



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 7, 2023

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alan Kan, Esq.
Kan Clark, LLP
270 17th Street NW, Suite 4006
Atlanta, GA 30363
akan@kanclark.com

RE: MUR 8022
MEI Services, Inc.

Dear Mr. Kan:

On July 6, 2022, the Federal Election Commission notified your client, MEI Services, Inc., of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to your client at that time.

Upon review of the allegations contained in the complaint, and information provided by you on behalf of your client, the Commission, on February 9, 2023, found that there is reason to believe your client violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(a) by making prohibited federal contractor contributions. The Factual and Legal Analysis, which formed the basis for the Commission's finding, is enclosed for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents must be submitted to the Office of the General Counsel within 30 days of your receipt of this notification. Any additional materials or statements you wish to submit should accompany the response to the subpoena. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. *See* 52 USC § 30109(a)(4).

Please note that you have a legal obligation to preserve all documents, records and materials relating to this matter until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

If you are interested in pursuing pre-probable cause conciliation, you should make such a request by letter to the Office of the General Counsel. *See* 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into in order to complete its investigation of

MUR 8022 (MEI Services, Inc.)
RTB Letter w/Subpoena
Page 2

the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after a brief on probable cause has been delivered to the respondent.

Requests for extensions of time are not routinely granted. Requests must be made in writing at least five days prior to the due date of the response and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days. Pre-probable cause conciliation, extensions of time, and other enforcement procedures and options are discussed more comprehensively in the Commission's "Guidebook for Complainants and Respondents on the FEC Enforcement Process," which is available on the Commission's website at http://www.fec.gov/em/respondent_guide.pdf.

Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public. For your information, we have enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Kimberly Hart, the attorney assigned to this matter, at (202) 694-1618 or khart@fec.gov.

On behalf of the Commission,



Dara Lindenbaum
Chair

Enclosures:
Subpoena to Produce Documents
Factual and Legal Analysis

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 8022
)

SUBPOENA TO PRODUCE DOCUMENTS

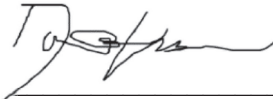
TO: MEI Services, Inc.
c/o Alan Kan, Esq.
Kan Clark, LLP
270 17th Street N.W.
Suite 4006
Atlanta, Georgia 30363

Pursuant to 52 U.S.C. § 30107(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 1050 First Street, N.E., Washington, D.C. 20463, within 30 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, D.C. on March 6, 2023.

On behalf of the Commission,



Dara Lindenbaum
Chair

ATTEST:

**Laura e
Sinram**

Digitally signed by
Laura e Sinram
Date: 2023.03.07
11:25:01 -05'00'

Laura Sinram
Secretary and Clerk of the Commission

Attachment
Instructions and Definitions
Document Request

INSTRUCTIONS

1. In answering the requests for production of documents, furnish all documents sufficient to show any refunds of the contributions made by MEI Services, Inc. to Patriots PAC, LLC between March 2022 and May 2022.
2. Should you claim a privilege with respect to any documents about which information is requested by the request for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.
3. Mark each page with identification and consecutive document control numbers (*i.e.*, Bates numbers).
4. Unless otherwise specified, these requests shall refer to the time period from March 2022, through the present.

All responses must be submitted under oath or affirmation under penalty of perjury, including any response that you have no responsive documents.

DEFINITIONS

For the purpose of the discovery request, including the instructions thereto, the terms listed below are defined as follows:

1. “You” shall mean MEI Services, Inc. or its designated representatives.
2. “Document” shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term “document” includes, but is not limited to financial records, correspondence, compilations from which information can be obtained. If the document request calls for a document that is maintained on or in a magnetic, optical, or electronic medium (for example, but not limited to, computer hard drive, USB drive, or CD-ROM), provide both “hard” (*i.e.*, paper) and “soft” (*i.e.*, in the magnetic or electronic medium) copies, including drafts, and identify the name (*e.g.*, Microsoft Word for Windows, WordPerfect) and version numbers of the software by which the document(s) will be most easily retrieved.
3. “Identify” with respect to a document shall mean state the nature or type of document (*e.g.*, letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, and the number of pages comprising the document.

DOCUMENT REQUEST

1. Produce documents sufficient to show refunds that MEI Services Inc. received from Patriots PAC, LLC in connection with the federal political contributions made to Patriots PAC, LLC on March 17, 2022, May 4, 2022, May 5, 2022, and May 17, 2022.

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

Respondent: MEI Services, Inc.

