

DBLASTMEDIA

POLICE AND LOCAL GOVERNMENT ACCOUNTABILITY CAMPAIGN

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OPEN MEETINGS COMPLIANCE BOARD FINDS SEAT PLEASANT VIOLATED OPEN MEETINGS ACT

Seat Pleasant, Maryland - In an eleven-page opinion released yesterday, the Maryland Open Meetings Compliance Board (“OMCB”) found that the City of Seat Pleasant violated three provisions of the Open Meetings Act regarding disclosures before and after closed session meetings, publishing meeting minutes online, and meeting notices.

DBlastMedia lodged a complaint with the OMCB on December 6, 2021, after a review of City Council documents between November 2020 and December 2021, revealed more than ninety violations.

Open Meetings laws, also referred to as sunshine laws, require, with some exceptions, that the meetings and decisions of state agencies, regulatory bodies, and local governments be open to the public.

Steve Thompson, this organization’s spokesman, stated, “Transparency is vital for combating corruption, strengthening accountability, and fostering participation in public affairs. When elected officials neglect their statutory obligations, it deprives citizens of the opportunity to oppose legislation, voice concerns, and learn about government activities.”

He added, “Seat Pleasant City officials tend to unnecessarily deny public records request and breach open meetings laws to avoid public scrutiny.”

DBlastMedia and our partners at Community Justice strive to uncover, intercede, and publish news about police misconduct, government corruption, and whistleblower retaliation.

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STATE OF MARYLAND
OPEN MEETINGS COMPLIANCE BOARD

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Seat Pleasant City Council

January 13, 2022

The Complainant alleges that the Seat Pleasant City Council (“Council”) violated several provisions of the Open Meetings Act (“Act”) between November 2020 and December 2021. As we explain more fully below, we find that the Council violated certain requirements for meeting notices, disclosures before and after meeting in closed sessions, and posting minutes online.

Discussion

A. Notice

1. Omitting special meetings and closed sessions from the Council’s calendar

The Complainant alleges that the Council violated the Act’s notice requirements by omitting special meetings from an online calendar used for regular meetings. The Council responds that it complied with the Act by posting notices of the special meetings on the city’s website.

We agree with the Complainant that, by omitting the special meetings from its meetings calendar, the Council violated the Act’s notice requirement. Section 3-302 provides that, “[b]efore meeting in a closed or open session, a public body shall give reasonable advance notice of the session.” § 3-302(a).¹ As for the method of providing notice, the Act generally affords public bodies “considerable flexibility.” 7 *OMCB Opinions* 237, 238 (2011) (quoting 4 *OMCB Opinions* 88, 98 (2004)). Moreover, the Act expressly permits a public body to post “notice on an Internet website ordinarily used by the public body to provide information to the public” “*if the public body previously has given public notice that this method will be used.*” § 3-302(c)(3) (emphasis added). The submissions are silent as to whether the Council informed the public that it would provide notice of special meetings and closed sessions via the city’s website, as opposed to the

¹ Statutory references are to the General Provisions Article of the Maryland Annotated Code.

meetings calendar. Regardless, we have previously said that “when a public body uses a calendar function for some meetings, it must post them all there.” 12 *OMCB Opinions* 1, 1 (2018). The Complainant asserts that the Council uses an online calendar to provide notice of regular meetings, and the Council acknowledges that the calendar “publishes the advance meeting dates for the year in accordance with the city charter mandated meetings of the first and second Monday of each month.” Because the Council uses the calendar to provide notice of its regular meetings, the Council should use the calendar to provide notice of all its meetings, including special meetings. Its failure to do so was a violation of § 3-302. See 12 *OMCB Opinions* at 1 (finding a violation of § 3-302 when a public body’s calendar listed regular meetings but not work sessions). “As evidenced by the complaint here, a public body’s failure to employ its usual method of giving notice, particularly when that method is seemingly easy and efficient, gives the public the impression that the public body wishes to conduct its discussions out of the public eye.” 8 *OMCB Opinions* 76, 83 (2012).

