The Florida Department of Administration



Relubin Ott A

Wallace W. Henderson

May 4, 1978

Mr. James E. Hartz, Director Straight, Inc. 5000 Park Street, North St. Petersburg, Florida 33709

.... Dear Mr. Hartz:

> 76-A4-13-EB01; Project Straight, Inc.; Special Monitoring Report

The attached Special Monitoring Report has been developed by the Bureau in coordination with the Drug Abuse Section of the Department of Health and Rehabilitative Services.

Copies of this report have been sent to LEAA, DHRS, Mr. James T. Russell, and to the Pinellas County Criminal Justice Planning Unit. This report has not been made public, pending a response from you and pending the conclusion of Mr. Russell's investigation.

If I can provide you with any additional information, please let me know.

Charles R. Davoli Bureau Chief

K Haus Gro

CRD/JHD/mvs Attachment

cc: Mr. Norm Dodge

Mr. Lewis Taylor

Mr. Bill Hannon

Mr. James T. Russell

Mr. Frank Griffin

The Florida Department of Administration



Reubin O'D, Askew

Wallace W. Henderson

April 11, 1978

Honorable James T. Russell State Attorney Post Office Box 5028 Clearwater, Florida 33518

Dear Mr. Russell:

R. G. Whittle, Jr.

Re: Project Straight, Inc. (76-A4-13-EB01)

The enclosed special monitoring report on Project Straight, Inc. is provided for your information and whatever action you deem appropriate.

The Bureau of Criminal Justice Planning and Assistance is not taking any action on Project Straight, Inc. pending completion of your investigation.

If I can provide you with any additional information, please let me, or Dr. John H. Dale, Jr., know.

Charles R. Davoli Bureau Chief

Sinderely,

CRD/JHD/mvs Enclosure

cc: Ms. Chris English

Control: 76-A4-13-EB01

State of Florida Department of Administration Division of State Planning Bureau of Criminal Justice Planning and Assistance

SPECIAL ON-SITE MONITORING REPORT

PROJECT STRAIGHT, INC.; 76-A4-13-EB01

March 30, 1978

Tallahassee, Florida

CONFIDENTIAL

TABLE OF CONTENTS

	PAGI
I.	INTRODUCTION
II.	NEWSPAPER ARTICLES 2
III.	COMPLAINT BY MR. GEORGE E. STEVENSON
IV.	DHRS LICENSURE REQUIREMENTS 8
٧.	PRIOR BCJPA FINANCIAL/PROGRAM MONITORING 8
VI.	FINDINGS12
VII.	CONCLUSIONS AND RECOMMENDATIONS19
VIII.	ACTIONS23
APPENDI(CES
APPENDIX A - NEWSPAPER ARTICLES	
APPENDIX B - LETTER FROM MR. GEORGE E. STEVENSON	
APPE	NDIX C - SPECIFIC DHRS LICENSURE REQUIREMENTS
APPENDIX D - PRIOR FINANCIAL/PROGRAM MONITORING REPORTS	

ON-SITE MONITORING REPORT PROJECT STRAIGHT, INC.; 76-A4-13-EB01 MARCH 30, 1978

I. INTRODUCTION

A special on-site monitoring assessment was conducted on Tuesday, March 28, 1978 at Project Straight's offices at 5000 Park Street, St. Petersburg, Florida.

Monitoring personnel included: Dr. John H. Dale, Jr., BCJPA; Mr. Mack Gardner, BCJPA; Mr. Harry Moffett, DHRS Drug Abuse; Mr. James Holley, DHRS District V; and Mr. Wayman Bailey, Pinellas County MPU.

The City of St. Petersburg also had two representatives present:
Mr. Jeff Symons and Ms. Pat Rankin.

Mr. James Hartz, Executive Director of Project Straight, was interviewed as was Mrs. Helen Petermann, Program Director of Project Straight.

Questions were raised within four primary categories:

(1) Newspaper articles by Mr. William Nottingham,
St. Petersburg Times, alleging numerous improprieties/
criminal violations;

- (2) A written complaint by Mr. George A. Stevenson to Governor Askew (involving Mr. Stevenson's two daughters who are "enrolled" in Project Straight);
- (3) Specific time-based programmatic changes required by DHRS to meet drug abuse licensure requirements; and
- (4) Alleged nepotism (LEAA conflict of interest regulations) and lack of minority representation among clients and staff.