MUR 8022

I. INTRODUCTION

This matter was generated by a Complaint filed with the Federal Election Commission alleging that MEI Services, Inc. (“MEI”), a medical supplies company, made a prohibited contribution, totaling \$90,000, to Patriots PAC, LLC and Melvin Johnson in his official capacity as treasurer (“Patriots PAC”), while MEI was a federal contractor in 2022. A review of Patriots PAC’s FEC disclosure reports also reflects that MEI made three additional contributions to the Committee, totaling \$49,500, in May 2022.¹ The Federal Election Campaign Act of 1971, as amended (the “Act”) prohibits federal contractors from making such contributions.

MEI does not deny that it was a federal contractor at the time it made the contributions to Patriots PAC in March 2022. The Joint Response filed on behalf of MEI and Patriots PAC states that MEI has taken action to rectify the issues noted in the Complaint, including refunds of the

¹ See Patriots PAC, LLC 2022 July Quarterly Report at 7 (“July 2022 Quarterly Report”) (July 15, 2022), <https://docquery.fec.gov/pdf/236/202207159521481236/202207159521481236.pdf>. On September 13, 2022, RAD sent a RFAI to Patriots PAC in reference to its July 2022 Quarterly Report, noting among other issues, the receipt of the \$49,500 in contributions from MEI, an entity not registered with the Commission, that may constitute prohibited contributions. See Patriots PAC RFAI at 2 (Sept. 13, 2022), <https://docquery.fec.gov/pdf/369/202209130300153369/202209130300153369.pdf>. The RFAI instructed Patriots PAC to notify the Commission of its method of remedy regarding the potential prohibited contributions. *Id.* To date, Patriots PAC has not responded to the RFAI or refunded the subsequent contributions to MEI. Further, the PAC was scheduled to file its October 2022 Quarterly Report by October 15, 2022. On November 2, 2022, RAD sent a RFAI to Patriots PAC in connection with its failure to file the disclosure report. See Patriots PAC RFAI at 1 (Nov. 2, 2022), <https://docquery.fec.gov/pdf/039/202211020300159039/202211020300159039.pdf>. To date, the PAC has not filed the October 2022 Quarterly Report. On December 22, 2022, RAD sent a RFAI to Patriots PAC in connection with its failure to file a 2022 Post-General Report. See Patriots PAC RFAI at 1 (Dec. 22, 2022), <https://docquery.fec.gov/pdf/799/202212220300165799/202212220300165799.pdf>. To date, the PAC has not filed the 2022 Post-General Report.

contributions.² MEI requests that the Commission consider its cooperation and corrective action in resolving the matter.³

MEI's request that the Commission consider what it characterizes as the prompt refund of the contribution is more appropriately viewed as an argument for mitigation. In addition, there is no indication that these additional prohibited contributions were ever refunded. Accordingly, the Commission finds reason to believe that MEI violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(a) by making prohibited contributions.

II. FACTUAL BACKGROUND

MEI is a company located in Atlanta, Georgia specializing in provision of medical supplies.⁴ Between August 14, 2021 and August 13, 2022, MEI had a Federal Supply Schedule ("FSS") contract administered by the U.S. Treasury Department ("Treasury Department") to provide intravenous products and other related services.⁵ FSS contracts are "indefinite delivery/indefinite quantity type contracts," meaning that sales are not guaranteed; instead, once an FSS contract is awarded, a vendor is added to a list of approved suppliers from which multiple agencies may choose to make purchases.⁶ MEI has been awarded \$3.9 million total in federal contracts from a variety of federal departments and agencies, including the Treasury Department,

² Joint Response of MEI Services, Inc. and Patriots PAC LLC ("Joint Resp.") at 2.

³ Joint Resp. at 2.

⁴ MEI SERVICES, INC, NPI 1295174407, <https://npiprofile.com/npi/1295174407> (last viewed Dec. 16, 2022); see About NPI Profile, <https://npiprofile.com/> (last viewed Dec. 16, 2022).

⁵ See https://www.usaspending.gov/award/CONT_AWD_20342321F00012_2036_20342320D00001_2036 (last visited December 16, 2022).

⁶ See U.S. Dep't of Veterans Affairs, *VA Federal Supply Schedule Service*, <https://www.fss.va.gov/> (last visited Dec. 16, 2022).

