

Title IX Training

Title IX Investigators/Decisionmakers

Christopher M. Pape

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LANIER FORD SHAVER & PAYNE, P.C.



Topics

- Title IX Overview
- What is Sex-Based Discrimination?
 - Summary of Title IX Grievance Procedure
 - The Role of an Investigator and Decisionmaker
 - Potential Big Changes Coming
 - New 11th Circuit Title IX Case
- General Duties Under Title IX

Proposed Changes

- June 2022 – Biden Administration released new, proposed Title IX rules that propose amendments to the rules adopted by the Trump administration in 2020.
 - Dept. of Education is finished taking comments on the proposed rules. They received 240,000 comments (more than double than the 2020 rules).
 - Final rule anticipated in October 2023
- Goal of Amendments: “clarifying and specifying the scope and application of Title IX protections”
 - Hot Take – The proposed rules broaden the scope and reach of Title IX’s grievance procedure while keeping the core components of the Title IX process.

Title IX Overview



What is Title IX?

- Title IX of the Education Amendments Act of 1972 provides that “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”



What is Title IX?

- In short, Title IX prohibits sex-based discrimination in a school's educational program or activity against any person in the United States.
 - includes any location/events/circumstance where the school had **substantial control** over the context & the alleged perpetrator
- It is equally applicable to STUDENTS and EMPLOYEES.
- Failure to meet Title IX requirements can cause civil liability and loss of federal funding.

What is Sex-Based Discrimination?



What is Sex-Based Discrimination?

- “Sex-based discrimination” includes any harassment or other discrimination based, in any way, on a person’s sex/gender.
- This includes discrimination based on a person’s pregnancy/parenting status and gender identity.



What is “Sexual Harassment”?

- Includes 3 types of misconduct on the basis of sex:
 1. Any instance of *quid pro quo* harassment by a school employee;
 2. Any unwelcome conduct that a reasonable person would find severe, pervasive **and** objectively offensive such that it effectively denies equal educational access;
 3. Any instance of sexual assault, dating violence, domestic violence, or stalking.

Proposed Changes

- Expands the scope and definition of sex-based harassment.
 - Now, definition includes harassment based on:
 - Sex characteristics;
 - Pregnancy or related conditions;
 - Sexual orientation; and
 - Gender identity.
 - Amends definition of hostile environment.
 - New definition – “sufficiently severe or pervasive that, based on the *totality of the circumstances* and evaluated *subjectively and objectively*, denies or limits a person’s ability to participate in or benefit from the recipient’s education program or activity.”

Overview: Definition of “Sexual Harassment”

- Certain conduct is defined by the **Violence Against Women Act** (34 U.S.C. § 12291(a)) and/or the **Clery Act** (20 U.S.C. § 1092(f)).
 1. **Sexual Assault**: Any sexual act directed against another person, forcibly and/or against that person’s will; or not forcibly or against the person’s will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her youth). This offense includes the forcible rape of both males and females. Sexual assault may include, but is not limited to rape, fondling, incest, and statutory rape.

Overview: Definition of “Sexual Harassment”

2. **Dating Violence**: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

3. **Domestic Violence**: Violence committed by a current/former spouse of the victim; person with whom the victim share a child in common; person who is cohabitating with or has cohabitated with the victim as spouse; or person similarly situated to a spouse of the victim.

Overview: Definition of “Sexual Harassment”

4. **Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his/her safety or the safety of others; or suffer substantial emotional distress. Stalking may be conducted directly or indirectly and may include, but is not limited to, behaviors such as making unwanted calls or following someone.

5. **Other Sex-Based Discrimination**: Any conduct based on a person’s sex, pregnancy, gender identity, or gender expression that adversely affects a term or condition of that person’s employment, education, or participation in an educational program/activity.

The Grievance Procedure Summarized



Proposed Changes – Big Takeaways

- Amends description of how a school must respond to sex discrimination.
 - Current – requires response when school district has “actual knowledge” of harassment and must respond only in a manner that is “not deliberately indifferent.”
 - How to do this? Follow the grievance procedure
 - New – school district must “take prompt and effective action to end any prohibited sex discrimination that has occurred in its education program or activity, prevent its recurrence, and remedy its effects.”
 - How to do this? We will have to wait and see.

