TAP 2022 Mid-Year Minutes

TAP members in attendance:

Brett Railey, Chair  Sam Criswell  Nick Knoll
Beth Barnes  Charlie Files  Patrick McNichol
Paul Batcheller  John Flannigan  Matt Myers
Karl Citek  Michael Hanson  Clint Shrum
Tim Cornelius  Jennifer Harmon  D’Arcy Smith

Members unable to attend:

David Beatty  Gary Tamkin
Ron Hoague  Tim Plummer
John Marshall

IACP Staff in Attendance:

Joe Abrusci  Chuck Hayes
Kyle Clark  Jim Maisano

Guests:

Christine Frank, NHTSA  Erin Vermilye, IACP
Jerry Miller, ITSMR  Keith Williams, NHTSA

Welcome and Introductions
Chair Brett Railey welcomed all TAP members and guests before calling the meeting to order. There was a round table self-introductions by all attendees.

Tap Membership Mission/Responsibilities and Goals
Chair Brett Railey reviewed the TAP Mission, Responsibilities, and Goals with the group.

Review/Approval of TAP Annual Meeting Minutes
The minutes from the 2021 Annual Meeting were reviewed and approved as written.
IACP Updates

Kyle Clark provided an update on the following items on behalf of IACP:

2022 DAID Conference

The Impaired Driving and Traffic Safety (IDTS) Conference will be held in San Antonio, Texas on August 21-23, 2022, as an in-person event only. It will take place at the Grand Hyatt San Antonio located on the River Walk. The training conference will include over 60 sessions within 6 tracks. Registration is now open, and a housing link will be provided in the confirmation email after an individual completes their registration. The New DRE state coordinators orientation and the meetings for the DRE state coordinators, DRE Section, and CARE Section will all be held the day before the conference begins on August 20th.

Future DAID Conferences

IACP has begun working to identify the location for the 2023 IDTS Conference. IACP plans to continue the rotation of East, West, Central and then East again. Doing so, the 2023 conference will be held in the eastern region. When the 2023 location has been finalized, the information will be made available. Moving forward, the goal is to have future conferences planned 2-3 years in advance.

Credentialing Updates

IACP continues to process DRE credentials within 30 days, and in many instances, within a couple of weeks. There are currently no backlogs with the credentialling. DRE cards are now being mailed to the state coordinators for distribution to the DREs in their state. As of 4/18/22, there were 7,320 certified DREs in the United States and 786 certified DREs in Canada. These numbers decreased slightly, but new requests have remained consistent due to new DRE schools.

2021 DRE Annual Report

The content is complete, and the report is currently in its graphic design stage. In 2021, 98 DRE Schools were conducted which resulted in the training of 1,375 new DREs. For ARIDE, 897 classes were conducted, training 15,061 officers, prosecutors, and toxicologists. There were 28,330 enforcement evaluations reported in 2021, with CNS stimulants being the number one predicted drug category at 15,598 opinions. Cannabis had 5,570 evaluation opinions, coming in second. Poly-category rates increased and comprised nearly 40% of all evaluations. The importance of getting the data into the National DRE Data System (NDDS) either directly or through a 3rd party system was stressed.
IACP Planned Expansion Efforts (LEL, Tribal, Federal Partners)

IACP staff is trying to enhance sharing of information with NHTSA LELs and other partners, which includes looking to expand DRE into tribal law enforcement communities. Expansion efforts also include working with federal officers, such as those located in the Washington DC area. A new DRE coordinator has been designated for the DC area, which includes officers from the Park Police. Other efforts include providing support to the U.S. Territories that have an interest in ARIDE and the DEC Program. Other partners include the Society of Forensic Toxicologists (SOFT), the TSRP’s, and organizations like MADD.

NHTSA Updates

Keith Williams welcomed everyone and thanked the TAP members for their great work. He reported that the Bi-partisan Infrastructure Bill that will provide NHTSA with additional funding has passed in Congress. He also reported that the MORE Act passed in the House and is now in the Senate. The act will decriminalize marijuana and would impose a tax on cannabis, which can be used to fund various programs. The act would also require NHTSA to evaluate the detection of cannabis impairment. NHTSA is strongly aware that drugged driving is a continuing and growing problem that has created a need for more DREs. NHTSA understands the issues and will be looking for TAP assistance in future efforts.

