April 23, 2009

Hon. Joel I. Klein Chancellor New York City Public Schools Department of Education 52 Chambers Street, Room 314 New York, NY 10007

Re: Erin Taylor

William Silver Martha Singer

SCI Case #2008-0298

Dear Chancellor Klein:

An investigation conducted by this office has substantiated that Erin Taylor, an assistant track coach assigned to Stuyvesant High School ("Stuyvesant") in Manhattan, took female members of the Stuyvesant track team and female students from the track team at the High School for Health Professions and Human Services ("Health Professions") in Manhattan, on an unauthorized trip to Dartmouth College. Taylor violated the Chancellor's regulation regarding school trips in a number of ways: she failed to obtain permission from the principal, she did not use Department of Education ("DOE") permission slips, she did not depart on the trip from the school, and she used private transportation. The investigation revealed that Taylor regularly took female track team members on unauthorized trips in the City, elsewhere in New York State, and outside the State. The investigation also substantiated that Stuyvesant Teacher William Silver, the head coach of the track team at the school, knew about the trip to Dartmouth College, but did not inform the principal or ensure that Taylor informed the principal and

¹ Taylor resigned from the Department of Education effective February 5, 2008, citing personal and medical reasons which caused her to be unable to perform her assistant track coach duties. She remains eligible for employment in the City school system.

² See Chancellor's regulation A-670. The regulation was updated on November 26, 2008, superseding the regulation in effect as of March 16, 2005. The changes reflected the current organization of the DOE, required that international trips be approved by the appropriate superintendent, and clarified insurance requirements for school trips.

followed the guidelines promulgated in the Chancellor's regulation.³ In addition, we have concluded that Stuyvesant Athletic Director Martha Singer either knew or should have known about Taylor's history of trips with students.⁴

This investigation began on January 16, 2008, when Stuyvesant Principal Stanley Teitel contacted the Office of the Special Commissioner of Investigation ("SCI") and lodged an allegation of misconduct committed by Taylor. Specifically, Teitel reported that Taylor had taken female members of the track team on a trip to a meet at Dartmouth College in New Hampshire, without receiving advance permission to do so. Teitel added that, en route to the out of State event, Taylor became involved in an automobile accident in Vermont, which resulted in injuries to several students and Taylor.

In an interview with SCI investigators, Principal Teitel explained that, on Sunday, January 13, 2008, he received a telephone call from Parent Association President Paola De Kock who asked whether Teitel knew about an accident, which took place in Vermont, involving Taylor and several Stuyvesant students. Teitel was unaware of a scheduled out of State trip and said that he would get back to De Kock. Teitel telephoned Athletic Director Martha Singer and questioned her about a scheduled trip to Vermont. Singer advised Teitel that she was not aware of the trip, but she then went online, and read him an article about the accident. Following the conversation with Singer, Teitel sent an e-mail message to Chancellor Klein, Superintendent Jill Levy, and Superintendent Alexis Penzell.

The following day, Teitel learned from Singer that Taylor had taken a group of female students from the Stuyvesant track team, as well as female students from Health Professions, on an unauthorized trip to Dartmouth College, apparently to attend the Dartmouth Relays. According to Teitel, Singer told him that she had not approved the trip. Teitel asserted that the trip was not school-sponsored and it appeared that Taylor had scheduled it on her own. He added that the school had nothing to do with the transportation or cost of the trip and Teitel believed that the school was not responsible. Teitel also explained that Taylor had been hired as an assistant coach for track, was paid by the DOE Public School Athletic League ("PSAL"), and was not part of Stuyvesant's budget.

In an interview with SCI investigators, Singer confirmed that, on Sunday, January 13, 2008, she received a telephone call from Teitel who informed her about the accident

³ Silver was not reassigned as a result of this investigation.

⁴ Singer was not reassigned as a result of this investigation.

⁵ Teitel explained that he spoke with DOE Deputy Press Secretary Marge Feinberg on several occasions between January 14th and January 16th which finally led to Feinberg suggesting that SCI be notified. According to Teitel, he then called Deputy Counsel Robin Greenfield and, although she did not believe that the incident was really an SCI matter, she eventually told Teitel to notify this office and he immediately did so.

in Vermont, and she told the principal that she was unaware of the trip. ⁶ According to Singer, on Monday, January 14, 2008, she left a message for William Silver, the head coach of the Stuyvesant track team, inquiring about his knowledge of the trip. She added that, when he returned her call, Silver admitted that he knew about the trip, and kept saying, "Oh my God." When Singer advised Silver that there was no paperwork documenting the trip, he did not respond.

