

# **EXHIBIT B**

Sent from AOL Desktop

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From: sldcorrespondence@usac.org

To: casinoatty@aol.com

Sent: 6/25/2018 12:08:07 PM US Mountain Standard Time

Subject: FW: Administrator's Decision on Appeal – Funding Year 2005-2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2005 Funding Commitment Decision Letter this is attached. This letter explains the basis of USAC's decision.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

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# EXHIBIT C

James J. Carroll, Esq.  
The Carroll Law Firm, PLC  
1 N. New York Rd., Suite 39  
Galloway, NJ 08205

Billed Entity Number: 123365  
Form 471 Application Number: 484579  
Form 486 Application Number:



Universal Service  
Administrative Co.

*Administrator's Decision on Schools and Libraries Program Appeal*

Via Electronic and Certified Mail

May 25, 2018

James J. Carroll, Esq.  
The Carroll Law Firm, PLC  
1 N. New York Rd., Suite 39  
Galloway, NJ 08205

Re: Pleasantville School District Appeal of USAC's Decision to Dismiss its  
Pending Funding Year (FY) 2017 Application

Dear Mr. Carroll:

The Universal Service Administrative Company (USAC) has completed its evaluation of the March 2, 2018 letter of appeal (Appeal) submitted by Pleasantville School District (Pleasantville) appealing USAC's decision to rescind Schools and Libraries (E-rate) Program funding for funding year (FY) 2005<sup>1</sup> as well as Pleasantville's January 16, 2018 request (Request) to hold its FY 2017 funding applications in abeyance (jointly, Appeals).<sup>2</sup> USAC rescinded Pleasantville's funding for FY 2005 because USAC was unable to determine if the competitive bidding and vendor selection process was fair and open and free from conflicts of interest.<sup>3</sup> USAC then dismissed Pleasantville's FY 2017 funding application because Pleasantville had not yet satisfied its debt resulting from the rescinded commitments and the requirement to recover disbursed funds.<sup>4</sup> The Appeals request that USAC reverse its decision to rescind funding, requests a waiver of the sixty (60) day appeal deadline, and requests that USAC hold Pleasantville's FY 2017 funding applications in abeyance pending resolution of the FY 2005 COMAD decision.<sup>5</sup>

USAC has reviewed the Appeals and the facts related to this matter and has determined that Federal Communications Commission (FCC) rules do not support reversing the decision to dismiss the pending FY 2017 funding applications pursuant to 47 C.F.R. §1.1910(b)(3). Specifically, as discussed further below, USAC has determined that Pleasantville failed to show that the competitive bidding and vendor selection process was fair and open and free from conflicts of interest.<sup>6</sup> Pleasantville's debt is valid and must be satisfied before its

<sup>1</sup> Letter from James J. Carroll, Counsel for Pleasantville, to USAC (March 2, 2018) (Appeal).

<sup>2</sup> Letter from Benjamin B. Brenner, Counsel for Pleasantville, to USAC at 3 (Jan. 16, 2018) (Request).

<sup>3</sup> See Notification of Commitment Adjustment Letter (June 16, 2017) (COMAD).

<sup>4</sup> See Notification of Withholding of Action Pending Red Light Rule (Nov. 15, 2017) ((Notice of Dismissal).

<sup>5</sup> See Appeal at 4, Request at 3.

<sup>6</sup> 47 C.F.R. § 54.503.

funding requests can be reviewed. Additionally, the Appeal was not filed within the sixty (60) day deadline.<sup>7</sup> Therefore, USAC may not grant the Appeals.

### Background

FCC rules require that E-rate applicants conduct a fair and open competitive bidding process before selecting a service provider.<sup>8</sup> For the process to be fair and open, all potential bidders must have access to the same information and no conflicts of interest can exist between the applicant or its representative and a bidder.<sup>9</sup> If USAC believes or receives information that the competitive bidding process may not have been fair and open, USAC requests additional information from the participants of the bidding process to assess whether any rules were violated. If USAC does not receive sufficient information demonstrating that the competitive bidding process was fair and open, related funding commitments must be rescinded and any disbursed funds recovered.<sup>10</sup>

