

1 Workers' Compensation Full Board Meeting Minutes

2
3 **Date:** Tuesday, May 14, 2024

4 **Location:** 328 State St., Schenectady, NY
5 Room 324

6 **Time:** Webcast Live
10:00 a.m.

7 **MEMBERS OF THE BOARD**

8 Clarissa M. Rodriguez, Chair

9 Freida Foster, Vice Chair

10 Mark Higgins

11 Loren Lobban, Esq.

12 Samuel Williams

13 Linda Hull

14 Steven A. Crain, Esq.

15 Mark R. Stasko

16 Pamela Caggianelli

17 Arelis Tavares

18 Martin M. Dilan

19 Renee Delgado, Esq.

20 Gloribelle Perez, Esq.

21 **EXECUTIVE DIRECTOR**

22 Steven M. Scotti, Esq.

23 **SECRETARY TO THE BOARD**

24 Laura Inglis

GENERAL COUNSEL

Heather MacMaster, Esq.

ASSOCIATE ATTORNEY

Heather Justice, Esq.

ALSO PRESENT

Anthony Tomaselli, WCB Advocate for Business

1 CLARISSA RODRIGUEZ: Good morning,
2 everyone.

3 ALL: Good morning.

4 CLARISSA RODRIGUEZ: Thank you for being
5 here. I am Clarissa Rodriguez, Chair of the New York
6 State Workers' Compensation Board. Today's meeting of
7 the Full Board is being webcast live for members of
8 the public. So welcome. It is also facilitated by an
9 American Sign Language Interpreter. Thank you,
10 Interpreter, for joining us today.

11 I now have the honor of calling the 1,032nd
12 meeting of the Full Board to order. Madam Secretary,
13 will you please call attendance?

14 LAURA INGLIS: Vice Chair Foster.

15 FREIDA FOSTER: Here.

16 LAURA INGLIS: Board Member Higgins.

17 MARK HIGGINS: Here.

18 LAURA INGLIS: Board Member Lobban.

19 LOREN LOBBAN: Here.

20 LAURA INGLIS: Board Member Williams.

21 SAMUEL WILLIAMS: Here.

22 LAURA INGLIS: Board Member Hull.

23 LINDA HULL: Here.

24 LAURA INGLIS: Board Member Crain.

1 STEVEN CRAIN: Here.

2 LAURA INGLIS: Board Member Stasko.

3 MARK STASKO: Here.

4 LAURA INGLIS: Board Member Tavares.

5 ARELIS TAVARES: Here.

6 LAURA INGLIS: Board Member Caggianelli.

7 PAMELA CAGGIANELLI: Here.

8 LAURA INGLIS: Board Member Dilan.

9 MARTIN DILAN: Here.

10 LAURA INGLIS: Board Member Delgado.

11 RENEE DELGADO: Here.

12 LAURA INGLIS: And Board Member Perez.

13 GLORIBELLE PEREZ: Here.

14 LAURA INGLIS: We have a Full Board today,
15 Madam Chair.

16 CLARISSA RODRIGUEZ: Thank you. Agenda
17 Item 1, approval of the April 16th meeting minutes.
18 You have all received a copy of the meeting minutes
19 for your review, Board Members. Are there any
20 questions or need for discussion? Okay. May I please
21 have a motion to accept the Board meeting minutes from
22 April 16, 2024?

23 SAMUEL WILLIAMS: Madam Chair, I move to
24 accept the minutes.

1 CLARISSA RODRIGUEZ: Thank you, Board
2 Member Williams. Is there a second?

3 MARK STASKO: Yes, I move to second it.

4 CLARISSA RODRIGUEZ: Okay, thank you, Board
5 Member Stasko. Is there any opposition to the motion?
6 Hearing none, all in favor, Board Members please say
7 aye.

8 ALL: Aye.

9 CLARISSA RODRIGUEZ: All opposed? I am
10 also a yes, that motion is passed. Thank you, Board
11 Members. Agenda Item 2, Office of General Counsel's
12 Departmental Report. General Counsel, Heather
13 MacMaster, will now present the Office of General
14 Counsel's Departmental Report for the month of April.
15 Good morning.

