



SOUTHPORT HARBOR

Dear Clients & Friends,

We are pleased to publish a new issue of our annual newsletter to update you on recent legal developments, topics of concern and a hand-picked compilation of BW news. The issue covers topics ranging from the enactment of Connecticut's new asset protection law to a discussion on how start-ups can raise much needed capital. We also welcome a new associate, Kimberly T. Smith, to the firm.

Over the past year, we introduced two new client service platforms to deliver more value to our client relationships. In May, we launched our first bi-annual electronic update as an additional means to share important timely information. We released our second issue in October. In November, we unveiled a new Tax Seminar Series intended to educate clients and referral sources on important tax developments and considerations. We look forward to building on the success of these efforts in 2020.

In closing, we hope you find this newsletter to be beneficial and of interest. We also hope the content reflects the unique and complementary experience and skills our attorneys provide to clients. We are thankful for the confidence and trust you place in us, year after year, and it is our pleasure to be of assistance. If you wish to opt-in to receive our electronic update, you may complete the news sign-up form on the BW website or send us a note at info@brodywilk.com. Finally, remember to follow us on LinkedIn, Twitter and Facebook.

Best Regards,
Brody Wilkinson PC

New Connecticut Directed Trust Act Offers Key Advantages

WHEN DISCUSSING THE ADVANTAGES OF TRUSTS

and the duties of trustees with clients, we are often asked the challenging question, "Who should serve as my trustee?" Before now, the answer to this question left clients to choose between the professional management of a corporate trust department or an individual, who, often times, is a close friend or family member. While each scenario offers certain advantages and disadvantages, clients often feel dissatisfied with having to name one or the other. The good news is that Connecticut recently adopted the Connecticut Directed Trust Act which allows individuals to name multiple separate fiduciaries to administer trusts.

In general, trustees play three (3) roles in administering trusts: (1) to invest trust assets; (2) to distribute trust assets to beneficiaries; and (3) to file tax returns, notices and accountings. With this new legislation, individuals may now designate different parties to fulfill each of these distinct roles. For example, clients may wish to name an investment management company to handle the trust investments and a friend/relative, who has a closer relationship with trust beneficiaries, to handle the distributions. In this example, the investment management company can be named as a trust investment director and the friend/relative can be named as a trust distribution director. In addition, a third party (or one of the above named directors) can be named a trustee to handle the administrative filings. If a client is

setting up an irrevocable trust for the benefit of family members, the client may be the investment director (subject to certain restrictions) while another person may be the distribution director.

The Connecticut Directed Trust Act provides two significant advantages. The first is that clients are no longer limited to selecting one fiduciary to manage all aspects of trust administration. They can utilize the unique value and strengths of different parties for each of the customary trustee roles. The second is that each trust director will, in most cases, have limited or no liability for the actions of the other trust directors. This benefit will allow clients greater flexibility to create trusts with non-customary trust assets, such as stock in a closely held business or certain classes of real estate. Although it can be argued that naming multiple trust directors makes matters more complicated, we feel clients will be better served with this “best in class” approach. *For more information, please contact James M. Powers (jpowers@brodywilk.com) or another BW attorney.*

How To Raise Vital Capital For Your Start-Up Venture

THE BIGGEST CHALLENGE FACING START-UP COMPANIES is how to pay for ongoing expenses until there are sufficient revenues. Start-ups often need to raise capital from outside sources in order to grow and become successful. This article outlines the most common methods start-ups use to raise capital and the benefits and disadvantages of each.

Friends/Family

Friends and family can provide start-ups with a quick injection of capital. However, if they do not financially qualify as “accredited investors,” the company may not be able to comply efficiently with the applicable securities laws governing investments.

Angel Investors

Angel investors are wealthy individuals or entities who invest their own money into start-ups. Some prefer companies that are local or that share a common mission. The biggest difficulty is finding them and convincing them to invest. Connecticut start-ups can utilize formal networking organizations, including the Angel Investor Forum, to meet angel investors.

Venture Capital

Venture capital funds are in the business of investing money in emerging companies. They can provide substantial funding to help companies grow. Some funds will ask for significant veto power over company decisions and numerous investor rights, which can be a problem for owners who want to maintain their control and upside.