Summary of Grievance Procedure

■ Step 1: Initial Report

- Any person can report an incident that may be sexual harassment or discrimination to you as an employee.
- This “**informal reporting**” can be in any format.
- You **MUST** report to Title IX Coordinator.

■ Step 2: Initial Contact with Complainant by Title IX Coordinator

■ Step 3: Formal Complaint submitted to Title IX Coordinator

Proposed Changes – Big Takeaways

- Allows for both written and oral complaints
 - No longer requirement that a formal complaint be filed with signature of complainant.
- Adds new definition for “disciplinary sanctions” that makes clear consequences may only follow a finding that respondent violated the prohibition on sex discrimination/harassment.
- Adds express discretion for larger schools to create both a district-wide Title IX Coordinator and school-level Title IX Coordinators.

Summary of Grievance Procedure

- **Step 4:** Initial Assessment by Title IX Coordinator
- **Step 5:** Written Contact to Parties by Title IX Coordinator
- **Step 6:** Investigator Conducts Investigation

Summary of Grievance Procedure

- **Step 7:** Preliminary Investigative Report by Investigator – This is basically a chance for “cross examination” by the parties.
- **Step 8:** Final Investigative Report by Investigator
- **Step 9:** Final Decision by Title IX Council (aka, decision-makers)

Summary of Grievance Procedure

- **Step 10:** Appeals to Superintendent
- **Step 11:** Imposition of Discipline

Investigator and Decisionmaker Guiding Principles



Avoiding Bias

- Implicit vs. Explicit Bias
 - Implicit biases are unconscious biases such as learned stereotypes
 - Cannot be biased against any party generally or specifically
 - Must remain impartial

- Beware of “leanings” toward a particular party at the outset
 - Job is not to advocate for or against any party
 - Title IX requires avoiding snap decisions before an investigation has been conducted
 - If unable to reserve judgment until the end, need to be removed from investigation/decision-making process

Conflicts of Interest

- Notify the Title IX Coordinator of any conflicts – actual or perceived
 - Removal only required for actual conflicts, but advisable for perceived conflicts as well
 - Conflicts can be in favor of or opposed to any party
- *Conflicts are especially likely in complaints involving employees*
 - If necessary, can use outside persons to investigate these types of complaints

Standard of Review

- Preponderance of the Evidence
 - Same standard for students and employees
 - Just “more likely than not” that alleged conduct occurred

- The **Investigator** bears the burden of proof
 - Complainants and respondents are not required to prove or disprove anything
 - Think of it as a truth-finding exercise

Role of Investigators



Running Investigations (Step 6)

■ Interviewing Parties

- Because parties will have advance notice, there is potential for witness tampering and intimidation
- Cannot impose a gag order, but can take that type of negative conduct into consideration (i.e., when determining credibility)
- Cannot begin with the “believe victims” approach – respondents cannot be presumed responsible
- Be aware that victims may be sensitive, especially with respect to specific topics
- Do not phrase questions in a way that implies blame
- Seeking written statements or using written questions may reduce issues that arise in live-interviews

Running Investigations (Step 6)

■ Managing Confidentiality

- Parties are permitted to have advisors present during Title IX proceedings
 - Advisors may be friends, family, attorneys, or other trusted individuals
 - These persons **MUST** be permitted to participate, and thus will potentially see sensitive or otherwise confidential information
- Title IX is to be interpreted to be consistent with FERPA
 - Generally, investigative information **MUST** be shared with the parties, but they are not permitted to use that information outside the grievance procedure
 - A nondisclosure agreement can be used to ensure confidentiality

Running Investigations (Step 6)

■ Potential Witnesses

- **Cannot be forced to provide evidence**
- Title IX does not include the right to depose parties or witnesses, nor compel such participation
- Cannot penalize students or employees for their participation or lack thereof

■ Questions from Parties

- Ensure the questions are not unnecessarily adversarial – avoid retraumatizing parties
- Check for relevance to issue at hand and appropriateness
- May need to reword questions before sending to other party

Running Investigations (Step 6)

■ Impartially Determining Credibility & Weighing Evidence

- Consider whether statements are internally consistent
- Can statements be corroborated by other evidence?
- Did parties or witnesses have their own bias or prejudice?
- Has a pattern become apparent?
- Are the allegations inherently plausible?
- What level of detail has been provided?