Christine Frank mentioned that Guam wants to be more involved in the DEC program. NHTSA’s tribal representative is interested in getting more impaired driving training out to tribal agencies. In addition, Christine addressed the following:

National DRE Data System

- Thanks to ITSMR and their work with NHTSA, efforts are improving to ingest evaluations into the National DRE Data System. NHTSA’s attempt to come out with enhancements to the system once a month has been put on hold. The federal government is now requiring the use of two-level authentication. There was an initial email that was sent out to the DRE state coordinators and additional information will follow.

Curriculum Updates

- Two new training courses are being developed through NHTSA: ARIDE Refresher and DRE Courtroom Testimony. The ARIDE Refresher is designed for those who went through the initial 16-hour class. One of the goals is to assist states that have highway safety office mandates requiring ARIDE updates to work grant-funded activities. DRE Courtroom Testimony is a training that provides guidance on how to testify and focuses on DRE testimonies. The goal is to release both trainings in August of 2022. The plan is to have the ARIDE Refresher as a 2–3-hour training and the DRE Courtroom Testimony as a 3–4-hour course. Both trainings will be available through the COP LMS system.
SFST Dry Lab & Truth Is in the Eyes Videos

The new dry lab videos and Truth Is in the Eyes video have been shot and are in the final editing process. The plan is to have them released with the 2022 curriculum at the same time.

New Impaired Driving Research

Marijuana legalization is a heavily discussed topic and there are plans to research the feasibility of field tests for cannabis impairment and the development of specific cannabis impairment tests. One of NHTSA’s projects is looking to develop states with e-warrant, phlebotomy, DRE call-out systems, and the expansion of tablets for conducting DRE evaluations.

TAP members asked if a new SFST validation study could be conducted. Keith Williams mentioned that he would take the idea to their research team if TAP members felt there was a need for a new SFST validation study. TAP members explained the issues with the “50 pounds and over” and “65 years and older” restrictions in the original studies. These two areas are frequently brought up in court by the defense because the authors from the original study acknowledged that they had not collected data on the current or potential performance on SFSTs of individuals 65 years of age or more and people who are 50 pounds overweight. TAP supported the need for an updated SFST validation study that would address both issues and incorporate how the SFSTs apply to these groups when at a BAC of below 0.08 and in the 0.05 BAC level. **Action Item**

Roadside Driver Survey: Christine Frank mentioned the Roadside Driver Surveys will be started again and it will likely take 2–3 years before the results are obtained and reported.

Old Business

DEC Program International Standards Revisions/Updates
Jim Maisano and John Flannigan reported the updates to the following International Standards proposed by the TAP Standards Workgroup (WG):

**Who can instruct ARIDE** (ARIDE Standard 6.1) - The proposed language modification applies to ARIDE Standard 6.1. The modification clarifies that only a DRE instructor is allowed to teach the full ARIDE curriculum. The modification would still allow the use of SFST instructors in Sessions 1 - 3 and for adjunct instructors, such as prosecutors, physicians, or toxicologist. After some discussion, the modification was approved. **Action Item: APPROVED**

**Proper setting for ARIDE training** (ARIDE Standard 1.7) - This modification relates to ARIDE Standard 1.7 and when this training should or should not be conducted (Basic Academy or after having attended Basic Academy). There was discussion about including language of “not intended” and the possibility of court challenges if that term is used in the Standards. The concern was how it would apply to the states who already include ARIDE in their basic police academy. The proposed language was modified and changed from a negative to positive sentence. Starting with the following language, “This is an intermediate level course designed
to offer more than a basic understanding of the impairing effects of drug (illicit and licit), alcohol, and/or the combination of both. The course was designed to be offered to officers with training and field experience”. After some discussion, the modification and language were approved. **Action Item: APPROVED**

**Clean-up references to Highway Safety Committee Duties (SFST Standard 1.2 and DRE Standard 1.3)** - This modification applies to SFST Standard 1.2, DRE Standard 1.3, and would remove references to the Highway Safety Committee. This clean-up language was necessary as a result of the Technical Advisory Panel (TAP) being restructured apart from the Highway Safety Committee. This modification was approved. **Action Item: APPROVED**

