



Karen B. Salmon, Ph.D.
State Superintendent of Schools

April 20, 2018

Ms. Jessica Williams
Education Due Process Solutions
711 Bain Drive #205
Hyattsville, Maryland 20725

Ms. Trinell Bowman
Director of Special Education
Prince George's County Public Schools
1400 Nalley Terrace
Landover, Maryland 20785

RE: XXXXX
Reference: #18-091

Dear Parties:

The Maryland State Department of Education, Division of Special Education/Early Intervention Services (MSDE), has completed the investigation of the complaint regarding special education services for the above-referenced student. This correspondence is the report of the final results of the investigation.

ALLEGATIONS:

On February 20, 2018 the MSDE received correspondence from Ms. Jessica Williams, hereafter, "the complainant" on behalf of Ms. XXXXXXXXX and her son, the above-referenced student. In that correspondence, the complainant alleged that the Prince George's County Public Schools (PGCPS) violated certain provisions of the Individuals with Disabilities Education Act (IDEA) with respect to the above-referenced student.

The MSDE investigated the following allegations:

1. The PGCPS has not ensured that the Individualized Education Program (IEP) has identified and addressed the student's needs, since May 23, 2017, in accordance with 34 CFR §300.324.
2. The PGCPS has not followed proper procedures when determining the student's educational placement required by the IEP during the 2017-2018 school year, in accordance with 34 CFR §§300.114 - .116.

3. The PGCPS did not obtain the written parent consent required when revising the IEP to reflect that the student will receive instruction and assessment on alternate academic achievement standards, in accordance with Md. Code Ann., Educ. §8-405.
4. The PGCPS has not followed proper procedures when responding to a request to amend the student's educational record since, June 12, 2017, in accordance with 34 CFR §300.324.

BACKGROUND:

The student is twelve (12) years old is identified as a student with an Intellectual Disability under the IDEA and has an IEP that requires the provision of special education instruction and related services. The student attended XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX prior to attending XXXXX XXXXXXXXXXXX

During the time period covered by this investigation the student's mother participated in the education decision-making process and was provided with written notice of the procedural safeguards.

FINDINGS OF FACTS:

1. The IEP in effect at the start of the investigation period which was developed on November 2, 2016, identifies the student's primary disability as Intellectual Disability. It indicates that the student has needs in the areas of early literacy, math, written language, fine and gross motor, social pragmatics, communication, functional adaptive skills and behavior. The IEP documents the student's cognitive strengths and weaknesses and how they impact his ability to access the general education curriculum without the provision of special education. It also documents the significant modifications, accommodations and additional adult support that the student requires.
2. The IEP states that the student's reading fluency skills were measured at the pre-kindergarten level indicating that the student was able to do the following:
 - identify thirty-two (32) of fifty-four (54) letters within a field of thirty-four (34) choices,
 - identify fifteen (15) out of fifty-four (54) letters,
 - identify nine (9) out of thirty-nine (39) kindergarten words,
 - identify rhyming words and demonstrate picture recognition in sixteen (16) out of eighteen (18) trials,
 - identify initial and final letters in one (1) out of eighteen (18) trials, and
 - identify that his name begins with a "J" three (3) out of five (5) times with verbal prompts.
3. The IEP states that the student's reading comprehension grade level performance is at the kindergarten level, his math calculation skills are at a pre-kindergarten level and his writing

skills are at a pre-kindergarten instructional level. The IEP states that the student is unable to draw a person, write his name, or copy lines or shapes.