Singer explained that Silver was the head coach and Taylor was the assistant coach and that track had three seasons: fall, winter, and spring.⁷ She added that Silver had been the head coach for 14 or 15 years and that Taylor had been the assistant for, she believed, the previous three years. According to Singer, Taylor had been hired for the position of assistant coach after being recommended by Silver, but the final decision had been a joint one made by Singer and Teitel.

SCI investigators spoke with Vermont State Police Trooper Richard Slusser and learned that Taylor had been driving a rental van which had a New York State license plate number. A review of documents received from Avis Budget Group verified that Taylor rented a white Ford E350 van on January 12, 2008, and was to return it no later than 10:00 a.m. on January 14, 2008.

SCI investigators spoke with Rick Berriman of Lancer Timing Services, a website used for track events, including the Dartmouth Relays in January 2008. According to Berriman, coaches and individuals accessed the Lancer Timing website, completed an entry form, printed it out, and sent it, along with the entry fee and waiver form, directly to the director of the Dartmouth Relays. Berriman referred the assigned SCI investigator to Barry Harwick of Dartmouth College for additional information.

In a conversation with the investigator, Harwick said that he was the Dartmouth men's track and field coach and that 2008 was the 39th year of the Dartmouth Relays competition. He explained that the Dartmouth Relays was a series of track events which took place over three days: Friday, Saturday, and Sunday. According to Harwick, Taylor and the students were scheduled to participate in Sunday's event which had open participation. Harwick provided SCI with the online application that had been submitted by Taylor on December 17, 2007, which listed the team as Health Professionals, Stuyvesant, and the South Texas Walking Club.

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⁶ Singer's first interview was on January 17, 2008. SCI investigators also spoke with Singer by telephone on April 8, 2008. She was interviewed on two additional dates: September 25, 2008, and again on February 5, 2009.

⁷ Singer provided SCI investigators with a list of the students who accompanied Taylor on the trip to Dartmouth.

⁸ Harwick confirmed that several of the students competed in Sunday's event.

⁹ The online application was for Taylor as well as the students.

SCI investigators spoke with seven of the eight female students who accompanied Taylor to participate in the race walking event at the Dartmouth Relays. ¹⁰ A 16-year-old Stuyvesant student ("Student B") told SCI investigators that Taylor previously had taken students to other track events, but she had gone on only the trip to the Dartmouth Relays. ¹¹ According to Student B, Taylor took the students to non-PSAL events so they could gain experience.

Student B explained that, approximately one or two months before the January trip to Dartmouth College, Taylor told the students about the event and followed up with an e-mail message which asked whether the students were interested in attending. According to Student B, Taylor made it clear that those who were interested needed parental permission, including a medical history, known allergies, and emergency contact information. Student B added that Taylor discussed the estimated cost of the trip and Taylor asked for contributions for the expense of the van.

SCI investigators interviewed a 16-year-old Stuyvesant student ("Student C") who explained that, with Taylor, she had attended two non-PSAL events to gain experience. The first, in June 2007, was a trip to upstate New York, and the second was a four day camp on Long Island. The trip to Long Island culminated in a race. According to Student C, she rode with Taylor in the assistant coach's private vehicle to the first event, in Niagara, New York, and she and other girls rode in private vehicles to the four day camp on Long Island. Student C asserted that the two events were not related to Stuyvesant, but simply were a means to gain additional experience in race walking.

Student C confirmed that Taylor discussed the Dartmouth Relays and followed up with an e-mail message about permission slips which were required for anyone who was interested in attending. Student C added that it was common knowledge among the students that this trip had nothing to do with the PSAL or Stuyvesant. According to Student C, everyone who went to the Dartmouth Relays met Taylor at 10:00 a.m. on January 12, 2008, at the Armory, located at 168th Street and Broadway in Manhattan. Student C explained that Taylor fronted the expenses for the rental van, the registration fees, and lodging, but it was understood that the cost would be split when the trip was completed.

