

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

COURT OF APPEALS
STATE OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,

Respondent,

-against-

NO. 54

EUGENE LIVELY,

Appellant.

20 Eagle Street
Albany, New York
April 17, 2024

Before:

CHIEF JUDGE ROWAN D. WILSON
ASSOCIATE JUDGE JENNY RIVERA
ASSOCIATE JUDGE MICHAEL J. GARCIA
ASSOCIATE JUDGE MADELINE SINGAS
ASSOCIATE JUDGE ANTHONY CANNATARO
ASSOCIATE JUDGE SHIRLEY TROUTMAN
ASSOCIATE JUDGE CAITLIN J. HALLIGAN

Appearances:

MORGAN R. MAYER, ESQ.
JEFFERSON COUNTY DISTRICT ATTORNEY'S OFFICE
Attorney for Respondent
175 Arsenal Street
Watertown, NY 13601

KAREN G. LESLIE, ESQ.
LAW OFFICE OF KAREN G. LESLIE
Attorney for Appellant
P.O. Box 624
Riverhead, NY 11901

Ellen S. Kolman
Official Court Transcriber

1 CHIEF JUDGE WILSON: And the last matter on the
2 calendar is People v. Lively.

3 MS. LESLIE: Good afternoon, Your Honors. Karen
4 Leslie for Eugene Lively - - - Lively.

5 I think that this is the - - - the bottom rung of
6 how a parole search should go. We would ask the court to
7 reverse. And addressing the suppression issue first, the
8 court's opinion in the Appellate Division was, in - - - in
9 our opinion, conclusory and citing McMillan and Johnson and
10 unsupported by those cases. And conclusory in - - - in
11 that when it cites to Huntley substantially related to the
12 parole officer's duty - - -

13 JUDGE TROUTMAN: So let's go to the facts here.
14 The parole shows up at defendant's home. It's his parole
15 officer, correct?

16 MS. LESLIE: No, it's not. And that's one of - -
17 -

18 JUDGE TROUTMAN: They are parole officers that
19 are - - - it's not the police. It's parole.

20 MS. LESLIE: It is parole, and it's someone who
21 basically knows nothing about nothing.

22 JUDGE TROUTMAN: It's a supervisor or something?

23 MS. LESLIE: It's not. It's Whitney Rogers. She
24 was asked to go fill in, and what I call a fill-in parole
25 officer.

1 JUDGE TROUTMAN: But in any - - - in any event,
2 he is on parole, and they go to his home.

3 MS. LESLIE: Respectfully, we don't even know
4 that because they didn't even submit the conditions of
5 parole. No nothing. She testifies. She's not even his
6 parole officer. And I submit that Huntley really - - - -

7 JUDGE TROUTMAN: Was it his home?

8 MS. LESLIE: It was his home, correct.

9 JUDGE TROUTMAN: And they go there. But it's not
10 about him that they go to the home.

11 MS. LESLIE: Right.

12 JUDGE TROUTMAN: Is that correct?

13 MS. LESLIE: It shouldn't be, because initially
14 in the grand jury, Whitney Rogers says it's a home visit.
15 She never even discloses that it's for an absconder, not
16 him.

17 JUDGE TROUTMAN: Um-hum.

18 MS. LESLIE: And then - -

19 CHIEF JUDGE WILSON: When you say it's his home -
20 - - I just want to - - - is it a house or is it an
21 apartment building or - - -

22 MS. LESLIE: It's an apartment.

23 CHIEF JUDGE WILSON: And - - -

24 MS. LESLIE: And that's another thing. We don't
25 even have a layout. We have - - - it comes out that it's a

1 one-bedroom apartment, but there's a - - - there's a list
2 of things that - - -

3 CHIEF JUDGE WILSON: So when they're looking - -
4 does the record show when the - - - I think that you said,
5 the record - - - that they were looking for an absconder,
6 right, not for Mr. Lively?

7 MS. LESLIE: That's correct.

8 CHIEF JUDGE WILSON: So do we know whether they
9 were looking for the absconder in Mr. Lively's apartment or
10 somewhere in the apartment building? Do we know that from
11 the record?

