

PROVIDENCE HOUSING AUTHORITY

VIOLENCE AGAINST WOMEN ACT POLICY

A. OVERVIEW

The Violence Against Women Reauthorization Act of 2005 (VAWA) prohibits denying admission to public or Section 8 housing to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. *[24 CFR 5.2005(a)]*.

The VAWA also prohibits the PHA from evicting a victim receiving public housing or Section 8 assistance solely because of the fact that s/he is a victim. This does not mean that the PHA cannot evict victims or deny victims assistance for other reasons such as failure to pay rent or violations of the lease which are not based on the tenant's victimization.

Specifically, the Violence against Women Reauthorization Act of 2005 (VAWA), provides that

“criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control, shall not be cause for termination of the tenancy or occupancy rights, if the tenant or immediate family member of the tenant’s family is the victim or threatened victim of that abuse.”

The VAWA does not take precedence over any provision of federal, state, or local law that provides greater protection to victims of domestic violence, dating violence, or stalking. *[24 CFR 5.2011]*

The VAWA further provides that incidents of actual or threatened domestic violence, dating violence, or stalking may not be construed either as serious or repeated violations of the lease by the victim of such violence or as good cause for terminating the tenancy or occupancy rights of the victim of such violence.

B. PURPOSE

The purpose of the PHA’s VAWA Policy is to implement the provisions of the Violence Against Women Act that apply to applicants and participants of the housing assistance programs of the Providence Housing Authority.

C. OBJECTIVES

1. To provide information to educate applicants and tenants of public housing on their rights as provided by the VAWA concerning domestic violence, dating violence, and stalking;
2. To help safeguard the physical safety of individuals and families who are assisted by the PHA and are the victims of actual or threatened domestic and dating violence or stalking;
3. To provide guidance to PHA staff so that they might respond appropriately to any incidents of violence in PHA assisted housing while maintaining a safe environment for applicants, tenants, guests, other residents and employees;

4. To develop and maintain a list of organizations that provide services to individuals and families who are victims/recipients of actual or threatened occurrences of domestic violence, dating violence, or stalking; and
5. To foster relationships among PHA staff, law enforcement organizations and victim service providers to address issues of domestic violence in PHA assisted housing.

D. DEFINITIONS AS USED IN VAWA [24 CFR 5.2003]

The following definitions are provided as assistance in understanding and implementing the VAWA protections. The definitions for domestic violence, dating violence, stalking and immediate family member have been incorporated from and shall the same meaning as found in the United States Housing Act.

1. Bifurcate

To divide or separate a public housing or Section 8 lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

2. Dating Violence

Violence committed by a person:

- a. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- b. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - 1) The length of the relationship;
 - 2) The type and/or nature of the relationship;
 - 3) The frequency of interaction between the persons involved in the relationship.

3. Domestic Violence

This includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the City of Providence and the State of Rhode Island, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the State of Rhode Island.

4. Immediate Family Member

- a. A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent, or
- b. Any other person living in the household of that person and related to that person by blood or marriage.

5. Stalking

a. Stalking means:

- 1) To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; or

- 2) To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
- b. In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to:
 - 1) That person,
 - 2) A member of the immediate family of that person, or
 - 3) The spouse or intimate partner of that person.

6. Perpetrator

A person who commits an act of domestic violence, dating violence or stalking against a victim.

E. PHA VAWA POLICY

1. The PHA or a Section 8 property owner or manager will not deny nor delay program assistance or admission to an applicant or tenant of public housing or Section 8, if the applicant or tenant has been a victim of domestic violence, dating violence, or stalking and is otherwise qualified for assistance or admission.
2. The PHA will require verification from a public housing applicant/tenant or other lawful occupant, that he/she is a victim of domestic violence, dating violence, or stalking and that the incidents in question are real incident(s) or threatened abuse is bona fide and meets the requirements of the applicable definitions described in this policy. See Section 28.8 for detailed information on verification.

