UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

RODERICK WALKER, et al,

Plaintiffs,

vs.

No. 81-40336
Judge Stewart Newblatt

PERRY JOHNSON, et al,

Defendants.
_____/

NEAL BUSH (P11471)
Attorney for Plaintiffs

PLAINTIFFS' SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR RECONSIDERATION, CLARIFICATION AND AMENDMENT OF COURT ORDER

I.

INTRODUCTION

Plaintiffs have raised in their Motion for Reconsideration, Clarification, and Amendment of Court Order eight (8) issues. Certain of these issues are raised to ensure that the Court's Order is consistent with its Opinion. See Plaintiffs' Motion, Paragraphs 1 and 2. The other issues will be considered in this Memorandum.

II.

THE COURT'S DETERMINATION THAT DEFENDANTS HAVE VIOLATED DUE PROCESS SHOULD APPLY TO ALL INMATES PRESENTLY IN ADMINISTRATIVE SEGREGATION OR GREEN CARD STATUS.

This Court determined that Defendants have failed to provide adequate notice under the due process clause of the Fifth Amendment to the United States Constitution. Every inmate presently in administrative segregation or green card status is there in violation of due process. This Court gave Defendants forty (40) days until July 31, 1982, to comply with its Order.

Therefore, unless a new hearing with proper notice is provided to an inmate by that date, that inmate should be released to general population. To continue to hold such inmate in administrative segregation or green card status would violate due process. Moreover, it would not be difficult for Defendants to provide a hearing upon proper notice.

III.

DUE PROCESS MANDATES THAT AN INMATE BE ALLOWED TO PRESENT EVIDENCE AND ARGUMENTS AT A PRISON HEARING TO DEMONSTRATE THAT HE SHOULD NOT SUFFER THE SANCTION OF ADMINISTRATIVE SEGREGATION.

Administrative segregation may be imposed only when:

A. A resident demonstrates inability to be managed with group privileges;

B. A resident needs protection from other prisoners;

C. A resident is a serious threat to the physical safety of staff or other residents, or to the good order of the facility; and,

D. A resident is a serious escape threat.

Michigan Administrative Rule 791.4405.

An inmate has a right to be in general population under this regulation unless the Department of Corrections can demonstrate that one of the above conditions exist.

Given this regulation, Judge Avern Cohn has ruled that, under Bills vs. Henderson, 631 F2d 1287 (6th Cir 1980), an inmate in Michigan has a constitutional right to be free of administrative segregation. Riley vs. Johnson, 528 F Supp 333, 340 (FD Mich 1981).

In administrative segregation, inmates are denied virtually every right, privilege and activity which accompanies general population status. The Michigan Department of Correction's Policy Directives Provide:

> Residents in Administrative Segregation, therefore, shall be afforded all privileges that are administratively feasible that can be safely allowed . . . When practicable, residents should be given opportunities to engage in educational, religious and treatment activities. Daily out-of-cell movement must

> be afforded each person and showers should be allowed as often as administratively possible but at least weekly.
>
> PD-BCF-60.01 (Emphasis added.)

While the above-stated policy sets forth noble goals, administrative segregation inmates in Michigan prisons are not permitted to engage in religious, education and treatment activities. Furthermore, inmates in administrative segregation will not receive the benefit of this Court's Order regarding showers, and will have one (1) shower approximately every ten (10) days (when the plumbing is working). Even an inmate's personal property is completely prohibited during the first thirty (30) days of administrative segregation, and severely restricted thereafter. Finally, administrative segregation inmates in Michigan prisons are, in almost all cases, housed in disciplinary segregation cells and administration segregation cells interchangeably, since they are identical and all in the same housing units. Accordingly, differences between administrative segregation and disciplinary segregation exist in theory only, and not at all in practice.

The Court in Wright vs. Enomoto, 462 F Supp 397 (ND Cal, 1976), aff'd 434 US 1052 (1978), exposes the fiction that administrative segregation and disciplinary segregation are qualitatively different. It is significant to note that the Michigan Court of Appeals has reached the same conclusion regarding the Michigan system. In Dickerson vs. Marquette Warden, 99 Mich App 630; 298 NW2d 841 (1980), inmates contended that they had been placed in administrative segregation without an appropriate hearing.

