

OFFICE OF COLLECTIVE BARGAINING
BOARD OF CERTIFICATION

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In the Matter of	:
	:
ORGANIZATION OF STAFF ANALYSTS,	:
	:
Petitioner,	:
	:
-and-	:
	:
THE CITY OF NEW YORK, THE NEW YORK	:
CITY HEALTH AND HOSPITALS CORPORATION	:
AND RELATED PUBLIC EMPLOYERS,	:
	:
-and-	:
	:
DISTRICT COUNCIL 37, AMERICAN FEDERATION	:
OF STATE, COUNTY AND MUNICIPAL	:
EMPLOYEES, AFL-CIO,	:
	:
Intervenor.	:
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Decision No. 1-2000
Docket No. RU-1206-96

DECISION AND ORDER

_____ On December 10, 1996, the Organization of Staff Analysts (“OSA”) filed a petition seeking to represent employees of the New York City Health and Hospitals Corporation (“HHC”) in the title of Supervising Systems Analyst (“SSA”). On July 24, 1997, HHC wrote a letter to the Office of Collective Bargaining (“OCB”) opposing the petition. On October 1, 1997, District Council 37, American Federation of State, County and Municipal Employees, AFL-CIO (“DC 37”) intervened. OSA and DC 37 share the representation of the underlying titles, Assistant Systems Analysts, Systems Analysts and Senior Systems Analysts.¹ On November 21, 1997 a pre-hearing conference was held. At the pre-hearing conference, the parties agreed to conduct surveys of the SSAs to

¹ See details, *infra*, at pp. 2-3.

determine whether the employees were performing managerial or confidential duties. On April 1, 1998, HHC withdrew its objection to the petition so long as certain employees would be ineligible for inclusion in bargaining. Subsequently, the parties agreed to the exclusion of the positions held by the following employees because they are managerial or confidential:

Janice Amato- North Central Bronx Hospital
Kevin Beauchamp - Central Office, Office of the Inspector General
Ollimpia Davidovici - Central Office
Sampson Efese - Central Office
Joel Lighter - Central Office
Ko Jin Liu - Central Office
Terrance Parris - Central Office
Valerie Presler - Kings County Hospital Center
Daniel Puiatti - Central Office
Edmund Seykere - Jacobi Hospital
D. San Augustin - Central Office
Bruce Thomas - Woodhull Hospital
Ronald Townes - Central Office
Lottie Samuels - Coler/Goldwater

Hearings were held on March 12, April 26, June 1 and July 13, 1999. Patricia Guthrie, Bonnie Ryan, Francena Bennett, Peggy Rose Viera, Paulette Knight, Ato Smith-Mensah, Mary Gonzalez and Mary Leung testified on behalf of OSA. William Platzek and Chatri Rusmeepongskul testified on behalf of DC 37. Post hearing briefs were filed by OSA and DC 37 on October 25, 1999 and October 27, 1999, respectively.

BACKGROUND

SSA Title History

The Systems Analyst titles were created in the early 1970's. From 1979 through 1988, a number of unions, including OSA and DC 37, sought to add by accretion the titles of Systems Analyst, Senior Systems Analyst, Assistant Systems Analyst and Supervising Systems Analyst to

their certifications. In Decision No. 12-94, the Board of Certification (“Board”) incorporated a stipulation, crafted by the parties, in its Order.

According to that stipulation, those in the titles Systems Analyst, Senior Systems Analyst and Assistant Systems Analyst were to retain their titles, were to be represented by OSA and accreted to Certification No. 3-88 (as amended).² New titles were created for employees who were to be represented by DC 37 and accreted to Certification No. 46D-75 (as amended):³ Systems Analyst (Finance) and Systems Analyst (EDP), Senior Systems Analyst (Finance) and Senior Systems Analyst (EDP), Assistant Systems Analyst (Finance) and Assistant Systems Analyst (EDP). Although parentheticals were added to the main titles of those represented by DC 37, the job specifications remained the same, *i.e.*, a Systems Analyst has the same job specification as a Systems Analyst (Finance) or Systems Analyst (EDP). OSA and DC 37 also agreed to withdraw their petitions to represent those in the title of SSA and not to seek representation of those employees for two years from the date of the execution of the stipulation.

