

1 The Florida Board of Chiropractic Medicine held a meeting on Friday, January 27, 2017, commencing at
2 8:30 a.m. This meeting was held at the Sheraton Suites Hotel at Cypress Creek, 555 NW 62nd Street, Ft.
3 Lauderdale, Florida 33309 (954) 772-5400, to which all persons were invited to attend. Participants in
4 this public meeting were made aware that these proceedings were being recorded and that an audio file
5 of the meeting will be posted to the board's website, <http://floridaschiropracticmedicine.gov/>
6

7 AGENDA

9 **General Board Business started: 9:06 a.m.**

11 **TO ORDER** (Roll Call):

12 The meeting was called to order at 9:06 by Dr. Fogarty.
13 Everyone introduced themselves.

15 **Board Members Present:**

16 Kevin Fogarty, D.C., F.I.C.A. (Hon), Chair
17 Danita Heagy, D.C., Vice-Chair
18 Christopher Fox, D.C., ATC (L)
19 Julie Hunt, D.C., DICCP
20 Kenneth Dougherty, D.C.
21 David Colter
22 Ruth Pelaez

24 **Board Staff Present:**

25 Dr. Anthony Spivey, Board Executive Director
26 Gail Curry, CPM, Program Operations Administrator
27 Savada Knight, Regulatory Supervisor/Consultant

29 **BOARD COUNSEL:**

30 Marlene Stern, Assistant Attorney General
31 Office of Attorney General

33 **PROSECUTION COUNSEL:**

34 Christopher Dierlam, Assistant General Counsel

36 **Physicians Recovery Network (PRN):**

37 Dr. Alexis Polles, Medical Director
38 Dr. Martha Brown, Associate Medical Director

40 **AUDIO/VISUAL:**

41 Vanguard Audio Visual
42 (941)334-3183

44 **II. APPROVAL OF MINUTES:**

46 **a. November 4, 2016 - Board Meeting**

47
48 **Action:** Motion to accept the minutes with correction was made by Dr. Heagy. Second by Dr.
49 Dougherty.

50
51 Dr. Dougherty has corrections on Page 8, line 34. Change "they must be a Chiropractor to work on

1 human beings” to “In Florida a chiropractor can work on an animal only under veterinary
2 prescription.”
3

4 Dr. Heagy – Page 9 line 39 -40 – Dr. Hunt will now be going in Dr. Heagy’s place.
5

6 Dr. Fogarty – Point of Clarification on page 9, line 1 was asked that there was going to be a
7 letter drafted by staff for board review concerning the veterinary course. Dr. Spivey drafted the letter and
8 sent it to Dr. Dougherty.

9 Vote: 7 yeas / 0 opposed; motion carried
10

11 **III. FINAL ORDER ACTION:**

12 **a. VOLUNTARY RELINQUISHMENT:**

13 **i. Harold Pompey, D.C., Case No. 2016-24008**

14 Not present/Not represented by counsel

15 Dr. Fox is recused due to participation on the Probable Cause Panel.
16
17
18

19 Mr. Dierlam presented the details of the case. Respondent had an Administrative Complaint filed based
20 on respondents felony guilty plea, respondent being terminated from Medicaid and failure to report these
21 of a forementioned crimes. Respondent agreed to voluntarily relinquish his license. The department
22 recommends the Board accepts the relinquishment as a final resolution to this matter.
23

24 **Action:** Motion to accept Dr. Pompey’s relinquishment was made by Dr. Heagy. Second by Dr. Hunt
25 7 yeas / 0 opposed: motion carries
26

27 **ii. Juan A. Baro, R.C.A., Case No. 2016-17442**

28 Not present/ Not represented by counsel

29 Dr. Hunt is recused due to participation on the Probable Cause Panel.
30

31 Mr. Dierlam presented the details of the case. Respondent had an Administrative Complaint filed based
32 on sexual misconduct with a patient. Respondent agreed to voluntarily relinquish his license. The
33 department recommends the Board accepts the relinquishment as a final resolution to this matter.
34

35 **Action:** Motion to accept Juan A. Baro’s relinquishment was made by Dr. Dougherty. Second by Dr.
36 Heagy.