Equity Crowdfunding

Start-ups can raise up to \$1,000,000 from investors in any 12-month period via equity crowdfunding in compliance with the JOBS Act. Crowdfunding campaigns must be conducted through registered investment portals and certain financial disclosures must be given to investors. Due to the compliance costs involved, a campaign may not be successful if a company’s funding goals are not achieved.

Kickstarter Campaigns

Campaigns on Kickstarter and other similar websites allow start-ups to raise money from the public while keeping all of their equity. Companies usually offer free products or services to incentivize donations. The drawback is that the donation amounts are usually small, which can hinder the company’s ability to raise a large amount of money.

Loan Financings

Start-ups can receive loans from the Small Business Association (SBA) or traditional lenders in lieu of offering equity to investors. But lenders tend to be less forgiving than investors if they are not timely repaid. Connecticut companies can also receive loans from the Department of Economic Community Development (DECD) which can be forgiven over time if they keep a minimum number of jobs in-state.

Incubators/Accelerators

Various incubator and accelerator programs (including CTech and CTNext) have been established to provide funding, advice and support to start-ups. They can provide valuable resources. However, some owners may find the program’s requirements to be restrictive. Therefore, finding the right program for your company is imperative.

Start-ups will often need to rely on multiple capital raising methods, whether in combination or in succession, during different development stages. Advisors such as business attorneys and accountants can help start-ups develop the best strategies for raising capital based on objectives and needs.

For more information, please contact Mark W. Klein (mklein@brodywilk.com) or another BW attorney.

Connecticut Enacts New Asset Protection Trust Law

UNDER THE NEW “CONNECTICUT QUALIFIED DISPOSITIONS IN TRUST ACT” that went into effect on January 1, 2020, an individual may now set up a trust (referred to as an Asset Protection Trust or APT) for his or her own benefit which protects against claims of most future creditors. Previously, Connecticut residents who wished to set up an APT needed to go to an ATP-friendly state, such as Delaware, and utilize a local trustee. This approach was both inconvenient and often costly. Using a Connecticut APT also avoids the uncertainty, due to recent cases, regarding how much protection out-of-state trusts provide.

A Connecticut APT must meet certain requirements including primarily: (1) the trust must be irrevocable; (2) one of the trustees with material responsibilities must be a Connecticut resident or a bank or trust company authorized to act in Connecticut; (3) Connecticut law must govern the trust; and (4) the trust must contain a spendthrift clause (which means that a beneficiary may not voluntarily or involuntarily transfer his or her interest in the trust).

The settlor (creator) may receive income and principal distributions made by the trustee in its discretion, and may also have the right to receive up to 5% of the value of the trust property each year. In addition, the settlor may retain certain powers, including the power to veto a distribution to another beneficiary from the trust, and a limited power of appointment exercisable by Will to determine how trust assets pass at his or her death. By including these last two powers, no taxable gift is made at the time of the transfer. This type of trust should not be used to make taxable gifts since these trust assets may be includible in the settlor's estate due to the settlor being a potential beneficiary.

The assets held in the APT will generally be protected against future creditor claims, except fraudulent transfer claims (e.g., if the transfer of assets to an APT renders the settlor insolvent, the transfer may be considered fraudulent). Your attorney will require that you complete a solvency affidavit before drafting the APT to make sure that you are a good candidate.

Claims of future creditors are barred four years after the assets were transferred to the trust. Claims of existing creditors are subject to the same four-year period or within one year after the transfer to the APT was discovered by the creditor (or reasonably could have been discovered), whichever occurs later. If the settlor/

debtor files for bankruptcy, then federal bankruptcy laws prevail and the statute of limitations is ten years from the date of the petition for bankruptcy. An APT does not protect against child support obligations and marital support/division of assets obligations pursuant to an agreement that existed prior to the transfer of assets, and tort claims arising prior to the transfer of assets. In addition, an APT cannot be used to circumvent state or federal Medicaid laws. *For more information, please contact Lisa F. Metz (lmetz@brodywilk.com) or another BW attorney.*

Is Your Business Website ADA Compliant?