Position Description: SSAs

According to the position description, SSAs are required to have a baccalaureate degree in a relevant field from an accredited college or university, a minimum of three years of experience in business, government, hospital, educational institution, or a non-profit organization in the development, analysis and implementation of systems and sub systems, manual and computer

² Certification No. 3-88 (as amended), held by OSA, *inter alia*, covers the titles of Staff and Associate Staff Analyst.

³ Certification No. 46D-75 (as amended), held by DC 37, *inter alia*, covers various accounting, statistical and computer-related titles.

applications with one year in a supervisory capacity. SSAs must also have knowledge of computer systems, familiarity with input data for machine operations, data processing programs and EDP equipment and systems applications. A satisfactory combination of education, training and experience is acceptable in lieu of the above. A master's degree in management, business administration, or approved related fields may be equated to a maximum of one year of required experience.

An SSA, under general direction, supervises a group of systems analysts working on a single project or simultaneously on a series of projects. They assign and review work and direct analysts in focusing their activity and assessment of priorities. Their major duties include:

1. Analyzes project problems and critical situations to develop alternate solutions; reviewing those presented by subordinates. Defines and implements decisions.
2. Schedules project assignments, determines priorities and evaluated performance systems analysts.
3. Directs, supervises and coordinates studies, surveys and analysis on operational systems and projects important to Corporate efficiency.
4. Reviews existing systems, identifies problems, bottlenecks and inadequate utilization of resources. Develops and recommends studies and analysis.
5. Directs the preparation, development, designs, modification and planning of complex systems, to effectuate Corporate optimization of human and material resources.
6. Reviews feasibility of automated systems, evaluates manual systems, and recommends courses of action, with respect to computer applications.
7. Supervises, coordinates and monitors implementation of systems and sub systems.
8. Develops training programs for implementation, and follows up systems to insure effectiveness and attainment of objectives.
9. Serves as a member of task forces established to cope with system wide problems. Organizes teams to administer projects or sub projects.
10. Supervises the systems analysts in the performance of their duties, makes recommendations regarding their performance and guides them to develop their proficiency and aptitudes.

SSA Witness Testimony

Patricia Guthrie has worked for HHC for thirteen years. Since 1998, she has been an SSA

assigned to Ancillary Services at the Cumberland Diagnostic and Treatment Center. She was hired as a PAA 1 and was promoted to a PAA 2 before assuming her position as an SSA. She is responsible for the day to day functioning of seven departments, and her daily schedule varies to accommodate high priority tasks. She types correspondence, requisitions, revisions of policy and procedure manuals and miscellaneous reports; she coordinates training and workshops for the Ancillary departments and acts as a liaison between Human Resources and the Ancillary departments; she negotiates service contracts with various companies for equipment and supplies and oversees all of the ordering and purchasing for the Radiology Department. She spends approximately thirty percent of her time typing at the computer. At the time of the hearing, Guthrie was earning \$38,000 a year. She has a high school diploma and has supplemented her education with additional courses.

Bonnie Ryan has worked for HHC for six years. She was hired as a Systems Analyst in the Quality Management Department at the Elmhurst Hospital Center. She was promoted to a SSA in 1997. The most significant portion of her time is spent generating analysis and graphs for patient satisfaction, patient education and patient complaints along with special projects for Risk Management and other departments. She is a facilitator for the Continuous Quality Improvement team by performing analytical work and coordinating, viewing and distributing patient education tapes. She also coordinates meetings of the Patient Satisfaction Work Group, collects and organizes data sent to the Health Association of New York, troubleshoots computer equipment malfunctions on a basic level and maintains a physician profiling database. At the time of the hearing, she earned \$36,000 a year. She has a Bachelor of Arts and is working on a master's degree. When she was a

Systems Analyst she was represented by OSA.

Francena Bennett is an SSA at Woodhull Hospital who has worked for HHC for 21 years. She started at HHC as an Office Aide, and had jobs as a Technical Support Aide, an Assistant Systems Analyst, a Systems Analyst and a Senior Systems Analyst. She has credits toward an associate degree and took a few classes in business administration. Her salary at the time of her testimony was \$44,656 a year. Bennett gave extensive testimony about her duties, which include the input of data, updating master computer files and generating computer reports for various departments. She also researches computer system problems and gives advice and assistance to computer users. She does not stage or install hardware or provide technical support. Bennett was a member of OSA prior to becoming an SSA.