**DRE Definitions, Clean-up of Forensic Testing definition, On-site testing devices** - This proposed modification applies to the definition of Forensic Testing. In the definition the term “point-of-collection” is used, however there is no other reference to “point-of-collection” within the Standards. “On-site Testing Device” is listed within the definitions and explains in-detail those type of devices. The term “point of collection” was replaced by “On-site Testing Device”. **Action Item: APPROVED**

**Agency Administration Approval (DRE Standard 1.1)** - This proposed modification would require a DRE candidate have written approval to attend the DRE training. This would be from their agency administrator (or designee) to indicate the agency’s agreement to allow the DRE to be utilized within their agency for DUI enforcement efforts and to perform DRE-related duties, such as DRE evaluations. This process may be accomplished by completing a section within the state’s DRE application process or by use of a simple memorandum, presented to the DRE state coordinator before the training begins acknowledging that the administration understands the purpose of the DRE training, agrees to allow the officer to participate in DUI enforcement efforts, and to perform DRE-related duties within their agency. It will also be strongly suggested that the DRE, with agency approval, be allowed to support other agencies requesting DRE assistance if within the ability of the agency. This modification was approved. **Action Item: APPROVED**

**Credit for certification evaluations with opinion of non-impaired (DRE Standard 1.1)** - The proposed modification attempts to clarify the language for DRE Standard 1.1 regarding whether a “non-impaired” evaluation should be allowed for one of the 12 field certification evaluations. There was in-depth discussion on whether the defense can discredit a DRE’s final certification if a training evaluation showed not under the influence, but the toxicology showed drugs. It was later noted that if the DRE candidate does a certification evaluation and the opinion is not impaired, that evaluation would still be listed within the DRE’s rolling log. So, if allowed or not, the entry in the rolling log would still be present. A modification of the wording was made from the floor which was approved and will read, “For evaluations having an opinion of alcohol impairment only, not impaired, or medical impairment, only (1) one of each of these types of opinions may be utilized in the 12 drug influence evaluations needed for certification.” **Action Item: APPROVED**
Time allowed for DRE IDC (Instructor Development Course) (DRE Standard 2.4) - This proposed modification clarified the period in which a DRE must complete the requirements to be a DRE instructor after completing the DRE IDC. A DRE instructor candidate will now have one year from completing the DRE IDC classroom training to complete the instructor certification. **Action Item: APPROVED**

Exam Score for DRE Pre-School (DRE Standard 1.5) - This modification addressed the issue of having a set minimum score for completing and passing the DRE Pre-School. Exams are given in SFST, ARIDE, and the conclusion of the DRE 7-Day classroom sessions with each requiring a passing score not less than 80%. Many states have already enacted enhanced standards which require a score not less than 80% to successfully complete the DRE Pre-School training. The modification requires a score not less than 80% on the DRE Pre-School exam. The recommendation was approved. **Action Item: APPROVED**

Enhanced State DEC Program Standards
An updated list of the states with new or modified enhanced standards was provided as information only. It was reported that the Standards Workgroup reviewed the enhanced standards submitted from each state and there did not appear to be any conflicts with the international standards. **No action needed, for information only.**

SFST/ARIDE/DRE Curricula Updates
A NHTSA impaired driving workgroup (WG) had been meeting since 2019 but due to the pandemic, in-person work had to be postponed. Despite the inability to meet in-person, the WG continued to work on the curricula updates for SFST, ARIDE and DRE. This included numerous virtual meetings and various work assignments. Once the pandemic travel restrictions were lifted, the WG conducted an in-person work session in Oklahoma City during October 2021 and January 2022. With the assistance of the Transportation Safety Institute (TSI), each curriculum is being prepared for pilot testing. Piloting will begin with the ARIDE curricula, followed by DRE and SFST. In addition to the updates, the WG and TAP Curriculum WG will be asked to help develop questions for a “questions bank” for the different DRE curricula sessions beginning with Form A. Some of the updates included a new page design and layout, combined pages with less verbiage on the PowerPoint slides, and the addition of MADD “attention getter” videos at the beginning of SFST and ARIDE. For DRE, revisions included new and updated DRE resources, new information regarding eye movement and impairment, four subcategories of CNS depressants, allowance of a red light for darkroom eye exams, clarification of what constitutes rebound dilation, modification of the general indicators, and new information on the on-set and duration of some drugs.