U.S. Department of Defense, U.S. Department of Justice, and U.S. Department of Veterans Affairs since 2011.⁷

On March 17, 2022, MEI, while holding the above-referenced FSS contract, made a \$90,000 contribution to Patriots PAC, a non-connected hybrid committee.⁸ The Joint Response does not describe any details on whether or how the contribution was solicited.⁹ A review of FEC disclosure reports listing MEI as the contributor also shows three additional contributions, totaling \$49,500, made to Patriots PAC, that fall within the same period of time that MEI held the FSS contract: \$10,000 on May 4, 2022, \$9,500 on May 5, 2022, and \$30,000 on May 17, 2022.¹⁰ No additional information is available about the circumstances of these contributions. Respondents represent that the contributions were refunded by Patriots PAC.¹¹

III. LEGAL ANALYSIS

The Act and the Commission's regulations prohibit contributions to political committees by any person who enters into a contract with the United States or its departments or agencies for

⁷ USAspending.gov, Recipient Profile MEI Services Inc., <https://www.usaspending.gov/recipient/b512b8c2-eb3c-ca04-b3ee-cea9caf94e5c-C/latest> (last visited Dec. 16, 2022).

⁸ Patriots PAC, 2022 April Quarterly Report at 6 (“April 2022 Quarterly Report”) (Apr. 19, 2022), <https://docquery.fec.gov/pdf/156/202204199500048156/202204199500048156.pdf>. On its Amended Statement of Organization, the Committee notified the Commission of its intent to operate as a hybrid committee and that it would maintain a separate “non-contribution” account in accordance with the stipulated order and consent judgment in *Carey v. FEC* for the purpose of making independent expenditures. Patriots PAC, LLC, Amended Statement of Organization (May 17, 2022). The Committee’s notice further indicated that “[t]he funds maintained in this separate account will not be used to make contributions, whether direct, in-kind, or via coordinated communications, or coordinated expenditures, to federal candidates or committees. During the 2022 election cycle, Patriots PAC also made two independent expenditures, totaling \$31,418, supporting Vernon Jones, a candidate for the U.S. House of Representatives in Georgia’s 10th Congressional district. *See* April 2022 Quarterly Report at 8.

⁹ *See generally* Joint Resp.

¹⁰ *See* July 2022 Quarterly Report.

¹¹ Joint Resp. at 1. The refund is not reflected in Patriots PAC’s disclosure reports because, to date, it has failed to file reports for the relevant periods. *See supra* n.1.

“furnishing any material, supplies, or equipment,” if payment on such contract “is to be made in whole or in part from funds appropriated by Congress.”¹² Such contributions are barred for the period between (1) the earlier of commencement of negotiations or when requests for proposal are sent out, and (2) the later of the completion of performance on or termination of negotiations for the contract.¹³ The prohibition covers contributions to any political party, political committee, federal candidate, or “any person for any political purpose or use.”¹⁴ The Act also bars any person from knowingly soliciting a contribution from a federal contractor during the prohibited period.¹⁵

MEI does not deny that it was a federal contractor at the time it made the contributions to Patriots PAC. Further, federal spending data confirms that MEI also had federal contractor status at that time. Specifically, at the relevant times MEI held a FSS contract to provide medical supplies to the Treasury Department.¹⁶ The Joint Response requests that the Commission take into consideration the cooperation and swift action taken by Patriots PAC when resolving the matter.¹⁷

The Commission has exercised prosecutorial discretion to dismiss allegations under the federal contractor ban in certain unique circumstances, but those conditions are not met here. In MUR 6403 (*Alaskans Standing Together, et al.*), the Commission exercised its prosecutorial

¹² 52 U.S.C. § 30119(a)(1); 11 C.F.R. § 115.2(a).

¹³ 11 C.F.R. § 115.1(b).

¹⁴ *Id.* § 115.2(a).

¹⁵ 52 U.S.C. § 30119(a)(2); 11 C.F.R. § 115.2(c).

¹⁶ USAspending.gov, Recipient Profile MEI Services Inc., <https://www.usaspending.gov/recipient/b512b8c2-eb3c-ca04-b3ee-cea9caf94e5c-C/latest> (last visited Dec. 16, 2022).

¹⁷ Joint Resp. at 2.

discretion when the relevant contractors did not ordinarily contract with the government, such that their officers responsible for the contributions were not aware of the contracts; the companies did not seek the contracts but were approached by the federal government because it had no other options in the geographic area; the contracts primarily benefitted the public — for example, one agreement was for hosting a Federal Aviation Administration beacon; and the amounts paid for the contracts were relatively small considering the contractors' other income and assets.¹⁸

While MEI does not specifically argue that dismissal is appropriate because of its receipt of a refund after being notified of the Complaint, it does ask “that the FEC consider the cooperation and swift action taken by the Respondents in its ultimate decision.”¹⁹ In some previous matters, the Commission has based dismissals in part on the relatively modest amounts at issue (\$1,000 in one case and approximately \$1,700 in the other).²⁰ Here, however, the amount in violation is significantly higher. Further, in prior federal contractor matters involving a refunded contribution, the Commission has consistently found reason to believe.