SINCE ITS INCEPTION THIRTY YEARS AGO, the Americans with Disabilities Act (ADA) has served to protect individuals with disabilities. The original scope of Title III of the ADA prohibited discrimination on the basis of disability in places of public accommodation, such as restaurants, hotels, retail stores, museums and libraries. Today, the scope and reach of the ADA has expanded due to the exponential increase in the use and prominence of the Internet. In response, courts and the Department of Justice (DOJ) have extended the application of the ADA to the Internet, and more specifically, to business websites. While the law is relatively unsettled and developing in this area, the message is clear: businesses must take steps to ensure that their websites are accessible by people with disabilities or risk defending a lawsuit under the ADA. For example, a website should be accessible to a visually impaired person through its compatibility with a site reader, which reads website content and plays it through the user's speakers.

What Businesses Are Affected?

Virtually every business that has a website could theoretically fall under the purview of the ADA. Businesses that operate websites offering goods and services that also operate brick and mortar locations are unquestionably considered places of public accommodation and therefore covered by the ADA. However, the courts are split over whether business websites that exclusively offer goods or services online are covered by the ADA. The Second Circuit (which includes the State of Connecticut) has held that a business does not require a brick and mortar location to be considered a place of public accommodation. Under this theory, any business offering goods or services through its website may be subject to the ADA.

What Actions Can Be Taken?

Businesses should assess whether their website is in compliance with the ADA. To do so, businesses should: (1) address compliance requirements with their web designer (provided the website was not designed in-house); (2) download software to assess the accessibility of their website; and (3) consult the Web Content Accessibility Guidelines (WCAG) which have been recognized by the DOJ. If a business is in the process of redesigning its website, the business should confirm that the new website is ADA compliant. In addition, businesses should ensure that their insurance policies (typically EPLI policies) provide coverage for ADA website claims.

What's Next?

Secondary sources indicate that courts are trending towards a more expansive view of the ADA, which may no longer distinguish between online and brick and mortar retailers. Consistent with this trend, ADA website claims are increasing. Accordingly, businesses should be proactive to ensure that their websites comply with the ADA to mitigate the risk of facing a claim. *For more information, please contact Daniel B. Fitzgerald (dfitzgerald@brodywilk.com) or another BW attorney.*

Connecticut UTC Imposes New Notice Requirements On Trustees

THE UNIFORM TRUST CODE, which went into effect January 1, 2020, creates new obligations for the trustee of an *intervivos* trust. The trustee now has a duty to provide an annual financial report to beneficiaries, unless waived under the trust agreement or by the beneficiaries. In addition, the trustee has new notice obligations. Within 60 days after the creation of an irrevocable trust or the death of the settlor (creator) of a revocable trust, the trustee must notify beneficiaries of their rights and provide them with the trustee's contact information. This type of notice must also be sent after a successor trustee is appointed. Notices must be sent to the beneficiaries directly, or to their parents if they are minors. Additionally, in certain circumstances, notices may be sent to a Designated Representative, if one is appointed under the trust agreement. A Designated Representative may receive notices, represent and bind the beneficiary. For example, this may be an appropriate measure with a beneficiary who struggles with substance abuse addiction.

An individual can bring a proceeding to contest the validity of a revocable trust within one year of the settlor's death, unless the trustee sends a copy of the trust agreement and a statement that the individual can bring a proceeding only within 120 days of such notice. For notices of this type given to a beneficiary, the notice must go to the beneficiary directly and not just to his or her Designated Representative.

A beneficiary can bring a claim for breach against the trustee not later than three years after the first to occur: (1) the removal, resignation or death of the trustee; (2) the termination of the beneficiary's interest in the trust; or (3) the termination of the trust. Alternatively, if the trustee sends a financial report to the beneficiary, then the beneficiary only has one year from the mailing date to file a claim, as long as the beneficiary is advised of his or her rights. We recommend that the trustee send annual financial reports to have protection from claims sooner. If the beneficiary signs a receipt and release and was made aware of his or her rights, then he or she is barred from making a claim.

If the trustee wishes to make a distribution from the trust and sends a proposed distribution to the beneficiaries along with a notice stating their rights and the time period to object, the trustee will be protected from claims brought beyond 30 days.