4. The IEP states that the student's articulation skills and his pragmatic language skills are below grade level. It states that he is mostly intelligible in his classroom environment and that when provided with visuals the student is able to socially interact with peers and adults, responding and asking a follow-up question. However, it also indicates that without the visuals, the student is only able to provide a one-word response and is not able to ask a question. The IEP reflects that with a communication device, the student consistently speaks using 3-word utterances to express his wants and needs.
5. In physical education, the student participates more readily in small group activities than with the whole group. Behaviorally, the student is functioning below his chronological age, however, he follows classroom routines with minimal verbal prompts. The school staff reports that the student checks his schedule without reminders, volunteers to help peers and adults with and without requests, responds well to motivation, peer and adult support, and relies upon visual and verbal prompting to participate in selected activities.
6. The IEP documents that the student is able to verbalize his toileting needs but that he needs assistance to clean himself thoroughly after a bowel movement. It also documents that during lunch, the student is able to open most containers, feed himself, and requires verbal prompting to clean up when lunch is complete.
7. The accommodations required by the IEP include:
 - Provision of a scribe;
 - Provision of a calculator;
 - Provision of a communication board;
 - Provision of extended time to complete work;
 - Provision of multiple or frequent breaks;
 - Provision of reduced distractions to the student; and
 - Provision of reduced distractions to other students.
8. The supplementary aids, services program modifications and supports required by the IEP, include:
 - Instructional: Daily use of manipulatives; modeling; wait time; picture symbols; communication symbols; staff needs to model a slow, clear speech production; repetition of directions;
 - Program: Daily break down of assignments into smaller units; altered/modified assignments; positive/concrete reinforcements;

- Physical/ Environmental Supports: Daily preferential seating; use of a slant board for writing and coloring; and
 - School Personnel/ Parental Supports: Daily additional adult support for toileting, prompting during instruction, including special area classes, breakfast, lunch, and during classroom centers and community based instructional trips assistive technology consultation.
9. The IEP includes annual goals in academic areas, as well as annual goals to address the student's needs in speech and language. The IEP indicates a goal for the student to increase his reading fluency by identifying ten (10) words accurately and by matching them to a picture. To increase his reading comprehension skills, the student is expected to answer "wh" questions accurately when a modified grade level text is read aloud to him. To improve his math calculation skills, the student is expected to be able to solve math problems involving addition and subtraction, when provided with a calculator and two verbal prompts.
10. The goal for speech/language articulation is to improve his intelligibility by producing 3-4 words with faded support. For increased pragmatic language skills, the student is expected to initiate conversations with peers and adults and maintaining social interaction over two turns. For overall improvement of his level of communication, the goal for the student is to improve sentence structure and expressive vocabulary by producing 3 to 4 word sentences with positional and descriptive words.
11. The IEP progress reports dated February 1, 2017, document that the student is making sufficient progress to meet the goals in reading with at least 76% accuracy, responding to "wh" questions with 77% accuracy. When identifying 10 words, reading the word verbally and matching the word to a picture, the student is progressing at a rate of 47% accuracy. In math, the student is progressing at a rate of 77% when using a calculator to solve addition and subtraction number problems. In the area of written language, he is able to use positional words 50% of the time. In speech/language, the student is able to initiate a conversation 50%-60% of the time.
12. The IEP documents that the student will participate in a special education classroom with a teacher and paraprofessional for modified instruction with extensions to the curriculum for all academic areas and for adaptive, functional, and independent living skills for nineteen (19) hours and thirty-five (35) minutes per week. With adult support, the student participates in lunch, recess, creative arts and physical education with non-disabled peers. The student receives consultative adaptive physical education, direct occupational therapy twice monthly, speech/language six (6) times monthly for thirty (30) minute sessions, and special education transportation services.

March 21, 2017 IEP Team Meeting

13. On March 21, 2017, the IEP team considered the results of a private assessment from Kaiser Permanente. Based on its review of this and previous assessments, the student's progress and the student's parent's input, the IEP team determined updated educational, psychological, speech/language, occupational therapy assessments were required, and an Autism specialist would observe the student in class as a part of completing the student's reevaluation.
14. The April 4, 2017 progress report in reading indicates the student is making sufficient progress with at least 60% accuracy. He is able to respond to "who" questions with 30% accuracy and "why" questions with 86% accuracy. In Universal Learning Systems checkpoint, the student was able to "who" questions correctly in nine (9) out of eleven (11) and "what" questions seven (7) out of eleven (11) questions accurately. The student is using the calculator to solve addition and subtraction problems with 77% and 58% accuracy.
15. The April 4, 2017 progress report also indicates that the student is making sufficient progress in identifying words with 90% accuracy. He is able to produce basic descriptive words in conversation 50-60% of the time, given one-to-one pointing prompts. The student has improved his social pragmatic skills with modeling and support by producing three (3) or more syllable words and becoming more efficient with high frequency words used in the classroom, such as the teacher's and classmates' names. The student is able to use pictures to compose a three sentence essay with 62% accuracy.