The Michigan Court of Appeals described the consequence of administrative segregation, Dickerson, supra, at 638:

> The hearing at issue here was termed administrative and not disciplinary. Accordingly, the sanction imposed was termed 'administrative segregation.' The plaintiffs contend, however, and it is not disputed, that administrative segregation is identical to solitary confinement. In either situation, all privileges and rights are identical... Under the circumstances presented by this case, however, and regardless of how the Warden chooses to characterize it, the initial hearing was, in fact, a disciplinary one since: the initial hearing was instituted after specific acts of misconduct had

> occurred; the punishment imposed was solitary confinement; and the length of solitary confinement, some eight months, was significantly disproportionate to the penalty of 7 days in solitary confinement finally imposed after the plaintiffs were found guilty in a subsequent 'disciplinary' hearing.

Thus, the Michigan Court of Appeals has placed substance over form and has officially recognized that placement in administrative segregation is, in fact, worse than the imposition of disciplinary segregation.

While the conditions of confinement in punitive and administrative segregation are similar, the effects of placement in administrative segregation are generally more serious and potentially devastating. The penalty for violation of an institutional rule includes detention (punitive segregation) of up to 7 days, with the maximum range reserved for only the most serious or persistent violators. Michigan Administrative Rule 791.5505(1)(a). No such limit is applicable to placement in administrative segregation. Thus, it is established that, at least in terms of how long an inmate can be placed in the "hole," the conditions involved are more onerous.

Additionally, as a result of the length of time involved in administrative segregation, an inmate:

1. Will lose his general population cell due to another inmate being reassigned to it. This will necessarily interfere with an inmate's interpersonal relations with his neighbors, and disrupts the emotional security obtained from maintaining and furnishing the individual cell which he occupied;

2. Will more likely lose a work or program assignment than an inmate who serves a short period of time in punitive segregation;

3. Will be more apt to be viewed by the Parole Board and prison staff as a "chronic troublemaker," whereas an inmate merely required to serve a short punitive detention period is seen as having made a single "mistake;"

4. Will suffer severe psycholigical harm during and subsequent to an extended stay in the "hole." See, e.g. Hardwick vs. Ault, 447 F Supp 166 at 125 (MD, Ga, 1978). Michigan assigns extra counseling staff to its segregation cell block in recognition of this problem. Staff shortages, overcrowding and high staff turnover prevent effective diffusion of the harm, and,

5. Will undergo a gradual and lengthy reincorporation into the general population mainstream, even after his or her release from administrative segregation.

Inmates at State Prison of Southern Michigan at Jackson are almost always moved from the administrative segregation unit to "4" Block. This Block, while general population by designation, has a certain unofficial "stigma" attached to it because of its being a repository for releasees from segregation. As a result, staff is less tolerant; jobs given to residents in that unit are more menial; yard time is more restricted (unofficially); and other privileges generally are interfered with (i.e., because of special "count" procedures, inmates who have programming after dinner are frequently as much as 1/2 hour late to their class).

Thus, it is seen that the effect of time alone on an inmate in segregated confinement differentiates his position from the inmate in punitive detention. With conditions of confinement between the two types of status being virtually indistinguishable, it is compellingly established that administrative segregation is more onerous than punitive detention.

It is within this framework that this Court must consider what process is due an inmate whom the Defendants wish to place in administrative segregation. Due process is a flexible concept and calls for procedural protection as the particular situation demands, Morrissey vs. Brewer, 408 US 471, 481 (1972).

In determining what process is due, the Court has identified specific factors, Mathews vs. Eldridge, 424 US 319, 355 (1976).

> Identification of the specific dictates of due process generally requires consideration

> of three distinct factors: First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the Government's interest, including the function nvolved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.

Under this analysis, administrative segregation should merit, as this Court has found, at least the protections mandated by Wolff vs. McDonnell, 418 US 539 (1974), because, as previously discussed, conditions in the segregation cell blocks parallel those of punitive detention, except that administrative segregation lasts longer and indefinitely. Cf., Wright vs. Enomoto, 462 F Supp 397, 403-4 (NE Cal, 1978). In fact, under the balancing test required by Matthews vs. Eldridge, supra, the nature of the loss to the administrative segregation inmate is greater than the punitive detention inmate because of the length of the time involved.

