

**DISCIPLINE COMMITTEE
OF THE COLLEGE OF EARLY CHILDHOOD EDUCATORS**

Citation: College of Early Childhood Educators vs Donna Desson,
2013 ONCECE 9
Date: 2013-09-24

IN THE MATTER OF the *Early Childhood Educators Act, 2007*, S.O. 2007, c. 7, Sched. 8
(the “ECE Act”) and the Regulation (Ontario Regulation 223/08) thereunder;

AND IN THE MATTER OF discipline proceedings against Donna Desson, a former member
of the College of Early Childhood Educators.

PANEL: Rosemary Sadlier, Chair
 Nici Cole, RECE
 Barbara Brown,
 RECE

BETWEEN:)	
COLLEGE OF EARLY CHILDHOOD)	Jordan S. Glick,
EDUCATORS)	WeirFoulds LLP,
)	for the College of Early Childhood Educators
- and -)	
)	
DONNA DESSON)	Brian G. Bell,
REGISTRATION # 05749)	Pace Law Firm,
)	for Donna Desson
)	
)	
)	Erica J. Baron,
)	McCarthy Tétrault LLP,
)	Independent Legal Counsel
)	
)	Heard: September 24, 2013

**REASONS FOR DECISION, DECISION AND
ORDER(S)**

This matter came on for hearing before a panel of the Discipline Committee (the “Committee”) on September 24, 2013 at the College of Early Childhood Educators (the “College”) at Toronto.

Counsel for the College tendered a Hearing Brief (Exhibit 1) containing a Notice of Hearing dated June 24, 2013 (Tab 1, Exhibit 1). The Notice of Hearing was served on Donna Desson (the “Member”) specifying the charges and requesting the Member’s attendance before the

Discipline Committee of the College of Early Childhood Educators (the “Committee”) on July 24, 2013 to set date for a hearing. Counsel for the College submitted an Affidavit of Service sworn by Agatha Wong, Hearings Coordinator (Tab 2, Exhibit 1) and sworn July 8, 2013, detailing confirmation that the Notice of Hearing was served on the Member.

Counsel for the College also tendered a Consent form signed by the Member on July 18, 2013 (Tab 3, Exhibit 1) indicating that the parties consented to hold the hearing on September 24, 2013.

The Member was in attendance at the hearing and was represented by Brian G. Bell of Pace Law Firm.

THE ALLEGATIONS

The allegations against the Member, as stated in the Notice of Hearing, are as follows:

IT IS ALLEGED that Donna Desson (the “**Member**”) is guilty of professional misconduct as defined in subsection 33(2) of the ECE Act, in that:

- (a) she abused physically, sexually, verbally, psychologically or emotionally a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3) and Standard V.A.1 of the College’s *Code of Ethics and Standards of Practice* (the “Standards of Practice”);
- (b) she failed to maintain the standards of the profession, contrary to Ontario Regulation 223/08, subsection 2(8), in that:
 - (i) she failed to demonstrate a thorough knowledge of child development theory and failed to use that knowledge and the recognition of children’s unique characteristics to plan, implement and assess developmentally appropriate learning strategies, contrary to Standard II.A of the College’s Standards of Practice; and
 - (ii) she failed to provide care and education to her students and to foster independence and interdependence among them, contrary to Standard II.B of the College’s Standards of Practice; and
- (c) she acted in a manner that, having regard to the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional, contrary to Ontario Regulation 223/08, subsection 2(10).

Counsel for the College submitted an affidavit signed on September 19, 2013 by S.E. Corke,

Registrar and Chief Executive Officer of the College (Tab 4, Exhibit 1). The affidavit outlines the historical changes that occurred since the Member was issued a Certificate of Registration and specifies that her current registration status is “Cancelled/Resigned”.

Although the Member has submitted a resignation form dated September 12, 2013 to the College (Tab 5, Exhibit 1), the allegations made against her are related to events that allegedly took place when her membership was still current. It is therefore within the jurisdiction of the Committee to adjudicate this matter, pursuant to subsection 18(3) of the ECE Act.