Additional peripheral questions evolved from these four primary issues and are shown where relevant, but not necessarily in the order in which they occurred.

The balance of this report is derived from information provided by DHRS district and central office staff, from former Project Straight Board members, and from previous BCJPA monitoring visits.

II. NEWSPAPER ARTICLES

Newspaper articles by Mr. William Nottingham, St. Petersburg

Times staff writer, were looked at back to Sunday, December 4,

1977. This article is entitled: "Straight: Six directors

have resigned, but drug program officials say lives are being saved (1B)".

The article begins as follows:

Since Straight, Inc. opened last year as Pinellas County's newest juvenile drug treatment program, at least six corporate directors have resigned to protest its management and treatment techniques.

One director has accused the nonprofit corporation of "misfeasance, malfeasance and non-feasance." The brunt of the criticism has fallen on Executive Director James E. Hartz.

. . . In a joint resignation last August, three directors said that neither Hartz nor Program Director Helen R. Petermann "have the necessary qualifications to rehabilitate preteens or teens who have a drug or alcohol problem. Furthermore, we feel we cannot recommend Straight, Inc. to our friends or citizens of our community."

Further on in the article, the following appears:

A former program volunteer also says that she, Hartz, and others once witnessed Mrs. Petermann maliciously kicking a youth who was passively resisting Straight officials. Hartz flatly denies the incident, as does Mrs. Petermann.

The next newspaper article is in the December 24, 1977 edition of the St. Petersburg Times and begins:

State health officials said Friday that a private Pinellas County drug treatment program may have illegally held some juvenile clients against their will. But as a result of their continuing investigation into Straight Inc., the officials said the "procedure" in question "has been suspended."

The following is contained in a newspaper article stamped February 4, 1978:

The leader of a St. Petersburg counseling group endorsed Straight Inc. Friday and accused state officials of investigating the juvenile drug-treatment program out of selfish motives.

. . . Reached in Tallahassee, Marshall said HRS is investigating Straight "for a very sincere reason . . . there was

concern expressed about the safety of children (in the program)."

HRS began examining Straight after a series of articles in Times quoted a youth who claimed to have been beaten while enrolled there. While they were unable to prove any mistreatment allegations, state investigators found that Straight apparently had held some clients against their will, in violation of the law. (Rev. Robert L.) askew also criticized that law. . .

The next article, dated February 12, 1978 and appearing in the St. Petersburg Times, is entitled: "Drug Program Allegedly Used Coercive Tactics to Control Clients." The article begins:

Coercive tactics including threatening a youth with a cocked handgun, have been used to control juvenile clients enrolled in the Straight Inc. drug treatment program, former counselors say.

Some of the tactics may have been illegal.

... Two former counselors - in sworn statements say they once stood by as Helen Petermann . . .
repeatedly slapped a small youth and yanked him by
the hair in an apparent outburst of temper. " I saw
maybe five good smacks," one ex-counselor says. On
at least two occasions, they say, program officials
prepared questionable documents to intimidate clients
into staying at Straight even though the youths may
have had a legal right to leave.

- . . . Dozens of client treatment reports were deliberately falsified by the counselors. And they say James E. Hartz . . . condoned it.
- . . . Straight officials generally deny the allegations.
- . . . He (Hartz) acknowledges that the program operated for more than a year before he informed counselors that they could not legally detain some clients against their will.
- . . . Two former Straight staffers recall a peculiar treatment session that they believe had little to do with saving juveniles from the evils of drug abuse.

They say Mrs. Petermann, 56, allegedly demonstrated different positions of sexual intercourse to a group of

female clients, some in their early teens.

. . . Perhaps the most serious allegation related by several sources dates back to February 1977, when a member of Straight's governing board - Richard E. Batchelor - led a band of juveniles in search of a runaway.

One member of the group carried a gun and - according to a witness' sworn statement - threatened to shoot a youth who was thought to have been aiding the runaway.

The band ultimately caught the runaway and wrestled him to the ground. When police arrived to break up the disturbance, no gun was found.

In an article dated February 3, 1978 and entitled: "Girl Forced to Return to a Straight Foster Home, Neighbors Say," the following appears:

A new complaint that the Straight Inc. drug program may be holding juveniles against their will was filed with state officials Thursday by a group of mid-Pinellas County homeowners.