Furthermore, there is a grave risk of error in predicting future misconduct. There is a great deal of professional literature which sets forth several basic difficulties in predicting human behavior, and, further, questioning whether the field of prediction has attained acceptable scientific levels. See, generally, Monahan: The Clinical Prediction of Violent Behavior, U. S. Department of Health and Human Services Publication No. (Adm) 81-921, (1981); American Psychological Association, Report of the Task Force on the Role of Psychology in the Criminal Justice System; American Psychologist, 1978, 33 1099-1113. Cocozza, J., and Steadman, H.: The Failure of Psychiatric Predictions of Dangerousness: Clear and Convincing Evidence, 29 Rutgers Law Review, 1084 (1976).

It is important to remember what is involved in the decision to classify an inmate to administrative segretation. It is not that the inmate has committed some misconduct. If this were the standard then every finding of misconduct would lead to placement in administrative segregation. Rather,

the issue is whether or not based on total inmate conduct an inmate cannot be managed or is a threat in general population. In making that decision, the Defendants review and consider an inmate's total history and institutional record. Such review is similar to a sentencing or a determination of damages after a finding of liability. Under the procedure of the Department of Corrections, which was upheld by this Court in its Opinion, an inmate who has been charged with misconduct does not have any opportunity to explain or present evidence concerning whether or not he is a management problem.[1] This decision is made by low level prison administrators.[2]

Not only are officials not properly trained for such decisions, but the officials who decide placement in administrative segregation have primary functions unrelated to the segregation decision. For example, the paper work which assigns an inmate to the segregation cell block must be signed by Assistant Deputy Wardens, or their designated subordinates. The primary duties of these officials include the ordering of sanitation supplies, maintenance supplies, the operation of industry, the provision of food, and, in general, the mechanical operation of the prison. But, the true decision is made even below this level of official. The complaining guard will take the paper work to a "control center," where other guards initially approve or disapprove the administrative segregation request. If the

---

1 Defendants' rules and regulations specify that only evidence as to guilt or innocence can be introduced at a misconduct hearing. PD-DWA 60.01, p 4.

2 Concerning such low level administrator, it is important to remember that many people go into prison work . . .

> because they have no other choice of livelihood. Their pay is low, the civil service standards are minimal, they are generally considered to be at the bottom of the law-enforcement barrel. A reading of recent congressional hearings on prison conditions reveals, not unexpectedly, that beyond those men and women who become guards because they have no alternative, this occupation appeals to those who like to wield power over the powerless and to persons of sadistic bent.
>
> Jessica Mitford, Kind and Usual Punishment: The Prison Business (Random House, Vintage Books).

administrative segregation request is denied, the process stops there. If it is approved, the paper work is sent to the Assistant Deputy Wardens where they are "rubber stamped" as approved. The real decision-maker, the control center guard, is in charge of staff complements, visiting procedures, and the day-to-day operation of the prison.

Given this situation, and given that this Court had recognized that due process applies to the decision to place an inmate in administrative segregation, a meaningful opportunity to be heard must include the right of an inmate to offer evidence and witnesses on the very issue being decided: is the inmate unmanageable or a threat in general population.

The Supreme Court in Wolff, supra, at 566-567 determined that an inmate must be allowed to present evidence and witnesses in his/her defense, unless the evidence is irrelevant or it would be a hazard to safety to call a specific witness. The Court did not define "defense" to mean solely guilty or innocence of the misconduct charged. Similarly, in Wright vs. Enomoto, supra, 462 F Supp at 404, the Court ordered that the notice given an inmate be "sufficient detail to enable (an inmate) to prepare a response or defense." This Order was affirmed by the Supreme Court. A response to the charge certainly could include why a certain punitive measure is or is not appropriate.

