

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION TWENTY-FIVE  
SUBREGION THIRTY-THREE

THE HOPE INSTITUTE FOR CHILDREN )  
AND FAMILIES, )  
 )  
Employer, )  
 )  
and )  
 )  
AMERICAN FEDERATION OF STATE, )  
COUNTY AND MUNICIPAL EMPLOYEES, )  
COUNCIL 31, AFL CIO, )  
 )  
Petitioner. )

Case No. 25-RC-085832

**REQUEST FOR REVIEW**

Now comes Petitioner pursuant to Sections 102.11 102.114 of the Board’s Rules and Regulations and requests review of the decision of the Regional Director in the above captioned matter.

On August 2, 2012 a hearing was held on a petition filed under 9(c) of the National Labor Relations Act (the “Act”), by Petitioner American Federation of State, County, Municipal Employees, Council 31, AFL CIO, on behalf of Local 2481, seeking to represent four employees of the Employer in the position entitled “Safety and Security Associates” (SSA). The only issue raised as to the Petition was whether these employees were “guards” as defined in the Act.

The Regional Director, by decision dated August 28, 2012, found that said employees were “guards” within the meaning of the Act. This decision was based on clearly erroneous factual conclusions and a misapplication of the Boards previous rulings on exclusion of “guards”.

The Board has set out those attributes of an employee's assignment that constitute guard duties and those that do not in the case of *Boeing Company*, 328 NLRB 128 (1999). Here, the employees at issue held none of the responsibilities depicted in the *Boeing* case. Their only authority in regard to such matters was the "simple reporting" of a departure from the Employer's standards of property control and maintenance.

### FACTS

The Employer, Hope Institute, is a not-for-profit agency that provides residential, educational and health services to youth 5 to 21 who have multiple disabilities, the large majority having a diagnosis of autism. There is a campus facility, which has 5 living units and an educational or learning center. Off-campus, the Employer operates 13 houses called community integrated living arrangements spread throughout the City of Springfield, Illinois (Tr. 15-16). Including all locations in Springfield, the Employer has approximately 550 employees. In addition to the sought-for employees, the Employer also employs persons in the title of Habilitation Specialists, Education Specialists, Shift Leads, Lead Teachers, LPN's, dietary workers, cooks, maintenance staff, job coaches, and a variety of other titles (Tr. 16-17). Many of these employees are covered by an existing collective bargaining agreement between Petitioner and the Employer. The collective bargaining agreement (Employer Exhibit 1) excludes employees in the category of "guards" and "risk management employees." The Safety and Security Associates herein at issue work in the Employer division called "risk management," which has recently been renamed as the Safety and Security Department (Tr. 19, 27-28).

The Employer is licensed and regulated by various State of Illinois agencies and reviewed and accredited by a national accreditation service (Tr. 18-19). These agencies and the accrediting body do not require the Employer to have security guards, nor does the Employer's insurance (Tr. 28-99). Like other employees hired by the Employer, the Safety and Security Associates go through a background check, including a criminal background check (Tr. 29-30). Upon being hired, all employees, including the Safety and Security Associates, go through a three-week training program, including techniques on how to intervene if the youth is acting out (Tr. 32 - 33).

Glenn Freberg, the Employer's Labor Relations Director, testified that the role of the Safety and Security Department is to provide security for the grounds including vehicle security and oversight of money "mostly I think of them as the go to people in any kind of crisis any kind of emergency situation." That Department's duties include liaison with law enforcement or other outside entities and coordinate responses to emergencies and "elopements"; an "elopement" being a situation where a youth physically runs away from the institution. When a youth runs away, coordination of the search is by the Safety and Security Department (Tr. 20-21). He further testified to his knowledge the employees at issue patrol the grounds, and check doors to make sure same are locked. When the Associates monitor the grounds and see an employee sleeping, they are to write a report (Employer's Exhibit 2). Such report may be used as evidence in a disciplinary proceeding (Tr. 22-24). Similarly, if anything out of the ordinary occurs during the shift of a Safety and Security Associate, it is to be noted by him in his daily report shift log." Such report may also be used in evidence, as in a disciplinary proceeding of an employee (Tr. 25-26).