STATEMENT OF UNSUBSTANTIATED FACTS

Counsel for the College advised the Committee that there was a statement of facts that neither party would be contesting for the purposes of the hearing. College counsel submitted a Statement of Unsubstantiated Facts signed September 17, 2013 (Tab 6, Exhibit 1). The Statement of Unsubstantiated Facts provides as follows:

1. Donna Desson (“**Ms. Desson**”) was at all times relevant to the allegations contained in the Notice of Hearing a registered member of the College of Early Childhood Educators (the “**College**”).
2. Ms. Desson is, and was at all times relevant to these allegations, a member of the College of Early Childhood Educators and employed in that capacity by the YMCA of Hamilton/Burlington/Brantford (the “**YMCA**”), first at the Mountain Family YMCA Child Care Centre (the “**Mountain Centre**”) and then subsequently, as explained below, at the Les Chater YMCA Child Care Centre (“**Les Chater**”).
3. While employed at the Mountain Centre, Ms. Desson was observed to have, in a number of instances, physically, verbally, psychologically and emotionally abused children under her care.
4. As a result of concerns that were raised by Ms. Desson’s conduct, the YMCA filed a report with the Ministry of Education and the Children’s Aid Society (“**CAS**”) alleging child abuse and inappropriate child behaviour management. The YMCA additionally conducted its own internal investigation to determine whether Ms. Desson had violated the YMCA’s own policies and procedures. On or about June 26, 2012, Ms. Desson was placed on paid suspension pending the results of the investigation.

5. While the CAS investigation findings were inconclusive, the YMCA confirmed concerns regarding Ms. Desson's failure to adhere to the YMCA's child guidance and behavioural management practices as follows:

- Ms. Desson texted on her phone and did not pay attention to the children;
- Ms. Desson acted angrily and aggressively towards other staff members;
- Ms. Desson spoke harshly, threateningly and inappropriately to children and ridiculed them; and,
- Ms. Desson used physical force to correct children's behaviour, to restrain them and to force-feed them.

6. More specifically, Ms. Desson:

- On or about October 25, 2011, denied food to a child;
- On or about October 26, 2011, forcefully removed a three-year-old girl from the lunch table and dropped her on the floor because the child had picked food up with her hands;
- On or about October 31, 2011, forcefully pulled a child with special needs away from the lunch table and yelled at him because he had chewed pears and then had spit them out;
- On or about November 9, 2011, dragged a boy with autism approximately 20 feet by one of his arms because he would not walk when she wanted him to;
- On or about November 10, 2011, dragged a boy with autism approximately 20 feet by one of his arms because he did not move away from the door when he was asked to do so;
- On or about June 6, 2012, force-fed potatoes to a three-year-old child and later commented, "That's ridiculous" and, "He's babied," about the child;
- On or about June 11, 2012, left a child, who had autism, in a wet diaper and shorts for an hour and a half after the child had urinated on himself;
- On or about June 20, 2012, called a four-year-old child "ridiculous" and "a baby" for urinating on himself; and,
- On or about June 21, 2012, force-fed a three or four year-old girl and called her a "ridiculous baby" for crying.

7. Ms. Desson additionally reported to a colleague that she intentionally wrote inaccurate information on a child's daily food log about what the child had eaten that day.
8. On or about September 6, 2012, Ms. Desson's employment with the YMCA was reinstated but she was reassigned to Les Chater in order for her to have an opportunity to have a fresh start in a new environment.
9. While employed at Les Chater, on or about October 16, 2012, Ms. Desson was observed to restrain a child with her arms and legs.
10. On or about December 17, 2012, Ms. Desson resigned from her position at Les Chater.
11. The parties agree, for the purposes of this proceeding only, that these facts are substantially accurate.

PLEA OF NO CONTEST

12. In accordance with Rule 3.02 of the *Rules of Procedure of the Discipline Committee and of the Fitness to Practise Committee*, Ms. Desson acknowledges that the facts referred to above constitute professional misconduct as defined in subsection 33(2) of the *Early Childhood Educators Act, 2007*, and pleads no contest to the allegations of professional misconduct against her, being more particularly that:
 - (a) she abused physically, sexually, verbally, psychologically or emotionally a child who was under her professional supervision, contrary to Ontario Regulation 223/08, subsection 2(3) and Standard V.A.1 of the College's *Code of Ethics and Standards of Practice* (the "Standards of Practice");
 - (b) she failed to maintain the standards of the profession, contrary to Ontario Regulation 223/08, subsection 2(8), in that:
 - (i) she failed to demonstrate a thorough knowledge of child development theory and failed to use that knowledge and the recognition of children's unique characteristics to plan, implement and assess developmentally appropriate learning strategies, contrary to Standard II.A of the College's Standards of Practice; and
 - (ii) she failed to provide care and education to her students and to foster independence and interdependence among them, contrary to Standard II.B of the College's Standards of Practice; and
 - (c) she acted in a manner that, having regard to the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional, contrary to Ontario Regulation 223/08, subsection 2(10).

