

OREGON GOVERNMENT ETHICS COMMISSION

PRELIMINARY REVIEW

CASE NO: 25-194ELG

DATE: May 29, 2025

RESPONDENT: PRITCHARD, Shaun, Commissioner, City of Roseburg Homeless Commission

COMPLAINANT: Woodard, Bernard

RECOMMENDED ACTION: Move to investigate possible violations of ORS 244.040(1) and ORS 244.120(2)

PRELIMINARY REVIEW: The Oregon Government Ethics Commission (Commission) received a written complaint from Bernard Woodard on March 31, 2025, alleging that Shaun Pritchard, a Commissioner on the City of Roseburg's Homeless Commission, may have violated Oregon Government Ethics Law. Receipt of the complaint was acknowledged in letters to Shaun Pritchard and Bernard Woodard. The Commission provided Shaun Pritchard with the details received in the complaint and invited them to provide any information that would assist the Commission in executing the preliminary review on these matters.

Complaint

The complaint alleges that Shaun Pritchard failed to declare a conflict of interest on multiple occasions during Homeless Commission meetings related to the City of Roseburg's purchase of property and award of a contract to develop a Navigation Center providing homeless services. (#PR1). The complaint further asserts that Shaun Pritchard may have violated the prohibited use of office statute by allegedly taking official actions and making decisions that benefited a non-profit organization with which he is employed as the Chief Executive Officer (CEO), United Community Action Network (UCAN). In pertinent part, the complaint alleges:

1 * * * [Shaun Pritchard] actively promoted, coordinated, and influenced a
2 public process that led to: [t]he City of Roseburg purchasing UCAN's
3 property at 948 SE Mill Street * * * [and] the award of a \$3.25 million sole-
4 source contract to UCAN to operate the Navigation Center at that site.

5
6 Each of these steps directly benefited UCAN financially, while Mr.
7 Pritchard maintained decision-making authority and participation on the
8 public commission overseeing the matter * * * without recusing himself. He
9 did not recuse himself from discussions until the January 2022 Homeless
10 Commission meeting * * *. (#PR1).

11
12 The complaint alleges that as a Homeless Commissioner, Shaun Pritchard helped
13 “initiate and shape” the development of a Navigation Center project to provide short-
14 term shelter and supportive services to the local houseless population, which ultimately
15 created a financial benefit for UCAN, a business with which he is associated. Despite
16 encountering multiple conflicts of interest throughout this process, the complaint
17 concludes, “Shaun Pritchard’s limited abstention from voting – after promoting and
18 arranging the deal – did not satisfy the ethical standard * * * ” under ORS 244.120.
19 (#PR1).

20 21 Response to Complaint

22 On April 21, 2025, Shaun Pritchard, through his attorney, provided a written response
23 to the complaint. (#PR2). The response asserts that Shaun Pritchard was only met with
24 a potential (rather than actual) conflict of interest, given that the Homeless
25 Commission's authority was limited to being able to deliberate and vote to make
26 recommendations to the Roseburg City Council. According to the response, the City
27 Council maintained the authority to vote on and approve the recommendations by the
28 Homeless Commission to purchase the property and approve the contract. The
29 response therefore concludes that as a Homeless Commissioner, Shaun Pritchard’s
30 official actions in this regard did not constitute an actual conflict of interest:

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1 * * * Because the Roseburg Homeless Commission merely provided
2 recommendation to the Roseburg City Council, which had actual authority
3 to take action and bind the city and its resources, the issues raised in Mr.
4 Woodard's complaint appear only to relate to potential conflicts of
5 interests. (#PR2).

6
7 The response asserts that Shaun Pritchard did take actions to dispose of the conflicts
8 and "was compliant with all conflicts of interest rules under ORS 244.130 [*sic.*]." (#PR2).
9 In relevant part, the response states:

- 10
11 • Mr. Pritchard properly notified the Homeless Commission of his
12 potential for a conflict of interest and abstained from any vote on the
13 matter (in both February and March 2022).
- 14
15 • Mr. Pritchard recused himself from participating in the [Homeless
16 Commission] sub-committee that investigated potential [property] sites
17 and [non-profit service provider] operators for the Navigation Center
18 [operations contract], and recused himself from participating in any
19 votes on the recommendation[s], further negating any possible conflict
20 of interest.
- 21
22 • As required under ORS 244.120(3) [*sic.*], Mr. Pritchard ensured that
23 notice and record was made in the Homeless Commission meeting
24 minutes at both February and March 2022 meetings, when each
25 recommendation was voted on by the Homeless Commission (while
26 Mr. Pritchard was recused). (#PR2).