Trusts set up under a Will generally are not subject to the above provisions but must comply with statutory and probate court rules. The trustee of a testamentary trust cannot be released from liability using receipts and releases but instead must get probate court approval, which can be costly and time-consuming. *For more information, please contact Kimberly T. Smith (ksmith@brodywilk.com) or another BW attorney.*

BW Tax Seminar Series

AS MENTIONED IN OUR OPENING, we recently developed a new Tax Seminar Series. Robert L. Teicher, who heads the firm's tax law practice, presented the first seminar of the series on "Important Choice of Entity Considerations" on November 12, 2019. The program was held in our Southport office and attended by an audience of local accountants, financial advisors, entrepreneurs and start-up investors. Mr. Teicher addressed:

- Effects Of New Tax Laws
- New Planning Opportunities
- Revival Of Old Tax Laws

- Traps For The Unwary
- Private Equity Investments
- Qualified Opportunity Zone Investments
- Capital Gains Deferral

For more information about the Tax Seminar Series, please contact Robert L. Teicher (rteicher@brodywilk.com).

Planning Strategies For Snowbirds

MANY NEW ENGLANDERS, particularly at this time of year, consider making full-time or part-time moves to Florida for both tax and climate reasons. If you are thinking about doing the same, here is a quick rundown on what you need to know.

The first time a taxpayer files taxes as a non-resident or part-year resident in Connecticut or New York, it is likely to trigger a residency audit. Connecticut, New York and other New England states need the tax revenue and thus are fairly aggressive in seeking to retain a tax hold over snowbirds.

Residency for income tax purposes is typically determined in one of two ways. The first is a domicile test. Domicile is defined as the taxpayer's principal or primary home. Where is the taxpayer's business or family? Where does the taxpayer spend most of his or her time? We recommend to our snowbird clients that they address these factors by changing their driver's license, voter registration, and mailing address for banking and taxing information to Florida. We also suggest joining a house of worship and/or social club in Florida to establish roots there.

The second test to determine residency for income tax purposes is a statutory 183 days test. The taxpayer has the burden of proving that he or she was not present in Connecticut or New York for all or part of 183 days per year and there are quirky aspects to how days are counted. For example, a flight from LaGuardia to Florida that leaves at 11:00 a.m., counts as a day in both New York and Florida. A JFK layover on a flight to Europe will usually not count as a day in New York provided that the taxpayer does not leave the airport. A snowbird must keep detailed records of his or her travel; otherwise record keeping can be quite burdensome.

The good news is that apps have been created to make this task easier. TaxBird.com and TaxDay.com both use location services through your phone to record your location and provide reporting for tax purposes. Using these apps, you can easily see how many days you have

spent in each state and know how many days you have left. As an added bonus, the New York State Department of Revenue has reported that it will accept the app report as evidence of presence in or out of the state.

If you intend to declare part-year residency, be prepared and remember two important things: do not overstay your welcome in any one state; and make sure you are where you need to be for tax purposes (and that you can prove it). For more information, please contact Heather J. Lange (hlange@brodywilk.com) or another BW attorney.

Kimberly T. Smith Joins BW's Trusts & Estates Group



WE ARE PLEASED TO ANNOUNCE THAT KIMBERLY

T. SMITH has joined the firm as an associate in the Trusts & Estates Group. Ms. Smith practices in the areas of estate planning, trust and estate administration, and taxation. Prior to joining the firm, she worked

at a New York City-based law firm where she gained extensive experience drafting complex tax and estate planning documents for high net worth individuals and owners of closely held businesses.

"We are excited to welcome Kimberly to the firm. Her advanced degree in taxation and prior work experience in New York add depth to our expanding trusts and estates practice. It is also a benefit to have yet another attorney within the Group admitted to practice in New York," stated principal Ronald B. Noren.

Ms. Smith is admitted to practice in Connecticut, New York and Massachusetts. She is a member of the Connecticut Bar Association. Ms. Smith received her B.A. from State University of New York at Albany in 2013. She received her J.D. from Suffolk University Law School in 2016, where she was a member of the Suffolk Law Transnational Law Review and founded the Suffolk Law Real Estate/Trusts and Estates Group. While at Suffolk, she also held several positions and internships with organizations such as the New England Innocence Project; Massachusetts State Senate; Massachusetts District Court, Land Court Department; and Margolis and Bloom, LLP. Ms. Smith received her LL.M. in taxation and a certificate in estate planning from Georgetown University Law Center in 2017. While at Georgetown, she completed an externship with the American Bar Association Commission on Law and Aging.