12 MS. LESLIE: We don't even know that. There's -
13 - - there's - - - it's like an anti-case. It's like
14 there's nothing there. It's not the parole - - -

15 JUDGE TROUTMAN: And is there any indication of a
16 connection between Mr. Lively and said absconder?

17 MS. LESLIE: No. There is not. And for the
18 first time on appeal in this court, the respondent argues
19 that based on an NYCRR provision that I - - - that I cited
20 the - - - - the just general one, she cites sub 7 that he
21 could potentially be acting in concert with this absconder.
22 Well, A, we don't know the absconder. It's not Eugene
23 Lively. We don't know this - - -

24 JUDGE TROUTMAN: Let me ask you this, in the
25 first instance. Let's assume it's Mr. Lively's residence

1 that parole goes to. Does parole have the right to visit
2 his residence?

3 MS. LESLIE: They have a right if they - - - if
4 we have some basis for it. There's no documentary proof
5 that he signed consent and is even on parole. That's what
6 I'm saying. There's - - - there's basic - - - -

7 JUDGE TROUTMAN: Oh, so you're - - - you're not
8 even conceding that he was on parole and that they have - -

9 MS. LESLIE: I'm - - - I'm - - - I'm saying that
10 they didn't - - - we have her saying - - - and this is
11 Whitney Rogers saying he's on parole. But she also says we
12 have the right to search at any time - - - at any time.
13 And that's not - - -

14 JUDGE TROUTMAN: Let me - - - let me try it this
15 way. Assume he is, in fact, on parole. And there are
16 conditions of parole.

17 MS. LESLIE: Right.

18 JUDGE TROUTMAN: Does parole have the right to
19 ensure that the conditions are met?

20 MS. LESLIE: Yes.

21 JUDGE TROUTMAN: And would going to the residence
22 of a parolee be permissible if that person was under parole
23 supervision?

24 MS. LESLIE: Yes.

25 JUDGE TROUTMAN: Now, just because you're on

1 parole, does it mean that you could search them for
2 anything unrelated to parole?

3 MS. LESLIE: Correct. He's - - -

4 JUDGE TROUTMAN: So here they're looking for an
5 absconder, correct?

6 MS. LESLIE: Correct.

7 JUDGE TROUTMAN: And you argue there is no
8 evidence establishing that the absconder and Mr. Lively are
9 connected, correct?

10 MS. LESLIE: Well, we don't know who - - - who it
11 is at the bare minimum, because we have her say - - - we
12 don't know - - -

13 JUDGE TROUTMAN: When they enter the home - - -
14 let me ask you this. When they enter, do they have the
15 right for safety to check people, just cursorily, to make
16 sure that they're safe, just for the sake of argument, for
17 weapons?

18 MS. LESLIE: I - - - I - - - it's - - - it's so
19 removed from reality from - - - from appellant's position
20 here because they're searching for someone. We don't know
21 who it is. They admit that it's not Mr. Lively. They come
22 in and they cuff him without any - - - -

23 JUDGE TROUTMAN: So what I'm saying to - - - so
24 you're saying they can't come in. They can't do a search
25 for safety. They can't pat people down. We're not even

1 getting into the pockets.

2 MS. LESLIE: I'm saying they can't just come and
3 handcuff and - - - I mean, if they're going to say they're
4 going - - -

5 JUDGE TROUTMAN: So you're saying it's unrelated
6 to parole duty to go there and check and make sure?

7 MS. LESLIE: No, I'm saying that they can - - -
8 they can go if we have conditions of parole and he's on
9 parole; they have a right. Different conditions, such as
10 in Samson and California, it's with or without cause.

11 JUDGE TROUTMAN: Let's assume that there are
12 conditions, he signed the conditions, and that he's on
13 parole.

14 MS. LESLIE: Right.

15 JUDGE TROUTMAN: Can they go to his home then?

16 MS. LESLIE: Yes.

17 JUDGE TROUTMAN: And let's assume - - - I'm not
18 saying that they established it here - - - that they wanted
19 to make sure he was in compliance with conditions, and it
20 was believed that an absconder was - - - or a felon, that
21 he wasn't supposed to associate, may be in the residence.
22 So you would agree they could go in there, right?

23 MS. LESLIE: I - - - I would agree they could go
24 in there, but it's not for - - -

25 JUDGE TROUTMAN: Okay. But - - - but - - -

1 MS. LESLIE: Right.

2 JUDGE TROUTMAN: - - - let - - - just follow me
3 here. So if they could go in, they can take re- - - -
4 would you agree, they could take reasonable measures to
5 make sure that people don't have weapons? A pat down?