13. Ms. Desson's plea of no contest does not constitute an admission by Ms. Desson as to the facts or findings in any other civil, criminal or administrative proceeding.
14. Ms. Desson understands the nature of the allegations that have been made against her and that by voluntarily admitting to these allegations, she waives her right to require the College to otherwise prove the case against her.
15. Ms. Desson understands that the Discipline Committee can accept that the facts herein constitute professional misconduct.
16. Ms. Desson understands that by pleading no contest to the allegations, she is waiving the right to require the College to prove the case against her and the right to have a hearing.
17. Ms. Desson voluntarily pleads no contest to the allegations.
18. Ms. Desson understands that the panel's decision and reasons may be published, including the facts contained herein along with her name.
19. Ms. Desson understands that any agreement between her and the College does not bind the Discipline Committee.
20. Ms. Desson acknowledges that she has had the opportunity to receive independent legal advice.
21. Ms. Desson and the College consent to the panel viewing the Notice of Hearing, this Agreed Statement of Facts and the Joint Submission as to Penalty prior to the start of the hearing.

DECISION

Having considered the Exhibits filed, and based on the Statement of Unsubstantiated Facts and plea of no contest, and the submissions made by College counsel and counsel for the Member, the Discipline Committee finds that the facts support a finding of professional misconduct. In particular, the Committee finds that Donna Desson, the Member, committed acts of professional misconduct as alleged, more particularly breaches of Ontario Regulation 223/08, section 2, subsections (3), (8) and (10) and Standards II.A, II.B and V.A.1 of the College's *Code of Ethics and Standards of Practice*.

REASONS FOR DECISION

The opposing parties jointly submitted a statement of facts, and in this statement, the Member pleads no contest to the allegations of professional misconduct brought against her.

Rule 3.02 of the Committee's *Rules of Procedure* stipulates that when a member enters a plea of no contest to allegations, the Committee may, for the purposes of the hearing, accept the alleged facts as correct and may accept that these facts constitute professional misconduct. As such, the Committee has deemed the facts outlined in the Statement of Unsubstantiated Facts to be true and has determined that such facts amount to professional misconduct.

The Statement of Unsubstantiated Facts, which is signed by the Member, refers to a series of incidents in which the Member engaged in conduct that contravenes the profession's Standards of Practice and the Professional Misconduct Regulation (Ontario Regulation 223/08). By verbally berating children and calling them names, the Member failed to recognize children's unique characteristics and their varying development milestones, contrary to Standard II.A. She also neglected to provide care to a child and did not foster his independence in accordance with Standard II.B when she dragged him approximately 20 feet by one of his arms. On multiple occasions, the Member resorted to physical force in her interactions with children, and in one instance, she left a child in a wet diaper and shorts for an hour and a half. Such acts constitute abuse and are a direct violation of Standard V.A.1 and subsection 2(3) of the Professional Misconduct Regulation.

The Committee considers the Member's conduct to be ethically and morally reprehensible. Her actions would reasonably be regarded by early childhood educators as disgraceful, dishonourable and unprofessional, in contravention of subsection 2(10) of the misconduct regulation.

JOINT SUBMISSION AS TO PENALTY

Counsel for the College and counsel for the Member advised the Committee that in addition to resigning from the College, the Member had signed an undertaking to refrain from applying

for the reinstatement of her College membership for a six-month period following the date of the Committee's decision (Tab 7, Exhibit 1). The undertaking further states that the Member will complete a course in "Professional Supervision in Early Learning and Care" before making an application to the College.