27
28 Regarding the contract to operate the Navigation Center services, the response
29 explains:

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1 * * * the City of Roseburg initially published a request for proposals for a
2 qualified organization to operate the Navigation Center and received zero
3 proposals by its deadline on October 13, 2021. After [this occurred], * * *
4 UCAN decided to indicate its willingness to serve as an operational
5 resource for the Navigation Center so that the state of Oregon's directives
6 would not locally go unfulfilled. (#PR2).

7
8 Additionally, the response asserts that Shaun Pritchard, " * * * did not leverage his
9 status on the Homeless Commission for favors from the City * * * or otherwise use his
10 position [as a Homeless Commissioner] to obtain some type of financial [impact] * * *."
11 The response states that Shaun Pritchard confirmed to the Homeless Commission at
12 the February 2022 meeting that he was not personally making any money regarding
13 UCAN's potential sale of property to the City. Further, the response points out that it
14 was also explained at that meeting that UCAN itself would not receive any profit from
15 the sale of the building as it was being offered for the balance of the loan remaining on
16 it, which was \$270,000. The response points out that the assed value was listed at
17 \$385,000, which was \$115,000 more than the sale price to the City. (#PR2).

18 19 Review of Documents

20 Commission staff reviewed relevant materials detailing the establishment of the
21 Roseburg Homeless Commission and UCAN's status as a tax exempt non-profit
22 organization.

23 24 *Homeless Commission Creation, Chapter 2.20*

25 Commission staff reviewed a document, Chapter 2.20 Homeless Commission, which
26 lays out the purpose and responsibilities of the Roseburg Homeless Commission. This
27 document states the Homeless Commission's purpose was to: "Research, gather
28 information and explore options in order to make recommendations to the City Council
29 addressing the needs of the unhoused." The document specifies membership
30 requirements and calls for one member to be the Chair. Additionally, regarding
31 membership, it states that four of the seven members of the Homeless Commission

1 must be directors or designated representatives from four agencies, including UCAN.
2 The document does not appear to require membership from the Mayor or City Council
3 specifically; however, based on meeting materials reviewed it appears that the Mayor
4 acted as the Chair and City Councilor Shelley Briggs-Loosley served as a member of the
5 Homeless Commission during the period relevant to this report. (#PR3).

6 7 *IRS Tax Exemption Status, UCAN*

8 Commission staff reviewed UCAN's letter from the IRS, designating it as a 501(c)(3) tax
9 exempt organization. (#PR4). The 990 Tax Returns for UCAN for 2021 and 2022 list
10 Shaun Pritchard as the full-time, paid Executive Director. (#PR5, #PR6).

11 12 Review of Homeless Commission Meetings

13 Commission staff reviewed the Homeless Commission meeting packets for meetings
14 that occurred in 2021, as well as the January, February, and March minutes in 2022.

15 16 *July 26, 2021 Meeting Minutes:*

17 In reviewing these minutes, Commission staff noted that the Mayor provides an update
18 at this meeting that several potential property sites have been identified in the search for
19 a location for the Navigation Center. The Mayor states that they will not announce the
20 potential properties publicly at this point in an attempt to keep the price from going up.
21 (#PR7).

22 23 *October 25, 2021 Meeting Minutes:*

24 During this meeting, the City Manager announces that the RFP to identify potential non-
25 profits to operate the Navigation Center had been opened from July 29th to September
26 9th; however, the City did not receive any proposals. The City Manager states that at
27 this point, if they received interest from a qualified organization, it could be possible to
28 request an exemption from the competitive bid process from the City Council.

29 Regarding the search for a location for the Navigation Center, the Mayor shared they
30 were in the process of reviewing three potential properties, but were still searching for

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1 others. Homeless Commissioners were asked by the Mayor and again later by the City
2 Manager to share any potential properties with them and alert the City Manager.
3 (#PR8).