Accordingly, the Commission finds reason to believe that MEI violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(a) by making prohibited contributions totaling \$139,500 to Patriots PAC.

¹⁸ Factual & Legal Analysis (“F&LA”) at 4, 10, MUR 6403 (Ahtna, Inc. and NANA Regional Corp., Inc.); F&LA at 8, MUR 6403 (Arctic Slope Regional Corp.). *But see* F&LA at 4, MUR 7099 (Suffolk Construction Co., Inc.) (concluding that respondent’s argument that its federal contract work represented a “small fraction” of its business did not negate the company’s status as a federal contractor, and noting that “[w]hile Suffolk may consider its federal contract work a “*de minimis*” portion of its overall work, its \$200,000 in contributions to the Committee are not *de minimis*”).

¹⁹ Joint Resp. at 2.

²⁰ F&LA at 3-4, MUR 7394 (O’Donnell for Congress, *et al.*) (dismissal citing the modest amount in violation and “remedial actions taken”); F&LA at 3, MUR 7338 (Rick for Congress, *et al.*) (same).

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

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3 In the Matter of)
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5 MEI Services, Inc.) MUR 8022
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8 **SECOND GENERAL COUNSEL'S REPORT**

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10 **I. ACTIONS RECOMMENDED**

11 (1) Enter into pre-probable cause conciliation with MEI Services, Inc. (“MEI”);

12 (2) approve the attached conciliation agreement; and (3) approve the appropriate letter.

13 **II. BACKGROUND**

14 On February 9, 2023, the Commission found reason to believe that MEI violated
15 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making \$139,500 in prohibited federal
16 contractor contributions to Patriots PAC LLC and Melvin Johnson in his official capacity as
17 treasurer (“Patriots PAC”), a non-connected hybrid committee.¹ Although the Response filed by
18 MEI and Patriots PAC stated that contributions had been refunded, no such refunds were
19 reflected on Patriots PAC’s disclosure reports, and the last filed report reflected a negative cash
20 on hand balance, which raised questions as to the claimed refunds.² On February 28, 2023, the
21 Commission approved a subpoena seeking records reflecting any refunds that MEI received from
22 Patriots PAC.³

¹ Certification (“Cert.”) ¶ 2.a, 2.c. (Feb. 13, 2023), MUR 8022 (MEI Services, Inc.). The Commission also voted to take no action at this time as to Patriots PAC, LLC with regard to the allegation that it violated 52 U.S.C. § 30119(a)(2) and 11 C.F.R. § 115.2(c) by knowingly soliciting a prohibited federal contractor contribution. *Id.* at ¶ 2.b. We anticipate making a recommendation regarding Patriots PAC following conciliation with MEI.

² Patriots PAC LLC, 2022 July Quarterly Report at 2 (July 15, 2022), <https://docquery.fec.gov/pdf/236/202207159521481236/202207159521481236.pdf>.

³ Certification (“Cert”) ¶ 2.d. (Mar. 3, 2023), MUR 8022 (MEI Services, Inc.).

1 In response to the subpoena, MEI provided documents to demonstrate that it received a
2 refund of \$139,500 from Patriots PAC.⁴ Further, following the Commission's reason to believe
3 findings as to MEI, Patriots PAC filed a late 2022 October Quarterly Report ("October Quarterly
4 Report") and two amended 2022 October Quarterly Reports that reflect contribution refunds it
5 made to MEI using previously unreported funds it received from another entity.⁵ Accordingly,
6 we recommend that the Commission authorize pre-probable cause conciliation with the MEI and
7 approve a proposed conciliation agreement

8 III. RESULTS OF INVESTIGATION

9 MEI, in response to the subpoena, provided redacted copies of checking account
10 statements both for itself and Patriots PAC.⁶ Both MEI and Patriots PAC maintain business

⁴ Email from Alan Kan, Esq., Counsel, MEI Services, Inc. to Kimberly Hart, Attorney, FEC (Apr. 10, 2023) ("Subpoena Resp."); Email from Alan Kan, Esq., Counsel, MEI Services, Inc. to Kimberly Hart, Attorney, FEC (Apr. 20, 2023) ("Supp. Subpoena Resp."). MEI's access to Patriots PAC bank account records may be explained by the fact that Patriots PAC's treasurer Melvin Johnson also appears to be an officer of MEI. MEI Services, Inc., Designation of Counsel (Nov. 16, 2022).