SCI investigators met with a 16-year-old Stuyvesant student ("Student D") who indicated that, with Taylor, she had attended competitive events which were not

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¹⁰ Taylor's attorney provided SCI investigators with permission slips for the eight students. SCI investigators attempted to speak with a 16-year-old Stuyvesant student ("Student A"), however her attorney refused to allow her to be interviewed. Student A has turned 18-years-old.

¹¹ Student B has turned 18-years-old.

¹² Student C has turned 17-years-old.

associated with Stuyvesant. 13 According to Student D, she went with Taylor to both Niagara, New York and to Connecticut and they traveled in private vehicles. Student D also confirmed that Taylor told the students about the trip to Dartmouth College, that Taylor paid for it, and that the students planned to split the expenses at the end of the trip. Student D added that Taylor participated in open events and also encouraged the students to participate in order to experience the competition and the atmosphere, and to use the events as a training tool to improve.

A 17-year-old Stuyvesant student ("Student E") explained to SCI investigators that she and two other students had accompanied Taylor to the Penn Relays in Pennsylvania the previous year. 14 She added that they rode with Taylor in her private vehicle. According to Student E, the trip to the Penn Relays was not a school-sponsored event. Student E also reported that she had flown to Florida with Taylor to attend the Pan Am Open trials, which was not a school-sponsored event. Student E said that Taylor encouraged the students to attend these events in order to experience the competition and improve. Student E confirmed that Taylor told her and the other students about the Dartmouth Relays both verbally and then by an e-mail message which requested permission slips to be completed by parents.

SCI investigators met with a 17-year-old Stuyvesant student ("Student F") who confirmed that Taylor took students to non-PSAL events to help the girls gain more experience and improve their times. ¹⁵ Student F added that she knew about prior trips to Florida for the Pan Am Open, to Pennsylvania for the Penn Relays, and to upstate New York for the Empire State Games. However, Student F said that she had not attended any of the previous trips with Taylor.

According to Student F, Taylor registered the students participating in the Dartmouth Relays under Stuyvesant because registration was by team only. Student F confirmed that Taylor requested permission slips from those students who were going on the trip. Student F added that Taylor fronted all the expenses for the trip and that the students were going to split the cost afterward.

SCI investigators spoke with a 15-year-old Health Professions student ("Student G") who explained that she first met Taylor at the Armory during the previous school year and, after watching Taylor and some of the Stuyvesant students performing race walking, she and another student ("Student H") began training with Taylor. 16 Student G said that she traveled with Taylor and other students to an event in which they trained for

Student D has turned 17-years-old.Student E has turned 19-years-old.

¹⁵ Student F has turned 18-years-old.

¹⁶ Student G has turned 17-years-old.

three days and then competed on the fourth day. ¹⁷ According to Student G, their respective high schools were never mentioned at that event.

Student G said that Taylor told her about and then sent an e-mail concerning an event at Dartmouth College. She added that Taylor encouraged students to attend various events in order to gain experience. Student G confirmed that permission slips were required and that Taylor fronted the expenses for registration fees, lodging, and transportation, which the students would split at the end of the trip.

Student H, a 14-year-old who attended Health Professions, confirmed that she and Student G began training with Taylor and the Stuyvesant students after watching them performing a new form of track called race walking. Student H added that, for the Dartmouth Relays trip, Taylor required a permission slip which included health issues, known allergies, and emergency contact information. Student H said that Taylor never described the trip as a school-sponsored event, but that Taylor thought the students could benefit from the additional practice.

SCI investigators interviewed PSAL Track Commissioner Dwayne Burnett who confirmed that race walking was a track and field event. Burnett said that the PSAL sponsored at least 12 events each year Citywide and that the PSAL encouraged students and staff to use public transportation or DOE authorized transportation, such as school buses, to travel to and from the events. Burnett added that coaches were lectured on not using their personal vehicles to transport students. According to Burnett, a trip would be classified as a school trip only when the principal authorized it. When SCI investigators advised Burnett that Taylor had informed Silver about her plan to take the students to Dartmouth College, Burnett maintained that it was Silver's responsibility, not Taylor's, to obtain authorization.