4
5 *November 22, 2021 Meeting Minutes and Recording:*

6 According to meeting minutes (#PR9) and a video recording (#PR10), there was a
7 regular meeting and an executive session on this date. During the public meeting, the
8 Mayor announces that they have some leads for non-profit operators and for potential
9 properties but until they get more commitment, this information would not be shared
10 publicly. Based on the video recording, at the conclusion of the public meeting, the
11 Mayor states they will be going into executive session under ORS 192.660(2)(e) to
12 engage in real property discussions. Based on the public meeting recording and the
13 minutes, it does not appear that any conflicts of interest were declared prior to the
14 Homeless Commission entering into executive session. (#PR9, #PR10).

15
16 Commission staff reviewed what appears to be draft minutes from this executive
17 session. (#PR11). It appears that the Homeless Commission discussed several
18 potential properties, including a property owned by UCAN. It appears that Shaun
19 Pritchard participated in the discussion of the UCAN property. (#PR11).

20
21 *January 24, 2022 Meeting Minutes and Recording:*

22 Based on the meeting minutes (#PR12) and video recording (#PR10), it appears that
23 the Roseburg City Manager presented the UCAN property to the Homeless Commission
24 as the best option after a review of several properties, information discussed during the
25 previous executive session on November 22nd, and with consideration of a June 30th
26 deadline for services to begin per grant requirements funding the project. The City
27 Manager states, "We have toured this building several times now. Shaun [Pritchard] has
28 been very gracious about opening the building and letting us walk through with different
29 folks." (#PR10).

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1 After the City Manager's presentation, Shaun Pritchard states, "Mayor Rich, I obviously
2 need to abstain from making any recommendations on this property and I think I would
3 be able to address any direct questions on it." The Mayor responds, "Ok, everyone be
4 aware that [Shaun Pritchard] is going to step aside on the discussion part and voting
5 part, but is available for direct questions." (#PR10). The Mayor proceeds with asking
6 three questions to Shaun Pritchard that appear to have been generated by submitted
7 written public comment. Shaun Pritchard responds to the questions to confirm that he is
8 not personally making any profit off of the sale of the building to the City and similarly
9 UCAN is not profiting from the sale as they are selling it under its assessed value.
10 Further, when asked why he is selling the property to the City at cost, Shaun Pritchard
11 relays that it is part of UCAN's mission to assist the population targeted by the project.
12 Based on the recording, Shaun Pritchard appears to abstain from this vote. (#PR10).
13 Additionally, the minutes state, "Commissioner Pritchard recused himself due to conflict
14 of interest for his employment position with UCAN." (#PR12).

15
16 *February 28, 2022 Meeting Minutes and Recording:*

17 According to the meeting minutes (#PR13) and video recording (#PR10), it appears that
18 the Roseburg City Recorder presented an update on the search for a non-profit to
19 operate the Navigation Center out of the building the City was in the process of
20 purchasing from UCAN. The City Recorder relayed that the RFP to identify potential
21 non-profits to operate the Navigation Center that the City had developed with the
22 Homeless Commission had previously been opened from July 29th to September 9th;
23 however, the City did not receive any proposals. The City Recorder stated that UCAN
24 had later approached the City to say they could possibly take on the service provision.
25 Based on the recording, it appears that the City Recorder states that UCAN:

26
27 * * * came forward and we have been meeting with them for some time to
28 discuss how that might look and work on some kind of agreement. So, we
29 are looking now to bring this forward to the Homeless Commission and
30 then to the City Council.

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1 * * * we are asking for an exemption from the public contracting process
2 so we can award this contract and the agreement to UCAN. * * * The cost
3 would be \$1.75 Million for the first year and \$1.5 Million the second * * *.
4 (#PR10).

5
6 Following the presentation by City staff, Shaun Pritchard states, “Just for the record, I
7 will be abstaining from this vote.” (#PR10). The meeting minutes reflect that Shaun
8 Pritchard did not participate in the vote, “Commissioner Pritchard abstained due to his
9 position and employment with UCAN.” (#PR13).

10
11 **RECOMMENDATIONS:** Shaun Pritchard is currently a Commissioner on the Homeless
12 Commission for the City of Roseburg and held this position during the period relevant to
13 this preliminary review. The City of Roseburg is a public body and the Homeless
14 Commission is a governing body of that public body. [ORS 192.610(5) and (6)]. As a
15 member of a governing body of a public body, Shaun Pritchard is a public official per
16 ORS 244.020(15) and therefore subject to Oregon Government Ethics Law.