Preliminary Investigative Report (Step 7)

■ Provide all information to both parties

- Parties must be permitted to review and respond to the evidence
- Preliminary report need ONLY outline the allegations & evidence – **include and documents/videos/etc. that you received during the process**
- May be simplest to send and receive information through the Title IX Coordinator

■ Follow up questions

- Once parties have had a chance to review the preliminary report outlining all evidence, the parties may submit written questions or further statements/evidence
- The investigator should submit these questions to the other party – but review them for relevance first
 - Consider rape-shield
 - Need be relevant to complaint
 - Can be reworded so long as gist of question remains intact

Final Investigative Report (Step 8)

- **Draft after reviewing all evidence**
 - Relevant information and facts
 - Direct observations and reasonable inferences drawn
 - Note consistencies or inconsistencies between sources
 - Credibility assessments of witnesses and evidence
 - May exclude general opinions regarding reputation of parties
 - **Include any hard evidence (documents, videos, etc.)**
- Provide to Title IX Coordinator for dissemination to parties and decisionmaker
- ***MUST NOT MAKE A RECOMMENDED DECISION***

Role of Decision-Makers



Decision-making (Step 9)

■ Review the Investigator's Final Report

- Follow up with any questions
- Consider the credibility and weight determinations made
- Determine whether the accused student should be found “responsible” based on the totality of the evidence presented in the report

Decision-making (Step 9)

- **Draft a Written “Opinion” for the Parties**
 - Must include:
 - Findings of fact;
 - Conclusions about whether the alleged conduct occurred;
 - Rationale for the result as to each allegation;
 - The disciplinary sanction, if any, to be imposed on the respondent;
 - Whether additional supportive services will be made available; and
 - Information about filing an appeal.

- Further questions about the process should go through **Title IX Coordinator**

A.P. v. Fayette County School District

New 11th Circuit case – decided June
26, 2023



A.P. v. Fayette County

- Victim alleged that she was forced to perform oral sex on another student and reported to her teacher
- Teacher reported incident to counselors, who spoke with both students
- Counselors determined the incident was consensual

A.P. v. Fayette County

- After counselor investigation, the school's APs conducted their own investigation
 - Spoke with both students
 - Reviewed surveillance footage, which did not show the incident, but showed that the students “hugged...and kissed...before going their separate ways.”
- APs concluded that the act was consensual
- Principal viewed footage and also found it consensual

A.P. v. Fayette County

- A consensual sex act on school grounds violated the school's student code of conduct
- The alleged victim was ultimately expelled (along with the accused student) for violating the code of conduct
- She sued the District for discrimination and retaliation under Title IX
 - Also for violating her equal protection rights

**Was the school
district deliberately
indifferent?**



NO!



Imperfect Investigation

- “Although the school’s investigation may not have been ‘perfect,’ it was no less ‘thorough’ than the ones we found reasonable in [other cases].”
- “The school responded reasonably to A.P.’s report by diligently investigating and reaching a conclusion supported by the results of the investigation.”

Imperfect Investigation

- Was the school's investigation done 100% in the way we recommend?
 - No!
 - The Court instead affirms that a plausibly reasonable investigation is not deliberately indifferent
- ****I still strongly recommend that you follow the Title IX process I shared earlier****

Role of All Employees



Don't Forget: Mandatory Reporting

- All public and private K-12 employees are mandatory reporters under Alabama law. Alabama Code § 26-14-3.
- Teachers and administrators must report suspected abuse or neglect of a child to law enforcement or DHR.
- It is a crime to knowingly fail to make a required report. Alabama Code § 26-14-13.