USAC notifies affected parties of its decision to rescind funding through a commitment adjustment (COMAD) letter.<sup>11</sup> Per FCC rules, parties affected by a USAC decision must file an appeal with USAC within sixty (60) days from the date USAC issued the decision.<sup>12</sup> Additionally, once USAC provides affected parties with a demand for payment, those parties have fifteen (15) days from the date of the demand in which to exercise the opportunity to request a review.<sup>13</sup>

FCC rules implementing the requirements of the Debt Collection Improvement Act of 1996 (DCIA) require that entities found to be delinquent in their debt have their applications dismissed (commonly referred to as the Red Light Rule).<sup>14</sup> Thus, E-rate applicants with outstanding debt are not eligible to receive benefits and any application for funding will be dismissed until the delinquent balance is paid.<sup>15</sup>

<sup>7</sup> 47 C.F.R. § 54.720.

<sup>8</sup> 47 C.F.R. § 54.503.

<sup>9</sup> See e.g. *Request for Review of Decisions of the Universal Service Administrator by MasterMind Internet Services, Inc.*, CC Docket No. 96-45, Order, 16 FCC Rcd 4028 (2000) (*MasterMind Order*); *Request for Review of Decisions of the Universal Service Administrator by Lazo Technologies, Inc.*, CC Docket No. 02-6, Order, 24 FCC Rcd. 10675, 10676 at para. 5 (2009) (*Lazo Order*) ("A fundamental requirement of the E-rate program is that solicitation for services be based on a fair and open competitive bidding process that is free from conflicts of interest.").

<sup>10</sup> See e.g., 47 C.F.R. § 54.707(a). See also *In the Matter of Changes to the Bd. of Dir. of the Nat'l Exch. Carrier Ass'n, Fed.-State Joint Bd. on Universal Service*, CC Docket Nos. 97-21, 96-45, Order, FCC 99-291, 17 Communications Reg. (P&F) 1192 (1999) ("Commitment Adjustment Order"); *In the Matter of Changes to the Bd. of Dir. of the Nat'l Exch. Carrier Ass'n, Fed.-State Joint Bd. on Universal Service*, CC Docket Nos. 97-21, 96-45, Order, FCC 00-350, 15 FCC Rcd 22975, (2000) ("Commitment Adjustment Implementation Order"); *In the Matter of Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Fifth Rep. and Order and Order, FCC 04-190, 19 FCC Rcd 15808, 15815-18, ¶¶ 18-29 (2004) ("Fifth Rep. & Order").

<sup>11</sup> See <https://www.usac.org/sl/applicants/before-youre-done/commitment-adjustments.aspx>.

<sup>12</sup> 47 C.F.R. § 54.720(a).

<sup>13</sup> 47 C.F.R. § 1.1911(d).

<sup>14</sup> 47 C.F.R. § 1.1910(b)(3).

<sup>15</sup> See <https://www.usac.org/cont/late-payments/default.aspx>.

### Pleasantville Funding Decision and Appeals

In 2010, USAC conducted a competitive bidding review of Pleasantville's FY 2005 funding applications. As part of the review, USAC requested additional information from Pleasantville and its consultant, Mr. Friedman, about Mr. Friedman's role during the competitive bidding process. In reviewing the submitted materials, USAC concluded that it did not receive enough information to find that Pleasantville's competitive bidding process was fair and open and compliant with FCC rules.

Pleasantville was notified of USAC's decision to recover previously disbursed funds through a COMAD letter dated June 16, 2017. The COMAD letter included instructions for filing an appeal within sixty (60) days. USAC subsequently sent Pleasantville a Demand Payment Letter on August 17, 2017 and a Second Demand Payment Letter on September 18, 2017.

Pleasantville first notified USAC of its intention to appeal USAC's COMAD letter on October 2, 2017, 108 days after the date of the decision.<sup>16</sup> Pleasantville then submitted its request for USAC to hold its FY 2017 funding applications in abeyance on January 16, 2018 after USAC notified Pleasantville that its FY 2017 funding application was dismissed because of the delinquent debt.<sup>17</sup> After requesting and receiving additional information from USAC, Pleasantville filed a formal appeal with USAC on March 2, 2018 regarding the decision to dismiss its FY 2017 funding application.