17
18 In this case, the complaint alleges Shaun Pritchard violated Government Ethics Law by
19 failing to declare a conflict of interest on multiple occasions during Homeless
20 Commission meetings where the Commission was deliberating on whether to
21 recommend the City purchase property from UCAN and award a contract to UCAN
22 related to the creation of a Navigation Center for homeless services. The complaint also
23 asserts that Shaun Pritchard may have engaged in a prohibited use of office by taking
24 official actions and making decisions that benefited an organization with which he is
25 associated.

26
27 Relevant Definitions

28 ORS 244.020(2) defines a “business” as “any corporation, partnership, proprietorship,
29 firm, enterprise, franchise, association, organization, self-employed individual and any
30 other legal entity operated for economic gain but excluding any income-producing not-
31 for-profit corporation that is tax exempt under section 501(c) of the Internal Revenue

1 Code with which a public official or a relative of the public official is associated only as a
2 member or board director or in a nonremunerative capacity.” UCAN is a registered
3 501(c)(3) tax exempt non-profit corporation; however, as Shaun Pritchard is the paid
4 CEO for UCAN, it meets the definition of a business per ORS 244.020(2).

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6 ORS 244.020(3)(a) defines a “business with which the person is associated” as any
7 private business or closely held corporation of which the person or their relative is a
8 director, officer, owner, employee, or agent; or one in which the person or their relative
9 currently owns or has owned within the preceding calendar year, stock, another form of
10 equity interest, stock options or debt instruments worth \$1,000 or more. Staff has
11 interpreted these provisions to mean that a non-profit is a business with which the
12 person is associated, unless the person is associated only as a member or board
13 director or in a nonremunerative capacity. In this case, it appears UCAN meets the
14 definition of a business with which Shaun Pritchard is associated. Shaun Pritchard held
15 a salaried position as the CEO of UCAN.

16 17 Conflicts of Interest

18 A statutory conflict of interest arises when a public official makes a decision or
19 recommendation or takes action, in their official capacity, that would (actual conflict of
20 interest) or could (potential conflict of interest) result in a financial impact (positive or
21 negative) on the public official, their relative, or a business with which the official or their
22 relative is associated. [ORS 244.020(1) and (13)].

23
24 When met with a conflict of interest, a public official serving on a commission, such as
25 Shaun Pritchard, must announce publicly the nature of the conflict of interest. If met with
26 a potential conflict of interest, this announcement must be made prior to participating in
27 any discussion or action on the matter. If met with an actual conflict of interest, the
28 public announcement must be made prior to any discussion of the matter and the public
29 official must refrain from participating in any discussion, debate or vote on the matter
30 out of which the actual conflict of interest arises, unless their vote is necessary to meet
31 a minimum vote requirement, in which case the public official may vote but may not

1 participate in any discussion or debate on the matter. [ORS 244.120(2)]. The
2 requirements of ORS 244.120(2) must be satisfied on each occasion when the matter is
3 being considered.

4
5 In this case, the complaint asserts that Shaun Pritchard was met with a conflict of
6 interest on multiple occasions during Homeless Commission meetings and participated
7 in decision-making processes that ultimately produced financial benefits to UCAN. In
8 2021 and 2022, the Homeless Commission engaged in deliberations and voted to make
9 a recommendation as to which property the City should purchase. The Commission
10 ultimately recommended that the City purchase UCAN's Mill Street property. That
11 recommendation and the subsequent City Council action to purchase the UCAN
12 property for \$270,000 resulted in a financial impact on UCAN, a business with which
13 Shaun Pritchard was associated. Additionally, the Homeless Commission deliberated
14 and voted to make recommendations to the City Council regarding the award of a
15 \$3,250,000 contract to UCAN to operate the Navigation Center.

16
17 The recommendations by the Homeless Commission, if implemented by the City
18 Council, would result in substantial financial impacts on UCAN. When the Homeless
19 Commission was considering multiple properties that could be used for the Navigation
20 Center, Shaun Pritchard would be met with a potential conflict of interest, as there
21 would be the possibility of a financial impact on UCAN, but that financial impact would
22 not be certain. When considering and voting on recommendations that would, if
23 implemented, financially impact UCAN, such as the purchase of UCAN's property or the
24 award of a contract to UCAN, Shaun Pritchard would be met with an actual conflict of
25 interest.