Section 8 owners or managers receiving rental assistance administered by the PHA may elect to require verification or not as permitted under applicable state law.
3. Although the title of the act uses the word "women", the VAWA policy is gender-neutral and shall apply to any man or woman in a domestic violence, dating violence or stalking situation.
4. The PHA or a Section 8 property owner or manager will allow public housing and Section 8 tenants to split (bifurcate) their lease in order to evict a tenant or an otherwise lawful occupant of the dwelling unit who engages in criminal acts of physical violence against family members or others. *[24 CFR 966.4(e)(9)]*
 - a. When a victim bifurcates the lease, the victim will be allowed to remain in place and benefits will remain with the victim and other non-offending household members.
 - b. When a victim bifurcates the lease, assistance will be terminated to the abuser and the abuser's tenancy shall be terminated.
5. The PHA or a Section 8 property owner or manager shall follow a court determination relative to the respective rights of family members as it relates to the dwelling unit, including a determination set out in a domestic violence restraining order, protective order, or injunction.
6. When rent for a public housing or Section 8 assisted unit has previously been determined based on the income of an abusive family member who has left the household or been excluded from the household by a domestic violence restraining

order, protective order, injunction or other court order, rent for the unit will immediately be adjusted to reflect the household's changed circumstances.

During the period that the PHA pursues an eviction action against an alleged abusive family member, while said abusive family member is still legally a tenant, no actual eviction will be carried out against the remaining members of the tenant family due to non-payment of any rent based on the income of the alleged abusive family member.

F. ADMISSION AND SCREENING

1. **Non-Denial of Assistance.** The PHA will not deny admission to its public housing or Section 8 programs to a person(s) who has been a victim of domestic violence, dating violence, or stalking so long as the applicant is otherwise qualified for admission. *[42 U.S.C. §§ 1437f(c)(9)(A) and (o)(6)(B).]*
2. **Mitigation of Disqualifying Information.** When requested in writing, by an applicant for assisted housing whose history includes an incident(s) in which the applicant was a victim of domestic violence, the PHA, will take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling.
 - a. If requested by an applicant to take mitigating information into account, the PHA is entitled to conduct inquiries as are reasonably necessary to verify the claimed history of domestic violence and its probable relevance to the potentially disqualifying information such as poor credit history, previous damage to an apartment, or a prior arrest.
 - b. Inquiries will be made regarding the circumstances contributing to this negative reporting to ascertain whether these past events were the consequence of domestic violence against a member of the applicant household.
 - c. The PHA may choose to use or to disregard potentially disqualifying information if the applicant household includes a perpetrator of a previous incident(s) of domestic violence.

G. TERMINATION OF TENANCY OR ASSISTANCE

The Violence Against Women Reauthorization Act (VAWA) of 2005, as amended, limits a public housing authority and Section 8 property owner's rights to terminate the tenancy or occupancy rights of public housing or Section 8 tenants. *[24 CFR 5.2005]*

1. **VAWA Protections.** Under VAWA, public housing residents and persons assisted under the Section 8 Rental Assistance Program have the following specific protections which shall govern the Providence Housing Authority in the administration of its programs:
 - a. An incident or incidents of actual or threatened domestic violence, dating violence, or stalking is not considered to be a "serious or repeated" violation of the lease by the victim or threatened victim of that violence and is not considered good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.
 - b. In addition to the foregoing, the PHA shall not terminate tenancy or assistance as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence or stalking engaged in by a member of the assisted

household, a guest or another person under the tenant's control, and the tenant or an immediate family member is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:

- 1) Nothing contained in this paragraph limits any otherwise available authority of the PHA or a Section 8 property owner or management agent to terminate tenancy, evict, or to terminate assistance for any violation of a lease or program requirement not premised on the act or acts of domestic violence, dating violence, or stalking in question against the tenant or a member of the tenant's household. However, in taking any such action, neither the PHA nor a Section 8 property owner or management agent may apply a more demanding standard to the victim of domestic violence dating violence or stalking than is applied to other tenants.
 - 2) Nothing contained herein, shall be construed to limit the authority of the PHA or a Section 8 property owner or management agent to evict or terminate from assistance any tenant or lawful applicant if the PHA, property owner or management agent can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance.
2. **Terminating or Evicting a Perpetrator [24 CFR 5.2009].** Although VAWA provides protection from termination for victims of domestic violence, it does not provide protection for perpetrators. The following remedies are available to victims of domestic violence, dating violence and stalking in HUD-assisted housing.
- a. **Lease Bifurcation** The VAWA gives the PHA or a Section 8 property owner or management agent the authority to *"...bifurcate a lease, or to remove a household member from a lease, without regard to whether a household member is a signatory to a lease in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant."*
 - 1) Eviction, removal, termination of occupancy rights or of assistance under the relevant public housing or Section 8 Rental Assistance programs shall be carried out in accordance with the procedures prescribed by Federal and State law.
 - 2) Notices and/or new and amended leases used for all public housing operated by the PHA and leases for dwelling units occupied by households in the Section 8 Rental Assistance Program administered by the PHA, will contain provisions setting forth the substance of this paragraph or as required by the US Department of HUD.
 - b. **Court Orders** Nothing in this policy may be construed to limit the authority of the PHA, property owner, or management agent, when notified, to comply with court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and/or issued to address the distribution of possessions or property among household members in a case where a family breaks up. *[42 U.S.C. § 1437d(l)(6)(C)].*