Your Duty Under Title IX

- All K-12 employees are ***MANDATORY*** reporters of any potential incident of sex-based discrimination/harassment under Title IX.
- Your duty is to listen and ***REPORT*** – any time you hear about conduct that potentially violates Title IX you should report it to the Title IX Coordinator.

Your Duty Under Title IX

- Important things to consider:
 - Trust of students is important, so explain that you may have to report what they tell you to the coordinator
 - Students maintain their right to privacy, but no “gag orders” can be put in place
 - Title IX applies to employee-employee and student-employee incidents equally
 - Any concerns should be directed to your administrator/supervisor and the Title IX Coordinator
 - Training & reporting are of vital importance!

Questions?

- Contact:
 - Chris Pape
 - cmp@lanierford.com
 - (256) 509-4654

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- Athletics Reminders

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 - includes any location/events/circumstance where the school had **substantial control** over the context & the alleged perpetrator
- It is equally applicable to STUDENTS and EMPLOYEES.
- Failure to meet Title IX requirements can cause civil liability and loss of federal funding.

Title IX Coordinator's Duties Under Title IX



General Duties of Title IX Coordinators

- Compliance
- Training
- Recordkeeping
- Avoiding Bias
- Coordinating District's Response to Complaints
- Notify Superintendent of Patterns or Issues

Compliance

- Take the time to learn the ins and outs of the policies, procedures, and requirements of Title IX
- Understand that Title IX is not just about equality in sports!
- Ensure that the District stays in compliance with Title IX
- Be prepared to answer in-depth questions from other personnel

Training

- Every employee who participates in Title IX procedures must receive training.

- All employees should receive basic training to ensure they know they are MANDATORY REPORTERS at the K-12 level

- At a minimum, training should teach all personnel:
 - The definition of sexual harassment and sex-based discrimination
 - What it means to be within the scope of the school’s “educational programs & activities”
 - What to do if receiving an informal report of potential prohibited conduct

Training

- Additionally, training for **decision-makers** and **investigators** should include:
 - The grievance procedure steps
 - How to conduct an investigation
 - Requirements of impartiality, bias, conflicts of interest, and prejudgment of facts
 - Applying the rape shield protections
- *Training material used for Title IX personnel must be posted on the website or otherwise made available for the public to inspect.*

Recordkeeping

- Keep meticulous records – even where a formal complaint is not filed
- Records that must be kept include not only for formal complaints, but training records and materials too
- When in doubt, **put it in the file!**

Avoiding Bias

- Implicit vs. Explicit Bias
 - Implicit biases are unconscious biases such as learned stereotypes
 - Cannot be biased against any party generally or specifically
 - Must remain impartial

- Beware of “leanings” toward a particular party at the outset
 - Job is not to advocate for or against any party
 - Title IX requires avoiding snap decisions before an investigation has been conducted

Coordinating Responses

- Ensure the investigators and decision-makers are properly following the grievance procedure
- Serve as point of contact between parties and the District
- Be prepared to answer questions
- Keep everyone on as tight a timeline as possible

Grievance Procedure Responsibilities

■ Step 1: Initial Report

- This is an informal report and can be made to any employee
- But K-12 employees MUST in-turn report to you
- Any person can opt to instead come directly to you
- Any format can be accepted so long as it results in the information being received
- Includes reports made outside normal business hours
- Can be anonymous, but failure to identify victim will prevent formal investigation from moving forward

Grievance Procedure Responsibilities

- **Step 2: Initial Contact with Purported Victim**
 - Must be PROMPT and CONFIDENTIAL
 - Must offer supportive services
 - Must explain the grievance procedure **in full**, including standards and possible discipline
 - Be careful to remain neutral – do not dissuade
 - Good to note that the Title IX procedure is independent from other policies, like the usual Code of Conduct