26
27 Although Shaun Pritchard did, sometimes, make a conflict of interest disclosure, he did
28 not always do so, and he did not refrain from participation in the discussions or
29 deliberations throughout the Commission's consideration of these matters. Notably, on
30 November 22, 2021, the Homeless Commission held an executive session under ORS
31 192.660(2)(e) to discuss potential properties, including the UCAN property, for the

1 Navigation Center. Shaun Pritchard appears to have been met with a potential conflict
2 of interest at this meeting, and neither the minutes nor the video recording for the public
3 meeting preceding the executive session indicate that Shaun Pritchard made any public
4 announcement of the nature of his conflict of interest.

5
6 It appears that Shaun Pritchard was met with actual conflicts of interest on at least two
7 occasions, during the January 24th and February 28th 2022 Homeless Commission
8 meetings. Based on the video recording of the January 24th meeting, it appears that
9 Shaun Pritchard stated they needed to abstain from making any recommendations
10 regarding the Homeless Commissions discussion of purchasing UCAN's Mill Street
11 property; however, he did not refrain from all participation. The recording indicates that
12 Shaun Pritchard did, in fact, answer three questions related to the discussion of the
13 matter, preceding the vote to recommend the purchase of UCAN's property to the City
14 Council. The video recording of the February 28th Homeless Commission meeting
15 appears to indicate that after the presentation regarding the proposed operator
16 contractor with UCAN, Shaun Pritchard states they will be abstaining from voting. It
17 does not appear that he engages in discussion during this meeting, but his disclosure
18 was made after the presentation.

19
20 On both occasions, during the January 24th and February 28th meetings, it does not
21 appear that Shaun Pritchard's conflict disclosure satisfied the requirements in ORS
22 244.120(2). The statute requires that the public official publicly announce the nature of
23 their conflict of interest. The meeting minutes for both meetings indicate that Shaun
24 Pritchard abstained from the vote due to a conflict of interest given his employment with
25 UCAN. Based on the recordings of these meetings, it does not appear that this was the
26 disclosure that was made. Rather, in the January 24th meeting, Shaun Pritchard
27 announced, "I obviously need to abstain from making any recommendations on this
28 property and I think I would be able to address any direct questions on it." This
29 announcement does not identify or state the nature of the conflict of interest. Similarly at
30 the February 28th meeting, all that Shaun Pritchard announced was that he would be

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1 abstaining from the vote. Such announcements do not appear to satisfy the
2 requirements in ORS 244.120(2).

3
4 Prohibited Use of Office

5 ORS 244.040(1) prohibits public officials from using or attempting to use their official
6 position to gain a financial benefit or avoid a financial detriment for themselves, a
7 relative, a household member, or a business with which any are associated, if that
8 benefit would not otherwise be available but for holding their official position. The
9 prohibited use of office provisions apply even if a public official satisfies the conflict of
10 interest disclosure requirements. [ORS 244.040(8)].

11
12 As explained above, it appears in this case that Shaun Pritchard may have participated
13 in the decision-making processes that resulted in a significant financial impact for
14 UCAN, a business with which he was associated. The Homeless Commission's
15 recommendations resulted in the City's purchase of UCAN's property for \$270,000 and
16 its award of a \$3,250,000 no-bid contract to UCAN. The response submitted on behalf
17 of Shaun Pritchard states that UCAN did not profit from the sale of its Mill Street
18 property due to it being sold to the City at a cost that was \$115,000 lower than the
19 assessed market value, nor did it profit from the City contract award to operate the
20 Navigation Center since it was based on actual costs to provide services. However,
21 ORS 244.040(1) is not limited to only financial gains; it also applies to the avoidance of
22 financial detriments. Had the City not purchased UCAN's property or awarded UCAN
23 the operator contract, UCAN may have faced a financial detriment.

24
25 It appears that Shaun Pritchard provided information and engaged in discussions with
26 City Staff and a committee of the Homeless Commission that were essential to the
27 Homeless Commission formulating its recommendations to the Roseburg City Council
28 to purchase property from UCAN and later award UCAN a contract. It appears that
29 Shaun Pritchard had the opportunity to participate in this decision-making process due
30 to his position as a Homeless Commissioner. Although he was the acting CEO of UCAN
31 during this negotiation process regarding the building purchase and contract award, he

1 was also a Homeless Commissioner. The central focus of the Homeless Commission
2 during the relevant period of 2021 and early 2022, was the development of the
3 Navigation Center, for which UCAN ultimately became the operator. In this situation, it is
4 not tenable to draw a distinction between instances in which Shuan Pritchard was
5 representing UCAN as the CEO and was acting in his official capacity as a Homeless
6 Commissioner when it comes to negotiations, recommendations, providing information,
7 or other actions associated with the decision-making process that led to the Homeless
8 Commission's recommendation of UCAN's building for purchase and awarding the
9 operator contract.