During a second interview with SCI investigators, conducted under oath, Burnett reiterated that race walking was part of track and field and that there were approximately 12 PSAL sponsored events for race walkers. Burnett said that there were numerous non-PSAL sponsored events for all forms of track and field. Burnett added that coaches did not have to obtain PSAL permission to attend the non-PSAL events because they would be considered school trips. Burnett asserted that he asked the coaches to notify PSAL when they took students to non-PSAL events so his office could monitor qualifying times for the Citywide championships. ²¹

¹⁹ SCI investigators met with Burnett on two occasions. The first interview took place on April 15, 2008, and the second on July 25, 2008.

¹⁷ Student G seemed to be describing the camp and race on Long Island.

¹⁸ Student H has turned 15-years-old.

²⁰ Burnett said that race walking was a relatively new event within track and field and was not a "highlighted event."

Burnett explained that, in order to qualify for the Citywide championships, students needed to obtain a qualifying time, but the qualifying time did not need to come from a PSAL event.

Burnett reported that he held a mandatory meeting for coaches and assistant coaches every year. At those meetings, Burnett discussed rules and regulations which also were posted on the PSAL website. Burnett maintained that he encouraged all in attendance to use public transportation to and from events. Burnett said that he instructed the coaches and assistant coaches not to use their own personal vehicles, but added that this was not written in the PSAL rules and regulations.²² Burnett asserted that he spoke with Taylor and Silver on several occasions, indicated that both had attended his annual meetings, but conceded that the meetings were not memorialized in any way.

When asked whether he had any discussions with the coaches and assistant coaches regarding taking students to non-PSAL events outside of the State, Burnett responded that the issue was a "hairy" one. He explained that many of the schools traveled to Pennsylvania to participate in the Penn Relays, one of the largest track events. However, Burnett asserted that those were considered school trips. Burnett acknowledged that he was familiar with the Pan Am Open held in Florida as well as the Dartmouth Relays, but reiterated that, if a school went to one of these events, then it would be considered a school trip. Burnett acknowledged that this information was not contained in the rules and regulations posted on the PSAL website.

Burnett spoke at length about what, in his opinion, constituted a school trip. According to Burnett, at the very least, the principal had to be notified. Burnett added that the team would register using the school's name, the students would wear their school uniform, and the team would take public or DOE authorized transportation.²³

In an interview with investigators from this office, conducted under oath and in the presence of her attorney, Erin Taylor answered pedigree information and then alternated between giving substantive answers and asserting the 5th Amendment privilege against self-incrimination to questions posed.²⁴ Taylor said that she had worked as an assistant coach at Stuyvesant since either 2002 or 2003. She acknowledged that she had spoken with and had met with Burnett but, when specifically asked whether she had been given instructions about rules and regulations by Burnett or anyone from PSAL, Taylor asserted the 5th Amendment privilege.

²² The Chancellor's regulation states that students may not be transported to or from the trip site in an unauthorized or private vehicle.

⁴ In total, Taylor asserted the 5th Amendment privilege 39 times.

²³ SCI investigators learned that Taylor had registered herself and the students as Health Professions. Stuyvesant, and the South Texas Walking Club. The seven students declined a second interview with SCI investigators, and the eighth student continued to refuse an interview, so we were unable to determine whether they were their school uniforms. A review of online information about the Dartmouth Relays revealed that, a school in Lancaster, New York, attended the event and, in a conversation with the assigned investigator, Lancaster High School Secretary Cindy Poe reported that the Lancaster students who participated in the Dartmouth Relays wore their school uniform.

Taylor denied being advised that she had to notify the principal or the athletic director if she took students to non-PSAL events within New York City or out of State. Taylor contended that she always informed Silver when she took students to PSAL or non-PSAL events. Taylor denied that Silver had discussed any rules or regulations regarding transporting the students to the events. Taylor added that she had never been told that the students had to wear their school uniform to non-PSAL events.

Taylor confirmed that she took eight students to the 2008 Dartmouth Relays and said that she had requested permission slips from the students. Taylor also asserted that she informed Silver about the trip to Dartmouth College and that Silver never expressed misgivings or attempted to discourage her from taking the students.

In a second interview with investigators from this office, conducted under oath and in the presence of her attorney, Martha Singer said that she had meetings with new coaches and assistant coaches regarding guidelines, the completion of insurance books, rules and regulations, the general nature of sportsmanship, equipment, and Stuyvesant policy. Singer believed that she met with Taylor when Taylor was hired as an assistant coach. Singer was unable to recall whether she had a discussion with Taylor regarding the use of personal vehicles, but said that Stuyvesant was a public school and most students generally used public transportation. She added that, should another type of transportation be required, coaches were informed that school buses could be arranged. Singer asserted that, until January 2008, she had never heard of a teacher, coach, or assistant coach using a personal vehicle or some other form of unauthorized transportation to transport students.