A girl, about 16 and wearing only a robe, slippers and blue jeans, apparently tried to run away from one of Straight's foster homes near Largo about 7:30 a.m. Wednesday, the residents told state officials.

Residents said the girl went to a neighbor's house and asked to use the telephone. But as several persons watched, she was physically apprehended by two other girls from Straight before she could complete the call.

"It happened so fast, they were after her in a flash," said Thelma Thomas, of 981 Stephen Foster Drive.

"She was so frightened . . . I think she was trying to get away, she kept telling her sister on the phone to hurry."

"She appeared scared," Mrs. Thomas said.

The two girls who chased the apparent runaway ran uninvited through the Thomas house, said Mrs. Thomas' husband Fisher.

After they caught her, the two girls from Straight held her by the arms and walked her back to the foster home.

A complaint was lodged Thursday with the Department of Health and Rehabilitative Services (HRS), which oversees drug treatment programs. The witnesses were represented by the Suburban Estates Home Owners Association, and Attorney James F. Beers.

The new allegations against Straight come only two weeks after HRS scolded the program's directors for apparently detaining some clients illegally in the past.

. . . HRS officials said the Thomases and other witnesses are prepared to recount the event in sworn statements to Pinellas-Pasco State Atty. James T. Russell if a criminal investigation is called for....

Additional newspaper articles relate similar type alleged events. It should be noted, though, that the Department of Health and Rehabilitative Services, District V, conducted an intense investigation into many of the allegations surrounding Project Straight, and obtained corroborating information. This investigation commenced approximately three months ago (January of 1978) and was concluded approximately two months ago (February of 1978).

The initial five-part DHRS District V report was presented to Project Straight board members, with full copy to Mr. James T. Russell, State Attorney, in approximately February of 1978.

It is alleged that Project Straight board members (one or more) contacted the Office of the Secretary of the Department of

Health and Rehabilitative Services and complained about the report.

Secretary Page's Office confirms that contact was made.

For whatever reasons, the extensive initial DHRS District V report was withdrawn and a considerably briefer report, mostly administrative in nature, was released.

III. COMPLAINT BY MR. GEORGE E. STEVENSON

In addition to the preceding, Mr. George E. Stevenson wrote Governor Reubin Askew in mid-March of 1978.

Mr. Stevenson expressed concern over his two daughters who were "committed" to Project Straight by their mother and stepfather, and was anxious to talk with both daughters.

Mr. Stevenson had tried calling Project Straight but was not allowed to talk, at that time, with either daughter. Copies of newspaper articles about Project Straight were sent to Mr. Stevenson by a third daughter, and these also caused him some concern.

IV. DHRS LICENSURE REQUIREMENTS

The abbreviated DHRS District V monitoring report contained specific administrative changes that Project Straight needed to implement in order to be eligible for a regular Drug Abuse Treatment and Education (DATE) license.

These requirements (see attached) included such things as requiring written Board of Directors minutes, written job descriptions, and the like.

Mr. James Holley, DHRS District V Drug Abuse Specialist, advises that Project Straight is meeting all of the procedural requirements at this time.

V. PRIOR BCJPA FINANCIAL/PROGRAM MONITORING

On-site monitoring by BCJPA personnel in January and March of 1978 revealed inadequate financial record-keeping and also raised the possibility of both conflict of interest and racial representation. At this same time, the BCJPA learned of DHRS' extensive investigation, though a copy of that report was not released to the Bureau.

The financial record-keeping problems were outlined, along with specific steps to correct the deficiencies, in a letter to the City of St. Petersburg, dated January 31, 1978. The City of St. Petersburg responded by letter dated February 7, 1978 and

advised the BCJPA that all of the required procedures had been implemented.

The conflict of interest issue arose when it became evident that children of three current or former board members (Richard G. Batchelor, Helen R. Petermann and Marlene Hauser) had been employed by Project Straight and paid out of grant funds. Although Mrs. Petermann is no longer on the Board of Directors herself, she is a full-time salaried employee of the Project.

Mr. James E. Hartz, Project Director, confirmed that children of former or current board members had been hired at the outset of the project, that it was necessary to staff initially, that there were no program "graduates" to hire from at that time (all senior and junior counselors are now recruited from successful graduates of the program), but that no relatives of board members were currently employed. Mr. Hartz further stated that the individuals were hired on the basis of merit and their familiarity with drug abuse treatment programs.

