



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS, REGION IV

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ATLANTA, GA 30303-8927

REGION IV
ALABAMA
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December 19, 2016

Mr. Wes Taylor
Superintendent
Lowndes County School District
1592 Normal Drive
Valdosta, GA 31601

Re: Complaint #04-16-1456

Dear Superintendent Taylor:

The U.S. Department of Education (Department), Office for Civil Rights (OCR), has completed its case resolution process of the above-referenced complaint filed on May 11, 2016, against the Lowndes County School District (District) in which the Complainant alleged that the District discriminated against his son (Student) on the basis of disability and engaged in retaliation. Specifically, the Complainant alleged that the District (1) denied the Student a free appropriate public education (FAPE) when, during the 2015-16 year, the District failed to provide services listed on the Student's Individualized Education Program (IEP) plan, specifically, occupational therapy (OT) and speech therapy; and (2) the District retaliated against the Complainant due to his advocacy on behalf of the Student by requiring him to pay tuition in order to continue enrolling the Student in the District for the 2016-17 year.

OCR investigated this complaint under the authority of Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended, 29 U.S.C. § 794, and its implementing regulation, 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability by recipients of Federal financial assistance; and Title II of the Americans with Disabilities Act of 1990 (Title II), as amended, 42 U.S.C. §§ 12131, *et seq.*, and its implementing regulation, 28 C.F.R. Part 35, which prohibit discrimination on the basis of disability by public entities. The District receives Federal financial assistance from the Department and is a public entity. Therefore, OCR has jurisdiction over this complaint.

Based on the above, OCR investigated the following legal issues:

1. Whether, throughout the 2015-16 school year, the District discriminated against the Student on the basis of disability and denied him a FAPE by failing to implement his IEP (i.e., speech and occupational therapy), in noncompliance with the Section 504 implementing regulation at 34 C.F.R. § 104.33, and the Title II implementing regulation at 28 C.F.R. § 35.130; and

2. Whether, at the end of the 2015-16 school year, the District retaliated against the Complainant by requiring him to pay tuition to continue enrolling the Student at the school for the 2016-17 year after the Complainant advocated for special education services for the Student, in noncompliance with the Section 504 implementing regulation at 34 C.F.R. § 104.61, and the Title II implementing regulation at 28 C.F.R. § 35.134.

During the course of its investigation thus far, OCR reviewed evidence submitted by the Complainant and the District and interviewed the Complainant and seven District staff members, including the Student's special education teacher (Teacher), the District's Special Education Director, the Student's speech language pathologist (Speech Pathologist), the Student's two occupational therapists, a consultant for the District (Consultant), and the District's Director of Information Technology and Accountability (IT Director).

A finding that a recipient has violated one of the laws that OCR enforces must be supported by a preponderance of the evidence (i.e., sufficient evidence to prove that it is more likely than not that unlawful discrimination occurred). As a result of this investigation, OCR determined that there is insufficient evidence to support a conclusion that the District failed to comply with Section 504 and Title II with respect to Issue 1 as it pertains to the provision of OT and Issue 2. Prior to the conclusion of the investigation, the District requested to resolve the remaining allegation in Issue 1 regarding the provision of speech therapy with the attached voluntary resolution agreement (Agreement). A description of OCR's investigation to date is below.

Legal Standards

The Section 504 regulation at 34 C.F.R. §104.33 (a) states that a recipient that operates a public elementary or secondary education program or activity shall provide a free appropriate public education to each qualified person with a disability who is in the recipient's jurisdiction, regardless of the nature or severity of the person's disability.

The Section 504 regulation at 34 C.F.R. §104.33 (b) states that provision of an appropriate education is the provision of regular or special education and related aids and services that (i) are designed to meet individual educational needs of persons with disabilities as adequately as the needs of persons without disabilities are met and (ii) are based upon adherence to procedures that satisfy the requirements of 34 C.F.R. §§ 104.34, 104.35, and 104.36. The implementation of an Individualized Education Program developed in accordance with the Individuals with Disabilities Education Act is one means of meeting the standard established in 34 C.F.R. §104.33(b)(1)(i).