6 MS. LESLIE: I - - - she - - - she did not
7 testify, Whitney Rogers, that - - - that there was any kind
8 of a bulge that would indicate that - - - -

9 JUDGE TROUTMAN: We didn't get there yet.

10 MS. LESLIE: Oh.

11 JUDGE TROUTMAN: I'm asking cursor - - - a
12 cursory check. Okay. You mentioned the pat down. Your
13 problem is, I know, it was in an earbud container. But
14 what I'm asking, did they have a - - - did they have the
15 right to touch him in the first instance?

16 MS. LESLIE: I - - -

17 JUDGE TROUTMAN: I'm not saying going into the
18 pocket.

19 MS. LESLIE: I have some problems with the
20 handcuffing in his own residence.

21 JUDGE TROUTMAN: Okay. So they can't do anything
22 to him here is what you're saying. They can't search.
23 They can't do anything. They can't pat down.

24 MS. LESLIE: I'm - - - if - - - if they handcuff
25 him, this - - - this widespread search, when he's not the

1 person they're looking for and there's no other information
2 in - - - in the facts here, to me is unreasonable under
3 these circumstances.

4 JUDGE SINGAS: If the parole officer - - - if the
5 parole officer thought he was housing an absconder, that
6 wouldn't be reason to go and briefly detain him to search
7 for an absconder if they thought that - - -

8 MS. LESLIE: If they - - - okay. Just for
9 purposes of argument, she cuffs him. Why is she going into
10 his pocket when - - -

11 JUDGE SINGAS: I didn't say that.

12 MS. LESLIE: Okay.

13 JUDGE SINGAS: I didn't get there yet. I'm just
14 saying - - - -

15 MS. LESLIE: I don't agree that - - - that he
16 should be cuffed if they're looking for something else. He
17 has no violations. It's not his parole officer. There's
18 not special needs that are carved out so that they - - - -

19 JUDGE SINGAS: Was there - - - they testified the
20 parole - - - the testimony on page A101 was, "Answer: I
21 was told they were looking for an absconder, someone on the
22 run from parole." They were told that they were
23 potentially at his apartment.

24 MS. LESLIE: Is - - - but I guess I - - - I have
25 problems with "they". Is it more than one absconder? They

1 were told that they - - -

2 JUDGE SINGAS: Well, if it's more than one even -
3 - - do you think then they would have a right to cuff him
4 while they look?

5 MS. LESLIE: What I'm saying is, there's nothing
6 in this record that is reasonable for cuffing and - - - and
7 - - - and - - - and searching him without any indication of
8 who they were looking for and even if they were in that
9 apartment.

10 JUDGE SINGAS: So when you mean, who they're
11 looking for? Like - - -

12 MS. LESLIE: So - - - so - - -

13 JUDGE SINGAS: - - - Joe Louis, absconder?

14 MS. LESLIE: She says Amber Comb (ph.). And then
15 McIntyre (ph.) said, "Well, Sierra Jobson (ph.) had meth in
16 her bedroom."

17 JUDGE HALLIGAN: Does it - - - doesn't - - -
18 isn't there testimony that there were three or four other
19 people - - -

20 MS. LESLIE: Yes. There was - - -

21 JUDGE HALLIGAN: - - - in addition to Mr. Lively?

22 MS. LESLIE: Well, it's - - - she double talk.
23 She says, "Two people - - - two others and maybe a woman,
24 but I don't know. I don't go there."

25 JUDGE HALLIGAN: But there's more than just Mr.

1 Lively there, yes?

2 MS. LESLIE: At the first instance, she says it's
3 - - - it's only Amber Comb. And then McIntyre says, "and"
4 - - - -

5 JUDGE HALLIGAN: I guess what I'm - - - what I'm
6 trying to get at is to the extent there are more people
7 than just Mr. Lively in the apartment and they're looking
8 for an absconder, doesn't that affect whether or not they
9 can briefly handcuff an individual in order to ensure
10 safety while they look around the apartment and see what's
11 going on?