It should be noted that no apparent attempt at community-wide personnel recruitment was made during the start-up period of the project, and that all personnel hiring is now done from within the ranks of current and former clients.

Further, during the special monitoring visit on March 28, 1978, it became apparent that an additional conflict of interest situation was in evidence. Project Straight's funds, including LEAA monies, state buy-in, project-generated income, and donations, are kept in accounts at the First Bank of Treasure Island, Florida. One of Project Straight's board members and President of the Board, Mr. Mel Sembler, is an employee of the bank, in the capacity of Director of the Bank.

The question of racial representation arose from the January 1978 and March 1, 1978 monitoring visits, at which time a visual inspection indicated that there were no blacks or other clearly identifiable racial and ethnic minorities in evidence.

It should be noted that since Project Straight, Inc. is a nonprofit corporation, they are exempt from the LEAA requirements
necessitating the formulation of an EEOP Plan. This, of course,
does not exempt them from complying with equal opportunity
requirements in hiring and selecting clients.

Mr. Mack Gardner, Corrections Planner for the BCJPA, asked Mr. James E. Hartz during the March 1, 1978 monitoring visit about minority representation. Mr. Hartz replied that one black had been in the program as had a couple of Puerto Ricans. At that time, though, there were no blacks or hispanic-origin individuals in the program.

Mr. Hartz advised Mr. Gardner that blacks and other minorities just didn't seem to apply to Project Straight for services.

Mr. Gardner also inquired as to the circumstances under which client fees (disguised as "donations") were waived. Mr. Hartz responded that client fees had been waived but could only remember one instance in which the fees had been waived. The circumstances involved a family that had two children enrolled in the program and could not reasonably pay two fees. The fees on the second child were waived.

Mr. Gardner notes in his monitoring report that no EEOP posters were displayed anywhere on the premises.

VI. FINDINGS

On March 28, 1978, against the previously described background, Dr. John H. Dale, Jr., Mr. Harry Moffett, Mr. Mack Gardner, Mr. Wayman Bailey, and Mr. James B. Holley met with Mr. Jim Hartz and Mrs. Helen Petermann. Mr. Jeff Symons and Ms. Pat Rankin from the City of St. Petersburg were also present but did not participate in the questions and answers.

Dr. John H. Dale, Jr., asked Mr. Hartz why Project Straight was getting all of the adverse publicity. Mr. Hartz responded that he didn't know.

Dr. Dale rephrased the question and asked Mr. Hartz if all of Project Straight's critics were just disgruntled former employees, untreatable drug abusers, moral degenerates, and generally losers.

Mr. Hartz responded that "...there are a lot of sick people out there...." Mr. Hartz then went on to discuss former board members and/or their spouses, who were critical of the program. According to Mr. Hartz, all of them were either mentally ill, alcoholics, or had tried to sell the Project a building that was inappropriate.

Dr. Dale noted that other projects fire staff and fail with some clients, but that they are not surrounded with such criticism.

Mr. Hartz shrugged his shoulders.

Dr. Dale asked Mr. Hartz if the reporter, Mr. Bill Nottingham, had something personal against him or the program. Mr. Hartz responded that Nottingham hadn't written anything else for the St. Petersburg Times in months, and that he was "...trying to make a name for himself."

Mr. Moffett asked Mr. Hartz about some of the allegations, such as the slapping of clients, kicking them, handcuffs, and so on. Mr. Hartz replied that no client, to his knowledge, was ever kicked or beaten by staff. A couple of clients, though, had been slapped a few times when they became hysterical.

Dr. Dale asked again about the handcuffs. Mr. Hartz said that Project Straight did not ever use handcuffs or other restraints. However, one parent brought a child in with handcuffs on, and another parent once gave a foster parent some handcuffs to use on a child but they were never used. Mr. Hartz added that the kids hold hands, or clasp belts, with newcomers, and that this might appear to someone at a distance to be handcuffs or the like.

Mr. Moffett asked about the alleged use of straightjackets.

Mr. Hartz stated that they had never used a straightjacket, they
didn't have a straightjacket, and that he didn't even know how to
use one. However, extremely violent clients (a couple or so) had,
on occasion, been wrapped in a blanket and restrained.