In its Appeal, Pleasantville claims it did not receive the June 16, 2017 COMAD letter or August 17, 2017 Demand Payment Letter and that its first notice of USAC's decision to rescind funding was through the Second Demand Payment Letter dated September 18, 2017. Pleasantville also asserts that USAC's explanation of why the funding was being rescinded did not contain sufficient information. In response to USAC's explanation that the funding was being rescinded because Pleasantville did not provide specifics regarding Mr. Friedman's role in the competitive bidding process, Pleasantville asserts that it did respond to USAC's inquiries. The Appeal points to several of Pleasantville's responses from 2010 that indicate that Pleasantville could not provide full details because the matter was in litigation and that the school board's solicitor would provide additional information. Pleasantville further argues that special circumstances exist in this matter to justify a waiver of the sixty (60) day appeal deadline because of its claim that it did not receive the COMAD letter and that USAC did not provide sufficient information about its 2010 competitive bidding review. Lastly, Pleasantville asserts that USAC's recovery action for FY 2005 violates the FCC's policy directive that USAC finish its investigations and seek recovery within five years of the final delivery of service for a specific funding year.<sup>18</sup>

### USAC Appeals Decision

<sup>16</sup> Letter from Benjamin B. Brenner, Counsel for Pleasantville, to USAC (Oct. 2, 2017).

<sup>17</sup> See Request.

<sup>18</sup> See Appeal.

Pleasantville claims that it did not receive the June 16, 2017 COMAD letter and argues that special circumstances exist to justify a waiver of the sixty (60) day appeal deadline; however, USAC does not have authority to waive FCC rules.<sup>19</sup> Pleasantville first notified USAC of its intention to appeal USAC's June 16, 2017 COMAD on October 2, 2017, 108 days after the date of the decision.<sup>20</sup> Because Pleasantville's Appeal regarding the underlying COMAD action was filed outside the sixty (60) day window, USAC must deny the request to reverse the COMAD decision.<sup>21</sup>

Pleasantville also argues that USAC's explanation of why the funding was being rescinded did not contain sufficient information. In the COMAD letter, USAC explained that it was unable to make a determination if Pleasantville engaged in a fair and open competitive bidding process free from conflicts of interest because Pleasantville did not provide specifics regarding the role played by Mr. Friedman in its competitive bidding and vendor selection process. Pleasantville claims that in 2010 it did respond to USAC's request for information stating that it could not provide detailed responses because the matter was in litigation.<sup>22</sup> Pleasantville's 2010 response stated that its board of education would forward the necessary documentation via its attorneys. However, USAC, to date, never received additional documentation from Pleasantville's board of education or its attorneys regarding the underlying competitive bid process or Mr. Friedman's role in the process.

In fact, the Appeal admits that the district's counsel in 2010 never provided USAC with the additional information.<sup>23</sup> Instead of providing USAC documentation showing that it engaged in a fair and open competitive bidding process, the Appeal attempts to shift the burden on USAC by emphasizing response times between correspondence and that USAC did not have sufficient information to conclude that Pleasantville violated FCC rules. Because Pleasantville never provided USAC with documentation showing that its competitive bidding process complied with FCC rules, USAC's decision to rescind the commitments and seek recovery of the disbursed FY 2005 funds was appropriate.

The Appeal also incorrectly describes Pleasantville's rights regarding access to information and documents related to this debt collection request. Under the FCC's debt collection regulations, debtors have fifteen (15) days from date of the demand letter to request a review to the FCC or USAC.<sup>24</sup> USAC sent Pleasantville a Demand Payment Letter on August 17, 2017. When USAC did not receive a response, it sent Pleasantville the Second Demand Payment Letter on September 18, 2017. The October 2, 2017 letter was Pleasantville's first request for documentation related to the underlying debts, sent 46 days after the initial demand letter. Pleasantville's request was thus untimely.

<sup>19</sup> 47 C.F.R. § 54.702(e); 47 C.F.R. § 1.3.

<sup>20</sup> Letter from Benjamin B. Brenner, Counsel for Pleasantville, to USAC (Oct. 2, 2017).

<sup>21</sup> 47 C.F.R. § 54.720.

<sup>22</sup> See Appeal at 3.

<sup>23</sup> *Id.*

<sup>24</sup> 47 C.F.R. § 1.1911(d).