⁵ Patriots PAC LLC, 2022 October Quarterly Report ("October Quarterly Report") at 6 (Mar. 27, 2023), <https://docquery.fec.gov/pdf/224/202303279579679224/202303279579679224.pdf>; Patriots PAC LLC, Amended 2022 October Quarterly Report at 6 (Mar. 30, 2023), <https://docquery.fec.gov/pdf/934/202303309579689934/202303309579689934.pdf>; Patriots PAC LLC, 2022 October Quarterly Report at 6 (Apr. 21, 2023), <https://docquery.fec.gov/pdf/994/202304219581254994/202304219581254994.pdf>. The Reports Analysis Division (RAD) has sent several Requests for Additional Information (RAFI) to Patriots PAC in response to its 2022 July Quarterly Report filed in 2022 and its recently filed Amended 2022 October Quarterly Report, 2022 Post-General Report, 2022 Year-End Report and Amended Termination Reports. Patriots PAC LLC, RAFI, 2022 July Quarterly Report (Sept. 13, 2022), <https://docquery.fec.gov/pdf/369/202209130300153369/202209130300153369.pdf>; Patriots PAC LLC, RAFI, Amended 2022 October Quarterly Report (Apr. 23, 2023), <https://docquery.fec.gov/pdf/718/202304230300178718/202304230300178718.pdf>; Patriots PAC LLC, RAFI, 2022 Post-General Report (Apr. 23, 2023), <https://docquery.fec.gov/pdf/722/202304230300178722/202304230300178722.pdf>; Patriots PAC LLC, RAFI, 2022 Year-End Report (Feb. 16, 2023), <https://docquery.fec.gov/pdf/457/202302160300172457/202302160300172457.pdf>; Patriots PAC LLC, RAFI, 2022 Termination Report (Mar. 27, 2023), <https://docquery.fec.gov/pdf/527/202303279579681527/202303279579681527.pdf>; Patriots PAC LLC, Amended Termination Report (Mar. 30, 2023), <https://docquery.fec.gov/pdf/948/202303309579689948/202303309579689948.pdf>; Patriots PAC LLC, RAFI, Termination Report (Apr. 24, 2023), <https://docquery.fec.gov/pdf/752/202304240300178752/202304240300178752.pdf>.

⁶ Subpoena Resp.; Supp. Subpoena Resp.

1 checking accounts with Chase Bank.⁷ The MEI and Patriots PAC checking account statements
2 reflect four online refund transfers from Patriots PAC to MEI, totaling \$139,500, on various
3 dates in late July 2022: a \$90,000 transfer on July 26, 2022 (transaction #14896881996); a
4 \$30,000 transfer on July 28, 2022 (transaction #1490978171); a \$10,000 transfer on July 28,
5 2022 (transaction #14912797138); and a \$9,500 transfer on July 29, 2022 (transaction
6 #14920167562).⁸

7 Further, Patriots PAC filed its October Quarterly Report for the first time on March 27,
8 2023, and therein disclosed the receipt of a contribution in the amount of \$139,500 from M2B
9 Yacht on July 26, 2022, and the issuance of three separate refunds to MEI totaling \$139,500
10 between July 26-28, 2023.⁹ The newly filed original and amended October Quarterly Reports
11 demonstrate that Patriots PAC had sufficient funds with which to make the refunds after it
12 received the \$139,500 contribution from M2B Yacht on July 26, 2022, and that such refunds
13 were made later in July 2022.

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⁷ *Id.*

⁸ *Id.*

⁹ October Quarterly Report at 6 (Mar. 27, 2023).

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9 **V. RECOMMENDATIONS**

- 10 1. Enter into pre-probable cause conciliation with MEI Services, Inc. prior to a
11 finding of probable cause to believe;
- 12 2. Approve the attached proposed Conciliation Agreement; and

1 3. Approve the appropriate letter.

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Lisa J. Stevenson
Acting General Counsel

5.12.2023

Charles Kitcher/ms

Date

Charles Kitcher
Associate General Counsel for Enforcement

Mark Shonkwiler

Mark Shonkwiler
Assistant General Counsel

Kimberly Hart/ms

Kimberly D. Hart
Attorney