37 7 yeas / 0 opposed: motion carries
38

39 **iii. Anthony Cirruzzo, R.C.A., Case No. 2015-17379**

40 Not present/ Not represented by counsel

41 Dr. Fox is recused due to participation on the Probable Cause Panel.
42

43 Mr. Dierlam presented the details of the case. The department filed an
44 Administrative Complaint against the respondent after he was found guilty of patient
45 brokering, in violation of section 817 of the Florida Statutes. Respondent agreed to voluntarily relinquish
46 his license after his case was referred to the Division of Administrative Hearings. The
47 department recommends the Board accepts the relinquishment as a final resolution
48 to this matter.
49

1 **Action:** Motion to accept Anthony Cirruzzo's relinquishment was made by Ms. Pelaez. Second by Dr.
2 Dougherty.

3 7 yeas / 0 opposed: motion carries

4
5 **a. SETTLEMENT AGREEMENTS:**

6
7 **i. Stanton T. Cooper, D.C., Case No. 2014-07618**

8 Present/Represented by Robert Repeal of Repeal Law Firm

9 Dr. Fox and Dr. Hunt are recused due to participation on the Probable Cause Panel.

10
11 Mr. Dierlam presented the details of the settlement agreement. Count one alleges the respondent violated
12 F.S. 464.131 (q) by being unable to practice Chiropractic Medicine with reasonable skill and safety.
13 Count two alleges the respondent violated F.S. 456.0721(h) (h) by being terminated from PRN. The terms
14 of the Settlement Agreement include costs currently at \$6,076.95 payable within 30 days of his license
15 being reinstated as well as the respondent demonstrating his ability to practice. This demonstration
16 includes a PRN evaluation. Disciplinary guidelines for F.S. 464.131(q) allow for a minimum fine of
17 \$1,000, 3 year probation and a referral for a PRN evaluation up to a maximum of suspension of license
18 for 1 year, followed up to 5 year probation. F.S 456.0721(h) (h) requires a minimum of suspension until
19 compliant with contract, up to a \$1,000 fine, and/or permanent revocation. The terms of the proposed
20 settlement agreement are sustainably within the disciplinary guidelines and the indefinite suspension
21 protects the public interests. The respondent has agreed to pay costs associated with the prosecution.
22 Therefore the department asks the board to accept the settlement agreement as presented.

23
24 **Discussion:** Robert Repeal presented Dr. Cooper's situation. Dr. Cooper is ready to return to PRN. Dr.
25 Fogarty asked if Dr. Cooper would come before the board again when he had finished with PRN.
26 Response from Mr. Dierlam was yes.

27
28 **Action:** Motion to accept Dr. Cooper's settlement agreement was made by Dr. Dougherty. Second by Dr.
29 Hunt. 6 yeas / 0 opposed: motion carries

30
31 **IV. COMPLIANCE:**

32
33 **a. Nicholas W. Belletto, D.C., 2014-01708**

34 Present/Not represented by counsel

35
36 Ms. Stern presented the case. Mr. Belletto has finished most of his requirements of his settlement
37 agreement. There is still some question about 1 hour of continuing education requirement. Dr. Belletto
38 is asking for an extension to meet the requirement.

39
40 **Discussion:** Dr. Belletto presented an affidavit as proof of his completing a 3 hour course. This would
41 meet his requirement.

42
43 **Action:** Motion to terminate Dr. Belletto's probation was made by Dr. Dougherty. Second by Dr. Fox.
44 6 yeas / 0 opposed: motion carries

45
46
47 **b. Leonard J. Kronen, D.C., Case No. 2005-69017; 2008-14573 and 2010-05869**

48 Present/Not represented by counsel

1 Ms. Stern presented the case. Dr. Kronen was before the board to ask for his payments to be lowered for
2 the year 2017.

3
4 **Discussion:** Dr. Fogarty asked when the last payment was made. Dr. Kronen explained his need for
5 lower payments. His payment has been reduced several times. All requirements have been met except the
6 payment.

7
8 **Action:** Motion to approve the payment reduction to \$200 a month for 1 year, after 1 year the payment
9 should go back to \$400, after 1 year at \$400 then the payment will increase to \$600 was made by Dr.
10 Dougherty. Second by Dr. Hunt.

