and a second to
15 adopt the minutes of the October 12th, 2023 meeting?

16 MS. MADELYNN LIGUORI: Motion.

17 COMMISSIONER ASIM REHMAN: I see a motion from
18 Madelynn.

19 MR. MATTHEW SCHNEID: Second.

20 COMMISSIONER ASIM REHMAN: A second from Matthew
21 Schneid. Any objections? Please take a vote.

22 MR. DAVID KIM: Are there any objection to the
23 motion approving the minutes of the October 12th, 2023,
24 ECB meeting? Seeing none. Hearing none. The motion is
25 approved unanimously.

1 COMMISSIONER ASIM REHMAN: Okay. Thank you.
2 We'll now move to the Department of Environmental
3 Protection's request for cease-and-desist orders, and I'll
4 turn it over to Russell Pecunies.

5 MR. RUSSELL PECUNIES: All right. Thank you.
6 Russell Pecunies with DEP legal. So, for this meeting,
7 DEP is at Bureau of Wastewater Treatment, is asking the
8 Board to issue two cease and desist orders. The first one
9 is for the Boston market at 3371 East Tremont Avenue in
10 the Bronx. DEP inspected these premises, and on June 7th
11 of 2022, issued a commissioner's order to the restaurant,
12 requiring them to install and maintain several grease
13 interceptors. And because they failed to comply with that
14 order, DEP then proceeded to issue several summonses for
15 Section 24-524(f) for failing to comply with the
16 Commissioner's order.

17 During the issuance of those summonses while
18 they were being issued actually at the -- at the issuance
19 of the next to last one, I think. The DEP inspector
20 observed one of the respondent's employees dumping a five-
21 gallon bucket of grease into a catch basin, and so at the
22 end of the issuance of all of these summonses, the most
23 recent one having been issued in July. And since the
24 respondent has failed to appear for the hearings and also
25 failed to appear for a compliance meeting that they were

1 ordered to attend in June, and since there is still no
2 compliance with the order to date, DEP is asking the Board
3 to issue an order to cease and desist. I really want to
4 do this one separately.

5 COMMISSIONER ASIM REHMAN: We'll do it one by
6 one.

7 MR. RUSSELL PECUNIES: Okay.

8 COMMISSIONER ASIM REHMAN: Thank you, Russell.
9 Does anyone have any questions for Russell? Go ahead,
10 Matt.

11 MR. MATTHEW SCHNEID: There's just been no
12 response whatsoever to any of the violations. Any of the
13 meeting requests?

14 MR. RUSSELL PECUNIES: Appear to be in default
15 as to the violations. Although if you look at the
16 printouts, they did a -- with default penalty on one of
17 them. But the rest of the summonses are in default, and
18 except, I think the most recent one, it might be still
19 pending hearing date, but the rest of them are all in
20 default and all unpaid, except for one that they do seem
21 to have paid penalty on.

22 MR. MATTHEW SCHNEID: If they -- if they managed
23 to pay one, I can gather they received the information.

24 MR. RUSSELL PECUNIES: Mm?

25 MR. MATTHEW SCHNEID: If they paid one, I gather

1 they received the information.

2 MR. RUSSELL PECUNIES: If they paid on one of
3 them, I'm -- I'm assuming that they did. They're non-
4 responsive. This is not because they don't know about
5 this.

6 MR. MATTHEW SCHNEID: Right. Okay.

7 COMMISSIONER ASIM REHMAN: I had a similar
8 reaction reading this, Russell. And could you explain to
9 us for the order that's issued after the summonses go out,
10 the commissioner's order? How is that order delivered? Is
11 it mailed? Is it brought over and turned over to an
12 employee?

13 MR. RUSSELL PECUNIES: So let's go to the order.
14 Yes, yeah. So the order is -- would be served by an
15 inspector. And the inspector's telephone number call is at
16 the bottom, and then they would also put a copy -- they
17 would also put a copy in the mail.

18 COMMISSIONER ASIM REHMAN: Okay. So, the
19 inspector service would be an in-person service?

20 MR. RUSSELL PECUNIES: They would go to the
21 restaurant and give it to whoever was there.

22 COMMISSIONER ASIM REHMAN: Okay.

23 MR. RUSSELL PECUNIES: And then they would also
24 put a copy -- put a copy in the mail.

25 COMMISSIONER ASIM REHMAN: Thank you. Any other

1 questions for Russell on this one? Okay. I'd like to
2 request a motion and a second regarding the request for
3 cease and desist order relating to the Boston Market
4 Corporation.