Of course, in other context, the Supreme Court has used the word "defense" to mean more than simply the adjudication phase of a proceeding. For example, the obligation of a prosecutor to provide an accused with material in the prosecutor's possession which supports an accused defense, includes evidence which might mitigate the sentence, Brody vs. Maryland, 373 US 83 (1963). Similarly, criminal sentencing must satisfy due process. Gardner vs. Florida, 430 US 349, 358 (1977) and

an indigent criminal defendant must be provided an attorney at sentencing.[3]

Plaintiffs, therefore, contend that the Supreme Court specifically in Wolff, supra, gave an inmate the right to present evidence and participate in the hearing with regard to disposition when the Court specified that an inmate could provide evidence and witnesses in his/her defense.

Assuming that the issue was not decided in Wolff, then such a procedure is required under the analysis of the Supreme Court in Mathews, supra, 424 US at 355. Plaintiffs have previously discussed the private interest which would be effected. Giving an inmate the opportunity to bring to the decision maker's attention facts to demonstrate mitigation factors would lessen the risk of erroneous deprivation.

Moreover, the burden to Defendants would be almost non-existent. An inmate would have the right to argue to the decision maker why he is not a management problem. Any other evidence, in most cases, would be a letter or oral testimony from prison staff that the inmate was not a management problem in general population. Certainly, since there already is a hearing procedure adding this type of evidence creates no burden on Defendant.

There is clearly no burden because inmates are allowed to make such a presentation at a hearing when there is an attempt by Defendants to classify an inmate to administrative segregation in those cases when there is no specific misconduct, but general conduct which may warrant administrative segregation.

Presently, all administration does when making the determination to send an inmate to administrative segregation after a conviction of misconduct, is review a file. No other

---

[3] Plaintiffs bring these cases to this Court's attention not to argue that the specifics required by due process in criminal cases apply to prison hearings, but to demonstrate that the common meaning of "defense" when used by the Supreme Court includes the disposition phase of a proceeding.

information is obtained. But, due process demands more. As the Court in Wright vs. Enomoto, supra, 462 F Supp at 397 stated:

> Defendants have made no showing that prison administration or safety will be jeopardized if defendants are required to accord plaintiffs at least the minimal protections called for by Wolff in the case of disciplinary sanctions. These minimal protections are essential if the inmate is to have any chance whatever to prove that he does not represent a risk to the security of the institution and thereby to avoid subjection to the severe deprivations of confinement in maximum security. Indeed, defendants' interest in preventing prison violence may well be served by making fair procedures requisite to maximum security confinement. (Emphasis added.)

This Court determined in its Opinion at p 18 that the Sixth Circuit Court of Appeals in the Bills case, supra, and Walker vs. Hughes, 558 F2d 1247 (6th Cir 1977), had not required that prison administrators allow an inmate to present evidence regarding whether or not he actually is a management problem and should or should not be placed in administrative segregation. But, the issue before this Court was never raised in those cases. Further, Bills, supra, supports Plaintiffs' position. The Sixth Circuit in Bills, supra, at 1295-6 made it clear that the hearing must be meaningful and the inmate must be allowed to marshall evidence in his defense. See also Finney vs. Mabry, 528 F Supp 567, 574 (ED Ark 1981).

How can a hearing be meaningful if an inmate cannot speak to the specific issue involved? How can an inmate marshall evidence in his defense if the evidence cannot be on point to the issue involved: at what level of custody the inmate should be placed and whether or not he is a management problem in general population?

Plaintiffs are asking for very little, the opportunity to be heard at a hearing which will determine where they will be placed, a determination as to whether they will have the limited freedoms of general population or the limited confinement

of an administrative segregation. This opportunity to be heard on the issues involved is required by due process and is a meaningful right which will protect inmates' rights, lessen the chance of erroneous decision, and, in no manner burden Defendants. This Court should reconsider its decision regarding this due process issue.

IV.

INMATE WHO HAD BEEN PREVIOUSLY CLASSIFIED TO ADMINISTRATIVE SEGREGATION SHOULD HAVE THEIR FILES EXPUNGED ON THAT DETERMINATION

This Court has determined that Defendants violated due process and the mandates of Wolff, supra, in classifying inmates to administrative segregation. Wolff was decided in 1974. Certainly, Defendant should have been able to properly apply the mandate of that case. In a similar, due process challenge, Judge Cornelia Kennedy ordered expungement of records, Coughlin vs. Johnson, (No. 75-70532) (attached).

V.