Representative Matters

We assisted a single family office, as general counsel, in connection with a multi-million dollar investment in a private health care company valued at \$1.2 billion; an acquisition of two pieces of contemporary art valued at \$20 million involving a related loan transaction; and a gift of 60 acres of open space land to a land trust.

James M. Powers worked on these matters.

We represented a private investor in connection with the acquisition of qualified opportunity zone property and the creation of a qualified opportunity zone fund in order to facilitate the deferral of significant amounts of capital gains. **Justin L. Galletti** and **Robert L. Teicher** worked on this matter.

We assisted a food and beverage industry client with a series A financing with a strategic investor which included the formation of and contribution of assets to a new C Corporation so that the owners could take advantage of the IRS Section 1202 Qualified Small Business Exemption. The financing was structured in multiple tiers allowing for additional investments over time. **Mark W. Klein, James E. Rice** and **Thomas J. Walsh, Jr.** worked on this matter.

We assisted several clients joining the boards of directors and advisors of several publicly traded and private companies, including negotiation of board service, indemnification, and cash and equity compensation arrangements. **Thomas J. Walsh, Jr.** and **Mark W. Klein** worked on these matters.

We represented the landlord of a commercial property in Westport, Connecticut, in connection with the renovation of its property and subsequent lease of over 13,000 square feet to multiple office tenants. **Justin L. Galletti** worked on this matter.

We represented the acquirer of a multi-million dollar hospitality supply company and related warehouses. **Justin L. Galletti** worked on this matter.

We assisted a Connecticut-based client who owned an out-of-state vacation home with the creation of a Spousal Lifetime Access Trust thereby avoiding the Connecticut gift and estate tax. **William J. Britt** and **Lisa F. Metz** worked on this matter.

We acted as Guardian Ad Litem in settling a dispute involving trustees and multi-generational beneficiaries of large family trusts. **William J. Britt** worked on this matter.

We represented a surviving spouse in gaining control of an estate administration as fiduciary and resolving multi-million dollar claims for and against the husband's estate. **Douglas R. Brown** and **Heather J. Lange** worked on this matter.

We represented a sister of a decedent in defending a multi-million dollar claim against an estate by the decedent's ex-wife. **Douglas R. Brown** worked on this matter.

We served as co-counsel in the defense of an employer in a gender discrimination lawsuit in the Connecticut Superior Court. **Daniel B. Fitzgerald** worked on this matter.

We represented a corporation in connection with the investigation and enforcement of a non-competition covenant after the corporation's former sales executive began work for a direct competitor in violation of the former executive's agreement with the corporation. **Daniel B. Fitzgerald** worked on this matter.

Accolades & Credits

Brody Wilkinson was named to the 2020 "Best Law Firms" list by U.S. News & World Report and Best Lawyers. The firm was also recognized with a Tier 1 ranking in the area of Trusts and Estates and Tier 3 rankings in the areas of Real Estate and Litigation – Trusts and Estates within the Metropolitan Stamford region. Firms included in the 2020 "Best Law Firms" list are recognized for professional excellence with persistently impressive ratings from clients and peers. Achieving a tiered ranking signals a unique combination of quality law practice and breadth of legal expertise. "Best Law Firms" rankings are based on a rigorous evaluation process that includes the collection of client and lawyer evaluations, peer review from leading attorneys in their field, and review of additional information provided by law firms as part of the formal submission process. *For more information on methodology, visit <https://bestlawfirms.usnews.com/methodology.aspx>.*

Six Brody Wilkinson lawyers were selected by their peers for inclusion in the 26th Edition of The Best Lawyers in America© 2020. **Douglas R. Brown** was selected in the fields of Litigation (Trusts and Estates) and Trusts and Estates; **Seth L. Cooper** was selected in the field of Real Estate Law; **Peter T. Mott** and **Ronald B. Noren** were selected in the field of Trusts

and Estates; **James E. Rice** was selected in the field of Energy Law; and **Thomas J. Walsh, Jr.** was selected in the field of Real Estate Law. Best Lawyers® lists are compiled based on an exhaustive peer-review evaluation. For the 2020 Edition of The Best Lawyers in America®, 7.8 million votes were analyzed, which resulted in approximately 60,000 leading lawyers being included in the new edition. Lawyers are not required or allowed to pay a fee to be listed; therefore inclusion in Best Lawyers® is considered a singular honor. Corporate Counsel magazine has called Best Lawyers® “the most respected referral list of attorneys in practice.” For more information, visit <http://www.bestlawyers.com/about/MethodologyCT.aspx>.