May 23, 2017 IEP Team Meeting

16. On May 23, 2017, the IEP team considered the results of the psychological assessment report which documented the student's history of a "genetic condition" where he has a full or partial extra copy of chromosome 21 (Down Syndrome).
17. Also on May 23, 2017, the IEP team considered the results of the psychological assessment report which indicated that the student's cognitive functioning was consistent with a child of three (3) years and two (2) months of age. The evaluator stated that the student's verbal, nonverbal and spatial abilities were consistent with the performance for a child of less than two (2) years seven (7) months of age. The student's adaptive functioning yielded results in the "well below average range."
18. At the May 23, 2017 IEP team meeting, the school psychologist provided recommendations within the assessment report which indicated that the student needed a classroom that provides sufficient structure and support to adapt instruction to match the student's instructional level and rate of learning, providing multiple opportunities for repetition, practice, feedback and check-ins for understanding and corrective feedback. The school psychologist further recommended that the student receive direct instruction of routine

adaptive behaviors and skills pertaining to his health and safety, community use, communication and social interaction.

19. The IEP team also considered the report of the speech/language assessment indicating that the student's listening comprehension and oral expression are consistent with a two (2) year old student. Receptively, the student understands basic nouns and verbs in the three (3) year age range. The student's vocabulary development is consistent with a student seven (7) years of age and is considered a strength of his expressive language skills. The student's understanding of qualitative, quantitative, and positional concepts is less than that of a five (5) year old student.
20. Also on May 23, 2017, the speech/language pathologist provided recommendations for the student that included verbal prompts, visual support, a modified academic curriculum with simplified language, and visual/picture support in all content areas and repetition of new information.
21. At the May 23, 2017 IEP team meeting, the team also considered the report of educational assessment, which states that the student's academic skills are "significantly below" his grade level in the areas of general knowledge, language, gross motor skills, writing, reading, math and phonemic awareness. The special education teacher further reported that in the areas of identifying body parts, articulation of final sounds, identifying personal data, rote counting and number comprehension, the student is performing "considerably below his age level."
22. On May 23, 2017, the IEP team further considered the report of an occupational therapy assessment which stated that the student's skills are "very low range." The occupational therapist further reported that he is beginning to recognize his name when choosing a nametag or to look at his schedule, but may choose another schedule if the student's name begins with the same letter. In the areas of identifying body parts, using a zipper and buttons, and other daily routines, the student is performing "considerably below his age level." The student needs self-opening scissors, a slant board, modified tools, alternative methods for labeling, visual schedules, fading prompts to promote independence, movement breaks, and modified clothing.
23. Also on May 23, 2017, the IEP team considered the report of an adapted physical education assessment which the physical education teacher reported the student excels in jumping, running, catching and striking a stationary ball. He has difficulty with galloping, hopping, leaping, kicking, throwing, underhand roll and dribbling. The adapted physical education teacher further reported that the student benefits from repetition of verbal cues, modeling and hand over hand demonstrations.
24. While the parents indicated that they believe the student's primary disability is Autism the IEP team determined that the student continues to meet the criteria for identification as a

student with an Intellectual Disability under the IDEA. There is no documentation that the IEP was revised to reflect the reevaluation results.

October 2, 2017 IEP Team Meeting

25. The IEP team convened to review the student's progress at the middle school where the student transitioned to the sixth grade in September 2017. The language arts teacher reported that the student's reading and language arts skills are emerging. The speech/language pathologist and the occupational therapist (OT) reported that the student's OT needs were being provided during therapy for speech/language and embedded in the daily curriculum.
26. At the October 2, 2017 IEP team meeting, it was documented that the student's mother is in disagreement with the disability code of Intellectual Disability that the IEP team from the student's previous school determined on May 23, 2017. The student's mother believes Autism is more reflective of the student's disability code, as identified by the private doctor's report from Kaiser Permanente on May 23, 2017. The parent's advocate questioned school staff about how special education is delivered at the middle school. The parent's advocate requested the student's expressive language goals indicate mastery of the student expressing himself without a communication device. She indicated the belief that the student needed to be able to articulate these words verbally, not through a device. The IEP team decided that the student requires a communication device to achieve the goal.

