

**BEFORE THE DELAWARE
HUMAN AND CIVIL RIGHTS COMMISSION**

Silas MANUEL)	
)	
Complainant,)	
)	
v.)	Case No. S-EA-2534-22
)	
PNC BANK, NA,)	
)	
Respondent.)	

MEMORANDUM DECISION AND ORDER

HEARING PANEL:

Gail Tarlecki, *Commission Chair and Panel Chair*,
Dwayne J. Bensing, *Commissioner and Panel Member*, and
Doris Cooper, *Commissioner and Panel Member*.

Daniel C. Mulveny, Deputy Attorney General,
Counsel for the Commission and the Panel.

APPEARANCES:

Mr. Silas Manuel, *pro se*,
Complainant.

Petal Munroe Reddick, Esq., K&L GATES LLP,
Counsel for Respondent.

INTRODUCTION

Pursuant to due notice of time and place of meeting served on all parties in interest, the above-identified Panel of the Delaware Human and Civil Rights Commission (the “DHCRC” or “Commission”) convened a hearing by videoconference beginning on September 13, 2022 and continuing on September 16, 2022 to determine whether a violation of Delaware’s Equal Accommodation Law (the “DEAL”, Title 6, Chapter 45 of the *Delaware Code*) occurred.

Mr. Silas Manuel filed a complaint with the Commission alleging that Respondent PNC Bank, NA (“Respondent” or “PNC”) discriminated against him based on his race and national origin. Immediately after the hearing concluded, the Panel conducted its deliberations.

SUMMARY OF THE COMPLAINT

In brief summary, the complaint alleges that Mr. Manuel was refused, withheld, or denied accommodations, facilities, advantages, or privileges of a place of public accommodation because of his race and national origin. Mr. Manuel is black and is of Japanese and Portuguese descent.

Mr. Manuel alleges that at around 3 p.m. on February 17, 2022, he went to the PNC Branch located at 19745 Sea Air Avenue in Rehoboth Beach, Delaware (hereinafter, the “Rehoboth branch”). Mr. Manuel explained his need to add a signature to his business account to a PNC Desk Agent, a white female (later

identified as Ms. Judith “Katie” Zamora). According to the complaint, Ms. Zamora instructed Mr. Manuel to call PNC customer service or go to another branch. Mr. Manuel did not understand why Ms. Zamora could not assist him. Mr. Manuel called his friend Michael Downey, who was waiting outside, and had him come inside to witness the denial of service. Mr. Downey was white.

The complaint further alleges that Ms. Zamora explained to Mr. Manuel that he needed to go to another branch, call customer service, or make an appointment the next day because there were no open appointments, and they could not help him at that time. Another friend of Mr. Manuel, Mr. Mark Hartl, had come inside and heard what Ms. Zamora said.

Mr. Manuel alleges that Mr. Downey told Ms. Zamora that he had a PNC account and that he was able to quickly add a signature to his account without an appointment and that a bank teller was able to perform the service. Ms. Zamora again instructed them to make an appointment the following day or to go to another branch. As Mr. Manuel started to leave, Ms. Zamora said “Have a nice day,” to which Mr. Manuel responded: “I will have a nice day, you should worry about your job.”

The complaint goes on to allege that Mr. Manuel followed up with PNC customer service after he left the Rehoboth branch and that he was told that he should have been served at the time of his request. Mr. Manuel also contacted PNC

about a week later to make a complaint about the events on February 17. Mr. Manuel also alleges that this was not the first incident and that PNC has a pattern of treating people of color rudely and unprofessionally. Mr. Manuel claims that PNC's treatment of him was discriminatory and embarrassed him.

SUMMARY OF THE EVIDENCE

Both parties made brief opening statements in support of their respective cases.¹ Each then presented their case.

Complainant's Case

1. Complainant Mr. Manuel.

Mr. Manuel, duly sworn, testified that he came to PNC's Rehoboth branch around 3 p.m. on February 17, 2022 to add a signature to his business account for his small business. He was told to call the "800" number for PNC's customer service. He asked to speak to a branch manager and was told "no".

Mr. Manuel then called in his friend Mr. Downey. Mr. Downey came in and spoke to Ms. Zamora. Mr. Manuel said that Ms. Zamora did not want to talk to him.