Mr. Freberg acknowledged that all employees of the Employer are required to report

instances of employee misconduct that could be detrimental to the health of youth including sleeping on the job (Tr. 27). The role of the Safety and Security Department is to coordinate all such reports (Tr. 27).

Mr. Tab Turk is the Director of Safety and Security for the Employer and testified that his Department consists of himself, Assistant Director Doug Morton and four Safety and Security Associates. They do not wear uniforms; they have an ID badge which states that they are with the Hope Institute for Children and Families with their picture on it, their name is highlighted. It also has their job title. Employer's Exhibit 4 is the job posting for the Safety and Security position. Turk stated that the position involves making rounds on campus buildings to see that the appropriate security measures are in place, that unusual incidents are reported, including unusual incidents with fellow staff members and/or unusual persons on the parking lot. Their checking includes checking on the doors and the Employer's vehicles and that the vehicles return from their trips in good working condition with adequate fuel (Tr. 38-40). The Safety and Security Associates issue out vehicles, telephones, credit cards, etc., when staff take same on prescheduled trips and logging same back in. If there is a discrepancy in the staff reporting as to such items, the Safety and Security Associate is to obtain a statement from staff as to explanation and report any unusual matter to their supervisor (Tr. 41-42, 52).

When the Safety and Security Associate is in the office, they can view a computer monitor that allows them to observe through cameras placed throughout the institution, with a view of the institution's doors. At times, the Safety and Security Associates are called by staff to verify the time when a staff member came to work by reviewing the videos of the aforesaid cameras (Tr. 45-46). The Safety and Security Associates also play a role in activating the entry cards for staff

(Tr. 46-47). If a staff member is to be terminated, the Safety and Security Department is notified 75% to 80% of the time. Mr. Turk himself escorts employees that were terminated off the grounds (Tr. 48). If a termination were to occur outside of Turk's normal work hours, a Residential Service Manager or an Acting Director would escort the employee out (Tr. 49).

When Safety and Security Associates are hired, Turk walks them through their tasks for a minimum of one week to train them on everything they are required to do regarding the cameras, the money, the trips, the rounds, and the incident reports (Tr 56). The incident reports that are filled out by Safety and Security Associates are given to the staff supervisors who could use them in a variety of situations from the verbal discussion all the way up to discipline (Tr. 58). In making their evening and night rounds, Safety and Security Associates may observe a staff member sleeping, in which case they are to note same in their reports (Tr. 61, 62, 63). Turk then reviews such reports and sends them on to the Director and Assistant Director and the Residential Chief of Learning and Living. Those persons decide how to handle the situation (Tr. 64-66).

He further testified that, if there is a fight on the premises, the Safety and Security Department is called and someone will go out and try to calm things down. If something horrific happened at the scene he would expect staff to report the same in their incident report and get a camera to take pictures of property damaged so as to be able to make a complete report to him (Tr. 67). If there are reports of child neglect or abuse, this is coordinated by his Department (Tr. 68-69). Employer's Exhibit 13 is a document prepared by Mr. Turk to give to the new administrator Mary Miller describing what the Safety and Security Department does (Tr. 71-73). Mr. Turk testified that either he or his assistant Doug Morton meet with staff on a regular basis to discuss things that may be out of the ordinary with the Institution or with the youth. He investigates any alleged staff

misconduct if requested and if there are incidents of this behavior that need to be sent on to DCFS or to licensing, he writes that report (Tr. 73-75). The Safety and Security Department also coordinates the giving of employee identification cards to staff, which card is used to gain access to the facility doors (Tr. 77-79).

Mr. Turk further testified that the task of walking staff that have been terminated out of the institution is not limited to the Safety and Security Department (Tr. 80-81). When a Safety and Security Associate in the course of his duties sees something unusual, he will "follow up," by which is meant that he will inform either Mr. Turk or Mr. Morton of what has occurred or is occurring (Tr. 81). If any Safety and Security Associate is not available for monitoring and walking around the facility, it does not occur. As to the reports generated by the computer as to persons seeking access to doors of the institution by use of their cards, whether access is granted or not is a function of whether their card was so programmed. The Safety and Security Associate, who is observing the monitor of the cameras viewing the doors, does not control said access (Tr. 83-84). Turk is aware that other employees also fill out log sheets and reports. The reports of unusual events or incidents filled out by the Safety and Security Associates are sent to the area supervisor who makes the determination as to what if anything should be done (Tr. 84-86). As to the potential situation of the fight between two staff members, the only training received by the Safety and Security Associates was the same training that is given to all new employees (Tr. 87-88).