16 HEATHER MACMASTER: Thank you, Madam Chair,
17 good morning, Madam Vice Chair, Board Members. In
18 April of 2024, the Office of General Counsel's
19 Adjudication Division held 17,548 hearings, 11,230 of
20 these were resolved at hearing, and they issued 318
21 Reserve Decisions. 2,209 Waiver Agreements were
22 finalized.

23 In the Administrative Review Division, 1,049
24 applications were received, 895 were processed, and

1 there are currently 7,207 applications pending.

2 In the Legal Affairs Division, 85 Full Board
3 Review applications were received, 86 were processed,
4 and there are currently 205 pending. Thank you.

5 CLARISSA RODRIGUEZ: Okay. Thank you so
6 much, Heather. Board Members, are there any questions
7 or need for discussion? Okay, hearing none, may I
8 please have a motion to accept the Office of General
9 Counsel's Departmental Report for the month of April?

10 MARK HIGGINS: Yes, Madam Chair, I move that
11 we approve the report of the Chief Counsel.

12 CLARISSA RODRIGUEZ: Thank you very much,
13 Board Member Higgins. Is there a second?

14 LINDA HULL: I second that motion. Board
15 Member Hull.

16 CLARISSA RODRIGUEZ: Thank you, Board
17 Member Hull. Is there any opposition to the motion?
18 Okay, seeing none, Board Members all in favor, please
19 say aye.

20 ALL: Aye.

21 CLARISSA RODRIGUEZ: All opposed? I am also
22 a yes, that motion is passed. Thank you, Board
23 Members. Agenda Item 3, License Applications.
24 Associate Attorney, Heather Justice, will now present

1 the Licensing Applications for the last month.

2 HEATHER JUSTICE: Good morning, Madam Chair,
3 Madam Vice Chair, Board Members, and Colleagues. You
4 have before you the recommendations from the Assigned
5 Board Panel regarding the Licensing Applications
6 listed in Part 3 of today's agenda. Pursuant to
7 Section 24-a, there were no applications. Pursuant to
8 Section 50(3-b), we have CompCare Services LLC. The
9 qualifying officer is Bill, William Jones, and this is
10 to be held in abeyance for one year. Under
11 Section 50(3-d), we have Cotting -- Cottingham &
12 Butler Claims Services LLC, also with William Jones as
13 the qualifying officer. And we are recommending three
14 years. I present these recommendations to the Board
15 for your consideration.

16 CLARISSA RODRIGUEZ: Thank you, Heather.
17 Are there any other questions or need for discussion,
18 Board Members? Okay, hearing none, Board Members all
19 in favor, please say aye.

20 ALL: Aye.

21 CLARISSA RODRIGUEZ: Thank you. All
22 opposed? I am also a yes, that motion is passed.
23 Thank you. Oh --

24 UNIDENTIFIED MALE SPEAKER: You didn't --

1 (Simultaneous crosstalk.)
2 CLARISSA RODRIGUEZ: I was like wait, I
3 kind of skipped a pretty important part.
4 LINDA HULL: -- Chair, I move to accept --
5 CLARISSA RODRIGUEZ: Yes, I got ahead of
6 myself.
7 LINDA HULL: -- the Licensing Applications
8 as presented by --
9 CLARISSA RODRIGUEZ: -- should have the
10 motion first.
11 LINDA HULL: -- I move that we accept
12 Heather Justice's Licensing Application as reviewed.
13 CLARISSA RODRIGUEZ: Yes, thank you.
14 LOREN LOBBAN: And this is Board Member
15 Loren Lobban, I second the motion.
16 CLARISSA RODRIGUEZ: Okay. Thank you so
17 much, Board Members. Now is there any opposition to
18 the motion? Okay, well Board Members all in favor,
19 please say aye.
20 ALL: Aye.
21 CLARISSA RODRIGUEZ: All opposed? All
22 right, I am also a yes, that motion is passed. Agenda
23 Item 4, Legal Appeals. Heather MacMaster will now
24 present the recommendations concerning decisions by

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

the Appellate Division.

HEATHER MACMASTER: Thank you, Madam Chair.
It is the recommendation of the Office of General
Counsel that the Appellate Division decisions in items
4A through 4E be adopted as the opinions of the Board.
Thank you.

CLARISSA RODRIGUEZ: Thank you. Board
Members, may I please have a motion to accept the
recommendations of the Office of General Counsel?