Mr. Downey explained to Ms. Zamora that he had a bank teller provide the same service at a different branch. Mr. Manuel said that Ms. Zamora did not want

¹ The Panel notes that opening statements are not evidence and are not summarized here. They are, however, part of the official record.

to hear about it. Ms. Zamora told them to make an appointment and leave the bank.

As they were leaving, Ms. Zamora loudly said “I hope you have a nice day” in a sarcastic voice. Mr. Manuel responded: “I will have a nice day. You should worry about your job.”

After the incident, Mr. Manuel said that he contacted PNC and did not get a response. Then he filed an equal accommodations complaint with the Commission.

Mr. Manuel said that he was kicked out of the bank. He further said that PNC has a past history of calling the police on people who do not leave when asked.

On cross-examination by Respondent’s counsel, Mr. Manuel explained that he did not have an appointment. After initially being denied the requested service, He then sat down in the lobby and waited; no one asked him to do so. Ms. Zamora came out and gave him her business card. Mr. Manuel said that no one told him they could not serve him because of his race or national origin.

In response to Panel questioning, Mr. Manuel explained that he believed that PNC has a history of calling the police when a black man is told to leave.² Mr. Manuel admitted that he did not have any firsthand knowledge of such history.

² PNC objected to this testimony on the grounds of relevance and hearsay. The objection was overruled. In making this Decision, the Panel weighed the substance of Mr. Manuel’s testimony in view of its relevance and hearsay foundation.

When asked by the Panel if he had any evidence of past discrimination at the Rehoboth branch, Mr. Manuel said that he has previously experienced discrimination twice at the Rehoboth branch. On one occasion in 2017, he went to open an account and was told he could not be served. He did not understand why. They said the branch was closing in 10 minutes. He was told to go to another branch. On the other occasion, he went to open an escrow account and was told that he could not be helped. He was told to call the “800” number. He did and was able to get the account opened.

When asked what made him feel discriminated against, Mr. Manuel explained that he was summarily dismissed. There was no attempt to help him. When asked if he had any basis to believe that this was because of his race and national origin, Mr. Manuel said that he was not given an opportunity to explain what his needs were and that he believed this was because of his race.

On further cross-examination by PNC’s counsel, Mr. Manuel said that he did not hear anyone threaten to call the police.

2. Mr. Michael Downey

Mr. Downey, duly sworn, testified that he was at the Rehoboth branch with Mr. Manuel on the day in question. He heard a conversation between Mr. Manuel and Ms. Zamora. Mr. Downey told Ms. Zamora that he was able to get a signature added to a business account at another branch by a teller.

He heard Ms. Zamora tell Mr. Manuel to leave the bank and, as Mr. Manuel left, Ms. Zamora sarcastically said: “have a good day”.

On cross-examination by PNC’s counsel, Mr. Downey said that he is a friend of Mr. Manuel. He did not go into the Rehoboth branch at the same time as Mr. Manuel; he came in later. He did not hear Ms. Zamora’s explanation. He did not hear anyone say that what happened was because of Mr. Manuel’s race or national origin but he explained that he would not expect anyone to say that because that is not how these things happen. He did not hear any explanation that Mr. Manuel could not be served because the task required a business banker.

In response to Panel questioning, Mr. Downey explained that he was at a different branch when he was able to add a signature to his account. Mr. Downey said that he is white.

On re-direct, Mr. Downey said that it was not a branch manager who served him before; it was a teller.

On re-cross, Mr. Downey said that he could not tell whether it was a branch manager or teller, but he was served at the teller desk.

3. Mr. Mark Hartl.

Mr. Mark Hartl, duly sworn, testified that he was at the Rehoboth branch with Mr. Manuel around 3 p.m. on February 17, 2022. He heard a conversation between Ms. Zamora and Mr. Manuel.

Mr. Manuel asked Ms. Zamora for help adding a name to a business account. Mr. Hartl was the person to be added to the account. Mr. Hartl said that as they were leaving because they could not get service, Ms. Zamora sarcastically said: “have a nice day.”

On cross-examination by PNC’s counsel, Mr. Hartl said that he did not walk into the branch at the same time. He did not hear the full conversation between Mr. Manuel and Ms. Zamora. He explained that he was a friend of Mr. Manuel and was to be added to Mr. Manuel’s business account. As to the events, he heard a branch employee explain that they could not handle the requested task. They were told to make an appointment or go to another branch. He did not hear anyone say that this was because of Mr. Manuel’s race or national origin.

