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Senate Committee on Conduct
c/o melissa.leoni@oregonlegislature.gov
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Re: Complaint against Senator Akasha Lawrence Spence

Dear Senators:

I represent Senator Akasha Lawrence Spence. I submit this letter on her behalf in response to a complaint filed with the Secretary of the Senate on March 9, 2022 (the “Complaint”). The Complaint alleges that Senator Lawrence Spence violated Senate Rule 3.33 by failing to declare a conflict of interest before voting on Senate Bill 1579 (2022) (“SB 1579”). The Committee on Conduct (the “Committee”) should recommend that the Senate take no action on the Complaint.

In summary, here is why:

1. Senator Lawrence Spence did not understand her business, Fifth Element LLC, to be eligible for the fund that SB 1579 established and did not intend that her business would apply to the fund—as she states under penalty of perjury in the attached declaration.
2. Fifth Element LLC appears to be ineligible to apply to the fund because
 - a. “Organization” is not defined, but the text of SB 1579 indicates that it means non-profit or charitable organizations that “provide” services—which Fifth Element LLC, a for-profit company, does not do;

- b. Fifth Element LLC, a for-profit company that sells its services to small businesses, does not “provide” anything;
 - c. Fifth Element LLC does not serve “disadvantaged” businesses, except to the extent that small businesses in general may face disadvantage; and
 - d. As Fifth Element LLC is not “aligned” with any particular “culture,” it does not provide “culturally responsive services.”
3. Even if Fifth Element LLC were eligible to apply for a grant, it is doubtful that its application would be successful because
 - a. Fifth Element LLC, a for-profit company, does not provide “outreach” as required by the bill; and
 - b. Fifth Element LLC’s business clients’ futures are not “at risk” because of “economic equity risk factors.”
4. In any event, even if Fifth Element LLC were eligible to apply for a grant and could successfully obtain one, the class exception to the conflict of interest laws, provided in ORS 244.020(13)(b), applies because
 - a. Entities providing “culturally responsive services” comprise an “industry” or “other group,” and therefore a “class” within the meaning of the exception; and
 - b. SB 1579 affects all entities providing “culturally responsive services” to the same degree.

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I. As she testifies under penalty of perjury in her attached declaration, Senator Lawrence Spence did not understand Fifth Element LLC to be eligible for the SB 1579 fund.

Prior to voting, and when she voted, on SB 1579, Senator Lawrence Spence had no intention of applying for a grant created by SB 1579. Lawrence Spence Decl., ¶ 2. She did not think that her, company Fifth Element LLC, would be eligible to apply for a grant under the bill. Lawrence Spence Decl., ¶ 3. Indeed, only “organizations” may apply under SB 1579. It’s unclear (at best), and was unclear to Senator Lawrence Spence at the time, whether that term refers strictly to non-profit corporations and charitable organizations, or whether it also encompasses corporations and limited liability companies like Fifth Element LLC. Lawrence Spence Decl., ¶ 4.

II. No conflict of interest exists because Fifth Element LLC does not appear to be eligible to apply for an SB 1579 grant and, even if it were eligible, it is far from clear whether any application that the company might submit would be successful based on the application criteria.

The foundational component of a conflict of interest is the receipt of a “private pecuniary benefit,” whether actual or potential. *See* ORS 244.020(1) & (13) (defining actual and potential conflicts of interest); Senate Rule 3.33(1) (borrowing conflict of interest definitions from ORS 244.020). For the reasons below, neither Senator Lawrence Spence nor her for-profit commercial development company, Fifth Element LLC, can receive such a benefit under SB 1579. Accordingly, no conflict of interest exists.

A. Fifth Element LLC is not an Eligible Organization under SB 1579.

Only a particular group of organizations is eligible to apply for a grant under SB 1579. To be eligible, an “organization” must “provide culturally responsive services to support economic stability, self-sufficiency, wealth building and economic equity among disadvantaged individuals,

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families, businesses and communities in this state” (the “Eligible Organizations”). SB 1579 (2020), Section 2, subsection 1 (enrolled). The term “organization” is not defined by the bill, but the context in which that term is used indicates the bill refers only to non-profit or charitable organizations. That’s because those organizations must “provide culturally responsive services” *Id.* (emphasis added).