PAMELA CAGGIANELLI: Madam Chair, this is
Board Member Caggianelli, and I move to accept the
Legal Appeals as presented.

CLARISSA RODRIGUEZ: Thank you, Board Member
Caggianelli. Is there a second?

LOREN LOBBAN: Board Member Loren Lobban, I
second the motion, Madam Chair.

CLARISSA RODRIGUEZ: Thank you, Board
Member Lobban. Is there any opposition to the motion?
Hearing no opposition, Board Members all in favor,
please say aye.

ALL: Aye.

CLARISSA RODRIGUEZ: All opposed? Okay, I
am also a yes, that motion is passed. Thank you.
Agenda Item 5, there are no Mandatory cases for review

1 this month. So we'll move on to our Discretionaries.
2 And I now turn this portion of the agenda over to Vice
3 Chair Freida Foster. Good morning.

4 FREIDA FOSTER: Thank you. Thank you, Madam
5 Chair. For the cases listed in Item 6 of your agenda,
6 Full Board Review has been recommended. Those cases
7 are 6A, Matter of New York City -- New York State
8 DOCCS; 6B, Matter of DOCCS Coxsackie Correctional
9 Facility; and 6C, New York State Division of Homeland.
10 I move to refer the cases back to their respective
11 Panels for further consideration.

12 CLARISSA RODRIGUEZ: Thank you, Vice Chair
13 Foster. Are there any recusals from this matter?

14 RENEE DELGADO: Yes, Madam Chair, Board
15 Member Delgado, I ask to be recused from 6A, Matter of
16 NYS DOCCS.

17 CLARISSA RODRIGUEZ: Okay. Permission
18 granted. Is there a motion to -- well you made the
19 motion, is there a second to that motion?

20 MARTIN DILAN: I second the motion.

21 CLARISSA RODRIGUEZ: Thank you, Board Member
22 Dilan. Is there any opposition to the motion?

23 UNIDENTIFIED MALE SPEAKER: No, ma'am.

24 CLARISSA RODRIGUEZ: Okay, hearing no

1 opposition, Board Members all in favor, please say
2 aye.

3 ALL: Aye.

4 CLARISSA RODRIGUEZ: Thank you. All
5 opposed? I am also a yes, that motion is passed.
6 Thank you, Board Members. Agenda Item 7, are there,
7 is there any other business to consider this month?
8 Okay, hearing none, then we'll move on to our guest
9 speaker today which is Anthony Tomaselli, the Board's
10 Advocate for Business.

11 As the Workers' Compensation Board's Advocate for
12 Business, Anthony leads the office that serves as a
13 liaison between New York's business community and the
14 Board, providing helpful assistance to employers on
15 issues related to workers' compensation, disability
16 benefits and Paid Family Leave.

17 Anthony joined the Board after more than eight
18 years at the New York State Office of General
19 Counsel -- of General Services, rather, where he
20 helped build the successful New York State Service
21 Disabled Veterans Owned Business program, or SDVOB.
22 He also served at the Empire State Development
23 Corporation; the New York State Division of Homeland
24 Security and Emergency Services; as a Social Studies

1 teacher in the Brentwood, Seaford, and New Lebanon
2 School Districts; and as a paratrooper in the US
3 Army's 82nd Airborne Division. Thank you so much for
4 being here this morning, Anthony. Welcome.

5 ANTHONY TOMASELLI: Thank you so much for
6 having me. Let me just test out my clicker real
7 quick, make sure -- good. So thank you for the nice
8 bio, by the way. I think, I think it's very helpful
9 to talk a little about my past as I get into what I'm
10 going to talk about today. I'm going to review an
11 outreach summary, really, of what I've done for the
12 last year.

13 Outreach is a big part of what we do in the
14 Advocate for Business Office. And it's a big part of
15 what I had to do with that previous role at OGS, the
16 Service Disabled Veterans Owned Business program.

17 So that law was passed in 2014. They created a
18 law that they were going to try to give a certain
19 number of state contracts, a certain percentage of
20 state contracts, a pretty high percentage, 6% for that
21 population. And so we had to implement this law, put
22 it into practice.

23 How do we give 6% of the state's contracts to
24 disabled veterans if we don't know where those

1 businesses are? So a huge part of building that
2 program was getting out across the state and finding
3 disabled veteran owned businesses to certify them, so
4 that we could meet that goal. The goal of the
5 legislation.