Grievance Procedure Responsibilities

■ Step 3: Obtain Formal Report

- No specific format required – but see sample form
 - Try to get the “who”, “what”, “when”, & “where”
- MUST be in writing and signed by either complainant or Title IX Coordinator
- Only sign a formal complaint over objection of complainant where not “clearly unreasonable”:
 - Best example: where you have received multiple reports against the respondent in question.
 - The initiating of an investigation likely needed to prevent a hostile environment on campus or address unsafe conditions
 - No cross examination where no complainant signature

Grievance Procedure Responsibilities

■ Step 4: Perform Initial Assessment

- Answer to all 3 questions must be YES – otherwise inform complainant that Title IX does not apply
 1. Is the accused (the “respondent”) a person covered by the Board’s policy (i.e., a student or employee)?
 2. Did the alleged conduct occur in an educational activity or program as defined in the Board’s policy?
 3. Do the facts set forth in the complaint, assuming they are true, constitute prohibited conduct that violates the Board’s policy?

Grievance Procedure Responsibilities

■ Step 5: Send Written Notice to Both Parties

- Must be in writing
- Inform respondent that not required to provide evidence

■ Required components of notice:

1. Explain allegations in detail;
2. list remedies and/or disciplinary actions available if responsibility found;
3. Explain burden of proof and that school bears that burden;
4. Describe the grievance procedure step-by-step;
5. Outline any appeal procedures;
6. List supportive measures available;
7. Respondent may, but not required to, submit statement; and
8. Parties can have an advisor help them

Grievance Procedure Responsibilities

- **Step 6-9: Receive Reports from Investigators & Decision-makers**
 - May need to transmit the information to the parties to reduce unnecessary contact
 - Make sure procedure is being followed

After the Investigator and Decisionmaker Finish Their Work, More Left for Coordinator

■ Step 10: Appeals

- Signed, written appeal notices should be submitted to Title IX Coordinator
- In turn, submit to Superintendent (or designated appellate board) for review
- Bases for appeals:
 - Procedural irregularity that affected the outcome of the matter
 - Conflict of interest or bias by any involved Title IX personnel that affected the outcome
 - Newly discovered evidence that could affect the outcome of the matter

Grievance Procedure Responsibilities

■ Step 11: Imposing Discipline

- Discipline will be imposed by the proper school or administrator
- But questions about discipline as it relates to Title IX will be directed to the Title IX Coordinator
- Remember – the focus is remedying the effects of the discrimination and preventing further prohibited conduct

Proposed Changes – Big Takeaways

- Adds new section regarding students with disabilities that addresses students with IEPs and 504 Plans.
 - Title IX Coordinator must “consult” with the IEP/504 Team about the student if a complaint is filed.
 - “Consult” is throughout the implementation of the grievance procedure.
 - “Consult” seems most relevant to ensuring any supportive measures are individualized and that there is no conflict between IEP and Title IX outcome.

Title IX Coordinator's Things to Look Out For



Keeping an Eye Out for Issues

- No “gag orders”
- Need to watch for patterns of conduct that may lead to a hostile educational environment
- Identifying patterns may help prevent future conduct
- Strike a balance between compassion for complainant while not presuming respondent is “guilty”

Keeping an Eye Out for Issues

- Rape Shield Protections Apply
- Title IX compliance may require overriding certain privacy protections
 - Respondents will know who has accused them
 - Complaints will know what, if any, punishment has been given to the respondent
- Anonymous (initial) complaints will be problematic

Keeping an Eye Out for Issues

- Title IX grievance procedure may run parallel to other school procedures or civil/criminal investigations
 - The existence of a criminal investigation does not currently excuse Title IX Compliance
 - Small delay likely not “deliberately indifferent”
- Ensure all personnel involved avoid retaliation
- If even a suggestion of bias, assign new personnel

Title IX: Athletics Reminders



Potential Trouble Areas

- Effective accommodation of student interests and abilities (typically with a focus on girls' activities)
- Financial assistance for athletics
- Other program components – we will discuss the specific list

Program Components

In determining whether equal opportunities are available [we] consider, among other factors:

- (1) Whether the selection of sports and levels of competition effectively accommodate the interests and abilities of members of both sexes;
- (2) The provision of equipment and supplies;
- (3) Scheduling of games and practice time;
- (4) Travel and per diem allowance;
- (5) Opportunity to receive coaching and academic tutoring;
- (6) Assignment and compensation of coaches and tutors;
- (7) Provision of locker rooms, practice and competitive facilities;
- (8) Provision of medical and training facilities and services;
- (9) Provision of housing and dining facilities and services;
- (10) Publicity.