Singer explained that, when she first met with coaches and assistant coaches, she provided them with guidelines, but she could not recall whether she had met with and provided the guidelines to Taylor. She added that, in her office, she maintained an older version of the guidelines which she distributed to the new coaches and assistant coaches. Singer said that the guidelines also could be accessed on the PSAL website. According to Singer, certain guidelines were required to be met when a team took a trip outside of New York City. These requirements included: permissions slips, an appropriate number of chaperones, a trip form to be completed by the coach, and the approval of the principal. She added that the guidelines listed on the PSAL website explained the above requirements.²⁶

²⁵ Singer reiterated that, although Silver recommended Taylor for the assistant coach position, her hiring was a joint decision by Singer and Teitel.

²⁶ SCI investigators viewed the PSAL website, but were unable to locate the specific guidelines mentioned by Singer. The only guidelines observed were general information regarding track events. However, the requirements described by Singer are similar to those in the Chancellor's regulation.

Singer reported that, at the beginning of the 2008-2009 school year, Principal Teitel addressed the faculty and informed them that all school trips required his approval. She was unable to recall whether Teitel had made the same announcement during any of the previous school years.

SCI investigators again questioned Singer about her knowledge of the trip to Dartmouth College. She recalled first learning about the trip from Teitel when he called her at home on a Sunday. Singer asserted that she had not known about the trip before hand, but added that, after the accident, she traveled to Vermont to be supportive of the injured students. According to Singer, when she returned from Vermont, she saw Silver who said, "I thought she told you," which she considered a reference to Taylor. Singer asserted that Taylor telling Silver about the trip was not sufficient and principal authorization was required.

Singer denied knowing about previous trips where Taylor took students to track events outside of New York City. Specifically, Singer denied any knowledge of trips to Niagara Falls, the Pan Am Open trials, the Empire State Games, and the Penn Relays.

Through his attorney, William Silver declined the opportunity to be interviewed by SCI investigators.

On January 8, 2009, during a second interview with investigators from this office, conducted under oath and in the presence of her attorney, Erin Taylor answered questions posed by SCI investigators. Taylor acknowledged meeting Burnett at track meets held at the Armory and Randall's Island; however, Taylor described the meetings as Burnett explaining general information about track. Specifically, Taylor said that Burnett indicated that the students were required to wear their uniforms when competing, had to wear their numbers, could not wear jewelry, and he also addressed the number of events in which an athlete must compete. Taylor was unable to recall whether she attended a meeting with Burnett or anyone from PSAL in which the DOE's rules and regulations or the Chancellor's rules and regulations were discussed.

Taylor recalled being told by Burnett, or someone from the PSAL, when and where students could pick up MetroCards for transportation to and from track events. She also remembered a conversation with Silver about how students were to get to and from track events and Silver told her that the students took public transportation. Taylor denied being instructed by Silver, Burnett, or anyone from the PSAL about not using her personal vehicle to transport students to and from track events.

²⁷ Singer said that she traveled to Vermont of her own accord and not on behalf of Stuyvesant.

Taylor maintained that she told Silver about her plans to take the students to the Dartmouth Relays and recalled a particular conversation about the trip during which Silver said, "that will be a great opportunity for them," and then asked how she planned on getting there. Taylor added that she told Silver that she was looking into several modes of transportation, but thought that a bus or train would be too expensive. According to Taylor, Silver again said it was "a great idea" and told her to let him know what type of transportation she chose. Taylor maintained that, when she later told Silver that she planned on renting a van, he responded, "ok, great."

Taylor asserted that Singer was aware that Taylor took students to events outside of New York City and added that Singer never told her that she had violated any rule or regulation. Specifically, Taylor said that Singer knew that Taylor had taken a student to Florida to participate in the Pan Am Open. Taylor explained that, after she and the student returned from Florida, Taylor told Singer how the student had done at the event and Singer replied, "good job." Additionally, Taylor claimed that she and Singer had discussed the results of one of the trips where she took students to participate in the Penn Relays.²⁸ Taylor maintained that Singer never spoke with her about the Chancellor's rules and regulations, the DOE's rules and regulations, or Stuyvesant's rules and regulations regarding student trips.

