



**LAWYERS FOR
SECURE IMMIGRATION**

By Email:

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February 5, 2025

Ms. Manon Brassard
Chairperson, Immigration and Refugee Board
Minto Place, Canada Building
344 Slater Street, 12th Floor
Ottawa, ON
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**RE: Concerns regarding the December 20, 2024, IRB National Documentation Package
for Israel and the Occupied Palestinian Territory**

We are writing to express serious concerns regarding the December 20, 2024, IRB National Documentation Package for Israel and the Palestinian Territory, Occupied.

Specifically, we wish to bring to the attention of Canada's Immigration and Refugee Board that there is material recently updated to the IRB National Documentation Package for Israel and the Palestinian Territory, Occupied on December 20, 2024, that has been prepared by the United Nations Relief and Works Agency for Palestine Refugees (UNRWA), and by Francesca Albanese.

Francesca Albanese





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Francesca Albanese has a documented multi-year history of anti-Semitism. The most recent has been reported by the *National Post* on October 30th, 2024. Kindly note the following excerpts: <https://nationalpost.com/news/politics/un-special-rapporteur-francesca-albanese>:

“Earlier this month, Albanese compared Israel to the Third Reich, arguing that the Jewish state was on a genocidal mission to create a “pure race.” She made similar [remarks](#) in August. In July, Albanese [compared](#) Israeli Prime Minister Benjamin Netanyahu to Adolf Hitler. ...

Her latest public comments drew the condemnation of Jewish leaders across the globe, including [Canada’s special envoy combatting antisemitism, Deborah Lyons](#).

“It is unacceptable for any official — independent or not — to engage in Holocaust distortion,” Lyons [wrote](#) on X, referring to a core component of the International Holocaust Remembrance Alliance’s working definition of antisemitism, which was [adopted](#) by the Canadian government in 2019. ...

As UN Special Rapporteur Albanese visits New York, I want to reiterate the U.S. belief she is unfit for her role. The United Nations should not tolerate antisemitism from a UN-affiliated official hired to promote human rights,” [U.S. Ambassador to the UN Linda Thomas-Greenfield wrote](#) on Tuesday.”

Francesca Albanese likens the systematic extermination of Jews under the Nazi “pure race” policy to Israel’s war against Hamas, accusing Israel of committing “genocide”: “Our collective obliviousness to what led, 100 years ago, to the Third Reich’s expansionism and the genocide of people not in conformity with the “pure race” is asinine. And it is leading to the commission of yet another genocide...”

<https://x.com/JGreenblattADL/status/1846276664545923517>

For more information regarding Francesca Albanese, please see (October 27th, 2024).: <https://www.adl.org/resources/article/francesca-albanese-her-own-words>





LAWYERS FOR SECURE IMMIGRATION

UNRWA

UN Watch has published extensive data on the ties between UNRWA and Hamas:

<https://unwatch.org/the-case-against-unrwa/>
[REDACTED]

UNRWA propagates anti-Semitism in the curriculum of UNRWA schools; and, UNRWA employees have actively participated in the October 7th, 2023, events against Israel. See: *Le Monde*

https://www.lemonde.fr/en/international/article/2024/08/06/un-confirms-possible-involvement-of-nine-unrwa-employees-in-october-7-attack_6710360_4.html – August 6 2024 See :

<https://www.newsweek.com/your-tax-dollars-are-being-used-teach-hate-opinion-1796318>

UNRWA houses Israeli hostages: <https://www.timesofisrael.com/emily-damaris-mom-my-daughter-was-held-in-unrwa-facilities-denied-medical-treatment/> - February 1st, 2025

UNRWA has Hamas tunnels under UNRWA facilities: <https://www.timesofisrael.com/directly-beneath-unrwas-gaza-headquarters-idf-uncovers-top-secret-hamas-data-center/>

The *National Post* published an article about the links between UNRWA and terror organizations:

<https://nationalpost.com/news/world/israel-middle-east/unrwa-links-to-terror-groups>

Hamas maintained a subterranean data center, with an electrical room, industrial battery power banks and living quarters for Hamas, under UNRWA's Gaza headquarters.