October 26, 2017 IEP Team Meeting

27. On October 26, 2017, the IEP team convened to review the student's progress. The IEP team agreed that the student needed a sufficient amount of time to acclimate to the middle school. The student's math teacher stated that the student is having difficulty identifying numbers zero (0) to five (5). Even with technology the student struggles to match and rearrange numbers to the correct position. The parent's advocate requested that the math goals be changed to focus on number identification. The math goal reflects that it was revised on October 26, 2017 to reflect that the student would identify numbers.
28. Also on October 26, 2017, the adapted physical education teacher reported that the student is engaged when he is able to work one-to-one with the teacher. A "peer buddy" was suggested for the student. In response to a request to increase special education hours, the adapted physical education teacher increased the student's physical education by thirty (30) minutes per month.
29. The parent's advocate suggested the student's special education hours be increased for related services. In response to the suggestion the OT services were increased. The team disagreed about the amount of progress the student was making on his communication goal. As a result, the IEP team agreed that a private speech/language assessment previously

scheduled will be used to target the student's current fluency and articulation skills and needs.

30. The IEP dated October 26, 2017, indicates the student's comprehension of reading material increased to a K.5 level. The student's math calculation skills are measured at a pre-kindergarten level. The student's writing skills are on a pre-kindergarten instructional level indicating that he is unable to draw a person, write his name or copy lines or shapes. The student's articulation skills are measured as below grade level.
31. The speech/language pathologist reported that with slow modeling, the student is able to consistently imitate two-syllable words, and has become more consistent with independent production of higher frequency two-syllable words. The student has difficulty producing multi-syllables that require a higher degree of motor planning.
32. The October 26, 2017 IEP states that the goals were revised for the student to improve his reading comprehension skills by answering "wh" questions accurately when given three (3) choices with one (1) verbal prompt. The criteria level was reduced from 85% to 65%. To improve his math calculation skills, the student is expected to be able to identify eight (8) out of ten (10) numbers from three (3) choices, which is a change from the previous goal that had the student solving math problems. The criteria for the written language goal decreased from 80% to 65%. The speech/language goals were condensed for the student to improve his expressive vocabulary by answering questions, engaging in conversation and responding with accuracy.
33. The IEP dated October 26, 2017 documents that the student will participate in a special education classroom with a teacher and paraprofessional for modified instruction in reading, math, science and social studies with extensions to the curriculum for all academic areas and for adaptive, functional and independent living skills for twenty-three (23) hours and forty-five (45) minutes per week and adapted physical education for three (3) hours and thirty (30) minutes per month. The student also receives OT for one (1) hour per month and speech/language therapy two (2) hours per month as related services with adult support, the student participates in lunch, recess, creative arts and adaptive physical education seven (7) times per month for thirty (30)-minute sessions with non-disabled peers. The student also receives weekly consultative speech/language therapy, adaptive physical education, occupational therapy, and special education transportation services.
34. The IEP team determined that the student should participate in an alternate assessment based on alternate achievement standards. The IEP team documented that the student is learning extended Maryland reading, math, and science content standards objectives. He requires explicit instruction in functional skills, extensive modifications of general education curriculum, instructional supports including physical prompting to access and participate in school, home, community and work environments. The IEP team documented that all IEP team participants were in agreement that the student is eligible to participate in the Maryland Alternate Assessments.

35. According to the Maryland Guidance for IEP Teams on Participation Decisions for the Alternate Assessments, the IEP teams are required to use a Participation Criteria and Checklist when identifying students with a “significant cognitive disability” for participation in the Maryland Alternate Assessments.
36. The Participation Criteria and Checklist was given to the parents at the end of the IEP team meeting to take home for consideration.
37. The IEP team considered but rejected placement within the general education environment with the use of supplementary aids and services since the student has significant needs in the areas of pre-academic, cognition, adaptive, personal-social, fine motor, and speech/language skills that cannot be effectively delivered in the general education and that allows for a smaller group setting, which allows for more individualized instruction.
38. The IEP team considered all assessment data from the most recent reevaluation, present levels of performance, progress report, attendance, input from the school team and the student’s parents.
39. The IEP team determined that no potential harmful effects in selecting the student’s least restrictive environment exist, the bus ride is less than thirty (30) minutes each way and the student will participate with non-disabled peers during lunch, at recess, assemblies, specials, physical education and music class.