6 So I spent the better part of the last eight
7 years trying to find businesses in New York State. So
8 I'm kind of plugged into the small business
9 development network in New York State. And I've tried
10 to leverage that as much as I can in this position
11 here at the Board.

12 I also kind of want to plug, I just got an e-mail
13 the other day, it was the ten-year anniversary of that
14 legislation, and we have awarded over \$1 billion to
15 disabled veteran owned businesses in New York State in
16 the last ten years.

17 CLARISSA RODRIGUEZ: Wow, that's amazing.

18 ALL: (Clapping).

19 ANTHONY TOMASELLI: It's a pretty
20 significant accomplishment. We never really thought
21 we would get anywhere close to that when we started
22 out. So, but that's the past, here I am today with
23 the Workers' Compensation Board. I'm going to review
24 what we did for the last year with our outreach.

1 So I think you are all familiar with the Advocate
2 for Business office. We generally have contact with
3 businesses through two ways: We have businesses
4 coming to us, right, they are calling us on the phone,
5 they are sending us e-mails, they are asking us for
6 help; but then we are trying to go out there and get
7 to the businesses.

8 We can do one of two things: We want to hear
9 what they have to say about their experience with the
10 Workers' Compensation Board; and we want to educate
11 them, because there's a great need for education. The
12 longer I'm in this role and the more I talk to
13 businesses, the more I really become aware how little
14 people know about the Workers' Compensation Board,
15 about workers' compensation insurance, about how the
16 system works in general.

17 So I'm trying to do that, trying to go out there
18 and connect with these businesses, and not wait for
19 them to come to me, go out there and get to them. So
20 I kind of set myself a few priorities for the first
21 year: Educate the start-ups and the small businesses.
22 They seem to be ones that needs the most help.

23 The number one reason employers contact us,
24 contact my office, is that they've got an accounting

1 letter from the Board and they need help. They don't
2 know what to do, they don't know why they got it.
3 They have no idea. So we try to help them.

4 And really what I started saying right from the
5 beginning is, man, I want to get to these people
6 before this happens. I want to talk to these
7 businesses and educate them, and help them, so they
8 don't get these penalty letters at all. That they are
9 in compliance, that they follow the law, that they
10 take care of their workers appropriately before they
11 get into trouble.

12 So that's my number one goal. So to try to do
13 that I really want to look at what we are doing with
14 our outreach. My predecessor was getting out there,
15 the Board does a lot of outreach. I wanted to kind of
16 get a better picture of it. So I really worked with
17 my team to start keeping better records of where we're
18 going, what we're doing, and who we're doing it with.

19 And then use that information to kind of try to
20 be a little smarter and a little more strategic about
21 what I'm doing, so that I can kind of shift the
22 posture of the office from being reactive, helping
23 people when they come to us, to being proactive,
24 trying to get to people before they come to us needing

1 help.

2 So that's what I've done. And I put this
3 together, started tracking the information that the
4 teams were doing, that we're making calls, right, I
5 already had an idea of the different types of groups
6 that I wanted to talk to. Just start making lists and
7 their contacts, and basic metrics related to those
8 organizations that we're reaching out to, and just
9 tracking it. Tracking it.

10 So that not just, not just the events that we
11 did, you know, not just, you know, where did we go,
12 who did we do a presentation with, but who are we
13 trying to do stuff with? Who did we call? Who blew
14 us off? Who is working with us? Who is able to
15 connect us with another partner? Like, this is all
16 helpful information to kind of try to get a better
17 picture of what we're doing.

18 So we're tracking the types of organizations, the
19 types of activities and events that we're doing with
20 them, the number of attendees and stakeholders, and
21 then also the region, because I do want to make sure
22 that we're getting a good spread across the whole
23 state, that we're not just getting stuck down into one
24 part of the state. That we're getting to businesses

1 everywhere. New York is a big state, right?

2 So how do we do that? Well here are the numbers
3 that we got. So we're calling people, we're reaching
4 out to them, we're not waiting for them to come to us.
5 We're almost cold calling. It's like, almost like a
6 sales and marketing operation.