5 MR. HARMINDERPAL RANA: Motion.

6 COMMISSIONER ASIM REHMAN: A motion from
7 Harminderpal.

8 MR. JOSEPH GREGORY: Second.

9 COMMISSIONER ASIM REHMAN: And a second from
10 Joseph. To vote.

11 MR. DAVID KIM: Are there any objections to
12 approving the cease-and-desist order? Seeing none.
13 Hearing none. The motion is approved unanimously.

14 COMMISSIONER ASIM REHMAN: Okay. Thank you very
15 much.

16 MR. RUSSELL PECUNIES: Thank you.

17 COMMISSIONER ASIM REHMAN: You can proceed to
18 the second.

19 MR. RUSSELL PECUNIES: And the second one
20 pertains to the Van Leeuwen Ice Cream at 54-56 Dobbin
21 Street in Brooklyn. For this one, the inspection
22 determined that they needed to install a grease
23 interceptor for several fixtures. This is an ice cream
24 store. But the grease interceptors are not just for
25 cooking, it's for fats, oils, and grease. So since ice

1 cream does involve milk and fat, this grease interceptor
2 is required for this facility. So they were issued a
3 commissioner's order in September of 2021 due to
4 noncompliance. A series of summonses were then issued up
5 through May of this year. And there is still no
6 compliance. They have paid two of the summonses -- three
7 of the summonses and rescheduled one of them for some
8 reason, which is rescheduled to January, but because of
9 the failure, continuing failure to comply with the order,
10 DEP is also requesting a cease-and-desist order be issued
11 on this one.

12 COMMISSIONER ASIM REHMAN: Thank you. Any
13 questions for us?

14 MS. ELIZABETH KNAUER: I do. I guess I have a
15 question about the -- they rescheduled the last summons
16 until January. Do you think their expectations are that
17 they'll sort of have an opportunity to present their
18 defense if they have one?

19 MR. RUSSELL PECUNIES: I don't know why they
20 would have paid three of them, including two of them. One
21 of them where they paid the default penalty, and then
22 rescheduled this one. I don't know the answer to that
23 because we don't know why people reschedule. It just
24 shows up on Ticket Finder that it's rescheduled. So --

25 MS. ELIZABETH KNAUER: But are they -- I'm sorry

1 to interrupt. Are they required to appear at a hearing
2 for this violation, or they could have just paid?

3 MR. RUSSELL PECUNIES: It just -- you know, I'm
4 not sure. All we can tell is whether they paid it or what
5 the current status of it is on Ticket Finder.

6 COMMISSIONER ASIM REHMAN: But, Elizabeth, are
7 you asking that if they decide tomorrow that they want to
8 pay, they could pay and avoid the hearing? Is that your
9 question?

10 MS. ELIZABETH KNAUER: Right. Right. I'm just
11 asking, is this the type of -- some -- I think there are
12 some violations that require you to appear at a hearing or
13 require the respondent to appear at a hearing, hearing and
14 others you -- they can --

15 MR. RUSSELL PECUNIES: I don't think these are
16 -- I think these can be admitted without an appearance.
17 I'm just looking at the summons to see -- yeah, I think
18 these can be admitted without showing up at the hearing.

19 MS. ELIZABETH KNAUER: Okay, so there's --

20 MR. RUSSELL PECUNIES: Because on the -- on one
21 of these, two of them, it just says paid in full. One of
22 them it says defaulted and paid in full. So --

23 MS. ELIZABETH KNAUER: So the fact that they
24 rescheduled their -- the hearing for the suggests that
25 they have some defense that they want to.

1 MR. RUSSELL PECUNIES: I couldn't -- I couldn't
2 address that. I don't know why they rescheduled it.
3 Maybe there's a new manager at the store who is now going
4 to pay attention to this. I -- we wouldn't know until
5 January when the hearing -- the new hearing date comes up.

6 MS. ELIZABETH KNAUER: So and --

7 MR. RUSSELL PECUNIES: What we know that as of
8 now, they're still -- they still have not complied with
9 the order that was issued over two years ago.