February 12, 2018 IEP Team Meeting

40. On February 12, 2018, the IEP team convened to review observations completed by a Regional Specialist from the PGCPS Office of Special Education. The specialist observed the student twice during two separate days while following directions, during the transition to lunch, while at lunch and during math and reading and accessing curriculum and additional supports and being socially responsive to peers.
41. The audio recording of the February 12, 2018 IEP team meeting reflects that the Regional Specialist reported that the student is appropriately placed in the Community Reference Inclusion Program. She reported that the student does not need the more restrictive placement of a Regional Program where the curriculum is heavily laden with daily living skills, and daily routines. For students in this program there are no transitions, one teacher, and the population is mostly non-verbal students, allowing for little to no opportunities for peer interaction. Further, there are few if any opportunities for interaction with non-disabled peers.
42. The audio recording of the February 12, 2018 IEP team meeting reflects that the student’s parents expressed concern that the student has not mastered a goal since being on an IEP,

disagreeing with the school based team members that the student has made sufficient progress on his current goals.

43. There is documentation that the student's parents also refused to consent to the student's participation in the Community Reference Inclusion Program and in the Maryland Alternate Assessments.
44. On February 28, 2018, the school system staff responded to the mother's June 12, 2017 and February 20, 2018 requests to amend the student's record by agreeing to amend the prior written notice and rejecting remaining requests to amend the progress reports. In that response, the school system staff informed the complainants of the right to appeal the decision and to ask for reconsideration in writing to the Zone or High School Consortium Executive Director.
45. The March 27, 2018 progress report in reading, describes the student being able to answer explicit who, what and/or why questions related to the text by marking the correct answer in $\frac{2}{3}$ of the trials. In math, the student is able to identify numbers one (1) to five (5) with 80% accuracy, the goal indicates identifying numbers one (1) to ten (10) with 80 % accuracy.
46. The March 27, 2018 progress report in written language expression, indicates that when the student is provided with a picture and with verbal and gestural prompts he is able to select a topic and details to complete a template and he is able to match letters. In speech/language the student completes open-ended sentences using an interactive board, he is able to choose adjectives from a field of three (3), and is able to articulate three (3)-syllable words with 80% accuracy. In physical education, the student is able to jump over small cones, hop on both feet, and is working on galloping and hitting a ball on a tee.

CONCLUSIONS:

ALLEGATION #1 ADDRESSING THE STUDENT'S NEEDS

Based on the Findings of Facts #9, #10 and #32, the MSDE finds that the IEP contains goals that are designed to assist the student with accessing the general curriculum, consistent with the data. Thus, this office finds that the goals and the short-term objectives within the goals are designed to move the student towards mastery of those content standards from the student's present levels of performance, in accordance with 34 CFR §§300.34, and .101, .320, .323, and .324.

Based on the Findings of Facts #1-#12, #27,#28, #31 and #30, the MSDE finds that the IEP requires the provision of specially designed instruction, including content and assignments that are modified to reduce their complexity, ambitious but achievable in order to assist the student in making progress on the goals, in accordance with 34 CFR §§300.323 and.324.

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However, based on the Finding of Fact #24, the MSDE finds that the PGCPS did not ensure that the IEP was revised, as appropriate, to address the results of a reevaluation and the student's anticipated needs, in accordance with 34 CFR §300.324. Therefore, this office finds that since May 23, 2017, a violation occurred with respect to the allegation.

ALLEGATION #2 DETERMINING THE STUDENT'S EDUCATIONAL PLACEMENT

Based on the Finding of Fact #12 the MSDE finds that the IEP team considered a less restrictive environment with the provision of supplementary aids and services, and determined the least restrictive environment in which the IEP can be implemented based on the student's needs, in accordance with 34 CFR §§300.114-.116. In addition, based on the Findings of Facts #38, #39 and #41, the MSDE finds the IEP team considered potential harmful effects when making the placement decision, consistent with the data.

However, based on the Findings of Facts # 24, the IEP team based the placement decision on the student's IEP which did not contain current information, in accordance with 34 CFR §300.116. Therefore, this office finds that a violation occurred with respect to this allegation.