11 4 yeas / Dr. Fogarty and Ms. Pelaez were opposed; motion carries

12 13 **V. DECLARATORY STATEMENT:**

14 15 **a. National Provider Compliance Corporation**

16
17 Ms. Stern gave her professional opinion that this petition should either be denied or the board can
18 entertain it. Her recommendation would be to deny the statement as it does not meet the requirements for
19 a Declaratory Statement. Dr. Dougherty has some concerns that if the statement is denied it might put the
20 board in an anti-trust situation. Ms. Stern suggests that the board entertain the statement once it is written
21 in the proper format.

22
23 **Action:** Motion to deny the Declaratory Statement with option to revisit when the Declaratory Statement
24 is in the correct format according to Chapter 120 F.S. was made by Dr. Heagy. Second by Dr. Dougherty.
25 5 yeas / Dr. Fogarty and Ms. Pelaez were opposed; motion carries

26 27 **VI. PETITION FOR WAIVER OR VARIANCE:**

28 29 **a. Dr. Christopher Williams**

30 Not Present/not represented by counsel

31
32 Dr. Williams attended a course that was not approved by the Board. He is looking to have the Board to
33 approve this course for himself and Dr. Mickey Cohen.

34
35 **Discussion:** Dr. Heagy would like to see the syllabus to be sure what the content of the course is and how
36 many credit hours should be given.

37
38 **Action:** Motion to deny CE hours for Life because there isn't enough information to evaluate the content
39 of the course and how many credit hours he should receive. The board will consider another request for
40 waiver or variance if he submits it with the information needed was made by Dr. Heagy. Second by Dr.
41 Colter.

42 7 yeas / 0 opposed; motion carries

43 44 **b. Dr. Matthew Erickson**

45 Not Present/Not represented by counsel

46
47 Dr. Erickson attended a course that was not approved by the Board. He is looking to have the Board to
48 approve this course for CE hours.

1 **Action:** Motion to deny CE hours because there isn't enough information to evaluate the content of the
2 course and how many credit hours he should receive. The board will consider another request for waiver
3 and variance if he submits it with the information needed was made by Dr. Heagy. Second by Dr. Hunt.
4 7 yeas / 0 opposed; motion carries
5

6 **VII. PROSECUTION REPORT:**

7 **Case Inventory:**

10 Total Cases open/active in PSU:	70
11 Cases in Emergency Action Unit:	2
12 Cases under legal review:	24
13 Cases with probable cause recommendation:	17
14 Total Cases where PC has been found:	16

15
16 **Total Number of Cases Older Than One Year: 31**

17
18 **Action:** Motion to accept the prosecution report and continue to prosecute cases over 1year old was made
19 by Dr. Fox. Second by Dr. Heagy.
20 7 yeas / 0 opposed; motion carries
21

22 **VIII. APPLICATIONS PRESENTED FOR BOARD REVIEW:**

23 **a. Dr. David Norris**

24 Not present
25

26
27 Dr. Norris answered yes to the criminal history question on the application. Last conviction was in 2005.
28 He has a total of 5 convictions.
29

30 **Discussion:** Dr. Heagy made several points of interest to deny his application. Dr. Norris has made poor
31 judgment and he lied on his application. Dr. Fogarty did mention that he was impaired on several arrests.
32

33 **Action:** Motion to deny the application due to poor judgment, lying on his application and being impaired
34 on several of the arrests was made by Dr. Heagy. Second by Dr. Fox.
35 7 yeas / 0 opposed; motion carries
36

37 **b. Dr. Tinnakon Xalaratt**

38 Not present
39

40 Dr. Xalaratt had a malpractice claim against him in which he settled in 2014.
41

42 **Discussion:** Dr. Dougherty is in favor of granting the application as this was only 1 malpractice claim
43 that was settled out of court. Dr. Hunt is in agreement.
44

45 **Action:** Motion to accept the application was made by Dr. Dougherty. Second by Dr. Fox.
46 7 yeas / 0 opposed; motion carries
47

1 **c. Dr. Christopher M. Polk**

2 Present

3
4 Dr. Polk answered yes to the criminal history questions on the application.

5
6 Dr. Polk explained that he had a traumatic situation happen to him and poor judgments lead to his arrests.

7
8 **Discussion:** Dr. Dougherty asked how long it has been since Dr. Polk had a drink. Dr. Polk responded
9 that it has been 6 months.

10
11 **Action:** Motion to grant a conditional license based on Dr. Polk passing a PRN evaluation or being on a
12 contract for PRN was made by Dr. Dougherty. Second by Dr. Heagy.