Taylor said that she had taken students to Niagara Falls to participate in a track event and to Connecticut for a day trip to participate in an event. According to Taylor, she and a friend drove between seven and nine students to the Connecticut event using their personal vehicles. Taylor also reported that she had taken students to New Jersey for three days of training and then to Long Island to participate in a racing event. Taylor asserted that she had informed Silver about all of these trips; she recalled Silver telling her that funds were available for the New Jersey/Long Island trip.²⁹

Taylor acknowledged that she fronted the expenses for the trip to Dartmouth College. She explained that she had requested permission slips for this particular trip only because her father had suggested it.³⁰

²⁸ Taylor reported that she had taken students to the Penn Relays on two or three occasions during her employment at Stuyvesant.

²⁹ Taylor recalled a conversation with Silver during which she told him that she was planning to take the students to train in New Jersey for three days followed by a race on Long Island on the fourth day. According to Taylor, Silver informed her that funds were available to assist with the cost because the girl's track team had volunteered at a Road Runner's Club event.

³⁰ Taylor explained that her father had been her coach many years ago and he suggested having permission slips for this particular trip because of the distance Taylor and the students would be traveling.

SCI investigators again met with Singer, in the presence of her attorney, to clear up statements made by Taylor during her interview. After being placed under oath, Singer denied knowing that Taylor had taken a student to Florida to participate in the Pan Am Open. Singer was then asked whether she learned about the trip after the fact, but Singer responded that she could not recall. Specifically, investigators asked whether Singer said, "good job," after Taylor told her about the student's performance at the Pan Am Open, but Singer again asserted that she could not recall. Asked whether she learned that Taylor had taken students to the Penn Relays, Singer replied that she did not recall. Singer also did not recall whether she had ever been given an update by Taylor about student performances at the Penn Relays.

As the athletic director at Stuyvesant, Singer supervised the coaches, including Silver and Taylor. While Singer may not have been aware of the Dartmouth trip before the accident, it is difficult to accept that Singer was unaware that Taylor had taken students to any of the many events discussed in this report. Silver, who was Taylor's direct supervisor, was aware that Taylor was taking students on unauthorized trips. It is the recommendation of this office that appropriate action be taken against Erin Taylor, William Silver, and Martha Singer.

It is apparent that these unauthorized trips were commonplace and an accepted practice at Stuyvesant.³¹ The Chancellor's regulation on trips may also have been disregarded at public schools across the City on a widespread basis. It is the recommendation of this office that either the regulation be revised to reflect the reality of trips – authorized and unauthorized – or that strict compliance with the regulation be required. If the decision is to enforce the current regulation, then schools must be put on notice that adverse consequences will result when violations occur.

We are sending a copy of this letter and of our report concerning this investigation to the Office of Legal Services. We also are forwarding our findings to the State Education Department for whatever action it deems appropriate. Should you have any

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³¹ Taylor's trip to Dartmouth was not the only unauthorized trip taken by staff and students at Stuyvesant. SCI substantiated that Julio Celestin, a French teacher at Stuyvesant, supervised unauthorized student trips to Quebec, Canada, in violation of the Chancellor's regulations. As a result, on April 24, 2001, SCI recommended that the rules set forth by the Chancellor be followed. See SCI Case # 2001-0614. In addition, SCI substantiated that R. Christopher Asch, a Stuyvesant teacher, took seven students on an unauthorized trip to Boston to compete in a Quiz Bowl at Harvard University, even after one parent denied permission for his son to attend. As a result, on March 19, 2008, SCI recommended strong disciplinary action be taken against Asch. See SCI Case # 2007-4277.

inquires regarding the above, please contact Special Counsel Christina Creek Laslo, the attorney assigned to the case. She can be reached at (212) 510-1454. Please notify Ms. Laslo within 30 days of receipt of this letter of what, if any, action has been taken or is contemplated concerning this investigation. Thank you for your attention to this matter.

Sincerely,

RICHARD J. CONDON Special Commissioner of Investigation for the New York City School District

Regina A. Loughran First Deputy Commissioner

RJC:RAL:CCL:gm c: Michael Best, Esq. Theresa Europe, Esq.