ALLEGATION #3 PROPER PROCEDURES FOR ALTERNATE ACHIEVEMENT STANDARDS

Based on the Findings of Facts #34 and #35, the MSDE finds that there was sufficient data to support the IEP team's decision determining that the student should participate in an alternate assessment based on alternate achievement standards.

However, based on the Finding of Fact #36, the IEP team did not obtain written consent as required by the IEP, in accordance with Md. Code Ann., Educ. §8 405(f). Therefore, this office finds that a violation occurred.

ALLEGATION #4 PROPER PROCEDURES FOR REQUEST TO AMEND THE STUDENT'S RECORD

Based on the Finding of Fact #44, the MSDE finds that while the school system eventually responded to all of the requests for amendments, it did not do so in a timely manner, in accordance with 34 CFR §§300.618 and .619. Therefore, this office finds that a violation occurred.

Notwithstanding the violation, based on Finding of Fact #44, the MSDE finds that the student's mother was informed of her right to appeal the decision. Therefore, no student-based corrective action is required to remediate the violation.

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CORRECTIVE ACTION/TIMELINES:

Student-Specific

The MSDE requires the PGCPS to provide documentation by June 1, 2018 that the IEP team has reviewed and revised, as appropriate, the IEP consistent with the data obtained during the

May 23, 2017 reevaluation. If the IEP requires revision as a result of this review, the IEP team must also determine the compensatory services needed to remediate the delay in revising the IEP consistent with the reevaluation data.

The MSDE requires the PGCPS to provide documentation by the end of the 2017-2018 school year that the IEP team has revised the IEP to ensure that it is designed to assist the student with progressing through the general curriculum and with pursuing a Maryland High School Diploma or that it is taking steps to resolve.

School-Based

The MSDE requires the BCPS to provide documentation by the start of the 2018-2019 school year of the steps it has taken to ensure that XXXXXXXXXXXXXXXXXXXXXXXX and XXXXXXXXXXXXXXXX XXXXXXX staff properly implements the following requirements:

1. That the IEP present levels of performance are clearly stated and supported by data.
2. That all needs arising out of a student's disability are addressed through the IEP.
3. That students are not identified for instruction and assessment on alternate academic standards without parental consent or a due process hearing decision that permits such identification.

The documentation must include a description of how the PGCPS will evaluate the effectiveness of the steps taken and monitor to ensure that the violations do not recur.

Please be advised that both the complainant and the PGCPS have the right to submit additional written documentation to this office, which must be received within fifteen (15) days of the date of this letter, if they disagree with the findings of facts or conclusions reached in this Letter of Findings. The additional written documentation must not have been provided or otherwise available to this office during the complaint investigation and must be related to the issues identified and addressed in the Letter of Findings.

TECHNICAL ASSISTANCE:

Technical assistance is available to the parties by contacting Bonnie Preis, Compliance Specialist, Family Support and Dispute Resolution Branch, MSDE at 410-767-7770.

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Please be advised that both the complainant and the PGCPS have the right to submit additional written documentation to this office, which must be received within fifteen (15) days of the date of this letter, if they disagree with the findings of facts or conclusions reached in this Letter of Findings. The additional written documentation must not have been provided or otherwise available to this office during the complaint investigation and must be related to the issues identified and addressed in the Letter of Findings.

If additional information is provided, it will be reviewed and the MSDE will determine if a reconsideration of the conclusions is necessary. Upon consideration of this additional documentation, this office may leave its findings and conclusions intact, set forth additional findings and conclusions, or enter new findings and conclusions. Pending the decision on a request for reconsideration, the school system must implement any corrective actions within the timelines reported in this Letter of Findings.

Questions regarding the findings and conclusions contained in this letter should be addressed to this office in writing. The parties maintain the right to request mediation or to file a due process complaint, if they disagree with the identification, evaluation, placement, or provision of a FAPE for the student, including issues subject to this State complaint investigation, consistent with the IDEA.

The MSDE recommends that this Letter of Findings be included with any request for mediation or a due process complaint.

Sincerely,

Marcella E. Franczkowski, M.S.
Assistant State Superintendent
Division of Special Education/Early Intervention Services

MEF:sf

c: Kevin Maxwell
Trinell Bowman
Gwendolyn Mason
Jodi Kaseff
XXXXXXXXX
Dori Wilson
Anita Mandis
Sharon Floyd
Bonnie Preis