2. *Failing to invite the public to open meetings during which the Council anticipated entering closed sessions*

The Complainant alleges that the Council further violated the Act with respect to the content of its notices. Specifically, the Complainant asserts that the Council failed to invite the public to attend meetings during which the Council anticipated entering closed sessions.

The Act generally requires a public body to conduct its business in meetings open to the public, § 3-301, except when the public body carries out a function outside the scope of the Act,² or discusses a matter that falls within one of fifteen exceptions that allow for closed meetings, § 3-305(b). Before meeting in closed session under one of the exceptions, however, “the public body must meet in open session.” 11 *OMCB Opinions* 74, 74 (2017); see also § 3-305(d) (setting forth the procedure for closing a meeting). And even when a public body intends to hold an open session “only for the purpose of voting to close the session,” the body “must publish notice reasonably in advance, so that interested individuals may exercise their right to attend.” 12 *OMCB Opinions* 25, 25, (2018). As to the content of that notice, it must make clear that the body will meet in open session, even if only to vote to close the session. 8 *OMCB Opinions* 150, 158 (2013). A notice that describes only a “closed” meeting “effectively exclude[s] the public from the open portion of that meeting and thereby violate[s] the mandate of [§ 3-301] that a public body’s meetings be open ‘[e]xcept as otherwise expressly provided’” *Id.*

² The Act does not apply when a public body is carrying out administrative, judicial, or quasi-judicial functions, or to chance encounters, social gatherings, or any other occasions not intended to circumvent the Act. § 3-103(a).

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Although a few of the Council’s notices regarding closed sessions indicated that the Council would “meet in a Closed Session immediately following [a] Regular Work Session via Zoom,” most of the notices violated the Act by failing to make clear that the Council would first convene in open session before closing the meeting to the public. The Council’s notice of its January 25, 2021 meeting, for example, says:

MONDAY, JANUARY 25, 2021 @5:00p.m.
CLOSED SESSION

IN ACCORDANCE WITH STATUTORY AUTHORITY TO CLOSED
[sic] SESSION, GENERAL PROVISIONS ARTICLE §3-305 (b)

(12) “To conduct or discuss an investigative proceeding on actual or possible criminal conduct”

The City Council will meet in a Closed Session at:

Seat Pleasant City Hall
6301 Addison Rd.
Seat Pleasant, MD 20743

Nowhere does the notice indicate that the Council would first meet in an open session, which the public would be allowed to attend. Thus, the content of the notice (and the many other similarly worded notices) constituted another violation of § 3-302. *See* 12 *OMCB Opinions* 19, 19 (2018) (finding that a public body violated § 3-302 by “wording its meeting notice in such a way as to convey that no part of the meeting would be public”).

3. *Alleged failure to provide notice of canceled meetings*

The Complainant alleges that the Council violated the Act by failing to publish notice that meetings on August 2 and 9, 2021 were canceled. The Act provides that, “[w]henever reasonable, a notice . . . shall . . . include the date, time and place of the session.” § 3-302(b). We have long recognized that “[i]mplicit in” this provision “is the requirement that the public be notified of changes in those facts, including the fact that a previously scheduled meeting had been canceled.” 1 *OMCB Opinions* 186, 189-90 (1996). In this case, however, we lack sufficient information to determine whether the Council violated this requirement. *See* § 3-207(c)(2) (recognizing that the Board may be “unable to resolve the complaint”). The Council’s response does not acknowledge cancellation of the August 2 and 9, 2021 meetings, and neither the Complainant nor the Council provides any explanation for why or when the meetings may have been canceled. Without these details, we cannot determine whether the Council violated the Act, even if we assume that

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the meetings were, in fact, canceled and that the Council failed to provide notice of the cancelations. As we have previously noted, if a meeting was canceled because a quorum was unexpectedly unavailable (and the lack of quorum was not known until the start of the meeting), providing advance notice of such a cancelation would not be feasible and, thus, failing to do so would not violate the Act. 3 *OMCB Opinions* 188, 190 (2002). By contrast, the failure to provide notice of a cancelation known in advance of the meeting would violate the Act. *Id.* Without knowing the basis for the cancelation of the August 2 and 9, 2021, meetings, we cannot determine whether the Council’s failure to provide notice of the cancelations violated the Act.