Peggy Rose Viera has worked for HHC since 1974. She is currently an SSA in the Office of Internal Audits. She was a Systems Analyst, a Senior Systems Analyst before becoming an SSA in 1997. She has an undergraduate degree and earned, at the time of her testimony, approximately \$47,000 a year. She acts as a liaison between HHC and outside auditors by preparing the contracts and insuring that the HHC affiliates are cooperating with those outside auditors. She does not review the quality of the auditors' work, but insures that the auditors perform according to the terms of the contract and meets all EEO criteria. She is also responsible for calculating payments to the auditors based on predetermined criteria. When Viera was a Senior Systems Analyst, she was a member of DC 37, Local 1407. She testified that when she was a Senior Systems Analyst, she was performing the same duties as she performs now.

Paulette Knight is in the Claims Processing Unit at MetroPlus, a Medicaid HMO. She has

been an SSA since 1997. She has a Bachelor of Science in Business Management. She earns \$35,000 a year and supervises employees in the title of Computer Aide, Systems Analyst and Clerical Associate II. The majority of her time is spent helping the staff to enter claims into the computer system so that they may be “finalized” - either paid or denied. Her unit only performs the computer processing for the claims so that they may be finalized, they do not make the actual decision on whether a claim will be paid or denied. She assigns clerical work to support staff and utilizes the computer daily. She also reviews her subordinates’ work for accuracy.

Ato Smith-Mensah works in the Claims Service Unit at MetroPlus. He has been an SSA since 1997 and earns \$39,000 a year. He has an undergraduate degree and had taken courses towards a master’s degree. The primary function of the Claims Service Unit is to “audit the claims that the claims examiners in the Processing Unit has on a daily basis.” His unit reviews the output of the Claims Processing Unit to insure that the claims are processed correctly. He also works to resolve problems with providers so that claims may be approved or denied.

Maria Gonzalez has worked for HHC for 29 years. She is currently an SSA in the Cashier and Registration unit of the Finance Department at Gouverneur Hospital. At the time of the hearing, she was earning \$46,000 a year. Her primary duty is to supervise seven clerical associates (Level III), one Principal Administrative Assistant and nine cashiers. She interviews patients to determine financial assistance eligibility, and she prepares and submits reports based on those interviews to the comptroller. She also works with other departments to solve problems patients may have, whether it be making an appointment, lowering a fee scale or referring them to someone that can counsel them on whatever aid may be available.

Mary Leung has been employed at Gouverneur Hospital in the Patient Accounts Department for 11 years. In March of 1999, 60% of her duties were moved to the Property Office. She was a Senior Systems Analyst represented by DC 37, Local 1407 prior to becoming an SSA. She maintains the Prospective Payment System, tracks Medicare days for billing, authors reports and acts as the liaison between vendors and Gouverneur billing, *i.e.*, several times a week she sends a report to the vendors to let them know which patients are covered by Medicare so they can determine whom to bill. She is responsible for a daily census of the hospital residents and she is responsible for a quarterly report on the financial classes of the residents. She does the bank reconciliation once a month and makes a daily deposit of cash collections, including checks and insurance. She also updates patient payments and patient disbursement on the computerized system. At the time of the survey, she was earning \$47,000 a year.

William Platzek was the first witness to be called by DC37. He has been employed at Jacobi Hospital for nine years. He has a Bachelor of Fine Arts and took a year of COBOL programming courses. He was, at the time of his testimony, an SSA in the Nursing Administration/Nursing Education unit. He functions as the Novel network administrator for Jacobi and North Central Bronx Hospital. He ensures that the computer network servers at each hospital are operating. He also oversees ANSOS, a nurse scheduling program. If the staff has any problems inputting data or if a special report is needed, Platzek helps them. He is responsible for upgrading the server so that more work stations may be added and he also produces educational videos. He does not do any computer programming, but gives basic software classes to users.

Chatri Rusmeepongskul has worked in Hospital Information Systems at Coney Island

Hospital for one year. He estimates that a good percentage of his duties are to troubleshoot most computer related issues that arise. He is assigned to the computer Help Desk, where someone calls him with a computer problem and he tries to walk them through the various steps that he knows will work to fix the problem. If something cannot be fixed over the phone, he sends a computer specialist technician to correct the problem. OSA stipulated that his duties fall within the job specifications for the title Computer Specialist (Software), which is represented by DC 37. He earned, at the time of his testimony, \$32,000 a year.

