

NEW YORK STATE DEPARTMENT OF EDUCATION
OFFICE OF ADULT CAREER AND CONTINUING SERVICES

[REDACTED]

Petitioner

DECISION OF IMPARTIAL
HEARING OFFICER

Against

OFFICE OF ADULT CAREER AND CONTINUING
EDUCATION SERVICES (ACCES)

Respondent

Before: [REDACTED] Impartial Hearing Officer

The undersigned was designated by the State Education Department/Office of Adult Career and Continuing Education Services-VR (hereinafter, “ACCES” or the “the Agency”) to serve as Impartial Hearing Officer in the matter above.

After notice was given, a hearing was opened on [REDACTED] 2017 at the [REDACTED] District Office of ACCES-VR, [REDACTED] [REDACTED] New York, [REDACTED]. The hearing was scheduled to begin at 10:00 a.m. ACCES was represented by [REDACTED] District Office Manager, [REDACTED] the Petitioner and Consumer/Petitioner, represented [REDACTED] [REDACTED] and [REDACTED] testified on behalf of the Agency. [REDACTED] [REDACTED] testified in [REDACTED] own behalf.

Exhibits

- IHO 1 Notice of Hearing ([REDACTED] 2017)
- IHO 2 Due Process Request [REDACTED] /17)
- Agency A Case Note [REDACTED] /16
- Agency B Case Note [REDACTED] /16
- Agency C Case Note [REDACTED] /16
- Agency D Case Note [REDACTED] /16
- Agency E Web Page with Business Plan
- Agency F Email thread from [REDACTED]
- Agency G [REDACTED] Letter to [REDACTED] /17)
- Agency H Case Note [REDACTED] /16
- Agency I Case Note [REDACTED] /16
- Agency J Case Note [REDACTED] /17

Issue

Should the Agency's decision that denied [REDACTED] (the Consumer) request for Agency sponsorship to become a self-employed used car salesman be upheld?

Opening Statements

[REDACTED] stated that [REDACTED] came to ACCES because [REDACTED] wanted to start [REDACTED] own business selling used cars. [REDACTED] further stated [REDACTED] needed assistance with start-up costs, that included licensing, and can run up to \$8,000. [REDACTED] also said that [REDACTED] did everything that the Agency asked [REDACTED] to do; even complying with some requests that were not part of the protocol for getting the license to sell used cars. [REDACTED] further stated that no one at ACCES with whom [REDACTED] was dealing took responsibility for making decisions with respect to the services [REDACTED] sought. [REDACTED] was told about a committee; but [REDACTED] never had a chance to meet anyone from any committee to present [REDACTED] proposal. Ultimately, [REDACTED] received a letter from [REDACTED] that contained a denial of [REDACTED] request.

The Agency stated, through its representative, [REDACTED] that there is little doubt that [REDACTED] is good at selling cars; that [REDACTED] presents very well: and, that [REDACTED] is quite a salesman. [REDACTED] added, however, that the Agency could not proceed based on the information and documentation that they had. [REDACTED] further stated that [REDACTED] was sent to a consultant who felt that [REDACTED] did not have command of the "business part" of the used car business. [REDACTED] concluded saying that the consultant did not have information [REDACTED] needed to make a recommendation; that the Agency requires submission detailed information to ascertain whether [REDACTED] has an acceptable business plan before sponsorship can be approved; and finally, that [REDACTED] might not have the facility for a business plan.

Testimony

██████████ testified that ██████ has been working for ACCES for two years and eight months. ██████ has been a rehabilitation counselor for 15 years. Nine of those years were spent working in a substance abuse program at Samaritan Village. Two subsequent years were spent at Interfaith Medical Center- where ██████ was a vocational rehabilitation counselor working with individuals with mental health disorders. ██████████ holds a Master's Degree in Vocational Rehabilitation Counseling; a license in mental health counseling; and, certification as an Alcohol and Substance Abuse Counselor.

██████████ ██████████ met ██████████ in ██████ 2016. ██████ testified that ██████ communicated very well, was calm, and maintained appropriate eye contact at that time. ██████ said that ██████ talked with ██████ ██████████ about ██████ work experience and learned from ██████ ██████████ that ██████ ██████████ was not able to complete a training program because ██████ doesn't like authority. (R.28) ██████ ██████████ asked for assistance in developing a used car business wherein ██████ would be ██████ own boss.