7 So we reached out to 170 organizations over the
8 last year. Out of those organizations, 47 of those
9 agencies were willing to do something with us. So my
10 success rate on calls is 28%. And that's a pretty
11 important number for me because as I'm trying to tell
12 my staff, okay, how many calls do we need to make each
13 week in order to keep our calendar full? You know,
14 allows us to kind of dial it up, dial it down, see
15 where we're going, see what we're doing.

16 Total number of outreach events we did last year,
17 73, okay? So you can see the numbers don't exactly
18 match up there, but that's because some of these
19 organizations did more than one thing with us. They
20 turned out to be really good partners. There's a lot
21 of repeat customers, if you will. Sometimes we double
22 up, sometimes we crossover. It works out pretty good.

23 Our attendance for the events that we've done
24 over the past year is 2,585 employers that we've

1 spoken to. I'd like to do more, and we're going to
2 try to do more. Hopefully this information will help
3 us do more.

4 So here we are. This is the breakdown of the
5 types of events that we've done. The most popular
6 offering is the webinar. They are easy to do, people
7 love it. They don't have to get space, they can
8 market it, advertise it, put a link on a website, pull
9 people in, do a webinar.

10 I push for the in-person presentations. I really
11 like that face-to-face contact. So I think we did a
12 fair amount of those. We do get out there, we do
13 tabling events. People come talk to us. And then
14 sometimes we get lucky and we can do both, we can do a
15 table and do a presentation.

16 And then occasionally we get pulled into other
17 things, you know, like a networking breakfast, or a
18 dinner, or something, but hey, if I can talk to
19 business owners, and I'm there, I'm going to go, I'm
20 going to see what we can do.

21 Where did we go? Okay, so this is the footprint
22 of the organizations that we worked with. You can see
23 we did quite a lot with the organizations that are
24 statewide. But I think, you know, we did a pretty

1 fair spread. I was kind of consciously trying to do
2 that. It helps to look at the data after the fact,
3 and see like, hey, we did, we did a pretty good job of
4 making sure we hit every single part of the state. So
5 I'm pretty happy to see that. And share that with
6 you, that we are getting across the whole state.

7 And then the types of organizations that we are
8 doing things with; we do mostly professional
9 associations seem very happy to work with us. That's
10 kind of where we're looking at. You know, these are
11 all organizations, professional associations, Chambers
12 of Commerce, small business development centers, like
13 the SUNY campuses, not-for-profits that are out there
14 doing small -- they are looking for what we have to
15 offer, right?

16 They are out there trying to deliver things to
17 their members. You know, if you join a professional
18 association, if you join the Chamber of Commerce, what
19 are you getting for being there? Well they put on
20 these educational programs, they give offerings out
21 there. So it's not like we're reaching out and giving
22 people something that they aren't looking for.

23 So that's really, you can see those are the
24 biggest ones, the professional associations, the

1 Chambers, because they are happy to have, you know,
2 some of them are regularly doing events, programs,
3 things like that, so they are happy to add us to the
4 mix.

5 So that's a pretty good spread. Most of these
6 people, again, I have some of these contacts from my
7 previous role, but I think it's important to keep
8 track of our contacts with them, because personnel
9 change, people turnover. You know, sometimes a person
10 here is not there anymore. So try to stay plugged in.

11 Ideally what I would like to do, bigger picture,
12 not just the Workers' Compensation Board business, but
13 for helping businesses in general, is start to connect
14 the dots between these types of organizations and the
15 regions. So that if we know, and we can get far
16 enough ahead of ourselves in our scheduling with what
17 we're doing, then we know, okay, so I'm going to be
18 out in Western New York next Thursday talking to a
19 Chamber of Commerce, let me try to see if I can make
20 the most of that trip, let me see if I can double up,
21 find another group or another organization in the
22 region, maybe we can do something together. If we
23 can't do something together, at least, you know, the
24 next day, so that we're not driving back and fourth

1 across the state two days in a row, or two different
2 days.

3 So you know, the more we keep track of this
4 information, the more we can plan, and again, be
5 strategic, be smart about what we're doing, be
6 efficient. And also, again, connect the dots. These
7 people all want to work together with each other too,
8 you know, they don't just want to work with the Board.

9 If we can help promote that, especially as I
10 said, there's a lot of turnover in these
11 organizations, if we can help promote that, help
12 connect the dots, and say, hey, I was just in your
13 neighborhood, I was talking to these other folks,
14 maybe you want to do something with them. I consider
15 that a win for small businesses.