10 COMMISSIONER ASIM REHMAN: You know, there's an
11 added feature here which is and I -- you know, please
12 would request correction if I'm wrong on this, that if it
13 goes to a hearing, and the only relief that can come from
14 the hearing officer is the penalty. Penalty. The hearing
15 officer can't direct complaints.

16 And so if the concern is well, they have a
17 hearing coming up, maybe we should wait for the hearing,
18 the outcomes are either going to be that it's going to be
19 dismissed or that it will be upheld. And the -- and if
20 it's upheld, it'll be a penalty. Whereas what DEP is
21 seeking here today is not just that the financial penalty,
22 it's the opportunity to stop the business.

23 MR. RUSSELL PECUNIES: By the way three of them
24 have already been upheld because they've paid three of
25 them.

1 COMMISSIONER ASIM REHMAN: Right. I was -- I
2 was raising it more because, Elizabeth, if what you're
3 thinking is, well, we let them go to hearing, you know,
4 they've got a hearing coming up. Why don't we wait? I'm
5 thinking the same thought myself. That doesn't
6 necessarily mean that then the same relief that's being
7 sought today would come out of that hearing. The most
8 that could come out of that is the penalty, not
9 necessarily the change in behavior.

10 MS. ELIZABETH KNAUER: Yeah, I understand that.
11 I guess I'm just -- my -- I guess my thought process was
12 given that, you know, it's gone this long, and now they
13 have scheduled -- they do have a hearing scheduled, would
14 it make sense to allow them to proceed with that hearing
15 to determine whether the violation will be dismissed or
16 upheld? And then if it -- if it is indeed upheld and they
17 don't present any substantive defense or they don't
18 present -- or if it's dismissed for other reasons, like a
19 service issue, then perhaps putting this off until the
20 next, you know, one more month, I guess. I guess we're
21 only meeting quarterly, so it would be longer, but.

22 COMMISSIONER ASIM REHMAN: Well, technically,
23 what we're -- we might discuss at the end of today's
24 meeting would be a next meeting for February. So if the
25 hearing date is January 25th. And there's a decent chance

1 that maybe not by February 1st, but by February 8th, a
2 hearing -- Judicial Hearing Officer would have rendered a
3 decision. And that could still be appealed, but at least
4 we'll know the status of that hearing.

5 MS. OLGA STATZ: I have one thing to think
6 about. Even if the ticket is dismissed at the next
7 hearing, that doesn't erase the findings of guilt or
8 admission from the previous three summonses. So
9 basically, he's admitted and conceded that, you know,
10 there's an issue to be fixed here. So even in the face of
11 a dismissal, the correction wouldn't be -- that wouldn't
12 affect the correction from previous three summonses.
13 Because I don't anticipate that at the hearing, the
14 Hearing Officer is going to say, look at this ticket, this
15 was issued with absolutely. They're going to find maybe
16 it's probably not properly filled out or something or not
17 properly served. It's not going to be a substantive thing
18 of this did not happen.

19 So we have a situation where the thing happened
20 and there is the equitable and right now, [unintelligible
21 00:15:16] but the equitable remedy and that this is the
22 only forum for the equitable remedy, the legal remedy can
23 happen or not happen at the hearing.

24 So it's kind of -- it's -- I see what you're
25 saying, like if we were just talking about guilt or

1 innocence, the propriety, the ticket, et cetera, I would
2 say, absolutely, let's just give the guy another chance to
3 show up and do his thing. But we're talking about the
4 equitable remedy here. so that -- not to try to change
5 your mind just for you to consider that because I don't
6 know if they're really analogous. I don't know if they're
7 really intrigue.

8 MS. ELIZABETH KNAUER: Well, I understand the
9 difference in the remedies, but I think there's like a
10 theoretical possibility, at least, that they could come to
11 the hearing and provide some substantive defense to the
12 predicate. That even though like that wouldn't erase the
13 -- their liability for the past violations, it may
14 indicate that there isn't a need for a cease-and-desist
15 order based on facts that are now present, like there, you
16 know, like the store is closed or they're only selling
17 packaged items or something like that. And I'm just
18 saying that that's a theoretical possibility that I guess
19 they could bring that same, you know, defense to a cease-
20 and-desist hearing. But it's just I don't remember a
21 situation where we had a hearing that was pending and in
22 the midst of that issued a cease-and-desist order.