The term “provide” also is not defined in the bill. Where the legislature does not define a term in a statute, we look to Webster’s Third to discern that term’s plain meaning. *See* Hon. Jack L. Landau, Oregon Statutory Construction, 97 OR. L. REV. 583, 653–54 (2019) (“[T]he courts have shown a marked preference for Webster’s Third New International Dictionary”). Webster’s defines “provide” as “to supply what is needed for sustenance or support.” Webster’s Third New Int’l Dictionary 1827 (unabridged ed 2002).

Fifth Element LLC does not “provide” anything; it sells its services for profit.

The plain language meaning of “provide” describes the work of a non-profit or charitable organization. Fifth Element LLC is not such an organization¹ and does not “supply what is needed for sustenance or support.” Rather, Fifth Element LLC is a commercial development company that works with small businesses to curate desirable commercial property uniquely suited to the businesses’ needs. It does that by “create[ing] ecosystems: 3-5 businesses, with shared values, who by working in close proximity to one another will see increased shared benefits.” *See* <https://fifthelement.studio/wecurate>. Fifth Element LLC then “find[s] the right building in need of

¹ Oregon Secretary of State, Corporation Division, Business Entity Data for Fifth Element LLC https://egov.sos.state.or.us/br/pkg_web_name_srch_inq.show_det?p_be_rsn=2036983&p_srce=BR_INQ&p_print=FALSE.

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some love, purchase[s] it, renovate[s] it, and sell[s] each business their individual units.” *Id.* In other words, Fifth Element LLC is a business; it doesn’t “provide” small businesses with commercial property, it identifies, renovates, and sells commercial property uniquely suited to the needs of its business clients. Accordingly, Fifth Element LLC is not an Eligible Organization.

Fifth Element LLC does not serve “disadvantaged” businesses (beyond the disadvantage all small businesses face).

Moreover, Eligible Organizations must serve “disadvantaged individuals, families, businesses and communities in this state.” SB 1579 (2020), Section 2, subsection 1 (enrolled) (emphasis added). Fifth Element LLC’s business model focuses on small businesses generally, and millennial business owners specifically. See <https://fifthelement.studio/fifthelementhome> (“fortifying small businesses through property ownership”); <https://fifthelement.studio/weempower> (“PROPERTY OWNERSHIP IS THE #1 MODALITY USED TO BUILD WEALTH IN AMERICA. Typically that ownership manifests when purchasing a home, but with more millennials putting off home ownership and starting small businesses, Fifth Element believes it is prudent to meet them where they are.”). Although small business ownership is undoubtedly challenging, neither small businesses nor millennials are inherently “disadvantaged.” See Webster’s Third New Int’l Dictionary 643 (unabridged ed 2002) (defining “disadvantaged” as “lacking in the basic resources or conditions (as standard housing, medical and educational facilities, civil rights) believed to be necessary for an equal position in society.”). Accordingly, Fifth Element LLC is not an Eligible Organization.

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Fifth Element LLC does not provide “culturally responsive services.”

Further still, Eligible Organizations not only must serve “disadvantaged” groups, but also must do so by providing “culturally responsive services.” The bill defines “culturally responsive services” as:

“services provided by an organization: (a) Whose founding mission and goals are aligned with the culture of the individuals, families, businesses and communities receiving the services; and (b) That demonstrates intimate knowledge of the lived experience of the individuals, families, businesses and communities receiving the services.”

SB 1579, Section 1, subsection 1 (enrolled). Those characteristics are highly subjective, which makes it difficult for anyone to determine whether their organization offers such “culturally responsive services.”

Here, however, it’s not so difficult because the founding mission and goals of Fifth Element LLC are not “aligned” with any particular “culture.” *See Webster’s Third New Int’l Dictionary 552 (unabridged ed 2002) (defining “culture” as “the body of customary beliefs, social forms, and material traits constituting a distinct complex of tradition of a racial, religious, or social group,” or “a complex of typical behavior or standardized social characteristics peculiar to a specific group, occupation or profession, sex, age grade, or social class.”)*. Fifth Element LLC’s clients are small business owners, with a specific emphasis on millennials. <https://fifthelement.studio/weempower>.