13 7 yeas / 0 opposed; motion carries

14
15 **IX. RATIFICATIONS:**

16
17 **a. Licensure**

18
19i. Registered Chiropractic Assistant

20 License numbers 15836 – 16134

21
22 **Action:** Motion to accept ratification list was made by Dr. Heagy. Second by Fox.

23 7 yeas / 0 opposed; motion carries

24
25 **ii. Chiropractic Physician**

26 License numbers 11981 – 12047

27
28 **Action:** Motion to accept ratification list was made by Ms. Pelaez. Second by Fox.

29 7 yeas / 0 opposed; motion carries

30
31 **iii. Certified Chiropractic Physician**

32 License number 826 – 832

33
34 **Action:** Motion to accept ratification list was made by Dr. Fox. Second by Hunt.

35 7 yeas / 0 opposed; motion carries

36
37 **a. CE Providers and Courses approved by Committee Chair**

38
39 **Action:** Motion to accept the CE Providers and Courses approved by the CE Chairs was made by Dr.

40 Heagy. Second by Dr. Fox.

41 7 yeas / 0 opposed; motion carries

42
43 **X. CHAIR/VICE-CHAIR REPORT:**

44
45 Dr. Fogarty and Dr. Heagy have nothing to report at this time.

46
47 **XI. LEGISLATIVE DISCUSSION:**

48

1 a. Chapter 460

2
3 This will be reviewed later in the agenda.

4
5 **XII. EXECUTIVE DIRECTOR'S REPORT:**

6 Dr. Spivey gave his report as follows:

7
8 **b. National Board Chiropractic Examiners**

9 May 5 – 7 in Orlando

10 Dr. Fogarty will be the voting delegate and Dr. Hunt will be the alternate delegate.

11
12 **c. National Board Chiropractic Examiners (volunteers)**

13
14 May Part IV Examination, May 19 – 21 in Port Orange, Florida. Dr. Heagy will attend.

15 November Part IV Examination, November 10 – 12 in Port Orange, Florida. Dr. Fox will attend.

16 June Part IV Test Committee, in Port Orange, Florida. Dr. Hunt will attend.

17
18 **d. Federation of Chiropractic Licensing Boards 2017 Annual Conference**

19 May 3 – 7 in Orlando.

20
21 Dr. Fogarty, Dr. Hunt and Dr. Spivey will be attending.

22
23 **e. Federation of Associates of Regulatory Boards**

24
25 **f. Anti-Trust Issue**

26
27 The anti-trust issue was discussed and the email from Adrienne Rodgers was shared with the Board.

28 Ms. Stern, Board Counsel, gave the policy of the Board of Health which states if a board members are

29 sued in an anti-trust as a standalone claim then the Department of Health will pay for the representation

30 provided the board adopted and accepted board counsel's recommendation. The law is still developing.

31 However, in the event of financial damages being awarded, the department will not cover this.

32
33 **g. Letter to Honorable Rick Scott dated April 18, 2016**

34 For the board's information.

35
36 **h. Letter to Honorable Rick Scott dated December 6, 2016**

37 For the board's information.

38
39 **XIV. BOARD COUNSEL'S REPORT:**

40 **Ms. Stern gave the Board Counsel Report.**

41
42 **a. Fractional Hours**

43
44
45 CE Broker in not set up for fractional hours. The Board was asked how they felt about using fractional
46 hours.

1 There was discussion between Board Members and it was agreed upon that the rule would be changed
2 from 19.5 to read up to 19 hours.

3
4 **Action:** Motion to accept the rule be changed to up to 19 hours was made by Dr. Fogarty. Second by Dr.
5 Hunt.

6 7 yeas / 0 opposed; motion carries

7
8 Ms. Stern asked the Statement of Estimated Regulatory Costs question. Will these proposed rule
9 amendments have an adverse effect on small business.

10
11 The Board members are in agreement that is rule change would not have an effect on small business.

12
13 Will the proposed amendments be likely to directly or indirectly increase regulatory costs to any
14 entities, including Government, in excess of \$200,000 in the aggregate, in Florida, within one year of
15 implantation of the rules?

16
17 The Board members are in agreement that is rule change would not directly or indirectly increase
18 regulatory costs to any entities, including Government in excess of \$200,000 in the aggregate, in Florida,
19 within one year of implantation of the rules.