Eight Brody Wilkinson lawyers were recognized in 2019 by Super Lawyers. **William J. Britt** (Estate Planning & Probate), **Douglas R. Brown** (Estate Planning & Probate), **Stephen J. Curley** (Business Litigation), **Barbara S. Miller** (Environmental), **Peter T. Mott** (Estate Planning & Probate) and **Ronald B. Noren** (Estate Planning & Probate) were named to the “Connecticut Super Lawyers” list. In addition, **Justin L. Galletti** (Business & Corporate) and **Alyssa M. Vesco** (Real Estate) were selected as “Connecticut Rising Stars.” All eight attorneys were featured in a special supplement of the November 2019 issues of Connecticut Magazine and New England Super Lawyers Magazine. Based on a rigorous, multiphase peer-review process, Super Lawyers is a credible, comprehensive and diverse listing of attorneys in more than 70 practice areas. Super Lawyers listings are used as a resource guide to assist businesses and individuals in hiring legal counsel. Super Lawyers is published by Law & Politics as a special supplement in top newspapers and city and regional magazines across the country. The published list represents no more than 5% of the lawyers in the state. For more information on the Super Lawyers selection process, visit https://www.superlawyers.com/connecticut/selection_details.html.

Brody Wilkinson’s Trusts & Estates practice and **Peter T. Mott** were recognized in the Chambers High Net Worth 2019 Guide, Chambers’ first publication directed specifically at the private wealth market. Brody Wilkinson’s Trusts & Estates practice received a ranking in the category of Private Wealth Law in the state of Connecticut. Only eight firms in the state, with just two based in Fairfield County, were awarded this designation. As the smallest of the firms selected, this recognition is a significant accomplishment. Mr. Mott received a “Band 1” ranking as a practitioner in the category of Private Wealth Law. He is one of seven private wealth lawyers in the state to achieve this highest ranking. For more information on the Chambers selection process, visit <https://chambers.com/research/methodology>.

Thomas J. Walsh, Jr. served as a member of the Business Law Section Council of the American Bar Association (ABA). He continues to serve as a Fellow of the American Bar Foundation.

Douglas R. Brown continued to serve on the Connecticut Probate Practice Book Advisory Committee. The Committee assists the Connecticut Probate Court Administrator in reviewing and editing the probate court rules of procedure used in all Connecticut probate court proceedings. In addition, he was elected to serve a 12th term as chairman of the Board of Managers of the Brooklawn Park Neighborhood Association.

Robert L. Teicher attended the 2019 New York University Institute on Federal Taxation, the leading annual national conference for tax lawyers. The conference provides high-level updates, practical advice and in-depth analysis of the latest trends and developments from leading experts in all areas of tax law. Mr. Teicher also presented a Brody Wilkinson tax seminar on “Important Choice of Entity Considerations” to an audience of accountants, financial advisors, entrepreneurs and start-up investors.

William J. Britt was honored by Martindale-Hubbell for maintaining the highest peer-review AV Preeminent ranking for the past 35 years.

Daniel B. Fitzgerald was a co-presenter at the Connecticut Bar Association program entitled “Representing The Start-Up Venture 2019.” Mr. Fitzgerald covered the essential employment issues faced by start-up ventures including wage and hour considerations, independent contractor misclassification, and use of non-competition agreements.

Alyssa M. Vesco and **Kimberly T. Smith** competed in the 2019 New York City Marathon. The 26.2-mile race was a first for both of them. Alyssa raised over \$4,000 for the National Multiple Sclerosis Society.

Kimberly T. Smith was appointed by the Connecticut Bar Association (CBA) to serve on its Legislative Policy and Review Committee (LPRC). The LPRC reviews position requests from CBA committees and makes recommendations to the House of Delegates and the Board of Governors for consideration.

Peter T. Mott and **Lisa F. Metz** co-authored an update to their “Lifetime Asset Transfers” chapter in *A Practical Guide to Estate Planning in Connecticut*, published by MCLE New England in November 2019.

Trusted Advisors, Practical Solutions

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