In response to Panel questioning, Mr. Hartl said that he was white.

On re-cross, Mr. Hartl said that he did not hear anyone say that the police would be called; all he heard was the request to leave.

4. Ms. Judith K. (“Katie”) Zamora.

Ms. Zamora, duly sworn, testified in response to questioning from Mr. Manuel. She explained that she has been a branch banker for four years. She denied that she had the ability to add a signature to Mr. Manuel’s business account. She explained that she has not taken the required training to become a business account certified banker that may perform services on business accounts and was

not permitted to do what Mr. Manuel requested. She said that she did not refuse Mr. Manuel service; she offered to schedule an appointment for another day when a business account banker would be available, which he declined. She also offered to call other branches to schedule such an appointment.

Ms. Zamora said that on the day in question, the Rehoboth branch did not have anyone available to help Mr. Manuel. Ms. Zamora did not consult her manager because the manager was in a meeting until 5 p.m. and would not be available to perform the requested service for the rest of the business day. Ms. Zamora said that Jason Joseph was the branch manager who would have provided business banking services, but he was off that day. She would not have been able to take Mr. Manuel's information and later have the business banker perform the requested service. She explained that the services she provided to Mr. Manuel were comparable to typical service.

Ms. Zamora said that Mr. Manuel announced that he was not going to leave until someone assisted him. She denied telling Mr. Manuel to leave. She said that they do not typically tell customers to leave; the only time is when a customer becomes irate or threatening. In that case, they contact security or the police. She explained that she said "have a nice day" because she wanted to ensure customer satisfaction. In response, Mr. Manuel said: "I will," and that she "should worry about her job." Ms. Zamora denied picking and choosing which customers to

serve.

Mr. Manuel played the video footage from the security system and Ms. Zamora confirmed the events that were recorded—she was talking with Mr. Manuel and then he left.

Mr. Manuel showed Ms. Zamora PNC's code of business conduct and ethics.³ She said that she followed the code.

On cross-examination by PNC's counsel, Ms. Zamora said that she has not changed an authorized signature for a business account; she is not certified to perform business banking. She is a "Level 1" banker and only permitted to service personal accounts. She explained that she can perform account management and service for personal accounts. She ordinarily queues the lobby, checking in customers to be assisted. She denied kicking Mr. Manuel out of the building. She did not threaten to call security, nor threaten to call the police. She denied using a sarcastic tone; she always uses a salutation with customers.

Ms. Zamora denied discriminating against Mr. Manuel based on his race or national origin. She treats all her customers the same. She said she did all that she could for Mr. Manuel and followed all procedures.

In response to Panel questioning, Ms. Zamora confirmed that she had never

³ Marked as Hearing Exhibit F. Also marked as Complainant's Exhibit 13.

previously added a signature to a business account. She explained that she would not directly interrupt the branch manager’s meeting by knocking on the door, she would send a Skype message; the protocol is to not interrupt an ongoing meeting of the branch manager. She further explained that she has never interrupted the branch manager’s meeting for customer needs—she would set up an appointment. When Mr. Manuel arrived at the branch, he was told that there was no one available with the credentials to provide the service he requested.

Mr. Manuel concluded his presentation of evidence.

Respondent’s Case

1. Ms. Zamora.

PNC began its presentation of evidence by calling Ms. Zamora who testified in response to questions from Respondent’s counsel.

Ms. Zamora explained that she was a branch banker and has worked for PNC for about four years. She started working at the Rehoboth branch around August 2021. Her responsibilities included dealing with personal account issues, credit cards, and loans. She can service personal accounts.

She confirmed that she was scheduled to work on February 17, 2022 as shown on the Rehoboth branch work schedule.⁴ On that day she was working “platform”; she would work the desk and dealt with customer’s personal banking

⁴ Marked at the hearing as Respondent’s Exhibit A.

needs. Ms. Lora Nacheva was a “floating switcher” going between bank branches. Ms. Nacheva was not trained to service business accounts.

Jason Joseph was the branch manager. He was on an investment call with all managers from 1 p.m. to 5 p.m. that day. It was a region-wide call with all managers on the call.