The Appeal further argues that USAC's recovery action for FY 2005 violates the FCC's policy that USAC finish its investigations and seek recovery within five years of the final delivery of service for a specific funding year.<sup>25</sup> However, USAC's ability to collect funds previously distributed to E-rate applicants and service providers is not limited by the FCC's *Fifth Report and Order*,<sup>26</sup> and USAC may impose administrative penalties, including interest and collection costs if the funds are not repaid.<sup>27</sup> In the *Fifth Report and Order*, the FCC explained that USAC and the FCC would initiate and complete investigations and inquiries to determine whether ... "[any] rule violations exist within a five year period after the final delivery of service for a specific funding year."<sup>28</sup> The FCC emphasized that its policy regarding the administrative period for conducting investigations and audits does not affect the statutes of limitations applicable under the Debt Collection and Information Act (DCIA) for collection of debts established by the FCC.<sup>29</sup>

Recently, the FCC re-emphasized that this policy did not apply to debt collection efforts pursuant to an investigation and has clarified that this five-year administrative period is a policy preference, not a statute of limitations for recovery for debt collection actions continuing beyond the five-year deadline.<sup>30</sup> Further, the investigation policy was not meant to interfere with the FCC's (and USAC's) statutory obligations to recover public funds pursuant to applicable debt collection statutes.<sup>31</sup> In light of its statutory obligations to collect debts and prevent waste, fraud, and abuse of the Universal Service Fund and the E-rate program, USAC may proceed with collection efforts against Pleasantville, even if the collection action begins or lasts more than five years after final delivery of service.

Prior to submitting its Appeal, Pleasantville requested that USAC hold its FY 2017 funding applications in abeyance.<sup>32</sup> However, Pleasantville has yet to satisfy its debt, as explained above. Because Pleasantville still owes monies to the Universal Service Fund, it has been put on Red

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<sup>25</sup> *Id.* at 4-5.

<sup>26</sup> *Schools and Libraries Universal Service Support Mechanism*, CC Docket 02-6, Fifth Report and Order, 19 FCC Rcd. 15808 (2004) (*Fifth Report and Order*).

<sup>27</sup> 47 C.F.R. § 1.1911; 31 U.S.C. §§ 3701, 3711, 3716-17.

<sup>28</sup> *Id.* at 15819, para. 32.

<sup>29</sup> *Id.* at para. 34.

<sup>30</sup> *Review of a Decision of the Wireline Competition Bureau by Net56, Inc. Palatine Ill.*, CC Docket 02-6, Order, 32 FCC Rcd. 963, 966, para. 9 (2017) ("*Net56 Order*"). See also *Request for Review of Decisions of the Universal Service Administrator by Joseph M. Hill Trustee in Bankruptcy for Lakehills Consulting, LP*, CC Docket No. 02-6, Order, 26 FCC Rcd. 16586, 16601, para. 28 (2011) ("USAC's recovery of government funds paid to an applicant or service provider who has no just right to keep the funds is not barred by the passage of time."); *Waiver or Review of a Decision of the Universal Service Administrator by Premio Computer, Inc.*, CC Docket No. 02-6, Order, 29 FCC Rcd. 8185, 1886-87, para. 6 (2014) ("In some instances, consistent with its general obligation to recover funds improperly disbursed, the Commission has elected to proceed with recovery even when more than five years has elapsed...").

<sup>31</sup> *Net56 Order*, at 966, para. 10; *Fifth Report and Order*, 19 FCC Rcd. at 15819, para. 34.

<sup>32</sup> See Request at 3.

James J. Carroll, Esq.  
The Carroll Law Firm  
May 25, 2018  
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Light Status pursuant to FCC rules<sup>33</sup> and USAC must dismiss any funding application until the debt has been satisfied. Therefore, Pleasantville's Request must be denied.

#### Conclusion

For the reasons discussed above, Pleasantville's Appeals are denied.

If you wish to appeal this decision or request a waiver, an appeal may be filed with the FCC pursuant to the requirements of 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:

<http://www.usac.org/about/about/program-integrity/appeals.aspx>.

Sincerely,

/s/ Universal Service Administrative Company

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<sup>33</sup> 47 C.F.R. § 1.1910.