12 MS. LESLIE: I think it's a question of
13 reasonableness. There's five officers there. They could
14 ask him to come outside. They could isolate him. They
15 didn't have to handcuff him. Maybe I'm stuck on
16 handcuffing. But they don't have - - -

17 JUDGE HALLIGAN: So your view is either that it
18 is not - - - it doesn't bear on it, or that even if it
19 does, it's not sufficient to justify the handcuffing?

20 MS. LESLIE: I'm saying in the first instance,
21 there's not enough - - - and the court relies on McMillan,
22 for example, individualized suspicion they talk about. And
23 they're - - - here, there's not enough individualized
24 suspicion to focus on him without more indicia of - - - of
25 - - - of a real absconder.

1 JUDGE HALLIGAN: When you say focus on him, do
2 you mean they can't handcuff him, or do you mean they can't
3 pat him down, or something different than that?

4 MS. LESLIE: I'm saying I don't, without more,
5 credit, the notion of an absconder without more information
6 isn't - - -

7 JUDGE HALLIGAN: So you think maybe there's no
8 abscond - - - they - - - they - - - they - - - we should
9 proceed on the assumption that maybe the record doesn't
10 establish they were there looking for an absconder?

11 MS. LESLIE: I think that Bud (ph.) should have
12 been there or a parole warrant that - - - that - - - or - -
13 - or a search warrant basically - - -

14 JUDGE TROUTMAN: Do you have to have a search
15 warrant if you're on parole?

16 MS. LESLIE: No, you - - - no, you don't. But
17 what I think is unreasonable in this circumstance, even for
18 a parole search, is this tip comes from nowhere, and we
19 don't know who it is, and we don't even know if it's his
20 apartment, which, as you know, there are a lot of pages - -
21 - -

22 JUDGE CANNATARO: If you - - - if you don't need
23 a warrant to go to the apartment to do the parole business,
24 why make up an absconder or - - - or a tip about an
25 absconder? What - - - what does that get the parole

1 officers?

2 MS. LESLIE: Well, it gets them the search.

3 JUDGE CANNATARO: But they - - - but they could -

4 JUDGE HALLIGAN: But they can do that - - -

5 JUDGE CANNATARO: - - - do that any - - - I'm
6 sorry.

7 JUDGE HALLIGAN: Sure.

8 JUDGE CANNATARO: Same thing.

9 MS. LESLIE: They - - - they - - - they get to
10 handcuff and - - - and search him, which I think is not
11 substantially what - - -

12 JUDGE HALLIGAN: But they could enter if he is a
13 parolee. I understand you - - - you question whether
14 that's sufficiently established. But - - -

15 MS. LESLIE: Well, most of the - - -

16 JUDGE HALLIGAN: If I could finish for a second.
17 They - - - they can enter the house - - - the apartment if
18 he is a parolee; is that - - - is that correct?

19 MS. LESLIE: Yes.

20 JUDGE HALLIGAN: Okay. And so is your argument
21 that the tip that they're looking for an absconder somehow
22 heightens the situation in a way that if we credit, it
23 allows them to handcuff, and - - - and if we don't credit,
24 it doesn't? I'm just trying to understand - - -

25 MS. LESLIE: I'm saying that - - -

1 JUDGE HALLIGAN: - - - how you think it bears.

2 MS. LESLIE: - - - that on the on the cases on
3 which the court relies, namely McMillan and Johnson.

4 JUDGE HALLIGAN: Um-hum.

5 MS. LESLIE: In Johnson, the parolee was on a
6 list of fifteen parolees. He was not singled out. There
7 was - - - there was a - - - a reason that is more than just
8 this anonymous comment by a parole officer that's not even
9 his own, that he can't carve out special needs and say,
10 this is why we handcuffed him and searched him. And this
11 is - - - you know, more that McMillan was a detective
12 executing a parole warrant. And so they - - - they had
13 corroboration from an ex-girlfriend so that there was more
14 to actually put some flesh on the bones of the actual
15 arrest and search in that case and there was corroboration.

16 Here, it's just this bare allegation of an
17 absconder. And let's, sort of Kafkaesque, go in and
18 handcuff him and search him, but he's not the one that
19 we're looking for. But he's - - - he's in the mix.

20 I don't see that the cases that the court relies
21 on where there's individualized suspicion in this case as
22 to Mr. Lively, support the court's affirming the
23 suppression court's ruling.