The regulation implementing Section 504 at 34 C.F.R. § 104.61 incorporates by reference the Title VI implementing regulation at 34 C.F.R. § 100.7 (e), which states that intimidating or retaliatory acts are prohibited and that no recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Section 504, or because she/he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under the Section 504 regulation. The Title II regulation at 28 C.F.R. § 35.134 sets forth a similar prohibition.

To determine whether retaliation has occurred, OCR must find that: (1) the Complainant engaged in a protected activity; (2) the recipient had knowledge of the protected activity; (3) the recipient took adverse action against the Complainant subsequent to or contemporaneous with the participation in a protected activity; and (4) there is a causal connection between the adverse action and the protected activity. If all of these elements are established, OCR then examines whether the District had a legitimate, nondiscriminatory and non-pretextual reason for taking an adverse action against the Complainant.

Background

During the 2015-16 school year, the Student attended XXXXX grade at XXXXXXXX XXXXXXXX (Academy), a member of the Georgia Network for Educational and Therapeutic Support (GNETS),¹ after being referred to the program in 2010 due to behavioral issues. Prior to the start of the 2016-17 school year, the Complainant moved out of the District and enrolled the Student, along with the Complainant's daughter, in a nearby school district.²

Issue 1: Whether, throughout the 2015-16 school year, the District discriminated against the Student on the basis of disability and denied him a FAPE by failing to implement his IEP (i.e., OT and speech therapy).

The Complainant alleged that, since the beginning of the 2015-16 school year, the Academy failed to provide the Student with OT and speech therapy as designated in his IEP. The Complainant maintains that, while he did not know how often the Student was to receive these services or how often the District failed to provide them, he believes the District did not administer the appropriate number of sessions and failed to make up any missed sessions. The Student's IEP, dated XXX XX XXXX, which was in effect until it was updated in XXX XXXX, identifies the Student's primary exceptionality as XXXXXXX and his secondary exceptionality as Speech/Language Impairment.

Occupational Therapy

The XXX XXXX IEP provides for "OT – Consultative" at a frequency of XX minutes, once per month. The IEP includes the following description: "Current motor and cognitive skills have plateaued and are being addressed appropriately in the classroom. OT will continue on a consultative basis as needed basis to provide support to his teachers and classroom modifications when appropriate." The XXX XXXX IEP provides for the same duration and frequency of OT as the previous IEP and includes the following description: "OT (X/XXXX): OT will provide support in the classroom to address fine motor skills on a Consult basis." OCR interviewed the two individuals who served as the Student's occupational therapists throughout the 2015-16 year. The first (Therapist 1) served as the Student's therapist from August – December 2015, and the

¹ According to the GA Department of Education's website, GNETS programs provide "comprehensive educational and therapeutic support services to students who might otherwise require residential or other more restrictive placements due to the severity of one or more of the characteristics of the disability category of emotional and behavioral disorders (EBD)."

² The Complainant advised OCR that he moved out of the District for reasons unrelated to the issues in this complaint.

second (Therapist 2) served as the Student's therapist from January 2016 until the end of the school year. Both therapists explained that the Student's OT was to occur on a consultative, as-needed basis.

Therapist 1 described the IEP's specification of "XX minutes, 1 time per month" for OT as a "program issue" that did not accurately reflect the amount of therapy the IEP team determined the Student was to receive. Instead, she stated that the software that generates the IEP required an amount be entered under the "frequency" column for each service, and she selected the minimum available. However, she stated that she ensured the IEP specified the OT would be provided on an as-needed and consultative basis. Therapist 1 further stated that she informed the IEP team, including the Complainant, how the OT would be provided to the Student as prescribed in the IEP. As explained by Therapist 1, the OT was indirect and involved consultation between the Teacher and the therapist to discuss any classroom modifications necessary to meet the Student's needs. Therapist 1 said she visited the Academy every Friday and met with the Teacher on several occasions, but she did not recall an occasion when her services were requested.

Therapist 2 explained that the Teacher and Consultant were responsible for checking in with her if there was a specific need for the Student. She stated the Student's OT was not provided on a direct basis; rather, she remained in contact with the Teacher, including through email and by visiting the Academy every Monday, in case her services were needed. Therapist 2 recalled two occasions when she assisted in procuring classroom tools for the Student. Specifically, in XXX XXXX, the Consultant requested a XXXXXX for the Student, and in XXX XXXX, the Teacher requested XXXXXX XXXXXXXX.