4. *Alleged failure to retain notices for one year*

The Complainant alleges that the Council failed to comply with the Act’s requirement to “keep a copy of a notice . . . for at least 1 year after the date of the session.” § 3-302(d). But the Complainant asserts no more facts in support of this allegation, and the Council has provided us copies of notices for meetings dating back to December 7, 2020. Thus, we have no basis to find a violation of § 3-302(d).

B. *Alleged failure to include in an agenda an anticipated closed session*

The Complainant alleges that the Council violated the Act through its “[f]ailure to include public vote on closure in meeting agenda” [sic] for its February 8, 2021 meeting. The Act requires only that an agenda contain “known items of business or topics to be discussed at the portion of the meeting that is open” and indicate “whether the public body expects to close any portion of the meeting.” § 3-302.1(a)(1). It is true that, although the Council entered closed session on February 8, 2021, the agenda did not say that the Council expected to close the meeting to the public. Still, we lack sufficient information to determine whether that omission violated § 3-302.1(a)(1). The Act expressly permits a public body to alter an agenda after it has been made available to the public, § 3-302.1(e), and nothing in the Act prohibits a public body from entering closed session if the need for closure arises unexpectedly during an open session. Indeed, we have previously found that a public body did not violate the Act’s *notice* provision³ by entering closed session despite not having provided notice to the public in advance that it intended to close the meeting; according to the body, the need to close the meeting didn’t become apparent until just before the start of the meeting, when it was too late to amend the notice. 5 *OMCB Opinions* 165, 167-68 (2007). Although that opinion involved the Act’s *notice* requirement, we see no reason why the result should be different for *agendas*, especially since the Act expressly

³ Section 3-302(b)(3) provides that, “if appropriate,” a notice shall “include a statement that a part or all of a meeting may be conducted in closed session.”

permits a public body to amend an agenda.⁴ Because we cannot tell from the submissions whether the February 8, 2021, closed session was anticipated at the time the Council prepared its agenda, we cannot determine whether the Council violated the Act by failing to state that it expected to enter closed session.

C. Public access to meetings

The Complainant alleges that the Council violated the Act by requiring the public to register, three or more days before a meeting date, to attend a virtual meeting. The Council responds that it asks members of the public to register “for a secure meeting platform,” as “[t]he city experienced a hack with the first Zoom meeting [it] held in May 2020.”

“Whenever a public body meets in open session, the general public is entitled to attend.” § 3-303(a). But “[t]he Act . . . does not address the question of whether public notices may include a request that people interested in attending contact the public body in advance.” Office of the Attorney General, *Open Meetings Act Manual* 2-4 (10th ed., January 2021). With respect to meetings in person, we have approved such requests as a way to ensure that the meeting space can accommodate the attendees. *See 9 OMCB Opinions* 206, 211 (2015) (noting that “public bodies without regular access to large meeting rooms routinely include in their meeting notices a request that people who are interested in attending the meeting notify the public body in advance” so “the public body can make arrangements for an unusually large crowd”). We have also recognized that public bodies may take “reasonable measures,” such as requiring meeting attendees to check in or provide identification, “to safeguard public property, government personnel, and members of the public who visit public buildings.” *9 OMCB Opinions* 296, 299 (2015). And more recently, we have recognized that, while “[v]irtual meetings do not share the same security concerns as in-person meetings,” “security is still a valid concern.” *15 OMCB Opinions* 168, 169 (2021); *see also 15 OMCB Opinions* 32, 32 (2021) (discussing a public body’s practice of requiring attendees to request the meeting password, rather than posting it online, to “prevent its meetings from being hijacked”).

We believe that the Council acted reasonably in requiring interested members of the public to register for virtual meetings. As we have previously noted, the Federal Bureau of Investigation received multiple reports of hackers disrupting video-teleconferences early in the pandemic, *15 OMCB Opinions* at 169, and the Council itself has already been the victim of a hack. At least one expert has recommended, as a means of securing virtual meetings, “[p]rovid[ing] the link” for the meeting “directly to specific people” rather than

⁴ Of course, if the item of discussion necessitating a closed session is not-time sensitive, the best practice would be to wait until the next meeting to discuss it in closed session, so that the public body could provide notice to the public that it would be meeting in closed session.