When a visitor comes to the institution during normal business hours he or she would go to administration and the receptionist will sign them in and give that visitor an ID card. After hours, a visitor is to go to the Safety and Security office and follow the same procedure (Tr. 90-91). Safety and Security Associates do not have weapons or any other like tools. Mr. Turk explained that

Hope is a DCFS-licensed facility and under the guidelines of DCFS, employees would not be allowed to have such equipment (Tr. 91). Safety and Security Associates do have portable radios with which one can access administration and maintenance, as do other employees (Tr. 92-93). Mr. Turk drafted provisions of the strike plan but could not state whether the strike plan has been adopted or implemented (Tr. 94-95). The Safety and Security Department would in the event of a strike have to be able to maintain security and protect the institution. They would probably have to hire additional people in such an event (Tr. 96). Employer Exhibit 13 was prepared by Mr. Turk to inform a new Chief of Living and Learning of the functions of the Safety and Security Department. It is not a job description for Safety and Security Associates (Tr. 71, 88-89). Employer Exhibit 14 was the last job description of the Safety and Security Associate position (Tr. 96-98). Safety and Security Associates were not given any special notification or training as to any particular role, if any, they might play in a strike (Tr. 99).

Mr. Freberg was recalled and testified that he put together the strike plan and stated that there is a role for the Safety and Security Department in that plan. It would be responsible for the delivery of supplies and insuring ingress and egress of the facilities and if necessary would transport youth to doctors' offices and the various places that you have to go to on a regular basis. Exhibit 15 contains excerpts from the Employer strike plan, the reference to the Safety and Security Staff in the plan refers to the responsibilities of the Director of Safety and Security as he made direct and pertains to the overseeing and coordinating of all security arrangements and to the task of being liaison with law enforcement agencies. The Safety and Security Department would be a command post in the event of a strike, and it would be run by the Safety and Security Director, who would work with Human Resources to deactivate the security access of striking employees (Tr. 105-107).

The strike plan called for the possible hiring of an outside security firm to handle security and discussions were held with that entity as to the possibility of such an eventuality. However, the Safety and Security Associates at issue were not spoken to about what, if any, role they might play in a strike or whether there would be any change in the roles that they currently play (Tr. 108).

Theresa Brown, an employee of Hope, works as a Lead Teacher's Aide and has been employed there for 6 ½ years. She testified that there is a protocol to be followed in the event that a youth is physically out of control and is more than the immediate staff person can handle. That protocol is to involve the "Crisis Response Team." The team consists of staff from education, educational specialists, LTA's, behavioral specialists, and the clinical psychologists. This team has been used but no Safety and Security Associate was involved in those incidents (Tr. 112). When she comes to work and leaves work, neither her person nor her coat is searched (Tr. 112). Some students that come from the community are searched, which is done by the teachers and support staff in that classroom, the Safety and Security Associates are not involved in that (Tr. 112-113). Some employees have lockers where they can keep their personal belongings, the employees bring their own locks and do not give keys to the Security Department. As Union Steward, she was often involved when employees are being disciplined and are being told to leave the campus. As a routine matter she walks the employee out (Tr. 113). In the evening and night shifts, there are non-security staff that make rounds and check that everything is as it is supposed to be and to make sure, among other things, that monitoring employees are not sleeping and write them up if necessary (Tr. 114-116).