- c. **Rent Adjustment** It is the intent of the PHA to immediately make changes in family composition and/or income for victims of domestic violence or abuse in public or subsidized housing. This insures that the victims are not punished by a potential non-payment eviction due to the loss of family income and a delay by the PHA in making a rent adjustment.

During the period that the PHA pursues an eviction action against an alleged abusive family member, no actual eviction will be carried out due to non-payment of rent by the remaining members of the tenant family for any rent based on the income of the alleged abusive family member.

H. VERIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING

1. **Requirement for Verification.** It is the policy of the PHA to require verification that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking claimed by a public housing tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions described in this policy subject only to waiver as provided in Section 28.8 3 below.

Section 8 owners or management agents receiving rental assistance from the PHA can elect to require verification, or not to require it as permitted under applicable law.

2. **Forms of Verification** Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence or stalking must be provided in one of the following three ways:

- a. **Approved Certification (Form HUD-50066)** – Provide to the PHA or to the requesting Section 8 owner or management agent a written certification, on Form HUD-50056 that the individual is a victim of domestic violence, dating violence or stalking that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) described in this policy. The incident(s) in question must be described in reasonable detail as required in Form HUD-50066, and the completed certification must include the name of the perpetrator.

- b. **Police or Court Record** – Provide to the PHA or to the requesting Section 8 owner or management agent a Federal, State, tribal, territorial, or local police or court record or report describing the incident or incidents in question.

Public housing applicants or residents providing police reports or court records to verify an incident or incidents of domestic violence, dating violence, or stalking will complete the PHA's VAWA Certification Form Section B, which is attached.

The victim must also sign and attest to the documentation, under penalty of perjury, that the incident(s) of domestic violence, dating violence or stalking set forth in the police report or court record is/are true and correct.

- c. **Certification By a Victims' Service Provider, Attorney or a Medical Professional** – Provide the PHA or the requesting Section 8 owner or management agent documentation signed by an employee, agent, or volunteer of a victims' service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking, or the effects of the abuse, described in the documentation.

Public housing applicants or residents providing documentation from an employee, agent, or volunteer of a victims' service provider, an attorney or a medical professional to verify an incident or incidents of domestic violence, dating violence, or stalking, will complete the *PHA's VAWA Certification Form* Section C, which is attached. By signing the form they will certify that it is her/his belief that the incident(s) or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) described in this VAWA policy.

The victim must also sign and attest to the documentation under penalty of perjury (28 U.S.C. 1746).

- 3. Time Allowed To Provide Verification / Failure To Provide** An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by the PHA, or a Section 8 owner or management agent to provide documentation to verify the incident(s), must provide such verification (documentation) within fourteen (14) business days (excluding Saturdays, Sundays and all Federal and State of Rhode Island recognized holidays), after receipt of the request for verification.

Failure to provide verification, in proper form within fourteen (14) days results in loss of protection under VAWA and this policy against a proposed adverse action. The 14-business day window for submission of verification does not begin until the sooner of the date the individual receives the written request or within three days of the mailing a written request for such verification.

Time for response may be extended at the discretion of the PHA. *[24 CFR §5.007(a)]*

- 4. Waiver of verification requirement.** The PHA's Executive Director, a designee, or a Section 8 owner or management agent, may with respect to any specific case, temporarily waive the requirements for verification, and provide the PHA's VAWA policy's benefits based on the victim's statement or other corroborating evidence. Temporary Waivers can be granted in the sole discretion of the PHA's Executive Director, a designee, Section 8 owner, or management agent.

Any waiver **must** be in writing. A temporary waiver in a particular instance(s) does not operate as precedent for, or create any right to, a waiver in any other case or cases, regardless of similarity in circumstances.

- 5. Response to conflicting certification.** In cases where the PHA, owner, or management agent receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, a PHA, owner, or management agent may determine which is the true victim by requiring third-party documentation as described in this section and in accordance with any HUD guidance as to how such determinations will be made. A PHA, owner, or management agent shall honor any court orders addressing rights of access or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household.