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sharing the link on an unrestricted publicly available site.⁵ We thus decline to find a violation of the Act based on the Council requiring meeting attendees to register in advance.

The Complainant's grievance, however, is not just that the Council requires registration, but requires registration three days before a meeting. The Complainant directs our attention to a notice for a meeting at 6 p.m. Monday, December 6, 2021, that says the following:

Residents are welcomed and encouraged to attend the Regular Work Session Meeting. Please select the below link to register for the meeting before 5:00p.m., on Friday, December 3, 2021.

The Council's response does not address the timing aspect of its registration requirement, that is, that its meeting notice asked prospective attendees to register several days in advance of the meeting. However, neither the complaint nor the response indicates that any member of the public wanted to attend the meeting but was denied because of failing to register by 5 p.m. Friday, December 3. Thus, we have no basis to conclude that anyone was actually excluded from a meeting, in violation of § 3-303(a). Nonetheless, we have some concern that the manner in which the notice was worded indicates that a member of the public who learned about the meeting after that deadline would not have been able to attend. To avoid that potential problem, we recommend that the Council ensure that members of the public can register for a virtual meeting even after it has started, which may require designating an employee to be on call to provide the necessary log-in information. *Cf.* 15 *OMCB Opinions* 55, 56 (2021) (recommending that "public bodies have staff available by phone or e-mail before and during [a virtual] meeting, so that they can coordinate with the presiding officer if it becomes apparent that the capacity is inadequate and so that reasonable steps can be taken to prevent members of the public from being turned away"). Whatever approach the Council adopts, it should revise its notices accordingly.

D. Closing statements

The Complainant alleges that the Council's closing statements failed to describe topics of discussion or the reasons for excluding the public. The Act requires that "[b]efore a public body meets in closed session, the presiding officer shall: (i) conduct a recorded vote on the closing of the session; and (ii) make a written statement of the reason for closing

⁵ Kristen Setera, "FBI Warns of Teleconferencing and Online Classroom Hijacking During COVID-19 Pandemic," Federal Bureau of Investigation (Mar. 30, 2020), <https://www.fbi.gov/contact-us/field-offices/boston/news/press-releases/fbi-warns-of-teleconferencing-and-online-classroom-hijacking-during-covid-19-pandemic> (last visited Jan. 13, 2021).

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the meeting, including a citation of the authority under this section, and a listing of the topics to be discussed.” § 3-305(d)(2). “As we have previously explained, ‘each of the three items in the written statement serves a distinct purpose and must be included.’” 15 *OMCB Opinions* 99, 100 (2021) (quoting 10 *OMCB Opinions* 46, 49 (2016)). “[T]he written statement of the topics to be discussed and reasons for closing allows the members to cast an informed vote on whether the claimed reason is sufficient to depart from the Act’s norm of openness—that is whether it ‘really is necessary’ to exclude the public.” 9 *OMCB Opinions* 46, 49 (2013) (quoting 4 *OMCB Opinions* 46, 48 (2004)). “A properly drafted statement also enables members of the public to understand why they are being excluded and, later, to ascertain from the summary of the closed session whether the members adhered to the topics they identified.” 9 *OMCB Opinions* at 49.

In this case, we agree that at least some closing statements were insufficiently detailed. “[T]here is no hard and fast rule for how much information is required in every circumstance,” 7 *OMCB Opinions* 216, 224 (2011), and “a public body is not obliged to reveal in the statement information that is protected by the applicable exception,” 4 *OMCB Opinions* 46, 48 (2004). But there must be “some account beyond uninformative boilerplate,” *id.*, and “we have thus ‘advised public bodies to disclose as much information as they can without compromising the confidentiality of matters discussed within the claimed exception,’” 15 *OMCB Opinions* at 101 (quoting 15 *OMCB Opinions* 37, 39 (2021)). Here, we find that, on at least a few occasions, the Council failed to satisfy this standard. For example, in several closing statements, the Council listed as both the topic of discussion and the reason for closure “personnel.” This lacks sufficient detail. As we have said:

At a minimum, a closing statement claiming the personnel matters exception should provide enough information to inform the public that the discussion does indeed fall within the exception. The topic to be discussed or reason for closing should thus show that the discussion will involve the personal attributes or performance of specific individuals and will not instead involve broader policy, which would be implicated when anyone in the position would be affected by the action being considered and which would therefore not fall within the exception.