20
21 **Section XII ended at 10:10 a.m.**

22 **BREAK**

23 **Started at 10:15 a.m.**

24
25 Dr. Fogarty presented an attendee to make a request of the Board.

26
27 Dr. Lisa Tracy asked the Board for an extension until the end of 2017 to meet her CE requirements.

28
29 Ms. Stern gave her legal opinion to not accept this form of request. She did say this should be in the form
30 of a Petition for Waiver or Variance.

31
32 **Action:** Motion to extend Dr. Tracy's CE requirements until the end of 2017 was made by Dr.
33 Dougherty. Second by Dr. Heagy. 7 yeas / 0 opposed; motion carries

34
35 Mr. Colter also spoke to a doctor during the break in the same situation. The doctor isn't in the room at
36 this time. Dr. Fogarty said the doctor would have to make a Petition for Variance or Waiver.

37 38 **XV. COMMITTEE REPORTS**

39
40 **a. Budget – Mr. Colter**

41 Has nothing to report at this time.

42
43 Dr. Fogarty has a concern about moving the meetings once they have been scheduled. Dr. Dougherty
44 would like to keep the meetings in Orlando.

45 Dr. Heagy wanted to let the board know that her travel reimbursements have been caught up.

46
47 **b. Certified Chiropractic Physicians Assistants – Dr. Dougherty**

48 Everything is going well.

49

1 **c. Continuing Education – Drs. Heagy/Hunt**
2 Dr. Heagy and Dr. Hunt agree all is going well.

3
4 **d. Disciplinary Compliance – Dr. Fogarty**
5 Everything has been pushed through.

6
7 **e. Examination – Dr. Heagy**
8 Everything is going well. National Boards was addressed earlier in the agenda.

9
10 **f. Healthiest Weight – Dr. Hunt**
11 Next meeting is in September in Tallahassee. You will be notified of the dates from the department once
12 it is confirmed.

13
14 **g. Legislation – Dr. Heagy/Mr. Colter**
15 Dr. Heagy is asking the board look at the three main things that were proposed a year or two ago. This
16 being foreign grads and endorsement. Everything has been approved. Dr. Heagy would like to propose
17 they start with endorsement. Move this portion of the legislation forward first. This might move quicker
18 if it is done in small increments instead of a large package. Dr. Dougherty has some concern that the
19 whole chapter needs to be cleaned up and not done piece by piece.

20
21 **Action:** Motion to task Dr. Heagy with purging out the endorsement language from the statute, bringing
22 it back to the board, using the language that was already approved by the board, was made by Dr. Heagy.
23 Second by Dr. Hunt.

24
25 There was some discussion about breaking down the statute.

26
27 7 yeas / 0 opposed; motion carries

28
29 **h. Probable Cause – Drs. Dougherty/Fox/Hunt**
30 The probable cause meeting was a good meeting.
31 Next meeting is on February 7.

32
33 **i. Rules – Dr. Hunt**
34 There are some proposed rule changes. They will be addressed later in the meeting.

35
36 **j. Unlicensed Activity – Ms. Pelaez**
37 There has been 1 case since our last meeting in November.

38
39 **k. Outstanding Service Award – Dr. Heagy**
40 The board is always looking for people that have been volunteering to make a difference in the
41 community.

42
43 Back to part **XIII** Rules.

44
45 **XIII. ON-LINE CONTINUING EDUCATION PROPOSED RULES**

46 Rule changes for the online CE were worked on by Ms. Deborah Loucks and Dr. Hunt. Dr. Hunt gave an
47 explanation on how the Activator works. Dr. Heagy also examined this and finds it very useful.

1 **a. 64B2-13.004**

2 Dr. Dougherty did note that the online hours would be for general hours. Dr. Hunt will be sure “general
3 hours” are placed in the rule.
4

5 Paul Lambert, General Counsel for the Florida Chiropractic Association, introduced Kim Driggers, Co-
6 Counsel. Mr. Lambert addressed the board to commend the board on their hard work on this rule. Mr.
7 Lambert has some concern about the creditability of the person taking the online CE. The equipment or
8 computer you are using must be registered. Mr. Lambert will work to help find a solution to this issue.
9

10 **Action:** Motion to add “general hours” to the rule language was made by Dr. Dougherty. Second by Dr.
11 Hunt.