POSITIONS OF THE PARTIES

OSA's Position

OSA argues that the title of SSA should be placed in its bargaining unit or, alternatively, there should be a self-determination election for the employees in the SSA title to determine which bargaining unit they wish to be a part of and which union they wish to represent them. OSA asserts that the most important and relevant factors to be considered in determining the appropriate unit for the SSAs are the community of interest of the employees and the determination as to which unit will assure the employees the fullest freedom in the exercise of the rights granted under the NYCCBL. It argues that the other factors are not relevant because there has been no collective bargaining for the title or the factors are the same for both units. It also argues that either accretion to OSA or a self-determination election would be consistent with past Board decisions.

OSA argues that most of the witnesses perform duties consistent with titles OSA already represents. It contends that unlike a police officer, and emergency medical technician, accountant or computer programmer, with distinct duties and qualifications, employees in the SSA title perform

a variety of functions. It states that none of the witnesses testified to performing work which could be considered Accountant's work and only two performed duties related to computer titles. It asserts that although those two may be performing computer work, they do not have the type of training or qualifications referred to in the job specifications of the titles represented by DC 37. OSA asserts that the DC 37 titles require degrees in accounting and computer science, which none of the witnesses had, but that related job requirements of OSA-represented titles are not so limited and cover a spectrum of degrees.

OSA states that a comparison of the list of current employees in the SSA title and the surveys shows that a significant number of employees who filled out the surveys are either no longer SSAs or no longer employed by HHC. However, it contends that about four times as many of the remaining employees in the SSA title would appear to have a community of interest with OSA-represented titles.

OSA claims that several of the specifications for titles represented by it are similar to those that the SSAs perform. It states that the specifications for the Staff Analyst title provide, among other things, that the "class of positions encompasses professional and supervisory work . . . in the preparation of agency budgets and the . . . preparation and conduct of . . . operational studies and analyses concerning the agency's organization and operations . . . May utilize computers in the performance of these duties." The educational requirements of the position are a master's degree in any of several areas, including economics, finance, accounting or business or public administration, or a baccalaureate degree and three years of experience, or a high school diploma and seven years of experience or the satisfactory equivalent. The Associate Staff Analyst job

specifications provides for similar tasks at a higher level.

The Planning-Scheduling Analyst job specifications provide that the purpose of the position is to “participate in the development and maintenance of Management Information Systems . . .” The educational requirements include a baccalaureate degree and two years of experience in phases of capital project implementation processes or the equivalent in training, education or experience. The Senior Planning-Scheduling Analyst “develops and maintains time and cost management information systems to assist . . . in planning, scheduling, control and evaluation of projects, programs and operations.” The educational requirements are basically the same as for Planning Scheduling Analysts. OSA states that both are HHC positions.

The Senior Health Care/Program Planner/Analyst title, which OSA states is also an HHC title, is involved in health care program planning, analysis and implementation. A baccalaureate degree in Business Administration, Engineering or Social Sciences, Health Care Specialization, Physical Science or related programs and four years of related experience or a master’s degree in the same areas with three years of related experience or a satisfactory combination of training, education and experience is required.

Alternatively, OSA asserts that none of the other factors which are considered to determine community of interest would seem to weigh heavily in favor of either party. It states that the wage rates of employees in units represented by both parties are within the same range as the SSAs and there was no compelling testimony as to interchange and contact, lines of promotion or organization of the departments where employees work. As for assuring the employees the fullest freedom of exercising the rights granted under the NYCCBL, OSA contends that too little emphasis has been

placed on the wishes of the employees and those employees should have the opportunity to select the union which will represent them. As for an election, it asserts the fact that the parties, HHC and the Board agreed to split the employees in the Assistant Systems Analyst, Systems Analyst and Senior Systems Analyst series shows the fungibility of these titles.

DC 37's Position

DC 37 argues that the community of interest of the SSAs is the only factor to be analyzed because the other factors are either the same for DC 37 and OSA or of no moment. It states that the testimony and the evidence presented clearly demonstrates that the SSAs should be accreted to the Accounting and Electronic Data Processing Unit that includes titles from both Local 1407 (Accounting) and Local 2627 (Computer).