23 MR. RUSSELL PECUNIES: On the normal ones that
24 we submit for violations for air or noise. We usually
25 only bring them to the board if there's been three, at

1 least three issuing.

2 MS. ELIZABETH KNAUER: Mm-hmm.

3 MR. RUSSELL PECUNIES: And one of them, at least
4 one of them, is usually pending.

5 MS. ELIZABETH KNAUER: Oh, okay.

6 MR. RUSSELL PECUNIES: And we have at least two
7 violations, but there can still be one.

8 MS. ELIZABETH KNAUER: Okay.

9 MR. RUSSELL PECUNIES: Usually is one pending at
10 the time that we ask for the cease-and-desist order. For
11 air and noise, it's usually two adjudicated, and then we
12 issue a third one. And that's when we come to the Board
13 because at that point there's a pattern that they're not
14 coming into compliance.

15 MS. ELIZABETH KNAUER: Okay. Well, thanks for
16 correcting my memory there. So I will remove that
17 objection. And if this is standard for posture.

18 COMMISSIONER ASIM REHMAN: It's also just
19 notable that there was a summons from October 2022, not
20 for a condition violation, but just a failure to comply
21 with the order. So there's an order, and now this is all
22 about failure to comply. And that is the one that's going
23 to hearing. But then there was a subsequent summons in
24 May of 2023 that they paid on. So it's the --

25 MS. ELIZABETH KNAUER: Okay.

1 COMMISSIONER ASIM REHMAN: -- prior summons that
2 they're saying we want a hearing on and then a later
3 summons they paid on, and so it's -- it would be --

4 MS. ELIZABETH KNAUER: So it seems likely that
5 that's a service issue or something like that.

6 COMMISSIONER ASIM REHMAN: Because if it's a
7 failure to comply with the order, a -- the substantive
8 defense may be, no, we complied with the order. Look,
9 we're doing all these things, but then why would you pay
10 in full on the subsequent and the summons that came later?

11 MR. RUSSELL PECUNIES: Yeah, we don't know
12 because this is a chain and it's probably a corporate
13 office, and someone in that office is making decisions on
14 how to deal with these. And maybe somebody decided to just
15 send a check on some of them, and maybe somebody got a
16 hold of this one particular one and decided to reschedule
17 it. And then you have no idea.

18 COMMISSIONER ASIM REHMAN: The -- I'm sorry,
19 Matthew, are you going to say something?

20 MR. MATTHEW SCHNEID: No, I'm taking it all in.

21 COMMISSIONER ASIM REHMAN: Okay. So from a
22 process standpoint, the cease and desist order, if issued
23 would be a cease and desist with an opportunity for a
24 hearing.

25 MR. RUSSELL PECUNIES: Right. They have -- they

1 then would have a hearing scheduled to show that they've
2 come into compliance.

3 COMMISSIONER ASIM REHMAN: Right. And how --
4 what are the turnaround times right now between cease-and-
5 desist order and the hearings?

6 MR. RUSSELL PECUNIES: At least from the time
7 the Board approved it. I would say until the hearing date
8 is scheduled, probably at least six, eight weeks.

9 COMMISSIONER ASIM REHMAN: Okay. All right.
10 Other questions? Is there any opposition as a general
11 matter, for discussion purposes, we're going to take a
12 vote. But from a discussion standpoint. Okay. All
13 right. I'd like a motion to vote on the request for a
14 cease-and-desist order relating to Van Leeuwen Ice Cream
15 LLC.

16 MS. MADELYNN LIGUORI: Motion.

17 COMMISSIONER ASIM REHMAN: Okay. Motion,
18 Madeleine, second from Jarrod. Okay.

19 MR. DAVID KIM: Are there any objections to
20 approving the cease-and-desist order? Seeing none.
21 Hearing none. The motion is approved unanimously.

22 COMMISSIONER ASIM REHMAN: Okay. Thank you.
23 Thank you very much.

24 MR. RUSSELL PECUNIES: Thank you.

25 COMMISSIONER ASIM REHMAN: Before we move into

1 executive session, I just want to take note that we've
2 been joined by our newest board member, Lisa Urban. We'll
3 have an opportunity after executive session to introduce
4 Lisa more formally. But we'll now move into executive
5 session. Okay.