John Bartley, Sr., is a Safety and Security Associate at Hope and testified that his role as to the electronic access cards of staff is to activate or deactivate a card. He is told to activate or

deactivate by the Director or the Assistant Director. His role physically is to click “deactivate” and then “saved” on the computer (Tr. 117-118). The Safety and Security Associates play no role with the 13 cottages in that community that are part of Hope (Tr. 118-119). He received no training other than what other staff receives as to what if anything to do in the event of a physical fight (Tr. 119). If he sees a rule infraction, he is to report same; he has no authority to enforce the rules; there is always someone in management to whom he can report an incident that may require immediate attention. He has no authority to search people coming in or off the premises (Tr. 20). His role as to providing money to the staff is that if staff is authorized to have money, he would have received a packet from Finance. He then gives the packet to staff, for example, going on a field trip, and when they come back, they sign back in, and he sends the packet back to Finance. Each trip has an envelope that was pre-prepared before he receives it. He counts the money out and counts money back in and checks for receipts. If there is a discrepancy, staff has to write out what happened and then it’s reported. He has no authority to keep staff from entering the institution until they put the money back in (Tr. 122, 128). If an employee were on premises before or after that employee’s scheduled work time hours, Bartley’s only role would be to report it (Tr. 122). Bartley received no instructions as to what if anything would change in regard to the duties of a Safety and Security Associate if other employees went on strike (Tr. 122). If a vehicle is not in compliance with the Employer policy, such as there is insufficient gas or the vehicle is dented, his role is to write it up (Tr. 124-125). He does not have the authority to tell strangers on the facility grounds to leave (Tr. 126-127). He once asked a person what he was doing on the grounds with a dog and was later told by supervisors not to do that (Tr. 127).

## ARGUMENT

Section 9(b)(3) of the NLRA, *inter alia*, states that an appropriate unit may not include, together with other employees, “any individual employed as a guard to enforce against employees and other persons rules to protect property of the employer or to protect the safety of persons on the employer’s premises.”

As was held by the Board in *Boeing*, “Guard responsibilities include those typically associated with traditional police and plant security functions, such as the enforcement of rules directed at other employees; the possession of authority to compel compliance with these rules; training in security procedures; weapons training and possession; participation in security rounds or patrols; the monitoring and control of access to the Employer’s premises; and wearing uniforms or displaying other indicia of guard status.” The Board also stated that of particular significance is the role that the disputed employees may play during a period of industrial unrest or strike by other members of the Employer’s workforce. Thus, the Board stated it will look at the duties and responsibilities assumed by the disputed employees during periods in industrial unrest or strike. These guard responsibilities are to be distinguished, the Board held, from the type of duties engaged in by large categories of proto-typically non-guard employees who “for instance may have been charged with the simple reporting of health and safety infractions during periods of normal operations”.... “Hence when employees enforce the Employer’s safety rules during normal operations, and not during strikes and other incidents of industrial unrest, the Board has found that such rule enforcement duties were not related the circumstances in which Congress felt conflicting loyalties might exist, and that the employees questions were therefore not guards.”

In the case of *55 Liberty Owners Corp.*, 318 NLRB 308 (1995), the employees therein at issue – doorman and elevator operators in New York City apartment buildings – functioned in many ways as the employees here at issue do. The doorpersons or elevator operators monitor and regulate access into the building, deny entrance to unauthorized persons, and observe and report irregularities. The doorpersons and elevator operators receive deliveries when residents are not home, storing them in a room or an area off the lobby....the doorpersons have visitors and/or delivery-persons and contractors sign a log-in book. The disputed classifications carry no weapons nor are they authorized to engage in physical contact with unauthorized individuals. They do not wear uniforms, badges, or other insignia designating them as security personnel; are not deputized; and are not registered under state security law. The *Liberty Owners* Board reversed the Regional Director’s finding that these employees were guards, noting in addition to the foregoing that they “are not trained in security, are not armed, are not instructed to use physical force, and do not present themselves as guards in their appearance. They do not perform other guard-like functions such as checking suspicious packages or asking off-duty employees to leave....” The *Liberty Owners* Board noted the similarity of the facts in that case to those in the case of *Ford Motor Company*, 116 NLRB 1995 (1956), wherein the receptionist was found not to be a guard notwithstanding the fact that she did not permit authorized employees to pass through the lobbies, immediately reported to her supervisor any violation of company security rules and regulations, checked in and issued passes to vendors and visitors, and required clearance passes for all incoming and outgoing packages, and was an employee of the security department of the plant. Nonetheless, this was insufficient to make her a guard within the meaning of the Act. In accord *Wolverine Dispatch and International Union, United Plant Guard Workers of America*, 321 NLRB 796 (1996), “employees who perform some