<https://stefanik.house.gov/2024/2/stefanik-statement-on-hamas-data-center-uncovered-underneath-unrwa-headquarters>





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UN Watch reported links between UNRWA and terrorist organizations: “*Unholy Alliance: UNRWA, Hamas, Palestinian Islamic Jihad*”, January 7, 2025:

<https://unwatch.org/new,-investigation-exposes-un-agencys-shocking-ties-to-terror-groups/>

The Research Directorate at the Immigration and Refugee Board

The Research Directorate of the Immigration and Refugee Board provides “*country-of-origin information*” (“COI”) to the Refugee Protection Division and the Refugee Appeal Division.

The purpose of the COI is to provide decision-makers with different viewpoints on these aspects in a balanced and neutral manner, as they are available at the time of publication, without drawing conclusions.

Sources may include foreign government organizations, agencies, and news services; national and international non-governmental organizations; human rights organizations; academic publications; and other independent news services.

The reliability of sources and information referenced in the COI products is assessed in accordance with common methodological guidelines for processing COI, such as the [Austrian Center for Country of Origin & Asylum Research and Documentation \(ACCORD\) training manual](#) and the European Union Agency for Asylum (EUAA) guidelines.

The weight to be given to the COI produced by the Research Directorate is at the sole discretion of the decision-maker deciding a case after considering all the evidence and arguments presented.





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Our Concerns

We have never before seen the Research Directorate of the Immigration and Refugee Board include material from people or groups that have espoused hate.



We have never before seen the Research Directorate of the Immigration and Refugee Board include material from an organization that assists a designated terrorist organization.

We view the material from Francesca Albanese and UNRWA as neither balanced nor neutral, which is a requirement and at the core purpose of the COI of the Research Directorate at the Immigration and Refugee Board.

The inclusion of material from Francesca Albanese and UNRWA, at the Immigration and Refugee Board of Canada's Research Directorate, as "*neutral and balanced*", would shock the conscience of every person who upholds Canadian values of integrity and decency.

We request the immediate removal material from Francesca Albanese and UNRWA from the any National Documentation Package at the Research Directorate at the Immigration and Refugee Board.

Additionally, we ask the Immigration and Refugee Board to consider:

- A comprehensive review of the National Documentation packages for the Palestinian Territory, Occupied and Israel to ensure genuine neutrality and balance;
- Prevent inclusion of material that promotes hate of an identifiable group; and,





LAWYERS FOR SECURE IMMIGRATION

- Prevent inclusion of any material from affiliated groups of designated terrorist organizations.

Please note that individual Counsel is at liberty to adduce evidence in any particular matter, as Counsel sees fit. We are not seeking foreclosure to the admission of material from Francesca Albanese and UNRWA. The determination to admit evidence is performed on a case-by-case basis, in every case before the Immigration and Refugee Board.

Should Counsel seek to admit material from Francesca Albanese and UNRWA, they are now free, and should remain free, to do so in future. This is not about the admission of evidence from Francesca Albanese and UNRWA.

This is about the senior management decision of the Immigration and Refugee Board of Canada to determine that the material from Francesca Albanese and UNRWA is “*balanced and neutral*”.

Our concern is that inclusion of material from Francesca Albanese and UNRWA at the Research Directorate of the Immigration and Refugee Board is not “*balanced and neutral*”, and we point out to you, Madam Chair, that the inclusion of this hateful material at the Research Directorate of the Immigration and Refugee Board leaves a false *imprimatur* by Canada’s Immigration and Refugee Board, to Canada and to the world at large, that the specific material from Francesca Albanese and UNRWA that is published online at the Research Directorate of the Immigration and Refugee Board is, “*balanced and neutral*”.

We trust this concern will have your attention, and that the material from Francesca Albanese and UNRWA will be removed forthwith from the Research Directorate of the Immigration and Refugee Board pending disposition of your review of this matter.