# EXHIBIT D

APPLICANT WHO IS FILING APPEAL: PLEASANTVILLE SCHOOL DISTRICT

BILLED ENTITY NUMBER: 123365

SPIN: 143008185

FCC REGISTRATION NUMBER: 0006516231

CONTACT INFORMATION: JAMES J. CARROLL, III, ESQ.,  
COUNSEL FOR PLEASANTVILLE S.D.  
1 NORTH NEW YORK ROAD, STE. 39  
GALLOWAY, NJ 08205  
PHONE: 609-404-3440  
EMAIL: [casinoatty@aol.com](mailto:casinoatty@aol.com)

DOCUMENTATION:

1. COPY OF FCDL ISSUED ON 1/19/18
2. COPY OF CORRESPONDENCE TO/FROM DISTRICT AND USAC DATED: 10/2/17, 10/9/17, 10/13/17, 10/30/17, 11/15/17, 11/28/17, AND 1/16/18
3. PBOE JAN./2010 LEGAL BILL FOR SERVICES
4. COPY OF EMAILS DATED 9/22/10 TO/FROM LINDA GEIGER TO ELISHA THOMPSON, BA
5. LETTER TO LINDA GEIGER FROM MARTIN FRIEDMAN
6. SIGNED CERTIFICATION FROM ELISHA THOMPSON, B.A.

EXPLANATION:

USAC has asserted that Pleasantville has not repaid \$403,517.54 in previously disbursed E-rate funds. USAC determined that these funding commitments must be rescinded, and the disbursed funding recovered due to an alleged violation of E-rate program rules. As a result of Pleasantville's failure to repay the outstanding amounts, its Funding Year (FY) 2017 funding applications were denied and a funding commitment decision letter (FCDL) was issued on January 19, 2018. Pleasantville appeals the denial of funding for FY 2017.<sup>1</sup>

With respect to the alleged \$403,517.54 debt, Pleasantville has, simultaneously to the instant appeal, filed an appeal of the COMADs relating to the alleged \$403,517.54 debt.

As Pleasantville indicated in its appeal of the \$403,517.54 alleged debt, USAC had asserted that it sent Demand Payment Notice on this debt to Pleasantville by letters dated June 16, 2017; August 17, 2017, and September 18, 2017. Pleasantville asserted by signed certification under penalty of

law that it never received the first two Demand Payment Notices dated June 16, 2017 and August 17, 2017. The first notice Pleasantville received regarding this alleged debt was by letter dated September 18, 2017. See attached signed Certification of Elisha Thompkins, Business Administrator, Pleasantville Board of Education.

In said Demand Payment Notices for the \$403,517.54 debt, which contained a copy of the Funding Adjustment Reports ("COMAD"), USAC stated that its investigation had resulted in the following assertion:

During the course of a review, you [the District] was asked to provide information regarding Martin Friedman and Alemar Consulting and the roles he played at your school, including his role in the competitive bidding process. You did not provide specifics regarding the role played by Mr. Friedman in your competitive bidding and vendor selection process. Therefore, USAC is unable to make a determination if your school engaged in a fair and open competitive bidding process free from conflicts of interest. {Emphasis added.}

As Pleasantville alleged in its appeal of the \$403,517.54 debt, this explanation simply did not contain information sufficient to inform the District why the funding was being rescinded, or if it had any basis for appeal. Specifically, the COMADs did not state when the "review" was done by USAC; on what date the District was asked to provide information; or to whom said request was sent. It did not indicate whether the District responded to the inquiry, but the response was not "specific" enough; or, if the District did respond, what about their response was missing? Rather, the only information the District had was that sometime in the last twelve (12) years, USAC allegedly requested information from the District about Martin Friedman and allegedly the District failed to provide "the specific" information USAC was seeking. Because the COMADs were so vague and because this all allegedly happened twelve (12) years ago, the District had no choice but to request additional documentation from USAC regarding the matter to determine whether it could appeal.

Under the FCC's debt collection regulations, debtors have fifteen (15) days from the date of the demand letter to request a retrieval of invoices and documentation related to a debt to the FCC or USAC.

By letter dated October 2, 2017, Pleasantville provided USAC with the signed Certification from the Business Administrator indicating that that the District had not received the initial two notices from USAC. The letter dated October 2, 2017, also requested a copy of USAC's file relating to its investigation. The letter also placed USAC on notice that the District intended to dispute the propriety of the debt; and/or seek a waiver; and /or appeal the notification. This letter was timely, as it was sent within twelve (12) days of receipt of the first notice the District received from USAC.