Ms. Zamora further explained the events on February 17, 2022. She was in her office when Ms. Nacheva came into her office and said that Mr. Manuel needed help. Ms. Zamora came out and told Mr. Manuel that there were no business bankers available and that he could not be assisted that day. Ms. Zamora explained that she has not been trained and certified to perform business banking. The certification involves taking a class; it is an instructor-led training and there is a test. No one was available to help Mr. Manuel.

Ms. Zamora was shown a printout regarding PNC’s BBSC Program.⁵ Ms. Zamora explained that the exhibit was a printout from an internal information resource “like Google”. She explained that under PNC’s BBSC program, she was not certified to perform the service Mr. Manuel requested. Instead, she tried to provide Mr. Manuel alternatives.

On cross-examination by Mr. Manuel, Ms. Zamora explained that there is a

⁵ Marked at the hearing as Respondent’s Exhibit B.

difference in the complexity of the tasks between personal and business banking such as requiring additional documentation. Ms. Zamora further explained that the security guard at the Rehoboth branch was a private contractor and not an employee of PNC.

On re-direct, Ms. Zamora said that she followed PNC's procedures on February 17, 2022.

2. Complainant, Mr. Manuel

PNC next called Mr. Manuel and he testified in response to questions from Respondent's counsel. Mr. Manuel explained that he had complaints involving two prior incidents at PNC. One involved an attempt to open an escrow account and the other involved his attempt to open a business account. He did not recall how those cases were resolved.

Mr. Manuel said that he believed the incident on February 17, 2022 was discrimination because he had been discriminated against by PNC before. He believed that the discrimination was because of his race and national origin based on how he was treated.

When asked whether it is discrimination if no one is available to assist, Mr. Manuel said that it depends on whether the person is willing to help and their tone in providing the service. He further explained that it may not be discrimination if the service cannot be done but that the employee should try to help.

In response to Panel questioning, Mr. Manuel said that Ms. Zamora was not correct and that another banker could have provided further assistance. Mr. Manuel did not dispute that his banking needs that day involved business banking. He said that Ms. Zamora could have done more to help him. He said that Ms. Zamora said: “I hope *you* can have a nice day” in a sarcastic and discriminatory way.

On re-direct by Respondent’s counsel, Mr. Manuel conceded that his request to add an authorized signature to his business account involved business banking.

Summary of Closing Arguments

In closing, Mr. Manuel argued that he has lived in Sussex County for a long time. He knows what discrimination feels like and that it can be frustrating and humiliating. He argued that Ms. Zamora racially-profiled him and denied him service while white customers were served. She also harassed him when he left. He argued that Ms. Zamora did not follow PNC’s policy to not discriminate against people of color. He further argued that Ms. Zamora attempted to provoke him and delighted in doing so. He argued that PNC has a history of calling the police on people of color. And PNC still has not helped him with his banking needs.

In response, Respondent’s counsel argued that it was not a denial of access when the services Mr. Manuel requested could not be performed. Counsel argued that there were legitimate, non-discriminatory reasons why Mr. Manuel could not be served: there was no business banker scheduled to work that day and the branch

manager was in a region-wide meeting from 1 p.m. to 5 p.m. PNC legitimately followed race-neutral procedures and offered alternatives to Mr. Manuel. None of these actions amounted to a denial of service because of race or national origin.

The Panel asked Mr. Manuel to specify the relief he sought. He said that PNC needs to improve its practices; hire more black people; to terminate the wrongful managers and hire new ones. Mr. Manuel asked the Panel to do what it can to improve the lives of citizens. He requested \$25,000 in damages but said that while the amount was not important to him, the amount should be what is important to PNC.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

In this case, Mr. Manuel alleges that PNC violated the DEAL by denying him service on February 17, 2022 and also in how Ms. Zamora treated him.

Section 4504(a)(1) of the DEAL provides that “no person being the owner...manager...agent or employee of any place of public accommodation, shall directly or indirectly refuse, withhold from or deny to any person, on account of race, age, marital status, creed, color, sex, disability, sexual orientation, gender identity, or national origin, any of the accommodations, facilities, advantages, or privileges thereof.”