College counsel and counsel for the Member submitted a Joint Submission as to Penalty signed by the Member on September 17, 2013 (Tab 7, Exhibit 1), which provides as follows:

1. Ms. Desson shall be reprimanded by the Discipline Committee and the fact of the reprimand shall be recorded on the Register of the College.
2. Having resigned her membership in the College, Ms. Desson undertakes (pursuant to the undertaking executed and attached as Schedule "A") to not re-apply to the College for a period of 6 months following the Discipline Committee decision. In the event that she re-applies to the College for reinstatement of her membership after the 6 month period, she will participate in and successfully complete a course of study in "Professional Supervision in Early Learning and Care" that is satisfactory to the Registrar of the College of Early Childhood Educators, at her own expense.
3. The results of the hearing shall be recorded on the Register.
4. The Discipline Committee's finding and Order shall be published in full on the College's website and in summary in the College's newsletter, *Connexions*.
 - (a) Ms. Desson and the College will make submissions to be considered by the Discipline Committee regarding whether the publication of the findings and Order of the Discipline Committee on the College's website and in *Connexions* should include reference to Ms. Desson's name.
5. Ms. Desson and the College agree that if the Committee accepts this Joint Submission as to Penalty, there will be no appeal of the Committee's decision to any forum with the exception that either party is entitled to appeal the Discipline Committee's decision as to whether Ms. Desson's name should be referenced in the publication materials.

College counsel stated that the most relevant principle in this matter is general deterrence, indicating that the College cannot play a part in the Member's rehabilitation or retraining and that there is no need to specifically deter the Member, except to the extent that she chooses to apply for reinstatement in the future. College counsel asserted that a reprimand is therefore the last opportunity for the Committee to dialogue with the Member and to convey

disapproval of her conduct. Counsel for the College further submitted that the Member's undertaking to refrain from applying for reinstatement for a six-month period is akin to a six-month suspension and is therefore a substantial penalty. Counsel for the College submitted that the Committee should accept the joint submission as it protects the public interest, is proportionate to the misconduct found and is consistent with previous penalties imposed by self-regulating professions in analogous cases, citing *College of Early Childhood Educators v. Cynthia Skinner* (2013).

SUBMISSIONS AS TO PUBLICATION OF NAME

Counsel for the College and counsel for the Member advised the Committee that while the parties had agreed to a reprimand and the publication of the Committee's decision, an agreement had not been reached as to whether the Member's name should appear in the decision.

Submissions of the College

College counsel submitted that the Committee should order publication with name as this measure reflects the important principles of access and transparency to College processes, which helps build public confidence in the College's ability and willingness to police itself and thereby protect the public interest. Counsel for the College stated that Ontario courts abide by a similar principle of public access, citing the Divisional court case *Orpin v. College of Physicians and Surgeons of Ontario* (1988), 25 O.A.C. 235 (Div. Ct.). In this case, the Divisional Court rejected a doctor's request for anonymity in published records. The judge indicated that when the courts have weighed the "powerful presumption of openness in judicial proceedings" against harm and distress to the individual, they have come down on the side of the public's "right to know what transpires in their courts of law."

Counsel for the College went on to assert that professional disciplinary bodies often direct that their decisions be published with the member's name. College counsel cited a number of Ontario College of Teachers decisions in which the member's name was published following a finding, including *Ontario College of Teachers v. Marcon* [2003] O.C.T.D.D. No. 61 and *Ontario College of Teachers v. Curtis* [2005] O.C.T.D.D. No. 12.

College counsel further submitted that publication with the Member's name would be consistent with previous decisions made by the Committee. To date, all but one of the Committee's decisions include the name of the member in question. The one case in which the member remained anonymous involved very minor allegations relating to an isolated incident in which the member fell asleep when she was supposed to be supervising children. Counsel for the College argued that the present matter is not comparable in that it involves allegations of abuse against children, including abuse against children with special needs. College counsel cited *College of Early Childhood Educators v. Dorothy Rainey* (2013) as a more relevant precedent. In the May 2013 case, a former early childhood educator submitted that her name should not be published, but the Committee ordered publication of its decision with her name, invoking the need for public protection and transparency.

Counsel for the College stated that the Member's name should be published as it would generally deter early childhood educators from engaging in similar conduct and would specifically deter the Member from repeating her actions should she apply for reinstatement of her membership. In the College's view, it would not be advisable for the Committee to send the message that early childhood educators who are subject to disciplinary proceedings can resign their membership and avoid having a public record of their misconduct. College counsel stated that publication with name does, in fact, have an element of public shaming but that such an effect is appropriate in the sphere of professional misconduct.