INMATES SHOULD BE ALLOWED TO SHOWER EACH DAY THEY ARE PERMITTED OUTSIDE YARD RECREATION.

This Court in its Opinion at Page 30, made a finding that the three showers per week allotment at MBP was constitutional, but further ordered that Defendants must provide inmates at SPSM with three showers per week without the inmate having to give up yard time or meals in order to shower. Opinion at Page 42.

Although the Court, in referring to Rhodes vs. Chapman, US ; 101 S Ct 2392 (1981), said that sanitation is an important concern, it further stated that three showers per week is not a serious threat to personal sanitation (Page 30). However, given the fact that following the Court's Order, daily exercise will be available for all inmates, this Court should modify and amend its Order to provide that inmates be permitted to shower each day they have yard recreation.

Prior to the disturbances in May, 1981, Plaintiffs were permitted daily showers and yard time. Following the disturbances, Defendants drastically reduced yard time from several hours per day to a maximum of one hour per day. This Court, through its Order, has enlarged the yard time at MBP and SPSM to two hours per day, and 20 minutes at the Michigan Reformatory. Since Defendants now have such a short time for outside recreation, compared with the pre-May, 1981 period, it is expected that they will use this time to maximize the amount of exercise they want. More than likely, inmates will be engaged in strenuous physical activity, such as playing basketball in an effort to best use their outdoor time. Given that inmates will in all likelihood be involved in such strenuous exercise seven times per week, standards of personal sanitation require the ability to shower each day there is yard. To put it less abstractly, one can only imagine the effect of a hearty football game for one hour on a warm day and then have to wait two days before the sweat and grime can be washed off. Perhaps if Plaintiffs only used yard time for sun bathing, then three showers might not pose a serious threat

to personal hygiene. However, given daily active and strenuous exercise, this Court should order that Plaintiffs have showers available each day they have yard time.

VI.

MICHIGAN REFORMATORY INMATES, CONSISTENT WITH THE COURT'S OPINION, SHOULD HAVE TWO (2) HOURS OF YARD RECREATION

With reference to the claim made regarding yard recreation time at the Michigan Reformatory (hereinafter MR), this Court ordered that unassigned inmates should receive twenty (20) minutes of daily yard time (Opinion at p. 42). Based on the Court record of the amount of post-riot yard time and on the amount ordered by this Court for SPSM and Marquette Branch Prison, this Court should reconsider its Order as to MR.

At the close of trial, unassigned inmates at the MR were permitted in the yard 2 - 3 times per week for 45 minutes to one hour each period (Opinion, p. 10). This meant that an inmate, prior to the Court's Order had a potential of 180 minutes each week for yard time. Under the Court's Order an unassigned inmate now has a potential of receiving only 140 minutes of yard time each week. Although this Court found the post-riot yard time to be violative of the Eighth Amendment (p. 39), it has ordered that the Defendants provide an even lesser amount than what is presently available. This twenty minute per day requirement should be expanded.

In its Opinion, this Court found, inter alia, that the post-riot yard time at Marquette Branch Prison and SPSM was also violative of the Eighth Amendment. The post-riot yard time for inmates in general population at MBP is 45 minutes per day (p. 5), and is one hour at SPSM. In making its ruling, the Court stated, "The denial of yard time generates rage, hostility and depression. The psychiatric testimony indicated that the prolongation of such reaction can lead to permanent psychoses." (p. 6). Although made with reference to MBP, this statement was incorporated by reference to apply to SPSM and the MR (pp. 10-11). Since there was psychological harm found at all of the prisons, produced in part by the amount of yard time, it appears unreasonable that this Court should order that Defendants provide inmates at the MR with yard time which is less than half of the yard time which caused the

psychological harm at MBP. That is, a finding was made that 45 minutes per day of yard time at MBP amounted to the infliction of unnecessary and wanton pain (p. 27), but then ordered that 20 minutes at another prison is sufficient.

Even assuming that prison officials have the discretion to determine the amount of yard time based on the security classification of the institution, this argument fails in this case. All three institutions are considered maximum security and therefore incarcerate the same type of inmate. This Court ordered that inmates in administrative segregation and green card status at MBP must get no less than thirty to forty minutes per day of yard time. If the Order of twenty minutes should remain, Defendants will be permitted to provide more yard time to inmates who have been determined to be "unmanageable in the general population," than to inmates who pose no problems to Defendants.