6
7 COMMISSIONER ASIM REHMAN: Thank you. We're
8 returning to public session for our December 7th ECB
9 meeting. I'd now like to move to what was previously
10 number two in the agenda, welcoming our newest Board
11 Member, Lisa Urban.

12 For those of you who haven't had a chance to
13 meet Lisa, Lisa is a partner at Mavrides, Moyal, Packman &
14 Sadkin LLP, and she has many, many years of experience
15 specializing in commercial and residential real estate.
16 Lisa received her bachelor's degree from Stony Brook and
17 her JD from Fordham Law School. Go, Rams. And so,
18 welcome Lisa and we look forward to working with you and
19 your -- Board to your contributions on this Board.

20 MS. LISA URBAN: I apologize for being late.
21 Thank you. It was a tough morning.

22 COMMISSIONER ASIM REHMAN: No, no problem at
23 all.

24 MS. LISA URBAN: Usually, I'm not late.

25 COMMISSIONER ASIM REHMAN: But if you'd like to

1 say anything to introduce yourself if you want to.

2 MS. LISA URBAN: Just very excited to meet
3 everyone to be a part of this. It's something, you know,
4 I -- I've been looking for something to add to my sphere
5 of work and interest. And being a resident, I've lived in
6 Manhattan for a long time and been a city resident for a
7 long time and I'm excited to contribute and be a part of
8 this Board. So I look forward to working with all of you.

9 COMMISSIONER ASIM REHMAN: Great, well, all of
10 us are at your disposal in the interim, if you have any
11 questions just about the experience of working on the
12 Board, feel free to reach out to folks here, particularly
13 the appointed members --

14 MS. LISA URBAN: Okay.

15 COMMISSIONER ASIM REHMAN: -- who will be able
16 to share their experiences with you as well. Okay. We
17 are going to next move to the selection of dates for our
18 next Board Meeting. Give us the dates.

19 MR. DAVID KIM: Possible dates we have are
20 February 1st, 2024, and February 8th, 2024.

21 MR. JOSEPH GREGORY: He said February 3rd?

22 COMMISSIONER ASIM REHMAN: One, one, and eight.

23 MR. DAVID KIM: Yeah, 1st and 8th.

24 MR. JOSEPH GREGORY: Okay.

25 COMMISSIONER ASIM REHMAN: Does anyone have any

1 concerns or objections to either of those dates? Okay.

2 Shall we do February 1st? Okay.

3 MR. JOSEPH GREGORY: Sure.

4 COMMISSIONER ASIM REHMAN: We'll sit down
5 February 1st, 2024, as our next date. And before we
6 adjourn, let me just take a moment to note that this is
7 our last meeting of the 2023 calendar year, and it has
8 been a very, very busy year for the Board. By the end of
9 the calendar year, you all will have reviewed over 2000
10 appeals decisions through the panel process. And on top
11 of just those numbers we've spent this past year having
12 some fairly in-depth discussions on some challenging
13 topics that have been very much as part of the public
14 discussion.

15 And when we have those discussions, you've all
16 brought a high degree of professionalism and
17 thoughtfulness, and respectful discourse to the table,
18 which is much appreciated. This is also a year where some
19 of the topics we looked at were very much topics that were
20 in the public eye, whether it being discussed in the
21 press, whether it being discussed at City Council, and
22 that public discussion you know did not distract any of
23 you from doing the important work of the Board, the
24 important work that the government of New York City and
25 the members of the public rely on us to do. This was also

1 a year of transition in several ways. We have just
2 welcomed a new Board member. We've welcomed Harinderpal
3 as our new DOHMH representative this past calendar year.
4 We also transitioned from the virtual space back
5 to the in-person space among other things. And so let me
6 just say, with all of that change, with all those
7 challenges, again, as chair, how much I appreciate the
8 time, effort, skills, expertise, and professionalism that
9 you all bring to this work, it helps us meet our mission
10 and it's very important to the city. And with that, let
11 me say that, you know, for any of you who are celebrating
12 holidays or have winter vacations, I wish you a safe time
13 and I wish you all a very happy New Year, and we will see
14 each other in February. With that, motion to adjourn the
15 meeting. A motion from Elizabeth. A second from Matthew.
16 Okay. We are adjourned. Thank you very much.

(The board meeting concluded at 10:14 a.m.)

Reviewed and corrected by OATH General Counsel

Office January 4, 2024.