OCR also spoke to the Teacher, who explained that the Student's OT involved her or the Consultant making a request to the therapist for a classroom modification and that the team discussed this process with the Complainant during IEP meetings. She stated that she had the therapists' contact information and also saw them regularly at the Academy. She also recalled requesting the therapists' services to acquire a XXXXXX and a XXXXXX XXXXXXXX for the Student. During an interview, the Consultant also explained that OT occurred on an as-needed basis, and she recounted an occasion where Therapist 2 helped her procure a XXXXXX for the Student.

None of the individuals OCR interviewed recalled the Complainant expressing a concern about the District's provision of OT to the Student. During a rebuttal call, the Complainant maintained that the District did not provide the Student's OT appropriately; however, he did not provide any additional information.

Occupational Therapy: Analysis and Conclusion

The Complainant alleged that the District failed to provide the Student with OT at the frequency delineated on the IEP. Although the IEPs in effect during the 2015-16 year denote a single XX-minute session per month of consultative OT, District staff explained the therapy was provided only on an as-needed basis through consultation between the therapists, the Teacher, and the Consultant.

Inconsistent language in an IEP does not necessarily equate to a denial of FAPE so long as the student is appropriately and consistently provided his or her services and the provisions of the IEP are understood by those who implement it, as well as by the student's parent/guardian. In this instance, District staff members were consistent in their descriptions of the District's process for providing OT to the Student as well as in their statements that staff explained this process to the Complainant. OCR did not encounter any evidence indicating that the District failed to provide OT or provided it in a way that did not align with the IEP. The evidence also shows that Therapist 2 was consulted for classroom modifications on at least two occasions and assisted in providing these modifications in the forms of a XXXXXX and a XXXXXXXX XXXXXX. Finally, the Complainant's unspecified belief that OT was not being provided was not substantiated in any way. Therefore, based upon a preponderance of the evidence, OCR is unable to establish that the District denied the Student a FAPE by failing to provide him with OT. Accordingly, OCR finds there is insufficient evidence to support a finding of noncompliance with Section 504 or Title II with respect to this allegation.³

Speech Therapy

The Student's XXX XXXX IEP provides for speech therapy at a rate of XX minutes, twice per week. This provision was modified in the XXX XXXX IEP to a single XX-minute session per week. OCR spoke to the Speech Pathologist, who explained that she provided the Student's therapy pursuant to the XXX XXXX IEP during back-to-back sessions once per week on XXXXXXXX. When asked whether the Student had missed any sessions throughout the 2015-16 school year, she stated that there were a "few" occasions that the Student did not attend because he was sick or because she had to attend to other responsibilities, such as trainings or IEP meetings of other students. She stated that she let the Teacher know in advance of any absence, that the number of times the Student missed therapy was "not significant" and never in consecutive weeks, and that if she were to have missed an excessive amount of sessions, the District would have hired a substitute. When OCR asked whether any of the Student's missed sessions had been made up, the Speech Pathologist said they had not.

During an interview with OCR, the Teacher stated that the Student had not attended "a couple of days" of speech therapy when he was sick and when the Speech Pathologist's schedule conflicted with the scheduled therapy sessions. While the Teacher did not recall the number of sessions the Student missed, she stated that none of the sessions were made up.

The Director of Special Education also submitted a statement to OCR regarding the District's provision of speech services to the Student. In it, she wrote:

During the time frame in which the XXX XX XXXX, IEP was in effect, [the Student] received two Speech Impaired sessions, back to back, each scheduled day that school was

³ Although OCR did not find evidence of noncompliance with regard to the provision of OT pursuant to the Student's IEP, OCR did note that the inconsistent language used to designate the frequency of OT (e.g., "XX minutes, 1 time per month" vs. "consultative basis as needed") may have caused confusion. Accordingly, OCR has provided the District with technical assistance regarding the importance of clarity when drafting educational plans to ensure that related aids and services are appropriately and consistently provided.

in session except for XXXXXXXX XX XXXX (the Student was absent) and X days (X sessions total) in which his speech therapist had other duties in the system (testing a student, observing a student, attending an IEP meeting; XX/XX/XXXX, X/XX/XXXX, and XX/XX/XXXX respectively).