██████████ ██████████ told ██████ ██████████ that ██████ would have to go for a psychological evaluation. ██████ ██████████ went for the evaluation. ██████ ██████████ testified that results indicated that "██████████ cognitive ability is satisfactory." (R.29)

██████████ ██████████ met with ██████ ██████████ again on ██████████, 2016. ██████ supervisor, ██████ ██████████ ██████████ participated in the meeting. ██████ ██████████ told ██████ ██████████ and ██████ ██████████ that that ██████

was already buying and selling used cars from out of state; and [REDACTED] wanted to get a license so that [REDACTED] could “transport the cars legally.” (R. 31)

[REDACTED] testified that [REDACTED] told [REDACTED] that, “We would need to develop a business plan.” [REDACTED] further suggested to [REDACTED] that [REDACTED] meet with a business consultant, named [REDACTED] “to assess the feasibility of [REDACTED] plan.” (R.34) [REDACTED] described [REDACTED] as an independent consultant who initially assesses business plans for agency consumers/participants who want to be self-employed; and, who later works with those individuals to develop their businesses. (R.46)

[REDACTED] provided testimony about [REDACTED] case note dated [REDACTED]/16 and the documents attached thereto. The documents consisted of an updated report from [REDACTED] received by the Agency on [REDACTED] 16; and a follow up email from [REDACTED] that was authored on [REDACTED]/16. [REDACTED] recited language from page 8 in [REDACTED] report: “The threats we see for [REDACTED] ([REDACTED]) are not related to the used car industry in general but more regarding [REDACTED] ability to take criticism and be willing to run a business using standard business practices. We are not convinced that [REDACTED] fully understands the complexity and hard work necessary to keep an entity afloat and sustainable.” (R.41)

[REDACTED] recited additional comments from [REDACTED] report: “[REDACTED] understands the used car dealership industry, how it works, and what [REDACTED] wants to accomplish very well.” [REDACTED] referenced other comments in the report that note [REDACTED] other strengths – that include knowledge of requirements to become a second hand car dealer in great detail. (R.43)

█ █ and █ █ met sometimes after █ █ met with █ █ for the first time. █ explained that █ was concerned that █ drew conclusions about █ █ and █ idea without having information that █ thought was important. █ pledged to provide █ with additional information that █ thought necessary. (R.48)

█ █ offered a case note, dated █/16 and testified that █ █ █ █, and █ █ met on █ 2017 to discuss █ Self-Employment Evaluation report that the Agency received on █/17 following █ discussions with █ on █/16. During the meeting █ █ told █ █ that █ needed a feasibility business plan from █ that █ could take to “the Committee.” █ █ promised to provide additional information that the agency sought. (R.50)

█ █ testified that █ █ raised objections to █ conclusions when █ spoke with █ █ sometime after the █/16 meeting. █ █ subsequently provided █ with the “missing information.” Thereafter █ provided █ with a blank template form for a standard business plan that included step by step instructions for filling out the form. (R.51)

█ █ said that “█ █ then submitted █ plan to █ █ it was evaluated, and found not adequate to change the original report.” (R55) █ said that (Exhibit E) contained the documentation that █ █ provided to █ █ with respect to the template. (█ █ *objected to the admission and characterization of the Exhibit.* █ *stated*

that the documents in Exhibit E were provided to ██████ in September response to a request by ██████ at that time.)

██████ testified that ██████ then told ██████ in email, that ██████ would no longer work with ██████ because ██████ plan wasn't feasible. (R.61) ██████ testified that ██████ decided to keep working with ██████ towards ██████ goal after ██████ final email.

██████ testified that ██████ ██████, a marketing specialist and Agency employee, then referred ██████ to ██████ Business Solutions Center for assistance to help ██████ develop ██████ business plan. (R.64) ██████ told ██████ about ██████

Near or around ██████ 2017 ██████ told ██████ that ██████ met with someone at ██████ ██████ and that the people there did not provide assistance with writing business plans. ██████ then referred ██████ to a small business development center at LaGuardia College.