**LAWYERS FOR
SECURE IMMIGRATION**

Yours truly,

[Redacted Signature]

For Lawyers for Secure Immigration

cc: The Honourable Marc Miller
Minister, Immigration and Refugees Citizenship Canada
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March 10, 2025

[REDACTED]
Lawyers for Secure Immigration
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Dear [REDACTED]

Please accept our apologies for the delay in responding to your correspondence which expressed concerns regarding the inclusion of certain reports in the December 2024 National Documentation Packages (NDPs) of the Immigration and Refugee Board (IRB) of Canada on Israel and the Occupied Palestinian Territory.

As you know, the purpose of NDPs is to support the refugee determination process by making available country-of-origin information (COI) that is publicly accessible at the time of publication, and which represent different points of view. The information contained in the NDPs reflects the perspectives of the sources. Their inclusion does not imply endorsement from the IRB or the Government of Canada, but rather ensures comprehensive coverage of available information.

Responsibility for COI information rests with the IRB's Research Directorate, staffed by a group of highly trained researchers. They abide by the following principles and use a rigorous methodology based on the [ACCORD Training Manual](#) and the [EUAA COI Methodology](#) for assessing what COI should be included in NDPs.

The principles used in preparing COI information are:

Neutrality: The principle of neutrality means that the research process must not be influenced by any interest in a particular outcome.



Impartiality: The Research Directorate which produces COI products, adheres to methodological guidelines, and does not seek to influence the decision-making process.

Access to information: COI should be available to decision-making bodies and legal advisors of applicants in procedures for persons seeking international protection. Applicants must have access to the information a decision is based on, so that they may comment on it. To support fair procedures, publicly available information should be used. Public information is open to review and scrutiny by the applicant, experts, and the public at large.

The Research Directorate's methodology is based on international best practices and can be summarized as follows:

Relevance: Information about the conditions in each country qualifies as COI when it serves to support the assessment of international protection needs. Relevance is determined by whether the information helps to assess if the applicant has a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion.

Reliability and Balance: It is necessary to include a range of sources to create a more comprehensive account of the situation, as every source has its own perspective. Therefore, many different sources, and different types of sources, should be consulted to achieve the most complete and balanced picture possible.

Accuracy and Currency: Accuracy and currency are quality standards that refer to the correlation between a piece of information and the actual situation. Accuracy is a straightforward notion in relation to some matters like names and dates, but more contested in relation to others (for example the treatment of members of certain minority groups by society at large). Currency of information can be understood as one crucial component of accuracy. Information is current if it reflects an event or a situation as it stands at the time of research.

The most common method of testing accuracy and currency of information is cross-checking. Several reliable sources of different types should be identified that report on a specific issue, and the information provided by each of these sources should be compared and contrasted. Ideally, every



piece of information should be corroborated by different types of sources (UN report, international or local human rights organisations, international or local media, expert opinion) that do not quote each other.

Transparency: To ensure transparency, COI should be clearly presented, and its meaning must not be distorted. Every piece of information should be traceable to its source. Therefore, information should be fully referenced to enable readers to independently verify and assess the information.

In the end, the IRB seeks to have a well-balanced NDP package. To ensure *overall* balance within each NDP, reports providing relevant insight and varying perspectives on country conditions are considered from a wide range of sources, including UN organizations. Together, this information aims to provide a comprehensive picture of the conditions on the ground.

As per IRB procedure, the assessment and weight assigned to the information in the NDPs are the responsibility of independent IRB members after considering the evidence and arguments presented by the parties, in each case.

In your correspondence, you raise concern with the inclusion of documents in the IRB's NDPs prepared by the United Nations Relief and Works Agency for Palestinian Refugees in the Near East (UNRWA), as well as reports by Francesca Albanese, prepared in her role as Special Rapporteur. You state that Francesca Albanese has a "documented multi-year history of anti-Semitism" and provide examples from a National Post article where she is quoted, amongst others.

The NDPs include reports prepared under the auspices of the UN and by Ms. Albanese in her role as Special Rapporteur on the Palestinian territories occupied since 1967¹. The reports in question were included following a thorough document assessment and adherence to the rigorous IRB methodology as described above.

The NDPs do regularly include UN reports, as do many of our international partners in their COI related materials. Some of the reports you take issue with, or earlier versions of them, are included in the United Kingdom and Denmark's

¹ The Special Rapporteur's mandate is: "to investigate Israel's violations of the principles and bases of international law, international humanitarian law and the Geneva Convention relative to the Protection of Civilian Persons in Time of War, of 12 August 1949, in the Palestinian territories occupied by Israel since 1967."