Even if small business owners and millennials somehow constitute cultures, they are not the “disadvantaged” cultures SB 1579 targets. *See Marty Wilde, State Rep. Dist. 11, Re: Vote Explanation on Senate Bill 1579-A (Mar. 3, 2022), available at <https://www.oregonlegislature.gov/pcive/SB%201579-A%20Wilde%203-3-2022.pdf>* (providing

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“40 facts dating from the time of Oregon’s statehood to the troubling inequities that still exist today” and explaining, “[w]hen we try to pass a bill that directly or indirectly establishes racial preference, we must establish a legislative record to support it.”). Accordingly, Fifth Element LLC is not an Eligible Organization.

B. If is far from clear whether Fifth Element LLC could submit a successful application that satisfies the criteria of SB 1579.

For a conflict of interest to exist, it’s not enough that an organization is eligible to apply for a grant under SB 1579; rather, there must be some likelihood that the organization application would be successful. That is because no grant money means no “private pecuniary benefit.” ORS 244.020(1) & (13) (defining actual and potential conflicts of interest). While Subsection 1 of Section 2 of SB 1579 identifies eligibility requirements, Subsection 3 restricts when grant moneys may be awarded, stating:

“Grant moneys shall be awarded to organizations only for proposals to provide outreach, support and resources to individuals, families, businesses or communities”

That is, not only must an organization be eligible to apply, but also propose to provide “outreach, support and resources.”

Fifth Element LLC does not engage in “outreach.”

There is no indication that Fifth Element LLC in its present form would submit a grant application satisfying these three mandatory—“and”—criteria. To begin, Fifth Element LLC has no outreach program. See https://www.merriam-webster.com/dictionary/outreach?utm_campaign=sd&utm_medium=serp&utm_source=jsonld (defining “outreach” as “the extending of services or assistance beyond current or usual limits”).

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Further, although Fifth Element LLC offers support and resources to small business owners in the form of courses and property management, it does not simply “provide . . . support and resources,” it’s a business that sells and manages commercial property. *See* <https://fifthelement.studio/wesupport>. The support and resources offered by Fifth Element LLC helps it to attract future business clients. Accordingly, even if Fifth Element LLC were somehow eligible to apply for a grant under SB 1579, it is a stretch to say that its application would meet the three criteria necessary to receive a grant. It cannot receive a “private pecuniary benefit” under SB 1579 and, therefore, no conflict of interest exists.

“[F]uture is at risk”; “economic risk factors.”

Moreover, Subsection 3 goes on to require that proposals from Eligible Organizations must also provide such outreach, support and resources to those “whose future is at risk” because of any combination of two or more economic equity risk factors:

“Grant moneys shall be awarded to organizations only for proposals to provide outreach, support and resources to individuals, families, businesses or communities whose future is at risk because of any combination of two or more economic equity risk factors in order to improve economic equity . . .”

(emphasis added). Economic equity risk factors include:

- “(a) Experience of discrimination because of race or ethnicity;
- (b) English language proficiency;
- (c) Citizenship status;
- (d) Socioeconomic status; or
- (e) Residence or operation in a rural location.”

SB 1579, Section 1, subsection 2.

To begin with, Fifth Element LLC doesn’t necessarily provide services to small businesses “whose future is at risk,” except to the extent that any nascent small businesses face uncertainty.