The Special Education Director stated that she determined the Student missed the above-referenced therapy sessions based on a review of the Speech Pathologist's data sheets and through conversation with her. According to the Special Education Director, while service providers in the District are not required to maintain logs of the services they provide, the Speech Pathologist did. The Special Education Director also stated that the Student's missed therapy sessions were not made up, and it was typically not the case that a service provider would make up a missed session with a student. OCR did not receive any evidence indicating the District provided compensatory services for any missed speech therapy sessions.

Speech Therapy: Analysis

OCR generally finds that a school district's failure to implement key aids, services, or accommodations/modifications identified in the IEP or Section 504 plan of a student with a disability denies the student a FAPE and, thus, violates Section 504 and Title II. Not every failure to implement an aid, service, or accommodation/modification in a plan, however, automatically constitutes a denial of an appropriate education. OCR takes into consideration the frequency of the failure to implement and what impact the failure had on the student's ability to participate in or benefit from a school district's services, programs, and activities. Interruptions in related aids and services due to a student's or provider's absence may impact the student's progress and performance and result in a denial of FAPE. A district policy or practice that allows for a service provider to not document the services they provide or to not make up missed services could therefore contribute to a denial of FAPE. Accordingly, districts should take steps to appropriately document, monitor, and respond to (e.g., schedule make-up services) any interruptions in order to ensure the continued provision of FAPE.

OCR has not obtained enough evidence (e.g., service logs and the Student's attendance records) to establish the number of days the Student missed speech therapy. However, the evidence OCR has obtained thus far in its investigation regarding the provision of speech therapy to the Student, as well as District-wide practices relating to documenting and responding to missed therapy sessions warrants entering into a 302 voluntary resolution addressing both issues. Specifically, District staff acknowledged the Student did not attend multiple days of therapy due to conflicts between the Speech Pathologist's schedule and the Student's regularly-scheduled XXXXXX sessions. The Special Education Director detailed four occasions the Student missed his back-to-back therapy sessions, the equivalent of XXXXX regular sessions:⁴ XXXX because the Student was absent and XXXXX times because of schedule conflicts. According to the Teacher, Speech Pathologist, and Special Education Director, these sessions were not made up. While the Speech Pathologist stated that the District would have hired a substitute were she to have been absent for an extended period of time, the Special Education Director stated that it was not typical for a

⁴ The Student's XXX XXXX IEP, which provides for two XX-minute sessions of speech therapy per week, was in effect during the dates identified by the Special Education Director.

service provider to make up a missed session. Additionally, the District indicated that it did not require service providers to maintain logs of the services they provide.

Resolution Agreement

The District has agreed to remedy these compliance concerns with the attached Agreement. The Agreement requires the District to: (1) determine the amount of time the Student did not attend his scheduled speech-language therapy sessions throughout the 2015-16 school year and for which the District failed to provide makeup services; (2) send the Complainant, via certified letter, written correspondence offering to provide the Student with compensatory speech-language services equaling the amount the Student did not receive; and, (3) if the Complainant accepts the offer, provide compensatory speech-language services to the Student.

The Agreement also requires the District to coordinate with OCR a mutually-convenient time and date for OCR to provide training to District administrative staff and special education service providers (including speech-language pathologists) regarding the District's responsibilities under Section 504 and Title II, including the District's responsibility to take steps to appropriately document, monitor, and respond to (e.g., schedule make-up services) any interruptions to the provision of a student's related aids and services caused by the unavailability of a service provider or other circumstances within the District's control that could potentially deny a student FAPE.

Issue 2: Whether, at the end of the 2015-16 school year, the District retaliated against the Complainant by requiring him to pay tuition to continue enrolling the Student at the school for the 2016-17 year after the Complainant advocated for special education services for the Student.