24 And with - - - with respect to the - - - if I may
25 move on to the sufficiency. The sufficiency was - - - the

1 defense was personal use, and the actual testimony of Gatch
2 (ph.) obviously, he was found not guilty of Suboxone and
3 meth was not found on him. And so he had two and a half
4 essential - - - essentially two-and-a-half envelopes of
5 heroin. And Gatch confirmed that one and a half was enough
6 for personal use. So he had one more. And based on the -
7 - - the actual facts in this case, I would suggest that
8 there's not - - - that there is a reason and - - - to - - -
9 to doubt and a basis for insufficiency based on the
10 People's case in this - - - in this regard.

11 Is there - - - is there anything back on the
12 suppression? I just wanted to get to that. No. All
13 right. Thank you.

14 CHIEF JUDGE WILSON: Thank you.

15 MS. MAYER: Good afternoon. May it please the
16 court. Morgan Mayer, on behalf of the Jefferson County
17 District Attorney's Office.

18 Whitney Rogers was a parole officer who was known
19 to the defendant. She had been to his house before. That
20 was brought out in the testimony. She was acting as an
21 agent of the parole office on behalf of Ofc. Bub, the
22 defendant's own officer.

23 JUDGE TROUTMAN: Here, with respect to the
24 defendant and the defendant's parole status, what was
25 presented that established his connection with the alleged

1 absconder?

2 MS. MAYER: The testimony that he - - - it was
3 his house - - - apartment that they had gone to, and that
4 there was potentially an absconder there is the evidence
5 that was established.

6 JUDGE TROUTMAN: That's - - - and that shows his
7 connection or his parole status requirements are impacted
8 how? How is Huntley being satisfied that they're showing
9 that they're furthering their responsibilities as it's
10 related to this parole?

11 MS. MAYER: I would argue that under the two-
12 prong test of protecting the needs of the people and the -
13 - - for the protection of the defendant as well.

14 JUDGE TROUTMAN: How?

15 MS. MAYER: The - - - if the parole has an
16 obligation to protect the defendant from committing further
17 offenses, if he's potentially housing an absconder, he's
18 potentially committing a parole violation.

19 JUDGE TROUTMAN: Okay. So let's assume you get
20 to go in his house. You're looking for the absconder, not
21 him.

22 MS. MAYER: Yes.

23 JUDGE TROUTMAN: And other than the fact he may
24 be associating with someone he may not be able to, you're
25 not there believing that he's possessing of a weapon or

1 anything like that, correct?

2 MS. MAYER: Yes.

3 JUDGE TROUTMAN: He - - - there's a pat down and
4 there's a bulge she says, correct?

5 MS. MAYER: Correct.

6 JUDGE TROUTMAN: Is there any indication at that
7 point that it's a weapon or that there's a safety concern?

8 MS. MAYER: Ofc. Rogers did testify that there
9 was a safety concern given the number of people in the
10 apartment.

11 JUDGE TROUTMAN: Okay. She did the pat down.

12 MS. MAYER: Yes. She did the pat down.

13 JUDGE TROUTMAN: And she felt a bulge. Did she
14 give an indication in her testimony that that bulge was
15 consistent with something that could cause harm?

16 MS. MAYER: She did not.

17 JUDGE TROUTMAN: And she then opened it, it's an
18 earbud, and there was heroin in there, correct?

19 MS. MAYER: Correct.

20 JUDGE TROUTMAN: So how is this anything other
21 than she felt a bud - - - a bulge? She went in his pockets
22 because she wanted to know what was in there.

23 MS. MAYER: She had the right to conduct the
24 search as - - -

25 JUDGE TROUTMAN: Why?

1 MS. MAYER: - - - given his parole status.

2 JUDGE TROUTMAN: So you're saying if you're on
3 parole, he can be searched at any time for a reason or no
4 reason at all?

5 MS. MAYER: I would argue that it's in defense of
6 that - - -

7 JUDGE CANNATARO: Can you see how that's
8 problematic, though? You - - - you - - - in response to
9 one of Judge Troutman's questions, you - - - you
10 acknowledge that the reason for being in the apartment was
11 to search for an absconder. I think she said then it had
12 nothing to do with him, and I think you might have said
13 like, yeah, it had nothing to do with him. But they cuff
14 him and you can understand why that might be for safety,
15 and you might even understand a pat down for safety of the
16 parole officers. But if they're not there for them, why
17 are they opening an iPod case?