However, USAC did not provide any response to the District's October 2, 2017 letter. Thereafter, by letter dated October 9, 2017, the District again reiterated its request for documentation indicating what investigation was conducted and what was the basis for the USAC's COMADs. USAC did not respond to the letter. Thereafter, by letter dated October 13, 2017, the District again reiterated its request for documentation. Finally, on October 30, 2017, USAC responded and provided the District with documentation. This documentation was provided to the District over forty (40) days after USAC first notified the District of its demand for repayment of \$403,517.54 from funding years 2005, or over eleven (11) years ago.

Upon receipt of the documentation, which was quite voluminous, the District immediately began its own investigation.

By letter dated November 28, 2017 (or within 31 days of receipt of the voluminous documentation), the District notified USAC that the USAC documentation, as well as the District's own records, indicated that in 2010, the District did respond to an inquiry from Linda Grieger, relating to information about Martin Friedman. In several of the responses the District provided to Ms. Geiger's inquiries, the District indicated that the matter was currently in litigation and that the Board's solicitor would be providing additional information as requested. Based upon the same, the District then attempted to contact the Board's solicitor at the time, namely, Ray Hamlin, Esq., to determine what information was provided on the District's behalf. In the letter dated November 28, 2017, the District requested additional time to secure this information from the Board's prior solicitor and requested a reasonable amount of time to obtain the necessary information relating to USAC's allegation that it "did not provide specifics regarding the role played by Mr. Friedman" in the competitive bidding process and thereby allow the District to investigate, refute, appeal or seek a waiver of the claim by USAC that it is owed \$403,517.54.

USAC did not provide any response to the District's November 28, 2017 letter.

By letter dated January 16, 2018, the District notified USAC that it had been able to contact Ray Hamlin, Esq., the District's counsel in 2010. Mr. Hamlin indicated that he had no documentation that reflected that his firm was ever placed on notice of this issue, who the notification was sent to, whether there is proof of its receipt, and who specifically provided a response to it. In the January 16, 2018 letter to USAC, the District asserted that based upon Mr. Hamlin's response, there is simply no proof one way or the other to USAC's assertion that twelve (12) years ago it made an inquiry of the District and no one responded. The District requested a meeting with the individual with appropriate authority at USAC to discuss this matter to seek an amicable resolution. In response to said request, by email dated January 31, 2018 (or approximately 133 days after the District first received the Demand Payment Notice in September 2017, and after failure to respond to the District letter dated November 28, 2017), Ms. Sheila Murray of USAC wrote:

We reviewed your January 16, 2018 letter in response to USAC's November 15, 2017 Notice of Dismissal to Pleasantville School District. As indicated in the November 15th notice, Pleasantville has not repaid \$403,517.54 in previously disbursed E-rate funds. USAC determined that these funding commitments must be rescinded, and the disbursed funding recovered due to a violation of E-rate program rules. Because of Pleasantville's failure to repay the outstanding amounts, its Funding Year (FY) 2017 funding applications were denied and the funding commitment decision letter (FCDL) was issued on January 19, 2018. (A copy of the FCDL is attached and the FCDL is also available in the E-rate Productivity Center and noted in Pleasantville's News Feed.)

To appeal this denial decision, you must submit your appeal to USAC within sixty (60) days of the denial decisions (by March 20, 2018). If you have any questions regarding the appeal process, please refer to the appeals section of USAC's website.

In response to said email, the District submits this appeal.

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The District respectfully asserts that USAC's January 19, 2018 denial of its 2017 funding is based upon an invalid prior debt asserted by USAC, namely the \$403,517.54 in previously disbursed E-rate funds from funding year 2015.

In conclusion, Pleasantville respectfully requests that a decision in this appeal not be made until a decision in Pleasantville's appeal of the \$403,517.54 alleged debt is decided. As indicated above, said appeal of the alleged \$403,517.54 debt was filed simultaneously with this present appeal for the denial of 2017 funding.

Date: March 2, 2018

s/James J. Carroll, Esq.  
JAMES J. CARROLL, ESQ.  
Counsel for Pleasantville School District