16 So what am I going to try to do next year? We'll
17 keep doing what we're doing. I want to expand. I
18 want to add additional target groups. I kind of have
19 been mostly focused on the smalls, like the really
20 smalls, I think they need the most help. You know,
21 they are trying to do it on their own. Everything.
22 Not just handle their insurance responsibilities, but
23 they are trying to run a business. As you get bigger,
24 you can start to hire people to help.

1 But I do want to focus a little more on larger
2 businesses and the self-insured employers. I haven't
3 really been getting there as much as I would like in
4 the last year. I'm noticing municipal workers. We do
5 do a code enforcement presentation on demand, that as
6 I'm speaking to businesses and seeing this
7 presentation out there, I'm starting to realize we
8 need to do more of that.

9 And I wasn't really sure that that was the
10 Advocate for Business's responsibility, but what I'm
11 discovering is a lot of the municipalities around the
12 state are giving out bad information, or out of date
13 information. And the business owners are getting
14 that, and it's confusing them, it's disrupting their
15 activities. So I really kind of want to ramp that up,
16 and essentially repeat the exercise that I'm doing
17 with the small business development centers, and the
18 Chambers and the professional associations.

19 We (inaudible) municipalities, to talk to the
20 people who are giving out the building permits and the
21 contracts, because they are interacting with so many
22 businesses. And make sure that we can sort of train
23 the trainer. Teach these people to get out there and
24 teach these businesses that they come in contact with,

1 what the law says, what they are supposed to do. And
2 how to, again, stay out of trouble, do their business,
3 keep generating economic activity, and keep the state
4 of New York running the way that it is.

5 Second thing there, I want to create a little
6 more content. I would like to have a menu of
7 offerings when I go out there and talk to these
8 business owners, and these organizations. Not just
9 keep running out there with the same presentations.
10 Offer them a little more variety in what we're talking
11 about.

12 Topics that I'm really kind of keying into that I
13 think really resonate with the business owners is risk
14 control, safety, return to work programs. Talk to any
15 employer in New York State, you ask them what the
16 number one problem is, finding good help. Everyone,
17 no matter how big or how small the business is, they
18 are all telling me I can't find good workers.

19 So protect the ones that you have, right? Focus
20 on safety, focus on risk control. It's so hard to
21 find good workers, let's keep the ones that we have,
22 and keep them safe, and look out for them. So I think
23 we can do a little more like that.

24 And again, just all in the same context of being

1 proactive, looking ahead. I really don't like to be
2 told where I'm going, I want to go where I want to go.
3 You know, I want to be steering the ship, not just
4 floating along where people take me.

5 So that's pretty much all I got for you. I more
6 or less put this together really just to kind of show
7 my team. Like hey, look, this is what we've done. I
8 keep talking about it, I want to see it, right, I want
9 to see it. I want to see what we're doing. And so
10 that's where getting numbers, getting the information,
11 putting it into a few simple charts that really kind
12 of helps open it up so that you can see and look at
13 what you're doing.

14 And show it to Clarissa. Hey, you want to come
15 and show it to the Board Members? So here I am. I
16 can answer any questions that anybody has. And again,
17 I'm really glad to be here.

18 CLARISSA RODRIGUEZ: Yeah, thank you so
19 much, Anthony. That was a great, great presentation.

20 ALL: Clapping.

21 LOREN LOBBAN: You have the main criteria,
22 enthusiasm.

23 CLARISSA RODRIGUEZ: Yes, yes, here, here.
24 Well thank you so much, Anthony. All right, Board

1 Members, that concludes our meeting. May I please
2 have a motion to adjourn today's meeting?

3 UNIDENTIFIED MALE SPEAKER: Motion to
4 adjourn.

5 CLARISSA RODRIGUEZ: Okay, thank you. Is
6 there a second?

7 STEVEN CRAIN: Second.

8 LINDA HULL: I second that.

9 CLARISSA RODRIGUEZ: Okay, thank you. All
10 in favor?

11 ALL: Aye.

12 CLARISSA RODRIGUEZ: All opposed? I am
13 also a yes, meeting adjourned. Thank you.

14

15 (Whereupon, the meeting was adjourned.)

16

17

18

19

20

21

22

23

24