7 *OMCB Opinions* 225, 228 (2011).

Similarly, the Council on more than one occasion invoked the “legal advice” exception of § 3-305(b)(7) but provided no topic of discussion and simply repeated the statutory language when listing the reason for the closure: “To consult with counsel to obtain legal advice.” As we have repeatedly recognized,

a public body might decide to receive legal advice from its lawyer in a closed session because the public body does not want to waive the attorney-client privilege as to a particular matter, or because public disclosure would adversely affect the public body's position in litigation, or even because the public body wants the lawyer's advice on whether a matter should or must be kept confidential. If so, the public body should disclose those reasons; it is not necessarily a foregone conclusion that a public body's attorney should only address the members' questions in a closed session.

15 *OMCB Opinions* at 101 (quoting 10 *OMCB Opinions* 4, 6 (2016)). We thus find that several of the Council's closing statements lacked sufficient details as to the topics of discussion and the reasons for the closure, in violation of § 3-305(d)(2).

E. Closed session discussions

The Complainant alleges that the Council violated the Act at its May 10, 2021, closed session by engaging in a discussion that exceeded the scope of the claimed exception (apparently, the procurement exception of § 3-305(b)(14)).⁶ The Complainant offers no more details and the Council does not respond to the allegation, perhaps because it does not appear in the body of the complaint but, rather, appears, without elaboration, in a four-page table listing various meetings that allegedly involved violations of the Act. Because the Complainant alleges no facts that would aid us in determining whether a violation has occurred, we decline to consider such a "speculative allegation[]." 13 *OMCB Opinions* 61, 64 (2019); see also 3 *OMCB Opinions* 143, 144 (2001) (noting that a complaint should be based on "a reasonable inquiry into the available facts"); § 3-205(b)(2) (providing that a complaint shall "describe the action of the public body, the date of the action, and the circumstances of the action").

F. Closed session summaries

"If a public body meets in closed session, the minutes for its next open session shall include: (i) a statement of the time, place, and purpose of the closed session; (ii) a record of the vote of each member as to closing the session; (iii) a citation of the authority under § 3-305 . . . for closing the session; and (iv) a listing of the topics of discussion, persons present, and each action taken during the session." § 3-306(c)(2).

⁶ The procurement exception permits a public body to meet in closed session to discuss, "before a contract is awarded or bids are opened, a matter directly related to a negotiating strategy or the contents of a bid or proposal, if public discussion or disclosure would adversely impact the ability of the public body to participate in the competitive bidding or proposal process." § 3-305(b)(14).

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The Complainant alleges that the Council frequently omitted the last of these requirements by failing to disclose topics discussed and actions taken and by failing to adequately identify individuals present during a closed session. As to the last assertion, the Complainant alleges that the Council’s reference to individuals’ titles—such as “Interim Chief Operating Officer” and “City Clerk”—is insufficient to satisfy the Act; according to the Complainant, the closed session summaries must identify the individuals’ names. We disagree. The Act requires only that the public body provide “a listing of . . . persons present” but does not specify *how* the body must identify those individuals. We thus believe that a public body complies with the Act if it provides the official titles of persons present during a closed session, provided each title describes only one person and not a category of people (e.g., “councilmember”).