10
11 Based on minutes from the October 2021 Homeless Commission meeting, it appears
12 that Commissioners were asked to identify potential properties to the City Manager.
13 Members of the public do not appear to have been asked to submit potential property
14 recommendations. In fact, the Mayor states in several meetings that they are not
15 publicly discussing information related to potential properties until they have a
16 commitment, to avoid prices from increasing. Since this was a request of Homeless
17 Commissioners and Shaun Pritchard appears to have recommended UCAN's property
18 to the City, he would have thus been acting in his official capacity as a Homeless
19 Commissioner. The fact that the property he appears to have recommended was owned
20 by UCAN and its purchase by the City would later provide UCAN with a financial impact,
21 means Shaun Pritchard may have used his official position to obtain a financial impact
22 to a business with which he is associated.

23
24 Based on meeting recordings and minutes, it appears that a subcommittee of the
25 Homeless Commission toured properties and engaged in discussions outside of the
26 public meetings related to developing the final recommendation to purchase UCAN's
27 Mill Street property. This information indicates that Shaun Pritchard may have also
28 participated in these tours and discussions, and in doing so could have been met with a
29 potential prohibited use of office violation in these actions per ORS 244.040(1). No
30 evidence was presented during this review period to indicate this was not the case, thus
31 an investigation is necessary to verify the facts surrounding these circumstances.

1 Shaun Pritchard's participation in the decision-making process for both actions by the
2 Homeless Commission raise questions as to whether he used or attempted to use his
3 position on the Homeless Commission to give UCAN an advantage over its competitors.
4 It does appear, with respect to the property purchase, that UCAN had competitors, as
5 the Homeless Commission was considering other properties when it held the November
6 2021 executive session. In terms of the operator contract, it appears that the contract
7 was awarded without competition. The City had issued an RFP prior to October 2021,
8 but received no proposals. In the February 28th meeting, the City Recorder stated that
9 after the RFP process had closed with no proposals, UCAN approached City staff to
10 suggest they could provide the services and began meeting with City staff to negotiate
11 an agreement, outside of any formal procurement process. The CEO of UCAN was
12 Shaun Pritchard.

13
14 Based on the information available during this preliminary review, there appears to be a
15 substantial objective basis to believe that Shaun Pritchard may have violated the use of
16 office and conflict of interest provisions in the Oregon Government Ethics Laws. The
17 Oregon Government Ethics Commission should move to investigate whether Shaun
18 Pritchard may have violated ORS 244.040(1) and ORS 244.120(2). (Motion 4).

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ASSOCIATED DOCUMENTS:

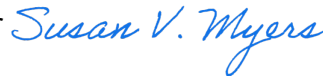
- #PR1 Original Complaint, received 3/31/2025
- #PR2 Response from Attorney on 4/21/2025
- #PR3 Homeless Commission Creation: Chapter 2.20, dated 1/25/2021
- #PR4 IRS Tax Exempt Letter for UCAN, received 4/7/2025
- #PR5 UCAN 990 Tax Returns for 2021
- #PR6 UCAN 990 Tax Returns for 2022
- #PR7 Homeless Commission Meeting Minutes, 7/26/2021
- #PR8 Homeless Commission Meeting Minutes, 10/25/2021
- #PR9 Homeless Commission Meeting Minutes, 11/22/2021
- #PR10 Homeless Commission Meeting Links to Video Recordings
- #PR11 Confidential - Homeless Commission Executive Session Notes, 11/22/2021
- #PR12 Homeless Commission Meeting Minutes, 1/24/2022
- #PR13 Homeless Commission Meeting Minutes, 2/28/2022

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5/29/2025

APPROVED BY Susan V. Myers, Executive Director



5/29/2025

REVIEWED BY Sean T. Brady, Sr. Assistant Attorney General Authorized on 5/29/2025