Drugs and Human Performance Fact Sheets
Toxcel, who was awarded the contract through NHTSA to update the Drugs and Human Performance Fact Sheets is continuing their work on the document. Several DREs were involved and assisted with the project. The actual release date of the new document is not known.
**Scientific Workgroup Literature Review**

Matt Myers provided a summary of a few issues addressed to the Scientific Workgroup (SWG), which included the review of several research papers. One research paper had reported that 43 of 44 cannabis subjects exhibited HGN. It was published without any description on how the HGN was assessed or evaluated. Matt participated in a conference call with the authors of the paper, who explained how they conducted the HGN. What the authors demonstrated was not like the actual HGN process. They were asked by Dr. Citek to make a correction to their paper, but the authors decided to redo that part of the test instead. The next review dealt with the differences of marijuana by routes of administration. The summary listed the application of SFST to cannabis intoxication and went on to indicate that the SFSTs were not reliable to detect cannabis intoxication. The summary did not list any of the processes used to evaluate the SFST’s. Reading the basis of their statement is concerning for the DEC Program, especially since it has the National Institute of Justice (NIJ) title on the summary. The third paper reviewed was a Massachusetts General Hospital study that looked at profusion in the prefrontal cortex of subjects ingesting cannabis. DREs were involved in evaluating the subjects being tested. The concerning part was that the DRE had a 20% false positive rate on the persons using placebo drugs. The controls for the persons tested were voluntary and had directed to not use drugs for 24 hours before the test. There was no other testing conducted in the study. Matt suggested that if any DREs are asked to participate in these types of studies, they should not do so, unless TAP has a copy of the study process and reviews it before the DRE takes part. There have been issues in the past when a DRE has been contacted directly and the state coordinator has been unaware of the request or the DREs involvement. Additionally, Matt reported the SWG received a request to review protocol some DRE instructors were advocating a 3-minute wait period between step 5 and step 6 in the DRE process (divided attention testing and vital signs). A sample of actual evaluations were reviewed and there was no evidential support that a waiting period was needed after the psychophysical tests before the 2nd pulse rate was taken.

**University of CA San Diego Cannabis Study Update**

In past TAP meetings, there was information shared regarding the California study of dosing people with Cannabis and then having them on a driving track at the California Highway Patrol (CHP) academy. The project is on hold in California, and there is no information as to when the study will take place.

**DRE Field Certification Training Updates**

Work continues to identify DRE field certification sites in the regions to assist states that cannot for various reasons do in-state training. Chuck, Jim, and Joe reported on the sites in their regions and on the work done to locate additional sites. In the Western Region, CHP had five certification sites but are now only using them for in-state DREs. This is mainly due to funding and fewer DRE instructors being available to assist with the training. The Mesa, Arizona site has been highly active and is open to assisting out-of-state students. The Washoe County Jail in Reno, Nevada is another option in the West, but has been slower than other sites. The new Maricopa County Jail is still not available for DRE field certifications, and it is not known if it will be.
Joe reported the Eastern Region has three states open for use. Jacksonville, Florida is still open and remains busy. Philadelphia, Pennsylvania is open and is showing to be a productive site. The evaluations included are showing synthetic cannabinoids and downside effects of drugs. The newest site is in Winston Salem, North Carolina. It is a community outreach center and methadone clinic that appears to be a productive site. All three sites in the East have a user fee.

Jim reported that in the Central Region, Oklahoma hosted a DRE class from Louisiana in two smaller groups. Both groups easily completed the required number of evaluations. Some of the drugs the students encountered were PCP, cannabis, stimulants, depressants, and narcotics. San Antonio, Texas has agreed to allow out-of-state DRE candidates use their facility. An additional site could be the Houston PD jail in Harris County, Texas. Kyle reminded the TAP members of the recently published “Promising Practices for Field Certification” document which is available to assist state coordinators in developing in-state certification sites.

**DRE Reconstruction Ad Hoc Committee**

Jim Maisano reported on the ad hoc committee’s work related to DRE Reconstruction. A document was prepared using the term “DRE Post-incident Review” in place of DRE Reconstruction to differentiate it from collision reconstruction. The documentation was presented to TAP and included in the TAP Notebook. There was no discussion and the document was approved. The document will be distributed to the DRE state coordinators and other stakeholders. **Action Item: APPROVED**

**New Business**

**Credentials of Academy SFST Trainers**

There were questions about individuals teaching the SFSTs, the academies, and various agencies as some had been teaching with unofficial modifications to the curriculum. There appears to be a need to ensure instructors have attended the NHTSA/IACP instructor development courses. This was addressed at a past TAP meeting where it was agreed that an approved manner was to have states document their basic instructor development class to ensure it covers the same adult learner topics so that they can do a SFST IDC condensed two-day class.