I. CONSIDERATION OF CIRCUMSTANCES

The United States Department of Housing and Urban Development (HUD) authorizes public housing agencies to consider all relevant circumstances when deciding whether to deny assistance based on a family's past history except in the situations for which denial of assistance is mandated. *[24 CFR 982.552(c)(2)]*

1. When determining whether to deny a family admission or participation, the PHA will ensure that an otherwise qualified applicant is not denied admission or participation on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking.
2. When determining whether to deny assistance because of action or failure to act by members of the family, the PHA has the discretion of considering circumstances including:
 - a. The seriousness of the case;
 - b. The extent of participation or culpability of family members;
 - c. Mitigating circumstances relating to the disability of a family member; and
 - d. The effect that denial of admission would have on other members of the family who were not involved in the action or failure to act. *[24 CFR 5.2005]*

J. LIMITS ON PROTECTIONS *[24 CFR 5.2005(B) & 5.2005(E)]*

Although the VAWA prohibits the PHA from using domestic violence, dating violence, or stalking as the cause for a termination or eviction action against a public housing or Section 8 tenant who is the victim of the abuse, the protections it provides are not absolute.

1. The VAWA does not limit the PHA's otherwise available authority to terminate assistance to or evict a victim for lease violations not based on an act of domestic violence, dating violence, or stalking providing that the PHA does not subject the victim to a more demanding standard than other tenants.
2. VAWA does not limit PHA's authority to terminate the tenancy of any public housing tenant if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant's tenancy is not terminated.

If the verifications and certifications are not acceptable, or not submitted to PHA within the specified time frame, the PHA may continue with the notice of lease violation and/or eviction action.

K. PHA CONFIDENTIALITY REQUIREMENTS *[24 CFR 5.2007(b)(4)]*

1. All information regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, provided to the PHA or to a Section 8 owner or management agent in connection with a verification as required by Section 28.8 of this policy shall be kept confidential. This includes information provided in lieu of such verification where a waiver of verification is granted by the PHA as provided for in Section 28.8.4.

2. The PHA, owner, or management agent:
 - a. May not enter this information into any shared database;
 - b. May not share nor provide access to this information to any employees of the PHA, owners, or management agents, or those within their employ (e.g., contractors) unless explicitly authorized by the PHA, owner, or management agent for reasons that specifically call for these employees or those within their employ to have access to this information; and
 - c. May not disclose this information to any other entity or individual, except to the extent that disclosure is:
 - Requested or consented to by the individual making the documentation, in writing; or
 - Required for use in an eviction proceeding in public housing or termination of Section 8 assistance; or
 - Required by rule of Court, Court Order and/or applicable law.

L. NOTIFICATION OF VAWA RIGHTS AND PROTECTIONS

All tenants of public housing and those participating in the Section 8 Rental Assistance Program administered by the PHA, shall be notified in writing concerning the rights and obligations created under VAWA including confidentiality, denial of assistance and termination of assistance. Notification will be provided in the following manner:

1. Information regarding VAWA will be included in or attached to leases, Housing Assistance Payment Contracts and Project Based Section 8 Contracts;
2. Information regarding VAWA will be included in orientations and briefing packets for new participants;
3. Information regarding VAWA will be posted in the PHA's offices and on the PHA's website;
4. Tenants will be informed of their rights under VAWA during any interim or annual recertification;
5. Section 8 owners, landlords and participants receiving assistance will be informed of their rights and obligations under VAWA in the "Property Owner's Guide" and the "Tenants Guide" respectively;
6. Information regarding VAWA rights and protections will be included in all program violation notices, eviction notices, and denial of assistance letters.

M. COURT ORDERS/FAMILY BREAK-UP

1. **Court Orders.** The PHA will comply with orders entered by courts of competent jurisdiction affecting individuals assisted by the PHA and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.
2. **Family Break-Up.** Other PHA policies regarding family break-up are found in Chapter 19, Section 19.5 "Adding or Deleting Members To The Lease" of the PHA's Property Management Administrative Plan.

N. TRANSFERS

In situations that involve significant imminent risk of harm to an individual as a result of verified incidents or threats of domestic violence, dating violence, or stalking, the PHA **may** consider, approving a transfer by a public housing tenant to a different unit in order to reduce the level of risk to the individual in accordance with the PHA's Transfer Policy as found in the Admission and Continued Occupancy Policy (ACOP) of the PHA.