Submissions of the Member

Counsel for the Member submitted that the Committee's findings and order should be published without reference to the Member's name. The Member's counsel stated that while publication with name may, in some cases, serve the functions of public protection and deterrence, the Committee should, in determining an outcome, consider two notions outlined in the Supreme Court case *McKinley v. BC Tel*, 2001 SCC 38, [2001] 2 SCR 161, namely context and proportionality.

Counsel for the Member submitted that the Member has been in the profession for 20 years, and has had an exemplary and unblemished performance record. No verbal or written warnings of poor conduct were raised prior to the incidents in the Statement of Unsubstantiated Facts. Alluding to College counsel's submission that members should not be able to resign and avoid a public record of misconduct, counsel for the Member indicated that the Member had resigned from her employment before a complaint was even filed with the College. She was only advised of the formal complaint almost a year after she voluntarily left the YMCA. As such, her resignation is in no way an attempt to gain favour with the Committee. The Member's counsel stated that the Member has, in fact, been looking to change careers for some time and has been doing studies at the postsecondary level for several years.

The Committee's attention was directed to a letter dated June 14, 2013 written by the Children's Aid Society and addressed to the Member. Counsel for the Member highlighted how the letter states that risk of harm was "not verified", indicating that such a statement differs from the assertion in the Notice of Hearing that the investigation findings were "inconclusive". The letter also indicates that no significant concerns were raised during interviews conducted by the Children's Aid Society.

As a precedent to non-publication of name, the Member's counsel cited the College case dated April 17, 2012 in which an early childhood educator pleaded no contest to allegations of misconduct and requested anonymity in the Committee's decision. The Committee subsequently ordered that its decision be published without reference to the early childhood educator's name. Counsel for the Member submitted that this case is analogous to the present matter. In the April 17, 2012 case, the Committee determined that the incident involving the member was an isolated event, and the Member's counsel asserted that the 12 incidents mentioned in the Statement of Unsubstantiated Facts were akin to an isolated incident when examining these events in the broader context of a 20-year career.

Counsel for the Member touched on the issue of public shaming, asserting that such shaming should not be directed towards family members of the individual in question. Explaining that the Member's own child has autism, the Member's counsel stated that the child is doing very well and moving on to higher education, something that could not have happened without the Member's support and care. The child has been able to search the Member's name on the Internet, and coming across web pages relating to the Member's referral to a hearing has created anxiety for the child. The Member's counsel stated that children can be mean and asserted that publication of the Member's name could create a difficult situation for the child.

Counsel for the Member submitted that in light of these factors, publication of the Member's name is neither appropriate nor necessary in the College discharging its role and responsibilities in protecting the public.

PENALTY DECISION

After considering the joint submission made by College counsel and counsel for the Member, the Committee makes the following order as to penalty:

1. The Member shall be reprimanded by the Discipline Committee, and the fact of the reprimand shall be recorded on the College's register.
2. The Discipline Committee's finding and order shall be published, with the Member's name, in full on the College's website and in summary in the College's official publication, *Connexions*.
3. The results of the hearing shall be recorded on the register.

REASONS FOR PENALTY DECISION

The Committee accepts the joint submission made by counsel for the College and counsel for the Member, having determined that the submission falls within a reasonable range of penalties given the Member's conduct.

In evaluating the joint submission, the Committee considered the Member's resignation and undertaking. The Member's resignation from the College limits the penalty orders that the Committee can issue. The Committee cannot direct the Registrar to suspend the Member's Certificate of Registration, nor can it impose terms, conditions or limitations on a cancelled certificate. The Member's undertaking, however, ensures that she will not reapply for the reinstatement of her membership for at least six months. Furthermore, the Member has agreed to complete a course in professional supervision before making an application to the College. This term of her undertaking ensures that the Member will participate in remedial training before any potential re-entry into the practice of early childhood education. The Committee further notes that in the event that the Member completes the course and subsequently applies for reinstatement after a six-month period, the College would consider her application, but she is not guaranteed readmission into the profession. As such, the resignation and undertaking have the effect of protecting the public interest.