COI products, who, like us, base their methodology on the [ACCORD Training Manual](#) and the [EUAA COI Methodology](#).

As per our practice, we review packages on a regular basis and add or remove documents to keep our NDPs balanced and up to date. The current update of this particular NDP is scheduled for May 2025.

Thank you for taking the time to share your concerns. I hope this overview of our approach to COI is sufficient for you to rest assured that every document has been carefully considered before its inclusion in the NDP.

If you wish to discuss further, please do not hesitate to contact me.

Best regards,

Executive Director



**LAWYERS FOR
SECURE IMMIGRATION**

By e-mail: manon.brassard@irb-cisr.gc.ca and [REDACTED]@irb-cisr.gc.ca

April 4, 2025

Ms. Manon Brassard, Chairperson
Mr. [REDACTED] Executive Director
Immigration and Refugee Board
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Dear Madam/Sir,

Thank you for your reply dated March 10, 2025, in response to our letter of February 5, 2025. To reiterate we have serious concerns about the inclusion of certain materials in the National Documentation Packages for Israel and Palestine, Occupied Territories.

Contrary to the assertion in your letter that the NDPs are not authoritative on a particular subject-matter, it is well recognized that NDP's are a compilation of materials from which Board members and counsel are expected to take "judicial notice" of. Moreover, they serve as evidence in each claim, infer the position that the Board is taking regarding country conditions and are persuasive to the outcome. The NDPs are in fact a representation by the IRB, and by extension IRCC and the Government of Canada, as a compilation of documentation that is deemed authoritative and accurate and endorsed by the Tribunal.

In terms of the assertion that the NDP's offer comprehensive coverage of country conditions, we would be respectfully highlight that the materials contained in the NDPs are neither comprehensive nor balanced and omit critical information about the sources of the information.



For example, the international NGO [UN Watch](#) has specifically reported on UNRWA operations and its political activities including association with terrorism. [UNRWA itself](#) has failed to adequately respond to the long-standing independent research about allegations of affiliation with terrorism.

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[UN Watch](#) has also documented the antisemitic views of the UN Special Rapporteur, Francesca Albanese. It is inaccurate to assert that different points of view are showcased in the NDP packages. There is an absence of information about the concerns that have been shared internationally about both UNRWA's support of terrorism and of Ms. Albanese's perpetuation of antisemitism.

While your reply speaks to the neutrality of the information contained in the NDPs and the highly trained professionals in the IRB's research directorate, a simple google search about the controversies surrounding UNRWA and Ms. Albanese, reveal that there is a plethora of publicly available information that uncover documented research about how each of these sources are neither impartial, independent nor current on country conditions, including the political overtones that colour the information being published by these sources.

The following link lists the countries that have taken issue with Ms. Albanese holding a position with the UN (including Canada) which is expected to be neutral organization:

<https://unwatch.org/un-watch-triggers-urgent-procedure-to-stop-francesca-albaneses-u-n-reappointment/>

The IRB reply speaks to other countries' reliance on such internationally accepted documents as to country conditions related to assessing persecution under the Convention. Other refugee receiving countries may rely on such sources, but that does not relieve the obligation on the IRB to prepare and disseminate bias free research. There is significant publicly available information of those that have registered dismay about Ms. Albanese and the views that she shares under the cloak of the legitimacy as a representative of the UN.

On October 15, 2024, the US Ambassador on Human Rights publicly denounced Ms. Albanese for her engagement in holocaust distortion. This can be view directly on X (formerly Twitter) <https://x.com/USAmbHRC/status/1846308382510404007> The US Ambassador stated:

“Antisemitism has no place at the UN, especially from those tasked with promoting human rights. Frances Albanese's recent remarks, including evoking Nazis, show yet again that she is unfit for any role at the UN”.

Just last week, [The Netherlands](#) announced that they will not support the reappointment of Ms. Albanese as special rapporteur precisely because her abhorrent views that are

unbecoming of a UN representative and her failure to adhere the UN Code of Conduct. This week [Parliamentarians in France](#) expressed their opposition to Ms. Albanese's reappointment as a representative of the UN.