The provisions of the DEAL are to be “liberally construed” to safeguard the

rights set forth therein.⁶ “The ultimate purpose [of the DEAL] is to eliminate the inconvenience, unfairness, and humiliation of...discrimination.”⁷

Under Delaware law, claims alleging a direct or indirect refusal or denial of public accommodations based upon unlawful discrimination are decided using the guidance of the U.S. Supreme Court’s three-part analysis in *McDonnell Douglas Corp. v. Green*.^{8,9} This analysis requires the following steps:

- (1) The complainant must establish a prima facie case of discrimination.
- (2) Once a prima facie case is established, the burden shifts to the respondent to present evidence of a legitimate, non-discriminatory reason for denying plaintiff access.
- (3) After this production of evidence, the complainant retains the burden of persuading by a preponderance of the evidence that the respondent’s proffered reason was a pretext for discrimination.¹⁰

Further, because Equal Accommodations hearings before the Commission are subject to the provisions of Delaware’s Administrative Procedures Act

⁶ 6 Del. C. § 4501.

⁷ *Uncle Willie’s Deli v. Whittington*, 1998 WL 960709 at *4 (Del. Super. Dec. 31, 1998) (citations and internal quotations omitted).

⁸ 411 U.S. 792 (1973).

⁹ See also *DP, Inc. v. Harris*, 2000 WL 1211151 at *6 (Del. Super. July 31, 2000) (“Delaware Courts have applied the standard articulated in *McDonnell Douglas Corporation v. Green* for cases alleging unlawful discrimination.”) (citations omitted); and *Uncle Willie’s*, 1998 WL 960709, at *4 (applying the *McDonnell Douglas* analysis to a case brought under the DEAL).

¹⁰ *Salty Sam’s Pier 13 v. Washam*, 2000 WL 1211227, at *2 (Del. Super. Aug. 3, 2000) (citations omitted).

(APA),¹¹ “the burden of proof shall always be upon the applicant or proponent.”¹²

Discussion

The Panel begins with the first step of the *McDonnell Douglas* analysis—whether or not Mr. Manuel established a prima facie case of discrimination under the DEAL. To do this, he needs to show by a preponderance of evidence three things: (a) that he is a member of a protected class; (b) that he was denied access to public accommodations; and (c) that non-members of the protected class were treated more favorably.¹³

1. Mr. Manuel is a member of a protected class.

On the first point, there is no dispute that Mr. Manuel is a member of a protect class on account of his race and national origin.

2. Mr. Manuel was denied service.

There is also no dispute that Mr. Manuel was denied the services he sought at the Rehoboth branch on February 17, 2022. While PNC argues that there was not a denial of service in the context of the DEAL because, under PNC’s procedures, Ms. Zamora could not perform the services requested, the Panel

¹¹ 29 *Del. C.* Ch. 101.

¹² 29 *Del. C.* § 10125(c).

¹³ See *Boggerty v. Stewart*, 14 A.3d 542, 550 (Del. 2011) (citations omitted); see also *Texas Department of Community Affairs v. Burdine*, 450 U.S. 248, 252-53 (1981) (“First, the plaintiff has the burden of proving by the preponderance of the evidence a prima facie case of discrimination.”).

declines to address that question at this time because, as explained below, the Panel finds that there is no evidence that Mr. Manuel was treated differently than non-members of his protected classes.¹⁴

3. Mr. Manuel failed to show that non-members were treated more favorably.

After careful review of the evidence presented, the Panel finds that Mr. Manuel has not met his burden to show that non-members of his protected classes were treated more favorably. Rather, the Panel finds that the evidence shows that PNC treated him the same as other customers given the circumstances involved.

PNC showed, and Mr. Manuel did not rebut, that under its procedures, Ms. Zamora could not perform the services required because she was not certified to perform business banking services. There is no evidence that non-members of Mr. Manuel's protected classes were provided business banking services on February 17, 2022 by Ms. Zamora or anyone else at the branch.

On the issue of how Ms. Zamora treated Mr. Manuel—specifically how she said “I hope you have a nice day”—again, the Panel finds that there is no direct evidence that she treated others any differently. That does not end the Panel's analysis of this issue because Delaware law contemplates that there can be

¹⁴ PNC's explanation for what happened is the subject of the second step of the *McDonnell Douglas* analysis. But the Panel does not get to that step here because Mr. Manuel has not shown all three parts of a prima facie case of discrimination.

disparate treatment when someone is treated in a “markedly hostile” manner that was objectively unreasonable.¹⁵

Here, the Panel does not find that Mr. Manuel has met his burden of proof to show that the way Ms. Zamora said “I hope you have a nice day” was said in a markedly hostile manner. Indeed, Mr. Manuel repeatedly characterized Ms. Zamora’s tone of voice to be sarcastic. Setting aside Ms. Zamora’s repeated denials that she was being sarcastic, the Panel is unconvinced that in the circumstances here, saying “I hope you have a nice day” in a sarcastic way rises to the level of discrimination in violation of the DEAL.