**DUID Language Resolution**

Chuck mentioned that some states have restrictions in their DUI statutes where a driver must be under the influence of a controlled substance and do not allow for “any drug” or any impairing substance. Chuck drafted an IACP Resolution to present to TAP that provides a standard definition of a drug to be applied in all states. The reasoning is that this may support the legislative efforts of those states with the controlled drug restrictions. The drafted resolution was previously presented to the DRE Section and resulted in several comments and edits before considered again by the section. If approved by TAP, the resolution will go back to the DRE section in August for their approval. One recommended change was made in the last sentence where “and alcohol” was modified to “with or without alcohol”. (Drafted Resolution attached). **Action Item**
TAP Terms Expiring This Year
Kyle reported on the TAP positions that will expire at the end of the year. Current members may apply for reappointment. The positions expiring at the end of the year include Medical, HSO, Sheriff, Central Region, Prosecutor and Toxicologist. IACP will post the notice on the expiring appointments in September and applications will be due in November.

Tracking DRE Activity
Chuck reported that he recently made inquiries to some DRE state coordinators regarding ways to ensure DREs are getting an agency activity giving them credit for the DRE evaluations. One way this is being done is through 3rd party vendors who are used for conducting DRE evaluations. Because not many law enforcement agencies do this, TAP may want to explore further and make recommendations to the DRE state coordinators and State and Provincial groups. Action Item

From the Floor
No new business.

TAP Member and Workgroup Reports
Police Administrator: Chief Ron Hoague was unable to attend the meeting and no report was provided.

DRE At-Large:
Paul Batcheller reported Iowa is working on a search warrant process to reduce the time needed for obtaining a search warrant. This was warranted due to a fatal ATV crash where it took six hours to obtain a search warrant. Iowa is once again conducting 420 enforcement efforts. Patrick McNichol reported the Eastern region lost the Patterson, NJ DRE field certification site. New Jersey will be starting a DRE School next week as they are currently focused on holding ARIDE classes and doing at least four classes per month. Nick Knoll stated that in the Western region, Idaho recently finished a DRE school and will be using the Mesa, Arizona site for their field certifications. It was reported that Nevada recently had an issue where an intoxicated individual that was let go by officers from a rest area, was later involved in a crash. He relayed the Phlebotomy program in Idaho is growing and proving to be successful. An announcement was made about the combined State Operation Trucker Check by Idaho and Washington taking place in May.

Highway Safety Office: Michael Hanson reported the HSO’s are getting ready to plan their next grant years. People were reminded that now is the time to approach their local HSO if state coordinators need anything. Additional funding is available from NHTSA with the recent passage of funding through Congress. It was reported that 164 funds are for alcohol only and even though drug impaired arrests have increased, states must fund drug impaired enforcement with 402 funds. NHTSA will be opening a public comment session to get input of
future program efforts. The 2022 GHSA Conference will be held in Louisville, Kentucky in September.

**Highway Safety Committee (HSC):** Matt Myers reported there is an issue obtaining blood toxicology results from fatal drivers as this is not being done in many states. In some areas around the country, coroners have mentioned they are not trained to obtain post-mortem blood toxicology results. Similarly, crime scene techs have reported there is no need for testing if the driver died from crash. Matt is looking for any guidance or steps that have been successful in other states or jurisdictions. **Action Item**

**International:** D’Arcy Smith reported Canada is pleased to be doing training again, now that COVID has decreased. Canada has lost 50 percent of DREs due to COVID. They are planning new DRE Schools in 2022 and have several field certification training visits to Jacksonville, Florida planned. Quebec is still using special provisions for the recovery back into DRE training due to COVID. Work is being done to expand the use of the DRE field certification site in British Columbia. The most frequently detected drugs in DUID cases throughout Canada have been CNS Stimulants, Narcotic Analgesics, CNS Depressants, followed by Cannabis.

**Medical/Optometry:**
Dr. Gary Tamkin was unable to attend the meeting and no report was provided. Dr. Karl Citek reported there was nothing else to report other than the work conducted by the SWG.