Mr. Moffett asked if they had procedures on using restraints and if the client files were noted when such an incident occurred. Mr. Hartz said no to both questions.

Mr. Moffett went on and urged Mr. Hartz, for his own protection and the clients', to develop the procedures and ensure that a written report was made each time restraints were employed.

Mr. Moffett then asked Mr. Hartz if clients were being held against their will. Mr. Hartz responded that most of that was sometime ago.

Mr. Moffett asked, again, if clients could leave anytime they wanted to. Mr. Hartz replied that Court-referred clients were not allowed to leave.

Mr. Moffett advised Mr. Hartz that it may be illegal/improper to hold even court-referred clients against their will.

Mr. Hartz responded that he had a Circuit Judge (Honorable Jack Dadswell) who told him he would hold him (Hartz) in contempt if he didn't hold a Court-referred client in the program.

Mr. Moffett suggested that Mr. Hartz should discuss the issue with Project Straight's attorney to obtain additional clarification.

Dr. Dale asked Mr. Hartz if voluntary or parent-referred clients could leave anytime they wished. Mr. Hartz responded that they held such clients until their parents could come down and talk

with them. Mr. Moffett asked if they then held such clients against their will. Mr. Hartz replied that they only released minors to their parents.

Mr. Moffett advised Mr. Hartz that this might be improper.

Mr. Hartz said it was a bad law and spent a few moments haranguing "parents rights" and "clients rights" which interfered with the program.

Dr. Dale asked Mr. Hartz about the alleged "sexual technique demonstration" given by Mrs. Petermann.

Mr. Hartz replied that nothing inappropriate had occurred, that questions about sexuality often occurred, and that Mrs. Petermann had acted properly in answering the girls' questions.

When Mrs. Petermann was invited into the room, Mr. Moffett asked her about the "sexual technique" incident.

Mrs. Petermann vehemently denied demonstrating different positions of sexual intercourse and told a rather different story from the one alleged by others.

Mrs. Petermann stated that she was already sitting on the floor, that she in fact did not get down on the floor, when one girl who had heretofore been non-communicative suddenly opened up and revealed all of the sexual abuses/experiences she had been

subjected to and/or participated in. Another girl expressed confusion about sexual behavior and commented to the effect that she didn't really know what was normal or acceptable.

Mrs. Petermann stated that she told the girls that different sexual behaviors were accepted in different cultures, that what was considered acceptable or normal in one culture was considered perverted or wrong in another culture. Mrs. Petermann noted that the reason for the statements about differing cultures was because one of the girls had had sexual relations with a non-American.

Mrs. Petermann again stated that there was no demonstration of any type of position used in sexual intercourse.

Dr. Dale asked Mrs. Petermann about the alleged kicking and slapping of clients.

Mrs. Petermann said it was a lie, that she had never kicked a client, but had slapped a few clients, a couple of times, when they were either hysterical or uttering a string of the filthiest profanity at her.

Dr. Dale and Mr. Moffett also interviewed both of Mr. Stevenson's daughters without Project staff present. Mr. Hartz readily agreed to this request, stated that they could talk to anyone

they desired - "we have nothing to hide" - and sent for the girls.

Both girls were somewhat shy at first but readily talked about the program and their experiences. Both girls said they wished to remain in the program, that they had become convinced that they had drug problems, and that they did not wish to leave. Both girls said they were treated alright and that they were fed adequately.

The oldest girl, who is not a minor, stated that she had run away twice, and that she had been brought back against her will at that time; but her head was in the right place now and she wished to stay.

When asked about alleged mistreatment of clients, the girls said they had not seen any of it, that that was all back in the beginning of the program (so they understood) and was not then occurring.

It is unclear whether either girl had in fact any drug abuse problem. Both girls, though, appeared to be somewhat immature and possessed rather blank affects. The significance of this is not clear.

Allegations that the program is psychologically damaging to some clients were untestable during this visit.

Mr. Moffett also sampled client files and found them to be incomplete. Signed individual treatment plans were not in evidence.

There is also some question as to the nutritional appropriateness of meals and the regularity of meals provided through foster homes.

VII. CONCLUSIONS AND RECOMMENDATIONS

1. Statements by Mr. Hartz and Mrs. Petermann denying kicking or otherwise abusing clients are at odds with statements reported by Mr. Bill Nottingham in the St. Petersburg Times and contained in the initial DHRS District report.