██████ testified that ██████ reported back to ██████ by ██████, 2018 to advise ██████ that LaGuardia College personnel told ██████ that LaGuardia does not provide the service of helping ██████ develop a plan. (R.74)

██████, ██████ and ██████ met on ██████/17, after ██████ filed ██████ Due Process Request for an Impartial Hearing to discuss ██████ case. They decided that ██████ would send ██████ the Agency's VS-70 form, (which was formerly called the VES-70),

for [REDACTED] to complete and resubmit, because all three wanted to “give [REDACTED] another opportunity.” (R. 79) [REDACTED] stated that ACCES first sent [REDACTED] the VS-70, “the actual form that ACCES uses”, on [REDACTED]/17, after [REDACTED] filed [REDACTED] Due Process Request. (R.79)

On cross-examination [REDACTED] testified that [REDACTED] initially sent [REDACTED] to [REDACTED] because [REDACTED] is a vendor who specializes in assessing and developing business plans. (R.87) [REDACTED] also agreed that [REDACTED] provided a response or a document in response to every question or issue raised by ACCES during the process. (R.92)

[REDACTED] testified that ACCES still has not made a final determination with respect to [REDACTED] application. (R. 93)

On Re-Direct examination [REDACTED] testified that [REDACTED] was retained to both assess [REDACTED] plan and help [REDACTED] to develop [REDACTED] plan. (R. 95)

[REDACTED] testified that [REDACTED] earned a Master’s Degree in Rehabilitation Counseling in 2001 from Hunter College. [REDACTED] has been working for ACCES for 15 years. [REDACTED] was a vocational counselor while working at Reality House before [REDACTED] started at ACCES. For [REDACTED] first thirteen years at ACCES [REDACTED] was a vocational counselor. [REDACTED] has been a Senior Vocational Rehabilitation Counselor for the last three years. [REDACTED] is also a Certified Rehabilitation Counselor.

█ █ first learned about the █ case in █ 2016 from █ █. █ met with █ █ for the first time, on █ 2016.

█ █ testified that █ spoke with █ █ via telephone on █/16. █ advised █ █ that █ plan could not move forward; and that █ would provide █ █ with resources in order for █ to try to get to work on █ self-employment plan. (R. 105) █ told █ █ that █ plan was deficient because █ plan did not provide information relating to income and marketing. (R.106)

█ █ testified that Agency form VS-70 is much more consumer friendly and required less detail than the form that █ █ required █ █ to fill out. (R.109) During a phone call on █/17 █ urged █ █ to fill out █ VS-70 form so that █ could present █ case to “the Committee.” █ █ chose not to fill out the VS-70 form. █ asked █ █ to submit the forms that █ previously provided to █ █ to the committee. (R.112)

On █/17 █ presented █ case to the committee. The committee consisted of █ █ Business Manager, █ █ Director of Counseling; █ █ Sr. Vocational Counselor; and, █ █ Sr. Vocational Rehabilitation Counselor. █ who is typically part of the Committee, recused █ because █ was advocating on behalf of █ █ █ told the Committee that █ █ is currently self-employed, buying, and selling used cars; and, that █ needs a license to make █ business legal. (R. 114) █ testified that █ presented █ assessment to the

committee. The committee did not approve the [REDACTED] plan. Notice of their determination was memorized in a letter dated [REDACTED] 2017. (R.117)

[REDACTED] further testified that [REDACTED] and [REDACTED] continued with efforts to get a plan approved for [REDACTED] after the Committee's decision. [REDACTED] asked [REDACTED] to send a VR-70 form to [REDACTED] on [REDACTED], 2017.

[REDACTED] has a Master's Degree in Rehabilitation Counseling from Hofstra University. [REDACTED] is a Certified Rehabilitation Counselor and is a licensed Mental Health Counselor. [REDACTED] has been working in the field for over 40 years. [REDACTED] has been with ACCES for more than 25 years. [REDACTED] is currently the manager of the district office.

[REDACTED] stated that during [REDACTED] tenure [REDACTED] has handled cases for individuals who sought sponsorship for self-employment. While the goal of self-employment is not frequent, getting a plan approved is very involved. [REDACTED] stated that an individual seeking sponsorship for a plan of self-employment must have both the skills necessary to do a job and acumen to run a business. [REDACTED] further stated that Agency policies and procedures limit the discretion of Agency counselors when an individual seeks a plan of self-employment. (R.124)

[REDACTED] testified that a major concern for the Agency was whether [REDACTED] had the experience and know-how to handle the administrative functions of the business. (R.125)

Specifically, the Committee needed to see projections regarding expenditures and income.