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Rather, It seeks to stabilize and empower those small businesses. *See* <https://fifthelement.studio/westabilize> (“when small businesses own their real estate, they extricate themselves from this destabilizing cycle.”); <https://fifthelement.studio/weempower> (“We provide the vehicle for these small business owners to diversify their businesses and build wealth through commercial property ownership.”). And, even if the future of those small businesses were at risk, they are not necessarily at risk “because of any combination of two or more economic equity risk factors.” SB 1579, Section 2, subsection 3. Small businesses are at risk for a number of reasons, and Fifth Element LLC sells its services to help small businesses minimize the risks that small businesses face, such as fluctuating rent and other expenses. *See* <https://fifthelement.studio/westabilize> (“[M]ost small business owners rent where they live and rent where their small business is located. Placing them in a tenuous position at the mercy of market fluctuations and insatiable landlords.”). That is, Fifth Element LLC works to “stabilize” small businesses by way of property ownership, not to save the future of the businesses from economic equity risk factors.

III. Any conflict of interest would be potential rather than actual.

“When involved in an actual or potential conflict of interest,” Senate Rule 3.33 requires members to announce the nature of the conflict prior to voting on the issue. That rule borrows the definition of actual and potential conflict of interest from ORS 244.020.

Subsection 1 of ORS 244.020 defines actual conflict of interest as “any action or any decision or recommendation by a person acting in a capacity as a public official, the effect of which would be to the private pecuniary benefit or detriment of the person or the person’s relative or any

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business with which the person or a relative of the person is associated unless the pecuniary benefit or detriment arises out of circumstances described in subsection (13) of this section.” (Emphasis added.)

Subsection 13 of ORS 244.020 defines potential conflict of interest by swapping “would” for “could” in the above definition and provides certain exceptions that do not constitute a conflict of interest. *See* ORS 244.020(13) (. . . unless the pecuniary benefit or detriment arises out of the following . . .”). One of those exceptions pertains to “Any action in the person’s official capacity which would affect to the same degree a class consisting of all inhabitants of the state, or a smaller class consisting of an industry, occupation or other group including one of which or in which the person, or the person’s relative or business with which the person or the person’s relative is associated, is a member or is engaged.” ORS 244.020(13)(b) (emphasis added).

The Complaint appears to allege a potential conflict of interest because SB 1579 does not automatically distribute funds to qualifying organizations. Instead, eligible organizations may apply for a grant. *See* Section 2, SB 1579 (2022) (enrolled). Neither Senator Lawrence Spence nor her company has applied for a grant, nor did she intend to prior to voting on the bill. *See generally* Lawrence Spence Decl. At the very least, it’s unclear whether Senator Lawrence Spence’s company is even eligible to apply for a grant. Indeed, the Complaint merely alleges that, in the opinion of the two signatories, “It appears that Senator Lawrence Spences’ business, Fifth Element, would be eligible for grant money . . . and if awarded, she would receive pecuniary benefits from the passage of SB 1579.” Compl., p. 2. That is, the Complaint merely alleges that Senator Lawrence Spences’ business might be eligible and that, if eligible, she would receive a

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pecuniary benefit if awarded. Of course, to add yet even further potentialities, all of that also depends on whether Senator Lawrence Spences' business applies for a grant in the first place. Accordingly, if anything, the Complaint presents a potential conflict of interest.

IV. The Class Exception of ORS 244.020(13)(b) applies; there was no potential conflict of interest to report.

Even if a potential conflict of interest otherwise would exist, the so-called “class exception” applies, so there was no reportable potential conflict of interest. ORS 244.020(13)(b) provides that no conflict of interest exists if a person’s action in their official capacity “would affect to the same degree a class consisting of all inhabitants of the state, or a smaller class consisting of an industry, occupation or other group . . .” (the “Class Exception”). For the following reasons, the Class Exception applies because (1) a class exists, and (2) SB 1579 affects members of that class, including Senator Lawrence Spence (assuming her business is even eligible to apply), to the same degree. Because the Class Exception applies here, no conflict of interest exists.

A. Providers of “culturally responsive services” comprise a class within the meaning of ORS 244.020(13)(b).

SB 1579 does not affect “all inhabitants of the state.” ORS 244.020(13)(b). So, a class exists only if the bill affects “a small class consisting of an industry, occupation or other group.” ORS 244.020(13)(b). A class exists here because the totality of organizations eligible to apply under SB 1579 constitute an “industry” or “other group,” though they need only be one for the exception to apply.