<u>Recommendation</u>: The State Attorney, Mr. James T. Russell, should investigate these allegations for possible criminal law violations.

2. Mrs. Petermann's version of the "sexual technique" incident is at odds with the newspaper version and the version contained in DHRS' District V initial report.

Recommendation: This incident should be examined by the State Attorney for possible criminal law violations.

DHRS should also determine the appropriateness, if the incident occurred, of such treatment techniques.

3. Both Court-referred and privately-referred clients are held against their will.

Recommendation: This situation should be examined by the State Attorney for appropriate action. In addition, DHRS attorneys should examine this situation in light of Project Straight's request for a regular DATE license.

4. Clients may be inappropriately "restrained," in blankets or the like, in violation of DHRS rules and regulations and Florida Statutes.

Recommendation: The State Attorney and/or DHRS attorneys should examine this situation for appropriate disposition.

5. The treatment program at Project Straight may be detrimental to some clients.

Recommendation: The therapeutic techniques or style utilized by Project Straight (come-downs, time-out, etc.) should be examined in detail by DHRS, since DHRS is responsible for ensuring that programs operated under its auspices (licensed by) are not detrimental to the welfare of clients.

In addition, effective screening procedures need to be developed and employed at intake and formal referral mechanisms withother community mental health, educational, and health facilities should be established.

6. The meals provided at the Center, mostly sandwiches, along with the uncertainity of meals provided through foster homes, may be inadequate for adolescents.

Recommendation: The DHRS should establish (or apply existing) nutritional standards for the care of adolescents in residential programs.

7. Foster homes utilized by Project Straight, Inc. are not approved by DHRS or any governmental agency.

Recommendation: DHRS should examine and approve all foster homes to be used in the care of emotionally disturbed/drug abusing adolescents. Attention should be given to the physical structures, health standards, and psychological fitness of all members of each prospective foster home.

8. There is not a racial and ethnic balance, reflective of the community at large, enrolled in Project Straight.

Recommendation: There is no apparent indication of deliberate, overt racial and ethnic discrimination.

However, there has been no apparent attempt by Project

Straight to make their services available to all racial and ethnic groups within the community, which is a violation of LEAA regulations (Subpart D). A deliberate outreach

effort should be made to apprise the entire community of the program. Scholarships for minority members should also be sought and that fact made known to the community and to the courts in the area.

9. A conflict of interest is in evidence.

Recommendation: (a) The hiring of relatives of board members or salaried staff should be prohibited, by amendment to the Articles of Incorporation or by rule adoption by the Board.

- (b) Project Straight, Inc. bank accounts should not be in a bank in which a board member has a direct interest. These accounts should be moved to a "neutral" facility at the earliest possible time.
- 10. Scholarships have been obtained for some clients. These funds have not been reported as project-generated income.

Recommendation: An accurate accounting of all funds obtained as scholarships should be undertaken as soon as possible and properly submitted to the BCJPA for approval in a Project Generated Income budget.

VIII. ACTIONS

The following actions or steps have been taken, or where indicated, are advised:

- 1. The U. S. Department of Justice, Law Enforcement Assistance Administration, Office of Audit and Investigation, had been advised of an alleged conflict of interest - as required by G7140.2A;
- 2. An internal special monitoring report has been written and disseminated to: (a) the Office of the Governor; and (b) DHRS, Mental Health Program Office, Drug Abuse Section; on April 7, 1978.
- 3. Project Straight, Inc.'s LEAA funds are still suspended and should remain in suspension pending the outcome of the State Attorney's investigation;
- 4. In light of the pending State Attorney's investigation, DHRS District V should not issue a regular DATE license but should, as appropriate, consider the issuance of another 90-day interim license;
- 5. No regular license nor any resumption of Federal/State funding should occur until all ten (10) items in the CONCLUSIONS AND RECOMMENDATIONS section of this report have been addressed and resolved;

- 6. Copies of this full report were sent on April 11, 1978 to the following:
 - (a) Office of Audit and Investigation, LEAA;
 - (b) Office of Civil Rights Compliance, LEAA;
 - (c) Mr. James T. Russell, State Attorney;
 - (d) Mr. Frank Griffith, Pinellas MPU; and
 - (e) Ms. Lucy Hadi, Acting District Administrator, DHRS District V.