(R.126) [REDACTED] said that the Committee did not have sufficient information to approve

[REDACTED] self-employment goal. (R.129) [REDACTED] testified that the Committee had neither [REDACTED]

██████████ form, nor the Agency's form, when the Committee met. (R.132) The only document that the Committee received for consideration was Agency Exhibit E. █████ further stated that the Committee met without adequate information because █████ █████ self-employment plan. (R140)

████ █████ said that after the Committee issued its decision the Agency continued to try to get information it deemed necessary by sending █████ █████ a VES-70 form, █████ █████ did not send back the completed form. (R.143)

When asked about the role that █████ █████ played in the self-employment process █████ █████ said that █████ is paid to help applicants to develop their plans after the assessment phase. (R.202) Had █████ recommended approval after the assessment phase █████ would have worked with █████ █████ in the next step of developing a business plan. (R. 204)

██████████ testified that █████ has been in the used car business, without being licensed or insured, for many years. █████ said that █████ used about half of █████ \$800 monthly check to buy a car after █████ used █████ automotive repair skills to assess whether the car was worth fixing. If the car was worth fixing █████ would buy it, make some repairs, and sell it for \$1,000 or more. (R.150) █████ found that █████ efforts were often frustrated because █████ had no place to park the car overnight. █████ started driving cars from auctions for a car buyer to avoid the risks of getting tickets or having the cars █████ bought booted overnight. █████ said █████ came to ACCES for help getting a license to buy and sell used cars. (R.159)

██████████ testified that ██████████ required ██████████ to meet ██████████ a business consultant, because ██████████ had expertise in the demands of running a business that neither ██████████ nor ██████████ supervisor had. ██████████ believed that ██████████ role was to help ██████████ develop a business plan. (R.181)

██████████ met with ██████████ at the New York Public Library at ██████████ suggestion. (R.163) ██████████ testified that ██████████ asked ██████████ for three specific items: where ██████████ bought ██████████ cars; the proposed name of the business that ██████████ wanted to open; and, an address from which ██████████ would run ██████████ business. (R.164) ██████████ testified that ██████████ provided ██████████ with the requested documentation; and that ██████████ acknowledged receipt in an email. (R. 165)

██████████ testified that ██████████ called ██████████ after a period of time to ask about the status of ██████████ application. ██████████ told ██████████ that ██████████ gave ██████████ plan an unfavorable review because ██████████ failed to send ██████████ the documentation that was requested. (R165) Thereafter, ██████████ arranged for a teleconference that included ██████████ ██████████ and ██████████ told ██████████ and ██████████ that ██████████ would send a template form to ██████████ so that ██████████ could provide information necessary to make a feasibility determination. (R.169)

██████████ testified that ██████████ relationship with ██████████ was deteriorating by that point in time. ██████████ seemed to be interestingly unreachable over protracted periods of time. ██████████ requested that a new counselor be assigned to ██████████ case. ██████████ said that no one at the Agency was giving ██████████

any answers. (R. 172) [REDACTED] reached out to [REDACTED] to request help in getting [REDACTED] goal approved because [REDACTED] believed that both [REDACTED] and [REDACTED] stopped working on [REDACTED] case. [REDACTED] did not speak with either [REDACTED] or [REDACTED] after [REDACTED] began speaking with [REDACTED] (R.184)

Upon cross-examination [REDACTED] testified that [REDACTED] provided [REDACTED] with the three items that [REDACTED] requested; and that [REDACTED] acknowledged receipt. (R.179)

[REDACTED] told [REDACTED] that [REDACTED] would send a “complete package” to [REDACTED] within five days. (R. 179) [REDACTED] was able to reach [REDACTED] more than two weeks later. [REDACTED] advised [REDACTED] that [REDACTED] didn’t get a good review from [REDACTED] (R.180)

[REDACTED] told [REDACTED] that [REDACTED] sent the unfavorable review because [REDACTED] was missing documents. (R. 180)

[REDACTED] said that [REDACTED] ultimately decided that the only way to get results was to push the process from the counselors to the Committee. Getting a Committee decision would at least result in getting something in writing. (R.201)

Findings of Fact

[REDACTED] came to ACCES-VR seeking sponsorship for [REDACTED] goal of getting a license to realize self-employment as a second hand used car dealer. [REDACTED] Counselor, did not ask [REDACTED] to fill out a Self-Employment Planning Form (VR-70) before [REDACTED] referred

█ to █ an Agency approved consultant, for an independent evaluation, to determine the feasibility of █ goal.