Representatives from ten countries have spoken out about their concerns in having Ms. Albanese continue to hold a position with the UN and are referenced in [this article](#).

Given the IRB Research Directorate's stated methodology which emphasizes balance, impartiality, transparency and the use of up-to-date sources in the preparation of national Documentation Packages (NDPs), we respectfully request clarification as to why none of the equally cogent, compelling and well-researched information is not included in the NDP packages? For the Directorate's review and consideration, we have appended a list of some of the most relevant documentation that we believe deserves inclusion in the NDP.

This list of compiled sources is a sampling of current information that we believe deserves inclusion in the NDP packages. It is imperative that members, legal counsel and claimants themselves have direct access to independent sources of information that offer a variety of viewpoints, not only about country conditions, but about the sources of information being furnished by the IRB as credible, trustworthy, impartial and independent of political influences.

We expect that the highly trained members of the IRB Research Directorate will see to it that added sources of information are included and accessible to the parties involved in filing, deciding and defending claims to Convention Refugee Status in Canada.

We will be reviewing the next update to the relevant NDPs and hope that the IRB will commit to including more independent and well-researched sources of information. The imbalance of information in the existing NDPs reflects a lack of impartiality and neutrality and the omission of critical information to adequately present the information needed to carry out the IRB's mandate.

Yours truly,

[REDACTED]

[REDACTED]

Per: Lawyer for Secure Immigration

cc: Minister of Immigration, Refugees and Citizenship Canada, The Honourable Rachel Bendayan

Suggested inclusions for the IRB National Documentation Package for Israel and Occupied Territories, Palestinian – April 4, 2025

Francesca Albanese Documentation

<https://unwatch.org/francesca-albanese/>

<https://unwatch.org/the-terrorists-who-cite-francesca-albanese/>

<https://unwatch.org/exposed-francesca-albaneses-global-influence-network-targeting-israel/>

<https://unwatch.org/dina-rovner-on-chai-fm-there-is-a-systemic-rot-within-the-united-nations/>

<https://unwatch.org/global-condemnation-of-un-rights-official-comparing-israel-to-third-reich/>

<https://unwatch.org/francesca-albanese/>

<https://unwatch.org/un-watch-triggers-urgent-procedure-to-stop-francesca-albaneses-u-n-reappointment/>

https://www.miragenews.com/un-rapporteur-albanese-reappointment-faces-1439239/#google_vignette

<https://unwatch.org/42-french-parliamentarians-oppose-renewal-of-francesca-albanese/>

<https://www.gov.il/en/pages/francesca-albenza>

<https://www.wizo.org/news/the-special-rapporteur-from-the-empire-of-lies/>

<https://extremismterms.adl.org/resources/article/francesca-albanese-her-own-words>

<https://www.nationalreview.com/corner/u-s-blasts-latest-antisemitic-screed-from-u-n-expert-who-warned-of-jewish-lobby/>

<https://www.dutchnews.nl/2025/03/minister-doesnt-back-second-term-for-uns-gaza-rapporteur/>

<https://www.dutchnews.nl/2025/02/dutch-mps-withdraw-invitation-to-uns-gaza-rapporteur/>

<https://peoplesdispatch.org/2025/02/14/dutch-parliamentarians-withdraw-invitation-to-un-rapporteur-francesca-albanese/>

<https://www.dutchnews.nl/2025/02/dutch-minister-wont-greet-uns-gaza-rapporteur-telegraaf/>

<https://www.dw.com/en/germany-anger-over-cancelled-talks-by-un-special-rapporteur-for-palestinian-territories/a-71662122#:~:text=A%20major%20Berlin%20university%20canceled%20a%20public%20lecture,from%20the%20Berlin%20mayor.%20Many%20academics%20are%20outraged.>

<https://www.foxnews.com/politics/republicans-seek-block-reappointment-un-official-accused-antisemitism>

<https://matzav.com/us-lawmakers-demand-un-reject-reappointment-of-francesca-albanese/>