O. RELATIONSHIPS WITH SERVICE PROVIDERS

It is the policy of PHA to cooperate with organizations and entities, both private and governmental that provides shelter and/or services to victims of domestic violence, dating violence, or stalking.

If the PHA staff becomes aware that an individual assisted by the PHA is experiencing or has experienced domestic violence, the PHA will endeavor to refer the victim to one of the members of the Rhode Island Coalition Against Domestic Violence.

Notwithstanding the foregoing, this Policy does not create any legal obligation requiring PHA either to maintain a relationship with any particular provider of shelter or services to victims of domestic violence, dating violence or stalking or to make a referral in any particular case.

P. THE VAWA AND OTHER LAWS [24 CFR 5.2011]

Neither the VAWA nor the PHA's VAWA Policy shall be construed to supersede any provision of federal, state, or local law that provides greater protection to victims of domestic violence, dating violence, or stalking than the PHA's VAWA Policy.

Q. AMENDMENTS

This policy may be amended from time to time by the Providence Housing Authority as approved by the PHA's Board of Commissioners.

PROVIDENCE HOUSING AUTHORITY

VIOLENCE AGAINST WOMEN ACT (VAWA) CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE OR STALKING

Certification shall be made as provided in one of the three Sections, A, B or C below.

1. Date this VAWA certification form given/mailed to resident: _____
2. PHA Staff member giving/mailing form to resident/applicant: _____
3. Completed form must be returned to the PHA **within 14 business days** after receipt by the resident (add three days if form mailed to resident/applicant).

A. FOR A CERTIFICATION MADE BY A RESIDENT

Please return the completed and signed HUD Form 50066 which is attached.

B. FOR A CERTIFICATION MADE BY PROVIDING POLICE REPORT OR COURT RECORD

1. Name of the victim of domestic violence, dating violence or stalking: _____

2. Victim's address: _____

3. Head of Household on lease: _____
4. Perpetrator's name: _____
5. If perpetrator's name is not known, explain why: _____

6. Perpetrator's relation to victim: _____
7. Dates and description of the qualifying incidents: _____

Certification of the Domestic Violence, Dating Violence or Stalking (Section B).

I hereby certify and attest that the description of the incident(s) of domestic violence, dating violence or stalking set forth in the attached police report or court record is/are true and correct.

Signature of Resident

Date:

Sworn to and subscribed before me this _____ day of _____, 20_____.

Notary Public: _____
Signature *Print Name:*

Date: _____ My commission expires: _____

Note: A copy of a police report, temporary or permanent restraining order, or other police or court records relating to the violence must be attached when you return this form.

C. FOR A CERTIFICATION MADE BY AN EMPLOYEE, AGENT OR A VOLUNTEER OF A SERVICE PROVIDER TO VICTIMS OF DOMESTIC VIOLENCE; OR AN ATTORNEY OR MEDICAL PROFESSIONAL FROM WHOM THE VICTIM HAS SOUGHT HELP IN ADDRESSING DOMESTIC VIOLENCE, DATING VIOLENCE OR STALKING OR ITS EFFECTS

THIS SECTION MUST BE COMPLETED BY THE SERVICE PROVIDER/PROFESSIONAL

1. Name of the victim of domestic violence, dating violence or stalking: _____

2. Victim's address: _____

3. Head of Household on lease: _____

4. Perpetrator's name: _____

5. If perpetrator's name is not known, explain why: _____

6. Perpetrator's relation to victim: _____

7. Dates and description of the qualifying incidents: _____

6. Perpetrator's relation to victim: _____

7. Dates and description of the qualifying incidents: _____

Certification of Domestic Violence, Dating Violence or Stalking By a Service Provider or Professional. (Section C)

A. Name of person completing this section: _____

B. What category best describes you? **(check one ✓)**

Victims' Service Provider _____ Attorney _____ Medical Professional _____

C. Title: _____ Phone #: _____

D. Agency/Business Name: _____

E. Agency/Business Address: _____

CERTIFICATION

I hereby certify and attest under penalty of perjury (28 U.S.C. 1746) that the foregoing is true and correct and I believe that the incident(s) described above is/are bona fide incidents of abuse.

Signature of Service Provider/Professional _____
Date:

Sworn to and subscribed before me this ____ day of _____, 20____.

NOTARY PUBLIC/_____
My commission expires:_____

Attested to as true and correct:

Signature of Victim _____
Date:

Sworn to and subscribed before me this ____ day of _____, 20____.

NOTARY PUBLIC/_____
My commission expires:_____