█ met with █ on █ 2016. (Agency Exhibit B)

█ asked █ to provide █ with three pieces of information during █ meeting.

█ issues a report that was received by the Agency on or about █/16. (Agency Exhibit

B) The report was attached to a Case Note, dated █ 16. The report indicated, in part, that █

█ needed to provide additional information. The Case Note also includes a follow up

email from █ to █ █, dated █ 2016. In the follow up email,

█ stated that █ █ “has provided me with the information I requested at the

initial meeting.” There is nothing in the record to support █ █ testimony that █

█ failed to provide information to █ █ following their initial meeting.

On █/16 █ █ and █ met with █ █ to discuss the Self-

Employment Evaluation that █ █ submitted on █/16. There is no indication in the

record to support █ █ or █ █ saw or read █ █ follow-up email from

█/16.

█ █ sent an email to █ █ on █/16 with an attachment that was designated

as “a Standard SCORE accredited business plan template”. (Agency Exhibit D) The attachment

was intended to provide █ █ with a guide for providing and presenting information

that █ █ still needed to provide.

██████████ continued to stress that ██████ needed assistance with completing the paper work in the templates and with creating a written business plan in acceptable form. The essence of ██████ problem was rooted in ██████ desire to provide reasonable estimates that were not based on guesses. ██████ needed help in making the distinction. The Agency provided ██████ ██████ with several resources that proved to be the fruitless with respect to getting the assistance ██████ needed. ██████ ██████ grew frustrated with the delays in the application process. ██████ demanded that ██████ application move to the “Committee” in an effort to get some movement in ██████ application.

The Committee met before ██████████ 2017. The Committee had no forms to review. The Agency had not provided ██████ ██████ with a VR-70 (VES-70) before the Committee met. ██████ ██████ had not completed the template forms provided by ██████ ██████ ██████ ██████ report was not produced. ██████ follow-up email was not produced. The Committee denied ██████ ██████ application. There was no written decision by the Committee produced. ██████ ██████ provided notice to ██████ ██████ of the Committee’s decision on ██████████ 2017.

(Exhibit J)

██████████ filed ██████ Due Process Request after ██████ received written notice that the Committee denied ██████ application.

The Agency sent ██████ ██████ a VR-70 on ██████/17, nearly two months after the Committee denied ██████ ██████ request for Self-Employment Rehabilitation.

Discussion

No competent evidence was produced for the record that suggests ██████ ██████ lacks the knowledge, experience, or capacity to successfully engage in the business of buying and selling second hand cars. It is unfortunate that some gratuitous comments made by ██████ ██████ in ██████

initial report, that are of little probative value and are beyond the scope of [REDACTED] expertise, seem to have taken on lives of their own, sometimes out of context, in various Case Notes. It is troublesome that these comments continued to be repeated, to varying degrees, in new Case Notes, even though [REDACTED] walked back the comments in [REDACTED] follow-up email of [REDACTED]/16. It is troublesome for two reasons: first, repeating [REDACTED] comments from [REDACTED] initial report after [REDACTED] walked them back in [REDACTED] follow-up email suggests that the follow-up email was never read - even though it is attached to a Case Note; and secondly, [REDACTED] [REDACTED] could be unfairly stigmatized by the comments because they continue to be repeated in subsequent Case Notes.

1301.00 Self-Employment Policy designates the parameters of self-employment rehabilitation and the protocol for gaining approval of such plans. It establishes responsibilities that both the Agency and a Consumer/Participant, like [REDACTED] [REDACTED] must meet; and a process that must be followed.