Beyond the Member's resignation and undertaking, the Committee has ordered a penalty that serves the functions of deterrence and public protection. The reprimand specifically deters the Member, sending her a message that she must refrain from engaging in misconduct in the future. It also contributes to public awareness and transparency as the Committee delivers its reprimand in public at the hearing. By conveying disapproval of the Member's behaviour in a public forum, the reprimand serves as a general deterrent to other early childhood educators, dissuading them from committing similar acts.

The Committee has also ordered publication of its decision on the College website, on the public register and in the College's publication *Connexions*. Publication educates the membership, communicating to registered early childhood educators the types of actions that constitute professional misconduct.

Although the Member requested that her name not be published, the Committee does not find the reasons provided by her counsel to be sufficiently compelling to outweigh the principle of transparency in discipline processes. The Member's counsel asserted that the Committee's April 17, 2012 decision was analogous to the present case because the 12 incidents outlined in the Statement of Unsubstantiated Facts are akin to an isolated incident in the context of an unblemished 20-year career. However, the Committee considers 12 incidents relating to the mistreatment of young children to be a pattern of intentional misconduct rather than an isolated episode caused by a lapse of judgment. The April 17, 2012 decision is therefore not a relevant precedent. Every other Committee decision, by contrast, includes the member's name. By directing that its findings and order be published with the Member's name, the Committee maintains consistency in its administration of justice.

As part of his penalty submissions, counsel for the Member stated that the Member did not resign from her employment in an attempt to gain favour with the Committee as she had been

planning to change careers for some time. The Member's counsel further submitted that the letter from the Children's Aid Society indicates that no risk to children under the Member's care was verified. In the Committee's view, however, these factors are irrelevant to the issue of publication and penalty. In determining the aspects of an appropriate penalty, the Committee considers questions of deterrence, public protection and the nature and severity of the misconduct found. The misconduct in this case has already been determined.

Whatever the Member's reasons for resigning from her position, they do not change the fact that the Member has pleaded no contest to the allegations of professional misconduct in the Notice of Hearing. In the same vein, the Children's Aid Society letter may fail to confirm any risk of harm, but the Statement of Unsubstantiated Facts, which is signed by the Member, clearly outlines incidents of abuse committed against children under her professional supervision. It is these incidents and the uncontested allegations that the Committee takes into account when issuing a penalty decision, and the Committee's *Rules of Procedure* does not allow members to introduce evidence on the issue of penalty that is inconsistent with the findings made by the Committee.

As for the argument that publication with name could adversely impact the Member's child, the Committee understands that publication can be a sensitive issue and may cause embarrassment to family members. Nonetheless, the desire to prevent a difficult situation for one child does not outweigh the need for many Ontario families, children and employers to be informed of and protected against abuses in the early learning care sector. The Committee further notes that the child has already found information about the Member's referral to a hearing on the Internet. To an extent, the matter is already public, and the child is already aware of the case.

Overall, the Committee has not been provided with strong reasons for non-publication of the Member's name. Publication with name is important for building public confidence in the

College and for upholding its reputation as a defender of the public interest. It allows the families and children involved in the incidents of mistreatment to have closure and informs them of the outcome of the matter. Moreover, as publication with name has an element of public shaming, it specifically deters the Member from misconduct, keeping her accountable for her actions.

In conclusion, the Committee is confident that the penalty serves the interests of the public and of the profession.

Date: September 24, 2013



Rosemary Sadler
Chair, Discipline Panel



Nici Cole, RECE
Member, Discipline Panel



Barbara Brown, RECE
Member, Discipline Panel

SCHEDULE "A"

UNDERTAKING TO THE COLLEGE OF EARLY CHILDHOOD EDUCATORS

This Undertaking is given in connection with Discipline Committee hearing (the "Hearing") of the College of Early Childhood Educators (the "College") in respect of its former member, Ms. Donna Desson, who resigned from the College prior to the Hearing.

Ms. Desson agrees to not apply for the reinstatement of her membership with the College for a 6 month period from the date of the Discipline Committee decision. Ms. Desson additionally undertakes to participate in and successfully complete a course of study in "Professional Supervision in Early Learning and Care" that is satisfactory to the College at her own expense prior to reapplying for membership with the College.

DATED: September 17, 2013


Donna Desson

DATED: September 17, 2013


Witness
BRIAN GEORGE BELL