‘guard-like’ duties that are incidental to receptionist or clerical duties are not found to be guards under the Act”, citing *55 Liberty Owners Corp.*

Here, the Safety and Security Associates have not been shown to have the authority to enforce the Employer rules. They have not been trained in the use of physical security of other employees or of the “youth” or of the employees plant, they carry no weapons, have no uniform, their employee ID badge is no different in type from what other employees carry, the only distinguishing feature being their name and job title – which is not “guard.” They have a minimal, clerical role in employee access to the institution, that being to enter “access” in the computer so as to activate an employee card after receiving direction to do so. Indeed, unlike the employees in *55 Liberty Owners Corp.*, they do not even have authority to deny access to visitors.

They also have no responsibility to check or inspect, coming or going, employee or visitor clothing or bags. They do not have authority to require employees who are on premises after their shift to leave and, contrary to the finding of the Regional Director, have been told not to challenge strangers who walk onto the campus.

Furthermore, the Employer has not demonstrated that the responsibility/authority of the Safety and Security Department – such as its role, if any, in any strike – in any way is that of the Safety and Security Associates here at issue. In other words, that the Director of Safety and Security has responsibility/authority does not mean that he has delegated any such responsibility/authority to the Associates. (See Exhibit 13, which was not given to the Security and Safety Associates.) Indeed, as to the “strike plan” fragment in evidence, the Security and Safety Associates have received no indication from management that they would have any responsibilities. Certainly, the fact that Safety and Security Associates’ reports of employee misconduct may be used, at the discretion of

management, in disciplinary proceedings against other employees creates no more of a conflict between their duty to management and their loyalty to other employees than exists between all of the Employer's employees and the Employer, all of whom are obligated to report such misconduct.

As noted above, their primary role as "eyes and ears" of the Employer in reporting to management departures from the routine is insufficient to conclude that they are "guards" within the meaning of the Act.

As in the case of *Arcus Data Security*, 324 NLRB 496 (1997), where the Board found the employees therein at issue not to be "guards", here the SSA's have also not been trained, given any equipment for/or told that they are responsible for, "protecting" either the Employer's employees, students or property. In accord with this construction of the "guard" exclusion as expressed in *Arcus*, the Court in *Corrections Corp. v. NLRB*, 234 F.3d 1321 (D.C. Cir., 2000), in an enforcement order affirmed the Board's holding that the employer's "social penal workers" were not guards within the meaning of the Act because it was clear "that enforcement is not essential to their main duties."

The Regional Director's decision did not follow the standards set by the Board in *Boeing* and the other cases as noted above, but rather rested upon SSA responsibilities and Employer circumstance that are not included in the Act's definition of "guard" responsibilities nor found to be determinative in other Board cases, e.g. the fact that "there are no other security personnel guarding the employers facilities". The Regional Director's decision also relies upon isolated employee tasks found in earlier Board cases, to wit: *MGM Grand Hotel*, 274 NLRB 139 (1985); *A. W. Schlesinger Geriatric Center, Inc.*, 267 NLRB 1363 (1983) and *Wright Memorial Hospital*, 255 NLRB 1319 (1980). However, the Regional Director's decision ignores important distinguishing features of

those cases as held in subsequent Board decisions.

In *McDonald Aircraft*, 279 NLRB 357 (1986), the Board noted that in the *MGM Grand Hotel* case the employees in question “operated an automated light safety system used for fire prevention and security and engineering functions, and were found to be guards because they were intimately involved in security functions and life safety procedures at the employer’s facility.” This distinguished them, the Board concluded, from the employees at issue in *McDonald Aircraft* who had no such *responsibilities* and hence were not “guards”. Here, the employees at issue did not operate any lifesaving system used for fire prevention and security, are not involved in any security functions or lifesaving procedures at the Employer’s facility and had not been trained to do so. Their only role was to observe not operate interior doors at the Employer’s facilities through a camera and report malfunctions of same and/or, upon request, report automated video captured times of employee access/exits. There is no evidence that they otherwise operated these systems or had any authority to grant/deny access.

In the case of *Purolator Courier Corporation and Communication Workers of America*, 300 NLRB 812 (1990), the Board noted that its holding in *Schlesinger* to the effect that having the authority to only report a situation is not in and of itself a reason to find an employee was not a guard, but that this is applied only when said employees otherwise met, because of their other duties, the statutory requirement for being guards.