At the outset 1301.00 Self-Employment Policy requires a counselor to acquire enough detail to get a comprehensive picture of the Consumer/Participant's business plan. This can be done by having the Consumer/Participant complete a Self-Employment Planning Form (VR-70) It can also be done by independent evaluation provided that the evaluation provides a complete description of the proposed business. It is incumbent on the Counselor to get the all questions that are more than mere guesses. The counselor must decide if the plan is feasible. The counselor can make a feasibility determination based on a review of the Self Employment Planning Form (VR-70) and [REDACTED] own experience; or after consultation with a supervising Senior

Counselor; or, by enlisting the help from a District Office Self-Employment Team (the “Committee”)

A Consumer/Participant also has the responsibilities under the Policy. The Consumer/Participant is required, in part, to complete the Self-Employment Planning Form (VR-70) or go through an independent evaluation. In essence, the applicant for Self-Employment rehabilitation has an obligation to provide accurate information that can be in the form of estimates but cannot be mere guesswork. Providing this level of detail helps the counselor to satisfy the counselor’s obligation to acquire the requisite level of detail to provide a comprehensive picture of the proposed business plan.

In the case at hand, [REDACTED] was retained to conduct an independent evaluation of [REDACTED] self-employment plan. Counselor [REDACTED] did not ask [REDACTED] to fill out a Form VS-70. [REDACTED] met with [REDACTED] one time. They met at a public library. [REDACTED] issued a report. [REDACTED] read the report. Shortly, thereafter, [REDACTED] sent a follow up email, on [REDACTED]/16, stating that several issues that [REDACTED] raised in [REDACTED] report had been favorably resolved through follow-up contact with [REDACTED]. [REDACTED] did not read the follow-up email that reported favorable resolution of several issues that [REDACTED] raised in [REDACTED] report.

One of the issues that [REDACTED] raised continued to be unresolved. [REDACTED] seemed unable to unwilling to provide [REDACTED] with a more granular estimate of projected costs and revenues. [REDACTED] had difficulty making a distinction between estimating and guessing; so [REDACTED] chose

not to provide any additional information without first getting help from resources [REDACTED] felt would be more qualified. The process came to a halt. [REDACTED] [REDACTED] moved on [REDACTED] [REDACTED] and [REDACTED] [REDACTED] were unable to proceed further.

[REDACTED] heard the term “Committee” from Counselors [REDACTED] and [REDACTED] [REDACTED] demanded the Committee hear [REDACTED] application for self-employment rehabilitation after becoming frustrated with the peace of the feasibility process and [REDACTED] perception that [REDACTED] assigned counselor was not working optimally on [REDACTED] application. There is nothing in the record that suggests any Agency employee encouraged or discouraged [REDACTED] [REDACTED] from enlisting the Committee to get a feasibility determination.

The “Committee” that met to discuss whether [REDACTED] [REDACTED] self-employment plan was feasible is designated in Agency policy as the Self-Employment Evaluation Team. (The term “Committee” will continue to be used herein because the parties have established it and the parties are familiar with it).

The Committee had little information on which they could base a feasibility determination when they met in [REDACTED] 2017. There was no Form VR-70. The Committee was not provided with a consultant’s assessment in the form of [REDACTED] initial report or follow up email. The Committee did not receive a proposed business plan. The only documents that the Committee saw were some documents that [REDACTED] [REDACTED] sent to [REDACTED] [REDACTED] that did not provide any input. [REDACTED] summed up the situation up best when [REDACTED] testified: “We had no information. So, on the basis of that, we couldn’t go anywhere.” (R.33)

On [REDACTED] 2017 VRC [REDACTED] sent [REDACTED] [REDACTED] a Self-Employment Planning Form (VR-70) with a request that [REDACTED] [REDACTED] return the completed document as soon as possible.

(Exhibit G) One is hard pressed to understand why the form, which includes requests for information that the Committee could use to make its decision, was not given to [REDACTED] [REDACTED] before the Committee convened. Failure to provide [REDACTED] [REDACTED] with a Form (VS-70), a document on which the Committee could base an informed decision, deprived [REDACTED] [REDACTED] a fair chance of getting approval for [REDACTED] Self-Employment request.

Decision

The decision of the [REDACTED] ACCES-VR Self Employment Committee is vacated. The Consumer/Participant may renew [REDACTED] request for plan approval, without prejudice, after [REDACTED] submits a completed Self-Employment Planning Form (VR-70)

Dated: [REDACTED], New York
[REDACTED], 2017

[REDACTED]
Impartial Hearing Officer

An Original or Copies of this Decision were mailed to:

Anne Sternbach
ACCES-VR
[REDACTED]
[REDACTED] New York [REDACTED]

[REDACTED]
District Office Manager
ACCES-VR
[REDACTED]
[REDACTED] New York [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] New York [REDACTED]