Does Every Sport Have to Be the Same?

- No.
 - Title IX compares overall athletics programs between boys and girls within a school.

- The test is *equivalence*
 - This means that the overall benefits, opportunities, and treatment of boys and girls athletics programs need to be equal or *equal in effect* at each school.
 - There must be no disparity between the programs.
 - There can be differences, but there must be non-discriminatory reasons for this, such as the cost of uniforms and materials between comparator programs.

Does Every Sport Have to Be the Same?

“DISPARITY”

- Difference, *on the basis of sex*, in benefits or services, which negatively impacts athletes of one sex compared to athletes of the other sex.
- OCR will consider the different disparities and determine if the *overall* disparities are more for a particular sex.

3 Major Considerations

Participation/ Accommodations	Financial Assistance	Other Components
3- Prong Test <ul style="list-style-type: none">• Proportionality• History and Practice• Interest and Abilities	Scholarships Other funding issues: MOSTLY BOOSTERS	<ul style="list-style-type: none">• Facilities• Equipment• Schedules• Publicity• Coaching• Travel/allowance• Recruitment• Tutoring• Medical/training• Housing/Dining

3-Prong Test

We only need to prove **one**.

- Are athletic participation opportunities for males and females substantially proportionate to their respective enrollments? **OR**
- Does the school have a history and continuing practice of expanding athletic participation opportunities for the underrepresented sex? **OR**
- Has the school fully and effectively accommodated the interests and abilities of the underrepresented sex?

Effective Accommodations Prong

- This prong allows a school to show it is fully and effectively accommodating female students' athletic interests and abilities.
- Three considerations:
 - Is there unmet interest in a particular sport?
 - Is there sufficient ability to sustain a team in the sport?
 - Is there a reasonable expectation of competition for the team?

Effective Accommodations Prong

If the answer to all three questions on the last slide is “Yes,” OCR will find that an institution is NOT fully and effectively accommodating the interests and abilities of the underrepresented sex and is NOT in compliance with Prong 3.



Second Consideration: Financial Assistance

- Schools don't have to spend the same amount of money on different sports, and there may be times where that makes sense (Volleyball v. Football)
 - The bigger issue is the *overall impact* of the money, and not the monetary total.
- **But**, when a claim is made, the enforcement agencies **may consider** the amount of money spent as a potential factor.



Financial Assistance Examples

Sometimes, compliance will require spending money on more of one sex's teams than the other.

Example: ABC High School New Uniforms

- There are 9 boys' teams at ABC High.
- The athletics director wants to buy new uniforms for football and baseball.
- The boys on these two teams make up 60% of the boy athletes.

What is Equivalence?

- There are 8 girls' teams, and all of the teams are about the same size.
- To cover 50% of girls' uniforms, then ABC High will likely need to buy uniforms for 4 or 5 of the 8 teams, instead of paying for 2 teams.

Athletics

Unintuitive Aspects

- It makes ZERO DIFFERENCE with respect to Title IX whether the equipment/means/facilities were funded by the school system or some other group.
- The Board cannot justify any disparity by explaining that “the booster club paid for that, not the school.”
- It is irrelevant that the sport of one gender is more popular or generates more revenue.
- It is irrelevant the parents of a certain gender work harder to maintain their facilities.

Next Steps



NEXT STEPS

- Conduct professional development for faculty and staff
- Require attendance in trainings, take roll, and post the trainings online
- Keep good records

Questions?

- Contact:
 - Chris Pape
 - cmp@lanierford.com
 - (256) 509-4654

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