The class of Eligible Organizations under SB 1579 comprises “organizations that provide culturally responsive services to support economic stability, self-sufficiency, wealth building and

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economic equity among disadvantaged individuals, families, businesses and communities in this state”. SB 1579 (2020), Section 2, subsection 1 (enrolled). The bill further defines “culturally responsive services” as

“services provided by an organization: (a) Whose founding mission and goals are aligned with the culture of the individuals, families, businesses and communities receiving the services; and (b) That demonstrates intimate knowledge of the lived experience of the individuals, families, businesses and communities receiving the services.”

Those two qualities are implicit in the Eligible Organizations defined by Section 2, which is probably why the legislature chose to include those qualities in a definition of a term used to describe Eligible Organizations, rather than as separately stated eligibility requirements.

For two reasons, those Eligible Organizations qualify as a class for purposes of the Class Exception. First, Eligible Organizations comprise an industry. Organizations that provide “culturally responsive services” to support disadvantaged persons comprise an industry to the same extent as other industries whose members provide certain services to particular groups of people. Persons in the same industries and occupations typically have similar missions, goals or intimate knowledge. Indeed, that’s precisely what those terms convey. *See Webster’s Third New Int’l Dictionary* 1155-56 (unabridged ed 2002) (defining “industry” as “a department or branch of a craft, art, business, or manufacture: a division of productive of profit-making labor; esp: one that employs a large personnel and capital esp. in manufacturing,” or “a group of productive or profit-making enterprises or organizations that have a similar technological structure of production and that produce or supply technically substitutable goods, services, or sources of income”); *see id.* at 1156 (examples of industries include automobile, air transport, poultry, tourist, and smuggling of

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gold, liquor, and other contraband). SB 1579 inherently recognizes that an industry already exists that is serving disadvantaged communities. That is why the bill provides grants to advance the work of those organizations, rather than create government entities to fulfill those needs.

Second, organizations constitute an “other group.” A 2019 Oregon Government Ethics Commission (“GEC”) Advisory Opinion is instructive. There, the GEC explained that, for purposes of ORS 244.020(13)(b), the GEC may establish a minimum size or other criteria for a class, but the GEC has not done so:

“The legislature has given the Commission discretion to adopt rules that ‘limit the minimum size of, or otherwise establish criteria for or identify, the smaller classes that qualify under the class exemption[.]’ [ORS 244.290(3)(a)]. The Commission has not adopted such rules, so there is no minimum size requirement or established criteria for what constitutes a ‘class.’ But the Commission has explained its interpretation of ‘class’ in A Guide for Public Officials (2010) (Guide) as follows:

‘The Commission has the authority to identify a group or class and determine the minimum size of that ‘class.’ * * * For example, if a county commissioner votes to approve a contract to improve or maintain a county road that leads to the property the commissioner owns, but the improvements would also benefit many other property owners to the same degree, the commissioner would be exempt from the conflict of interest disclosure requirements and participation restrictions. Under the Guide, a class can be unlike an ‘industry’ or an ‘occupation,’ and can instead be comprised of groups like property owners in a certain area.’”

Oregon Government Ethics Commission Advisory Opinion 19-240A, at 5 (November 22, 2019) (the “2019 Opinion”). If a group of property owners in a certain area is an “other group” for purposes of the Class Exception, then certainly a group of organizations with common missions can be considered a class too.

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ORS 244.020 does not define “other group.” In the 2019 Opinion, the GEC helpfully noted that “Webster’s Third New Int’l Dictionary (unabridged 2002) defines “group” as ‘a number of individuals bound together by a community of interest, purpose or function.’” 2019 Opinion at 4. That aptly describes the Eligible Organizations.

Indeed, in the 2019 Opinion, the GEC found that groups of 42 classified district employees and 62 certified employees, while “certainly smaller than an entire industry or occupation . . . are not necessarily smaller than property owners affected by a public improvement contract to maintain a county road.” *Id.* at 5. Accordingly, the GEC determined that “the numbers are sufficient, and that there are two distinct classes[.]” *Id.* While the precise number of Eligible Organizations is unclear, it is likely a group as large as the number of property owners in a certain area along a county road, and might be as large as the 42 classified district employees in the 2019 GEC opinion.