As for the Complainant’s other grievances about closed session summaries, we agree that some summaries lacked sufficient detail about the topics of discussion. “The Open Meetings Act requires a statement of both the purpose and the topics of discussion.” 2 *OMCB Opinions* 18, 20 (1998) (emphasis omitted). “The latter provision, we have stated before, affords an opportunity for ‘interested members of the public . . . to find out the basics of what happened at a closed session.’” *Id.* (quoting 1 *OMCB Opinions* 63, 65-66 (1994)). “To be sure, the level of detail . . . ‘may preserve the confidence of information that led to the session’s being closed in the first place.’” *Id.* (quoting 1 *OMCB Opinions* 16, 17 (1992)). But “the summary of a closed meeting must go beyond a mere parroting of the statutory exception,” 3 *OMCB Opinions* 173, 178 (2002), and provide the public enough information “to broadly ascertain whether the actual discussion fell within the exceptions that the public body claimed as a basis for excluding the public,” 9 *OMCB Opinions* 127, 131 (2014); *see also* 11 *OMCB Opinions* 12, 17 (2017) (“A closed-session summary that merely repeats the words of the statutory exception seldom provides enough information about the topics discussed.”).

Several of the closed session summaries fell short of these requirements. The summary of the October 5, 2021 closed session, for example, repeats the statutory language of the claimed exception (the legal advice exception of § 3-305(b)(7), permitting closure to “consult with counsel to obtain legal advice”) but provides no indication of the actual topic of discussion. As we have previously recognized,

a public body can describe the topic related to its need for legal advice without disclosing confidences. It can say in the minutes, for example, that the topic of discussion was consideration of a settlement proposal in a lawsuit without disclosing any details about the proposal. But language that gives the public no information whatever about the topic of discussion is insufficient.

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2 *OMCB Opinions* at 20. Similarly, the summary of the September 27, 2021 closed session parrots the language of the claimed exception (the personnel matters exception of §3-305(b)(1)) but says nothing else about the topic of discussion. We thus find that these summaries (and others that merely repeat the language of the statutory exception) violate § 3-306(c)(2).

As for actions taken in closed session, we have previously recognized that there may be circumstances in which a public body does not take any action in closed session “that would require disclosure in the summary.” 15 *OMCB Opinions* 63, 67 (2021). The Council does not respond to the Complainant’s allegation that the closed session summaries here impermissibly omit details of actions taken. Thus, we cannot know for certain whether the Council simply did not take any actions requiring disclosure, or whether the Council merely failed to disclose them. We think the latter is more likely, given the many closed session summaries that make no mention of any action taken. But lacking the information necessary to conclusively determine that the Council violated this specific requirement, we simply draw the Council’s attention to § 3-306(c)(2)(iv), which expressly requires disclosure of “each action taken during the [closed] session.”

G. Minutes

Finally, the Complainant alleges that the Council violated the Act by failing to post online the minutes of its September 13, 15, and 27, 2021 meetings as soon as practicable. The Act provides that, “as soon as practicable after a public body meets, it shall have minutes of its session prepared,” § 3-306(b)(1), and “[t]o the extent practicable, a public body shall post online the minutes,” § 3-306(e)(2). The Council asserts that it approves meeting minutes “on the second Monday of each month for the prior month[’s] meetings” and the “approved meeting minutes are posted on the city’s website with[in] days.” Based on this representation, we understand it to be practicable for the Council to post its minutes online, and, indeed, minutes of many meetings appear on the Council’s website. But as of early January 2022, none of the September 2021 minutes appeared on the website, even though minutes for several October 2021 meetings did so appear. When asked where to find the September 2021 minutes online, the city clerk said that the minutes had been approved and “provided for posting,” but she was unable to provide a link and acknowledged an “issue” that needed to be “corrected.” Although the omission of the September 2021 minutes from the Council’s website appears to have been inadvertent, we nonetheless find a violation of § 3-306(e)(2).

Conclusion

We find that the Council violated § 3-302 by omitting special meetings and closed sessions from its meetings calendar and by failing to make clear in meeting notices that the

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Council would convene in open session before entering closed session. We further find that several of the Council's closing statements lacked sufficient details as to the topics of discussion and the reasons for the closure, in violation of § 3-305(d)(2). Similarly, several closed session summaries failed to disclose the topic of disclosure, in violation of § 3-306(c)(2). Finally, we find that the Council violated § 3-306(e)(2) by failing to timely post several sets of minutes online despite acknowledging that posting minutes online was practicable. This opinion is subject to the announcement and acknowledgment requirement of § 3-211.

Open Meetings Compliance Board

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