The Complainant alleged that, after moving out of the District at the end of the 2015-16 school year, he spoke to a District administrator who advised him that if he wished to continue enrolling the Student and his daughter in a District school, he would need to pay \$XXXX. The Complainant, who is a XXXXXX XXXXXXXX in Lowndes County, asserted that he was aware of other individuals living outside District boundaries who were exempted from paying tuition because they were county employees.

Protected Activity and Knowledge of Protected Activity

To be protected from retaliation, an individual must have engaged in a "protected activity." An individual engages in a protected activity if he or she opposes any act or policy that is believed to be discriminatory or unlawful under one of the civil rights laws that OCR enforces, or similar activities, such as advocating for rights guaranteed by these regulations. The protected activity can also take the form of making a complaint, testifying, assisting, or participating in any manner in an investigation, proceeding, or hearing conducted under any of the civil rights laws that OCR enforces.

OCR's review of documentation obtained during this investigation included an XXXXXX XX XXXX, email the Complainant sent to District staff, including the Special Education Director,

stating, in part, “over the past few years [the Student] has attended this school I have asked about more support for his behavior and haven’t received it . . . I would also like to go over his IEP to make sure that the goals that were set have been reached . . .” Additionally, the XXX XXXX IEP notes a concern the Complainant raised regarding the qualifications of the service providers working with the Student.

Based on this information, OCR determined that the Complainant engaged in protected activities in XXX and XXXXXX of XXXX and that the District had knowledge of these protected activities. Therefore, OCR proceeded to the next step of its analysis – whether the District subjected the Complainant or Student to adverse action(s).

Adverse Action

In determining whether an action is adverse, OCR examines whether the recipient’s action significantly disadvantaged an individual in his or her ability to gain the benefits of the recipient’s program. Even if the challenged action did not meet this standard because it did not objectively or substantially restrict an individual’s opportunities, the action could be considered to be retaliatory if the challenged action could reasonably be considered to have acted as a deterrent to further protected activity, or if the individual was, because of the challenged action, precluded from pursuing his or her discrimination claims. To make this determination, OCR considers (on a case-by-case basis, in light of all the facts and circumstances) whether the alleged adverse action caused lasting and tangible harm, or had a deterrent effect. Merely unpleasant or transient incidents usually are not considered adverse.

The Complainant alleged that toward the end of the 2015-16 school year, while speaking to a District administrator, he was advised that if he wished to continue enrolling the Student and his daughter in District schools, he would need to pay the District \$XXXX in tuition fees. Although the Complainant could not identify which staff member provided this information, during a telephone conversation with OCR, the XX XXXXXXXXX stated that a District staff member may have advised the Complainant that he may need to pay tuition to continue enrolling his children in a District school. OCR considers such a requirement to constitute an adverse action and accordingly continued with its retaliation analysis.

Causal Connection

The next step of OCR’s retaliation analysis is establishing a causal connection between the protected activity and adverse action. To establish a causal connection between the protected activity and the adverse action, OCR considers: (a) closeness in time between knowledge of the protected activity and the adverse action; (b) change in treatment of the Complainant/Student after the District had knowledge of the protected activity; or (c) treatment of the Complainant/Student compared to other similarly-situated persons.

The Complainant engaged in protected activities in XXX and XXXXXX of XXXX; according to the Complainant, the District’s alleged adverse action took place around the end of the 2015-16 school year. Accordingly, OCR finds that there is a causal connection between the

Complainant's protected activity and the District's alleged adverse action based on closeness in time.

Legitimate nondiscriminatory reason

During an interview with OCR, the XX XXXXXXXXX stated that all students whose parents live outside of the District's boundaries must pay tuition, with the exception of parents or guardians who are District employees. Based on the above, OCR finds the District provided a legitimate nondiscriminatory reason for its actions regarding this allegation.

Pretext

Next, OCR reviewed the evidence to determine whether the District's articulated reason was a pretext for retaliation. Pretext may be shown when, among other things: (1) the District's reasons regarding why the Complainant was required to pay tuition were not believable; (2) similarly-situated individuals were treated differently; or (3) there is deviation from the District's procedures or other guidelines concerning the subject matter of the proffered legitimate, nondiscriminatory reasons.