12 7 yeas / 0 opposed; motion carries
13

14 **Action:** Motion to accept the whole rule with the “general hours” added to the language was made by Dr.
15 Dougherty. Second by Ms. Pelaez.

16 7 yeas / 0 opposed; motion carries
17

18 Ms. Stern: The Board has voted to make substantive changes to incorporated rules of the Board of
19 Chiropractic Medicine. As the Board you are required to consider whether the changes to the forms will
20 be likely to have an adverse impact on small businesses.
21

22 The Board agreed it would not have an adverse effect.
23

24 Ms. Stern: Is this likely to increase regulatory costs to any entities including the government in excess of
25 \$200,000 within one year of implantation of the rules?
26

27 The Board agreed it would not have an adverse effect.
28

29 Ms. Stern: The proposed rule amendment will not have an adverse impact on small businesses and is not
30 likely to directly or indirectly increase regulatory costs to any entities including the government in
31 excess of \$200,000 within one year of implantation of the rules?
32

33 Vote:7 yeas / 0 opposed; motion carries.
34

35 **b. 64B2-16.003**

36 It was brought to the Board’s attention that in section a. there should be the word “offense” added to the
37 end of the sentence. So it should read “first offense.” There are some issues that need to be discussed
38 further.

39 *This rule will be tabled until the next meeting.*
40

41 **c. 64B2-16.001**

42 Board agrees that there will be no changes at this time.
43

44 **d. 64B2-16.0075**

45 Board agrees that there will be no changes at this time.
46

47 **e. 64B2-16.010**

48 Board agrees that there will be no changes at this time.
49

1 **XVI. OLD BUSINESS:**

2 Nothing at this time

3
4 **XVII. NEW BUSINESS:**

5
6 **a. Proposed 2018 Board Meeting Dates**

7
8 Dr. Spivey is requesting the board approval for the 2018 meeting dates. Dr. Spivey requested the dates
9 be emailed to him with the approval or rejection by the end of next week. Some members are waiting for
10 Association meetings to be set. These need to be set as soon as possible.

11
12 **b. Dr. Dougherty talked about the package that Mr. Lambert submitted. This is on two RCA's that have**
13 **been arrested because they are not licensed. RCA's do not have to be licensed in the State of Florida. Dr.**
14 **Dougherty feels the board should write a letter to the State's Attorney office in favor of the two people**
15 **being released from this arrest.**

16
17 **Action:** Motion to write a letter to the State Attorney's office, and include everyone that was included in
18 the original email, saying that the board's position is and always has been that an RCA's license is not
19 required for an employee to assist a Chiropractor Physician. Assisting a Chiropractor Physician with an
20 expired RCA license is not a crime was made by Dr. Dougherty. Second by Dr. Heagy.
21 7 yeas / 0 opposed; motion carries.

22
23 Dr. Dougherty will compose the email and get it to Dr. Spivey to send out.

24
25 **c. Record Monitoring (Dr. Fogarty)**

26 Ms. Stern presented a situation that there is a non-licensed Chiropractor that wants to do his required
27 community service by doing record monitoring. The board agreed that there are other means of
28 completing his obligation. He doesn't have the right to view patient records at this time.

29
30 **Action:** Motion to not allow this non-licensed chiropractor to do record monitoring as a means of
31 completing his required community service hours was made by Dr. Dougherty. Second by Dr. Heagy.
32 7 yeas / 0 opposed; motion carries.

33
34 Many licensed Chiropractors in the audience came forward to ask for extensions related to the CE
35 requirements.

36
37 The Board closed the requests.

38
39 64B2-13.007, F.A.C., addresses the 1year attendance to a Board meeting with discipline.

40
41 **Action:** Motion to revisit 64B13-13.007 was made by Mr. Colter. Second by Dr. Dougherty.
42 7 yeas / 0 opposed; motion carries

43
44 **XVIII. NEXT MEETING DATE**

45
46 **May 12, 2017**

47
48 **XIV. ADJOURNMENT:**

1
2
3
4
5
6
7

Action: Motion to adjourn the meeting was made by Dr. Heagy. Second by Ms. Pelaez.
7 yeas / 0 opposed; meeting adjourned.

The meeting was adjourned at 11:50 a.m.

DRAFT