Accordingly, Eligible Organizations are both (1) bound by a community of interest, purpose or function, and (2) large enough in number to be considered an “other group.” Even if Senator Lawrence Spence’s business is eligible to apply for a grant under SB 1579, the Class Exception applies. As a result, no conflict of interest exists.

B. SB 1579 would affect all members of the class of Eligible Organizations to the same degree.

The second consideration for the Class Exception is the extent to which the public official’s actions would affect the class to the same degree. ORS 244.020(13)(b). A Guide for Public Officials, published by the GEC, explains that “[t]he number of persons affected **to the same degree** as the public official will help to determine whether this [class] exception applies.” Oregon

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Government Ethics Commission, A Guide for Public Officials 14 (2021) (emphasis in original). Here, all Eligible Organizations are equally eligible to apply for a grant under SB 1579. Accordingly, SB 1579 affects the class to the same degree, including Fifth Element LLC (even assuming it is an Eligible Organization).

The 2019 Opinion is again instructive. There, the GEC determined that the class exception applied to some public officials, but not to others, based on whether they were affected to the same degree as the class. Compare the GEC's treatment of Directors Wytoski and Crapper with Director Coleman:

“The spouses of Directors Wytoski and Crapper are members of the certified employee class. Assuming the new Licensed CBA is similar to the current Licensed CBA and affects their spouses to the same degree as other members of the class, the class exception would apply and no conflict of interest would arise for Directors Wytoski and Crapper with respect to negotiating, discussing or voting on the new Licensed CBA.

“Director Coleman's spouse and her son are members of the certified employee class. As the District's FFA Advisor, Director Coleman's spouse is treated differently from other class members under the premium pay schedule in the current Licensed CBA. Assuming the new Licensed CBA contains similar terms, then Director Coleman's spouse again would not be affected to the same degree as other members of the certified employee class. Thus, when it comes time to negotiate, discuss or vote on the new Licensed Collective Bargaining Agreement, Director Coleman would have a conflict of interest. She will need to publicly disclose her conflict of interest each time it arises and refrain from any participation in the negotiations, discussion or vote on the new Licensed CBA.”

2019 Opinion at 6 (emphasis in original). Here, assuming Fifth Element LLC is eligible to apply, it would be affected to the same degree as all other organizations in the class of Eligible Organizations—including Fifth Element LLC's competitors. That is, SB 1579 does not afford Fifth Element LLC any special treatment; it simply would be eligible (maybe) to apply for a grant just

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like all other Eligible Organizations. Accordingly, no conflict of interest exists, and this Committee should recommend that the Senate take no action on the Complaint.

V. Conclusion.

For the reasons above, no conflict of interest exists because Fifth Element LLC is not an Eligible Organization and, even if it were, it is doubtful that it would receive a grant under SB 1579. Even if it could receive a grant, the Class Exception applies. Accordingly, this Committee should find that Senator Lawrence Spence was not required to announce a conflict of interest prior to voting on SB 1579 and recommend that the Senate take no action on the Complaint.

Very truly yours,

Snell & Wilmer



Clifford S. Davidson

Attachment

C: Senator Lawrence Spence
(sen.akashalawrencespence@oregonlegislature.gov)

DECLARATION OF SENATOR AKASHA LAWRENCE SPENCE

I, Akasha Lawrence Spence, declare under penalty of perjury as follows.

1. I represent Oregon Senate District 18. I am over the age of 18. I make this declaration based on personal knowledge. If called upon to do so, I would testify truthfully as follows.

2. Both prior to the vote on SB 1579 (2022), and when I voted, I had no intention of causing Fifth Element LLC to apply to the fund that SB 1579 created.

3. In fact, I did not understand Fifth Element LLC to be eligible for funds pursuant to SB 1579.

4. I interpreted the word “organizations” in SB 1579 to mean something other than for-profit businesses such as Fifth Element LLC.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

5/9/2022

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Sen. Akasha Lawrence Spence