<https://www.crif.org/fr/content/le-crif-demande-que-le-mandat-de-francesca-albanese-rapporteuse-speciale-des-nations-unies-ne-soit-pas-reconduit>

<https://www.jns.org/what-the-un-ignores-on-francesca-albanese/>

<https://thecjn.ca/news/montreal-albanese/>

<https://www.i24news.tv/en/news/middle-east/palestinian-territories/1707758752-more-than-4-000-lawyers-call-for-dismissal-of-un-special-rapporteur-to-palestinian-territories>

<https://nationalpost.com/opinion/arsen-ostrovsky-why-is-canada-welcoming-an-antisemitic-terror-supporting-un-official>

<https://nationalpost.com/news/politics/un-special-rapporteur-francesca-albanese>

<https://www.theguardian.com/news/2024/nov/11/pro-israel-campaigners-protest-against-un-special-rapporteurs-uk-visit>

<https://www.city-journal.org/article/the-occupation-dodge>

https://www.yahoo.com/news/we-are-appalled-us-officials-condemn-un-human-rights-official-accused-of-making-antisemitic-posts-222234541.html?fr=yhssrp_catchall

UNRWA Documentation

<https://unwatch.org/the-case-against-unrwa/>

<https://unwatch.org/the-unholy-alliance-unrwa-hamas-and-islamic-jihad/>

<https://unwatch.org/deconstructing-unrwa-facts/>

<https://unwatch.org/report-unrwas-terrorgram/>

<https://unwatch.org/report-u-n-teachers-celebrated-hamas-massacre/>

<https://unwatch.org/exposed-un-teachers-call-to-murder-jews/>

<https://unwatch.org/report-un-teachers-celebrate-deaths-of-israelis/>

Other sources of information about UNRWA

<https://www.fdd.org/analysis/2023/11/08/united-nations-bigotry-towards-israel-unrwa-anti-semitism-poisons-palestinian-youth/>

General background information

<https://www.jns.org/the-blood-libel-at-the-hague/>

<https://www.lawandisrael.org/wp-content/uploads/International/ICJ/The-Bias-of-ICJ-President-Nawaf-Salam-1.pdf>

<https://www.opendemocracy.net/en/bbc-impartiality-trust-israel-gaza-media-experts/>

Palestinian Authority

<https://jcpa.org/paying-salaries-terrorists-contradicts-palestinian-vows-peaceful-intentions/>

<https://www.fdd.org/analysis/2025/02/10/pa-to-modify-pay-to-slay-policy-in-apparent-overture-to-trump/>

<https://www.fdd.org/analysis/2025/02/07/palestinian-terrorists-released-in-ceasefire-deal-leave-israeli-jails-as-millionaires/>

NGO Monitor insights

https://ngo-monitor.org/ngos/amnesty_international/

https://ngo-monitor.org/ngos/human_rights_watch_hrw_/

<https://ngo-monitor.org/francesca-albanese-special-rapporteur-to-demonize-israel/>



July 7, 2025

[REDACTED]
Lawyers for Secure Immigration
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Dear [REDACTED],

Thank you for your correspondence of April 4, 2025, regarding the National Documentation Packages (NDPs) for Israel and the Occupied Palestinian Territory. We appreciate your thoughtful engagement.

We have carefully reviewed the documents you referenced and assessed them in accordance with the IRB's established methodology. A number of these documents, along with additional material from other reputable sources, will be included in the updated NDPs to continue to provide a wide array of reliable information and different perspectives. As part of our regular updates, the IRB is currently in the process of revising these NDPs and anticipates that the updated versions will be published before the fall.

As noted previously, the contents of the NDPs reflect the viewpoints of the cited sources. Their inclusion should not be understood as an endorsement by the Immigration and Refugee Board of Canada, Immigration, Refugees and Citizenship Canada, or the Government of Canada.

It remains the responsibility of IRB members (decision-makers) - acting independently - to consider the evidence and arguments presented in each case. The NDPs are intended to assist, but do not limit, the consideration of additional country-of-origin information that may be introduced during a proceeding.

Thank you again for taking the time to share your concerns.

Best regards,

[REDACTED]
Executive Director