18 MS. MAYER: They have the right to conduct the
19 search. It's part of the - - -

20 JUDGE CANNATARO: Search for what?

21 MS. MAYER: - - - conditions of parole to search
22 the defendant.

23 JUDGE CANNATARO: No. But you said that that's
24 not what they were there for. They were there to look for
25 an absconder. What does that have to do with looking for

1 an absconder? The absconder is not in an iPod case, is he?

2 MS. MAYER: The potential violation of his parole
3 we would argue, gives them the right to conduct a search.

4 JUDGE CANNATARO: What potential viol - - -

5 JUDGE HALLIGAN: What - - -

6 JUDGE CANNATARO: Is that the question you were
7 going to ask?

8 JUDGE HALLIGAN: Thank you.

9 JUDGE CANNATARO: What potential violation of his
10 parole?

11 MS. MAYER: 9 NYCRR Section 8003 subdivision 7
12 which says, "I will not associate with people who might
13 not" - - -

14 JUDGE CANNATARO: But they haven't even found
15 anyone yet.

16 MS. MAYER: They were looking for someone though,
17 and they had evidence - - -

18 JUDGE SINGAS: So your position is that basically
19 he - - - they're - - - they get this - - - they get
20 information that he may be housing an absconder. They're
21 going - - - yes, they're looking for an absconder, but he
22 may be committing a crime by housing an absconder. He may
23 be violating his parole by fraternizing with absconders.
24 And you're saying that that then justifies a search of his
25 person because of his diminished expectation of privacy

1 because of his status as a parolee?

2 MS. MAYER: Yes.

3 JUDGE HALLIGAN: It seems like a lot of
4 bootstrapping, though. I mean, even if you could, as Judge
5 Cannataro, I think, suggested, perhaps handcuff for
6 purposes of public safety while you assess whether the
7 absconder's there, to say that he has - - - you know, you
8 have reason to think that he has violated the regulation
9 because of the tip, is that the theory, and therefore, you
10 can go into the earbud case even though there's no
11 testimony and probably no practical reason to think that
12 it's a weapon?

13 MS. MAYER: That was the theory, correct.

14 JUDGE HALLIGAN: Okay.

15 MS. MAYER: And to address the legal sufficiency
16 argument brought up by the defense, there was testimony to
17 establish that one-and-a-half bundles was probably typical
18 for what an addict would use in a day. But what it boils
19 down to is the defendant had more than that. And based on
20 that, we believe that the evidence is legally sufficient to
21 prove that charge.

22 And if there are no further questions, we will
23 rest on the brief.

24 CHIEF JUDGE WILSON: Thank you.

25 MS. LESLIE: I'm sorry I didn't reserve. May I



1 just respond briefly?

2 CHIEF JUDGE WILSON: Sure. You have a minute.
3 Sure.

4 MS. LESLIE: I would point out that the
5 respondent did not raise NYCRR provision of subsection 7,
6 which talks about acting in concert before this court.
7 Never at the trial level, not in the Appellate Division,
8 never mentioned anything like that. And there's no
9 evidence, nothing in the record to support that.

10 And also the Smith case, I had argued this, and
11 Judge Bellacosa, it was different facts, but in terms of
12 People's preservation and raising a different issue on
13 appeal, it's 92 NY 2d. He basically - - - it was the
14 People's appeal, and he affirmed the appellate division and
15 he said basically that what they're doing is not proper in
16 this circumstance. Thank you.

17 CHIEF JUDGE WILSON: Thank you.

18 (Court is adjourned)

19

20

21

22

23

24

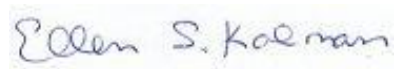
25



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T I O N

I, Ellen S. Kolman, certify that the foregoing transcript of proceedings in the Court of Appeals of the State of New York v. Eugene Lively, No. 52 was prepared using the required transcription equipment and is a true and accurate record of the proceedings.



Signature: _____

Agency Name: eScribers

Address of Agency: 7227 North 16th Street
Suite 207
Phoenix, AZ 85020

Date: April 24, 2024