The Delaware courts have identified three factors found to be relevant to determining whether behavior is “markedly hostile”: (1) was the conduct profoundly contrary to the manifest financial interests of PNC; (2) was the conduct “far outside of widely-accepted business norms”; and (3) whether the conduct was so arbitrary, that it “supports a rational inference of discrimination.”¹⁶ These factors, when considered as a whole, need to support the inference that Ms.

¹⁵ *Hadfield’s Seafood*, 2001 WL 1456795, at *5 (recognizing that the courts have found disparate treatment if it is shown that the complainant received services in a markedly hostile manner that a reasonable person would find to be objectively unreasonable) (citations and quotations omitted).

¹⁶ *Dover Downs, Inc. v. Lee*, 2012 WL 2370379, *8-*9 (Del. Super. May 31, 2012) (citations omitted).

Zamora's conduct was motivated by discrimination.¹⁷

It is here that the Panel finds that—even assuming Mr. Manuel's version of the events to be true (that is, Ms. Zamora was being sarcastic)—his case falls short.

The Panel addresses the three relevant factors in turn.

First. The Panel finds that sarcastic treatment of customers would not be in PNC's interests. But the Panel cannot further find that Ms. Zamora's allegedly sarcastic closing statement was so *profoundly* against PNC's interests that it warrants the inference of discrimination.

Second. There was no evidence shown by Mr. Manuel that Ms. Zamora was acting *far outside* of business norms. Stated another way, Mr. Manuel needed to show that Ms. Zamora's statement of "I hope you have a nice day" was said in an extraordinary way. This was not shown. The testimony about how Ms. Zamora said "I hope you have a nice day" was conflicting and, on balance, the Panel does not find that the evidence shows that Ms. Zamora's tone of voice was so extraordinary as to infer a discriminatory intent.

Last. There was no evidence presented that her allegedly sarcastic tone was *so arbitrary* that the Panel should infer that she was being discriminatory.¹⁸ Even

¹⁷ *Hadfield's Seafood*, 2001 WL 1456795, at *6.

¹⁸ The Panel notes that it was disputed whether or not Ms. Zamora was being sarcastic. While Mr. Manuel presented testimony from himself and two others that she sounded sarcastic, Ms. Zamora repeatedly denied being sarcastic. The Panel

giving Mr. Manuel the benefit of the doubt that Ms. Zamora was being sarcastic in response to Mr. Manuel not accepting Ms. Zamora's explanation that she could not perform the services he requested, a lapse of superior customer service does not warrant the inference that Ms. Zamora was motivated by discrimination in her conduct.

In sum, at best, Mr. Manuel only showed that Ms. Zamora was being sarcastic in response to his frustration that she could not provide the services he requested. In the circumstances here, the Panel cannot make the inference that Ms. Zamora's conduct was motivated by discrimination.

For these reasons, the Panel concludes that Mr. Manuel has not met his burden to show the third element of a prima facie case, and overall, his claims of discrimination under the DEAL fail.

CONCLUSION

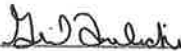
After careful consideration of the evidence and arguments presented, the Panel, by unanimous vote, concludes that Mr. Manuel has failed to prove that Respondent violated the DEAL.

need not decide which versions of the events to believe here because, even if Mr. Manuel's version of the events is true and Ms. Zamora was being sarcastic, her sarcasm alone does not support the inference of illegal discrimination.


ORDER

Pursuant to 6 *Del. C.* § 4508(g), the complaint against Respondent is **DISMISSED**. Each party shall bear their own fees, costs, and expenses.

IT IS SO ORDERED this 14th day of November, 2022.


Gail Tarlecki (Nov 7, 2022 17:24 EST)

Gail Tarlecki, *Commissioner and Panel Chair*


Dwayne J. Bensing (Nov 10, 2022 12:27 EST)

Dwayne J. Bensing, *Commissioner and Panel Member*


Doris Cooper (Nov 14, 2022 12:03 EST)

Doris Cooper, *Commissioner and Panel Member*