DC 37 argues that of the eight witnesses OSA produced, only one could be said to be performing duties similar to titles represented by OSA. It states that the rest are performing either Accounting or auditing work or Computer work, or, in one case, high level clerical duties similar to that of a title represented by the Communications Workers of America. DC 37 also argues that 80% of the 51 relevant surveys show a community interest with work performed by members of DC 37. It states that the remaining surveys do not show a community of interest with work performed by OSA members.

For example, DC 37 argues that many SSAs perform duties similar to the following DC 37 titles: Computer Specialists, Computer Analysts, Computer Associates and Management Auditors. The job description for Computer Specialist (Operations) states:

Under supervision, with considerable latitude for independent action or the exercise of independent judgment, is responsible for providing management with state-of-the art technical assistance in all aspects of data processing operations. Provides

supervision or senior staff support of computer operations in a large-scale, multi-programmed mainframe computer environment, or the conduct of similar duties within a large network of distributed minicomputer and microcomputer systems.

The job description requires a baccalaureate degree and four years of satisfactory full-time computer operations experience, one year of which must have been in a project leader capacity or as a major contributor on a complex project or an associate degree plus six years of full-time computer operations experience. Education and/or experience equivalent to the above is satisfactory provided the candidate has four years of relevant experience and a high school diploma.

The job description for Computer Specialist (Software) states:

This class of positions encompasses highly technical or supervisory responsibilities for the design, implementation, enhancement and maintenance of software systems performed at varying levels of difficulty and with varying degrees of latitude for independent initiative and judgment.

The educational requirements are similar to those for Computer Specialist (Operations).

The job description for Computer Programmer Analyst states that the class of positions develops computer programs with ordinary or more than ordinary difficulty. The description requires an associate degree including at least 21 credits in computer science or a related computer field among other things, or the equivalent education and/or experience.

The job description for Computer Associate (Software) state that the class of positions encompass technical or supervisory responsibilities for the design, implementation, enhancement and maintenance of computer applications, systems or database programming and/or data communications systems performed at various levels of difficulty and with various degrees of latitude for independent initiative and judgment. The educational requirements are that the candidate must hold an associate degree or the completion of two years of study at an accredited college and

five years of satisfactory full-time paid experience or a baccalaureate degree and three years of satisfactory full-time experience or education and/or experience equivalent to the above so long as the candidate possesses three years of satisfactory full-time experience.

The job description for a Management Auditor states that under supervision, the employee will perform work in the conduct of complex and detailed financial, operational and management audits, including reviews of EDP systems and applies statistical sampling techniques and analyzes financial and other data. The educational requirements for the position include a baccalaureate degree including or supplemented by 24 credits in accounting, including advanced accounting and auditing courses and a valid Certified Public Accountant license or a certificate as a Certified Internal Auditor.

DC 37 contends that elections have been ordered in the past, where the petitioner and intervenor both share a community of interest. However, it argues that both the testimony and documentary evidence establish that DC 37 should represent the SSAs and no election should be ordered.

DISCUSSION

We must determine whether the title SSA should be added, by accretion, to one of two previously certified units. In making such determinations, we consider whether the title, because of its similarity or close relationship to the unit titles, would have been included in the unit at the time of the original certification.⁴

Title 61, § 1-02(j) of the Rules of the City of New York, formerly §2.10 of the Revised

⁴ Decision Nos. 12-95; 16-93; 15-87; 23-75; 39-69.

Consolidated Rules of the Office of Collective Bargaining (hereinafter "OCB Rules") states:

In determining appropriate bargaining units, the Board will consider, among other factors:

1. Which unit will assure public employees the fullest freedom in the exercise of the rights granted under the statute and the applicable executive order;
2. The community of interest of the employees;
3. The history of collective bargaining in the unit, among other employees of the public employer, and in similar public employment;
4. The effect of the unit on the efficient operation of the public service and sound labor relations;
5. Whether the officials of government at the level of the unit have the power to agree or make effective recommendations to other administrative authority or the legislative body with respect to the terms and conditions of employment which are the subject of collective bargaining;
6. Whether the unit is consistent with the decisions and policies of the Board.