It seems apparent that this Court erred in ordering only 20 minutes per day for yard time at the MR. Efforts should be made to correct this inconsistency. The Court should require that Defendants provide MR inmates with two hours per day, that is, the amount this Court has already ordered at MBP and SPSM in order to avoid causing inmates further psychological harm.

CONCLUSION

For all of the above reasons, Plaintiffs' Motion for Reconsideration, Clarification and Amendment of Court Order should be granted.

Respectfully submitted,

NEAL BUSH (P11471)

Attorney for Plaintiffs
300 E. Long Lake Road
Suite 375
Bloomfield Hills, Michigan 48013
(313) 645-1450

Dated: July 17, 1982

WILLIAM H. GOODMAN (P14173)
3200 Cadillac Tower
Detroit, MI 48226
(313) 955-0050

JUDITH MAGID (P24525)
3550 Cadillac Tower
Detroit, MI 48226
(313) 962-9015

LARRY W. BENNETT (P26294)
6735 Telegraph Road, #100
Birmingham, MI 48010
(313) 642-6700

DEBORAH BROUWER
Wayne State University Law School
Detroit, MI 48226

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

RUTH COUGHLIN, and GLORIA MORGAN,
On Behalf of Themselves and all
Others Similarly Situated,

Plaintiffs

-v- Civil Action No. 75-70523

PERRY JOHNSON, In his capacity
as Director of the Michigan
Department of Corrections, et al.,

Defendants

_____/

At a session of said Court held
in the Federal Building, Detroit
Michigan, on Nov 29 1977

PRESENT: HON. CORNELIA G. KENNEDY
U.S. DISTRICT JUDGE

CONSENT JUDGMENT

This matter having come before the Court on the stipulation of the parties in order to resolve the conflict over the constitutional adequacy of the disciplinary procedures in effect at the Women's Division of the Detroit House of Correction and the Court being fully advised in the premises:

NOW THEREFORE, IT IS HEREBY ORDERED that Defendants Dorothy Coston and Gloria Richardson review all prisoners' files and expunge therefrom all misconduct reports and discipline hearing dispositions during the period from June 18, 1974 to June 1, 1976.

IT IS FURTHER ORDERED that Defendants Dorothy Coston and Gloria Richardson will notify in writing, each prisoner currently incarcerated whose discipline records have been expunged.

IT IS FURTHER ORDERED that copies of the Stipulation agreed upon by the parties will be posted conspicuously throughout the Huron Valley Women's Facility for a period of Thirty (30) days from the entry of this Consent Judgment.

HON. CORNELIA G. KENNEDY
U. S. DISTRICT JUDGE

APPROVED:

CENTER FOR URBAN LAW
(Wayne County Neighborhood
Legal Services)
1500 David Stott Building
Detroit, Michigan 48226
(313) 962 9015

JUDITH MAGID (P 24525)

Attorney for Plaintiffs

CHRISTINE DERDARIAN
Assistant Attorney General
Criminal Division
Law Building
525 West Ottawa
Lansing, Michigan 48913

Attorney for Defendants

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

RODERICK WALKER, et al,

Plaintiffs,

vs. No. 81-40336

PERRY JOHNSON, et al, Hon. Stewart Newblatt

Defendants.
_____/

PROOF OF SERVICE

STATE OF MICHIGAN)
)SS
COUNTY OF OAKLAND)

NEAL BUSH, being first duly sworn, deposes and says that on the 17th day of July, 1982, he served a copy of Plaintiffs' Supplemental Memorandum of Law in Support of Motion for Reconsideration, Clarification and Amendment of Court Order upon BRIAN MacKENZIE, Assistant Attorney General, Corrections Division, Plaza One Building, 401 S. Washington Square, Lansing, Michigan, by enclosing same in an envelope duly addressed and by depositing said envelope in the United States mail, postage fully prepaid.

NEAL BUSH

Subscribed and sworn to before me
this 17th day of July, 1982.

Mary Ann Resslar
MARY ANN RESSLAR, Macomb County acting
in Oakland County, MI

My Commission expires: 2-28-84