OCR reviewed "Board Policy JBCB – Nonresident Students," which pertains to the payment of tuition for non-resident students. It states:

Children of Lowndes County residents shall receive priority placement in schools whenever practicable. Students, who are not lawful residents of the Lowndes County School District, as defined in board policy, may be allowed to enroll as a tuition student after meeting each of the following criteria:

1. The student, as defined as a lawful resident, shall reside with legal parent or guardian.
2. The amount of tuition per year will be set by the Board of Education based on whether or not the legal parent or guardian owns property in Lowndes County. Tuition as established by the Lowndes County Board of Education is subject to change due to budgetary constraints or discretion of the Boards . . .

The policy also explains that the District will approve or deny the application for a tuition-paying student after analyzing projected enrollment and funding for the following year, and an accepted student may only attend a school with available space.

During an interview with OCR, the XX XXXXXXXXX stated that every student whose parent or legal guardian is not a District employee and does not reside within Lowndes County boundaries must pay tuition and that tuition-paying students may attend a District school only on a space-available basis. He stated that the applicable tuition amount depends on whether a parent owns property in Lowndes County on which he or she pays taxes. If a parent does own property in Lowndes County but does not reside in it, the District requires tuition in the amount of \$2,400 per student per year, payable in two payments of \$1,200. If the parent does not reside or own property within county boundaries, the rate is \$3,500, also payable in two installments. With respect to the Complainant, the XX XXXXXXXXX stated that if the Complainant did not own

property in Lowndes County, then he would need to pay tuition in the amount of \$XXXX, i.e., \$XXXX per student for the year.

OCR also reviewed a list of students enrolled in the District for the spring 2016 semester who did not have a parent or legal guardian residing within, or employed by, the District. Of the 57 students listed, 47 paid \$1,200, 7 paid \$2,400, 3 paid \$1,750, and 1 paid \$600. The XX XXXXXXXXX explained that the individuals who paid \$1,200 and \$2,400 owned land in Lowndes County and paid for 1 and 2 semesters during the 2015-16 school year, respectively; the individuals who paid \$1,750 did not own land in Lowndes County and paid for one semester; and the individual who paid \$600 likely had land within Lowndes County, and the student either enrolled in a District school roughly halfway through the semester (and was charged only half the semester rate) or unenrolled from the District halfway through the semester (and was refunded half).

During a rebuttal call, the Complainant stated that he did not reside in Lowndes County or own land within it at the time he inquired about tuition for his daughter and the Student. Additionally, the Complainant could not identify any individuals with students enrolled in the District who lived outside the District, were not District employees, and did not pay tuition.

Issue 2: Analysis and Conclusion

The criteria for tuition payments for non-resident students laid out in Board Policy JBCB comport with the XX XXXXXXXXX proffered justification as to why the District would require payment from the Complainant should he continue to enroll his children in District schools. Specifically, because the Complainant is not a District employee and neither lived within District boundaries nor owned property within it at the start of the 2016-17 school year, District policy mandates a tuition payment in the amount of \$XXXX for two students per academic year. Moreover, the District provided evidence that all students enrolled in the District as of the spring 2016 semester whose parent or legal guardian lived outside of the District and was not employed by the District paid tuition.

Based on the above, OCR concluded that the District's proffered justification for requesting a tuition payment was not pretext for unlawful retaliation. Therefore, OCR concluded that there is insufficient evidence to support a conclusion that the District engaged in unlawful retaliation in violation of Section 504 or Title II as alleged.

This letter sets forth OCR's determination in an individual OCR case. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public. The Complainant may have the right to file a private suit in federal court whether or not OCR finds a violation.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. If we receive such a request, we will seek to protect, to the extent possible, any personally identifiable information, the release of which could reasonably be expected to constitute an unwarranted invasion of personal privacy.

Intimidation or retaliation against complainants by recipients of Federal financial assistance is prohibited. No recipient may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by the laws OCR enforces, or because one has made a complaint, or participated in any manner in an investigation in connection with a complaint.

This concludes OCR's consideration of this complaint, which we are closing effective the date of this letter. If you have any questions regarding this letter, please contact Mr. Daniel Sorbera, Investigator, at (404) 974-9466, or me, at (404) 974-9367.

Sincerely,

Ebony Calloway-Spencer, Esq.
Compliance Team Leader

Enclosure