**NHTSA:** Keith Williams, who is filling in for John Marshall, reported the National Drug Control and Policy publication will soon be released and may be of interest to the TAP and DRE state coordinators.

**Police Training:** Tim Cornelius reported the IPTM Symposium is scheduled for June and that it will host the Central and Eastern regional DRE state coordinator meetings.

**POST:** David Beatty was unable to attend the meeting and no report was provided.

**Prosecutor:** Beth Barnes mentioned the Olenowski court case in New Jersey is still ongoing. Briefs have been filed and there will be 60 days for the special magistrate to make his recommendations, which will be sent to the state supreme court. Defense groups in Colorado continue to argue the SFSTs do not apply to drugs for identifying impairment. This has been causing numerous issues in Colorado. She reported Nebraska has a case on a DRE Forensic Review involving three different DREs. The case is still pending, and no decision has been reached yet. Michigan recently had a Daubert hearing, where they had the Supreme Court listen to the issue on whether DRE meets the 702 rules on evidence. Beth provided a handout in the TAP Notebook regarding other court cases of interest. She advised prosecutors have mentioned that more DRE evaluations need to be conducted. There may be various reasons why evaluations are not being done, one being that an agency may not let them do the evaluations.
**Regional Coordinators:**
Western Region – Tim Plummer was unable to attend the meeting so Chuck Hayes provided a report. Field certifications conducted in Portland, Oregon have been discontinued due to the demonstrations and civil unrest in the city. However, Oregon was able to identify a location in the southern part of the state that is working with a community response program in the City of Medford that has been working well. The evaluated individuals receive a meal ticket, meet with a drug counselor, and are provided information of other community services. DRE School training is increasing in the Western Region with over 28 schools scheduled in 2022. Nevada, which has typically conducted one or two DRE Schools per year, has four schools scheduled this year, and Arizona has six schools scheduled. Utah used DIDET funds and had an additional DRE School this year. Colorado had their first DRE School in over two years. The Western Region DRE State Coordinators meeting is planned for June 28th in Phoenix, Arizona and will be held in conjunction with Arizona’s Law Enforcement and Prosecutors Conference.

Central Region – Charlie Files reported the region conducted 8 DRE schools and 52 ARIDE classes in 2021. According to data in the NDDS, there was an increase in DRE evaluations in the region during the same period in 2021. The numbers may have been low in 2021 as officers were restricted from making minor traffic stops during COVID. He indicated he would like to see a “Cannabis Legalization Best Practice Guide” and asked attendees to contact him if they know of such a document.

Eastern Region – John Flannigan reported he has become aware of the number of DREs decreasing in the Region due to attrition and lack of DRE candidates. This has become a concern and is something everyone should monitor while also attempting to improve the issues.

**Sheriff’s Offices** – Sheriff Clint Shrum expressed concern that few Sheriff’s Offices are taking advantage of the funding available from NHTSA to do additional training. Another concern is the lack of DRE evaluations being done, especially in connection with traffic stops and vehicle crashes. Tennessee is seeing more deputies completing ARIDE and DRE training.

**State Coordinator** – Sam Criswell reported all the agenda items have been addressed and there was nothing additional to report.

**Toxicology** – Jennifer Harmon reported seeing an increase of cocaine seizures in the West. Labs are starting to see increased barbiturates mixed with fentanyl. She also reported on the recent start of the NHTSA Toxicology Liaisons and their work with toxicology labs in the regions. California is pushing for DRE incentives to try and address the loss of DREs. Many courts are pushing to have the DRE evaluation in addition to the toxicology test results. In the last two years, California has been offered $16 million to update their tox labs. If states have cannabis legalization, they should consider looking at receiving direct funding to keep up with the workload placed on the labs.
**DRE Section** – Paul Batcheller reported the planning for the IACP IDTS Conference in San Antonio, Texas is moving forward. The DRE Section is working with the IACP on a Section pin, one that will be changed each year.

**4:30 PM EST  Adjourn**

The Chair asked for a motion to adjourn the meeting, motion passed. Members were reminded that the next TAP meeting will be the annual meeting, which will be held in conjunction with the IACP Annual Conference in Dallas, Texas on October 15, 2022.

1st draft: 5/6/22 Maisano/Hayes

Formatted and edited: 5/12/22 Dominguez