Following *Purolator*, the Board in *Pony Express Courier Corp. and Joint Council of Teamsters No. 28 et al.*, 310 NLRB 102 (1993), found significant as a factor indicating lack of “guard” status, the fact that the employees at issue had no mandate to protect customer property, and any guard-like duties were incidental to their main function. Here, as in *Purolator* and *Pony*

*Express*, the only security related authority given to the employees at issue is reporting, the SSA's having no other authority to enforce the Employer's rules or training/equipment necessary to protect its property.

The Regional Director also cites *Wright Memorial* for the proposition that reporting findings to others who have the authority to deal with them is sufficient to make an employee a guard within the meaning of the Act. However, as explained by the Board in *BPS Guard Services Inc. DBA Burns International Security Services and United Steelworkers of America*, 300 NLRB 298, "employees with no greater responsibilities for plant security than those possessed by rank-and-file employees have been held not to be guards" citing *City Service Refining Corp.*, 121 NLRB 1091, 1092-1093. Here, other employees are also engaged in observing the facilities and noting and reporting any departures from expected standards of plant conditions or employee conduct.

As is well-established, the Employer being the party seeking exclusion is required to produce specific detailed evidence in support of its position. Here, the Employer provided no incidents of the employees at issue being actively engaged in those activities "typically associated with traditional policing and plant security functions".<sup>1/</sup> Indeed, the Employer's protocols for how to deal with physical disruption include the assembly of designated employees to handle the situation. The SSA's are not included in that team and are not used for that purpose. Nor where the Employer has established a procedure for inspecting the persons of people entering the facility are SSA's the employees charged with carrying out that function. Nor do they inspect baggage of

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<sup>1/</sup> As was held by the Board in *Burns*, the use of the words "as a guard" in Section 9(b)(3) was intended by Congress as a limitation of the exclusion so as to include only "those employees whose duties encompass the security type functions generally associated with guards".

persons/employees coming on or leaving the premises, nor do they have access to employee lockers, nor did they screen visitors or issue passes to said visitors except when the receptionist is not available. They have not been trained nor given any instructions as to what role if any they would have in the event of a strike. Rather, their primary function is of a clerical and quality control nature. They are given a predetermined amount of money to give to pre-authorized staff person for a “field trip”, they are to receive any returned money and receipts for said predesignated activity and to tally and report the same. That they ask the returning employee to provide said receipts and/or fill out a brief form explaining the lack thereof does not give them authority to enforce the Employer’s rules. In a similar manner they inspect the Employer’s automobiles to see that they are up to the Employer’s standard and that adequate gas is present. Any departure from the Employer’s standard is reported, much as an employee in a rental car service would note such conditions.

Moreover, the Regional Director’s finding that the SSA’s have responsibility to enforce the Employer’s rules or protect its property based on an incident wherein an SSA asked a non-employee who was on the grounds with a dog to leave, overlooks the fact that the employee involved was later instructed by management that he had no such authority and should refrain from doing so in the future.

The Regional Director distinguishes the facts in the instant case from those found in *Boeing* and *55 Liberty Owners Corp.* by arguing that in those cases the employees had non-guard responsibilities in addition to the simple reporting of health and safety infractions during periods of normal operations. Yet, as noted above, such activities, i.e. the simple reporting of infractions has never in and of itself been found by the Board to make an employee a “guard,” whether the Employer had other employees who actually functioned as “guards” or not.

**CONCLUSION**

For the above reasons as the SSA'S have neither "enforcement" nor "protection" authority and as the Regional Director correctly found that there was no showing that the SSA's have "strike" duties or responsibilities, Petitioner requests that the Board reverse the Regional Director's decision that the SSA's are "guards" within the meaning of the Act.

Respectfully submitted,

CORNFIELD AND FELDMAN

**September 11, 2012**

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**CERTIFICATE OF SERVICE**

Jacob Pomeranz, an attorney, hereby certifies that he caused a true and accurate copy of the foregoing **REQUEST FOR REVIEW** to be served upon the following by E-mail, on this 11<sup>th</sup> day of September , 2012:

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