We will first consider whether the new titles share a community of interest with one or the other of the existing units. When deciding whether there is a community of interest, we consider a number of factors, including but not limited to: the job duties and responsibilities of the employees; their qualifications, skills and training; interchange and contact; wage rates; lines of promotion; and organization or supervision of the department, office or other subdivision.⁵ This list is not exclusive and none of the factors necessarily is controlling. We consider each case individually and balance the various factors to determine where the greater community of interest lies.⁶

⁵ See, e.g., Decision No. 16-93 at 24 and the cases cited therein. See also, Decision Nos. 7-91; 11-90.

⁶ See, e.g., Decision Nos. 12-95, 16-93, 9-88; 15-87.

In the instant matter, each union has presented evidence that a community of interest exists between employees in its unit and employees in the title, and that it represents employees who have job responsibilities similar to the duties of those titles. Based on the job specifications, witness testimony and the surveys, the duties of the SSAs appear to be widespread and varied, with some sharing the responsibilities of those titles represented by DC 37 and others sharing the responsibilities of those titles represented by OSA.

The testimony and evidence presented shows that the salary ranges of employees in units represented by both parties are within the same range as the SSAs. Where the wages of the various groups are within the same range, this factor does not weigh in favor of either union.⁷ We also stress that the underlying titles are represented by both DC 37 and OSA and several of the SSAs that testified were represented by OSA or DC 37 when they were in those underlying titles.

Other factors to be considered in making unit determinations are the qualifications, skills and training required for the various titles. The SSA position description requires a baccalaureate degree in a “relevant field” and a minimum of three years experience in business, government, hospital, educational institution, or a non-profit organization in the development, analysis and implementation of systems and sub systems, manual and computer applications with one year in a supervisory capacity. Here, either party may sufficiently represent the SSAs. Although the titles mentioned by both parties have specific educational requirements that may differ from the SSAs, each party has put forth evidence to show that the required skills and training are similar to their own units, so much so that either party may satisfactorily represent the SSAs. For example, all of the specifications

⁷ Decision Nos. 12-95; 15-87.

require a high level of education, computer and professional skills.

Either of the units would be appropriate for the title. Where either of the petitioned-for units would be appropriate, the purposes and policies of the NYCCBL are best served by ascertaining the wishes of the employees in the title as to a determination of unit placement.⁸ Under these circumstances, the NYCCBL affords public employees the freedom to exercise their right to self-organization⁹ and authorizes the Board to conduct elections to determine the majority representative in an appropriate unit.¹⁰

Accordingly, we direct that DC 37 and OSA be named on the ballot in an election among employees in the title Supervising Systems Analyst. Those employees in the positions that have been designated managerial or confidential will be exempted from this election. We will add the employees in these titles to the bargaining unit represented by the union which receives a majority of the ballots cast. If either of the unions does not desire to participate in the election, it may have its name removed from the ballot upon written request filed with the Board within ten days after service of this Decision and Direction of Election.

ORDER

Pursuant to the powers vested in the Board of Certification by the New York City Collective

⁸ Decision No. 12-95.

⁹ Section 12-305 of the NYCCBL.

¹⁰ RCNY, Title 61, § 1-02(n).

Bargaining Law, it is hereby

DIRECTED, that as part of the investigation authorized by the Board, an election by secret ballot be conducted under the supervision of the Board, or its agents, at a time, place, and during the hours to be fixed by the Board, among the employees in the title Supervising Systems Analysts employed by the City of New York and related public employers subject to the jurisdiction of the Office of Collective Bargaining during the payroll period immediately preceding this Direction of Election (other than those employees who have voluntarily quit, retired, or who have been discharged for cause before the date of the election), to determine whether they desire to be represented for purposes of collective bargaining by District Council 37, AFSCME, AFL-CIO and thereby added to the bargaining unit covered by Certification No. 46D-75 (as amended), or by the Organization of Staff Analysts, and thereby added to the bargaining unit covered by Certification No. 3-88 (as amended); and it is further

DIRECTED, that those employees in the positions that have been designated either managerial or confidential will be exempted from the above-mentioned election; and it is further

DIRECTED, that either of the employee organizations may have its name removed from the ballot in the aforementioned elections by filing with the Board, within ten (10) days after service of this Direction of Election, a written request that its name be removed from the ballot.

Dated: New York, New York
March 9, 2000

STEVEN C. DeCOSTA

CHAIRMAN

GEORGE NICOLAU

MEMBER

DANIEL G. COLLINS

MEMBER