

1 **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**
2 **STATE OF NEVADA**

3 SHARATH CHANDRA, Administrator,
4 REAL ESTATE DIVISION,
5 DEPARTMENT OF BUSINESS AND
6 INDUSTRY,
7 STATE OF NEVADA,

8 Petitioner,

9 vs.

10 SERGIO TARDIO
11 (License No. A.00007555-CR),

12 Respondent.

Case No. 2017-868, AP17.031.S

**STIPULATION FOR SETTLEMENT OF
DISCIPLINARY ACTION**

FILED

JAN 15 2021

NEVADA COMMISSION OF APPRAISERS

Betsy Valadez

13 This Stipulation for Settlement of Disciplinary Action (“Agreement”) is entered into by
14 and between the REAL ESTATE DIVISION, DEPARTMENT OF BUSINESS AND
15 INDUSTRY, STATE OF NEVADA (“Division”), by and through its Administrator, SHARATH
16 CHANDRA, and the NEVADA COMMISSION OF APPRAISERS OF REAL ESTATE
17 (“Commission”), by and through its President (collectively “Petitioner”); and SERGIO
18 TARDIO (“Respondent”).

19 **JURISDICTION**

20 The Respondent is a Certified Residential Appraiser licensed by the Division, and
21 therefore, is subject to the Jurisdiction of the Division and the provisions of NRS and NAC
22 Chapter 645C. By availing himself of the benefits and protections of the laws of the State
23 of Nevada, the Respondent has submitted to the jurisdiction of the Division.

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PROCEDURAL HISTORY

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2 1. On or about April 18, 2017, the Division received a complaint/statement of
3 fact asserting that the Respondent completed a uniform residential appraisal report
4 ("Appraisal Report") which did not utilize current comparable sales.

5 2. The Division's initial investigation was completed on April 24, 2018 and
6 determined that there was insufficient evidence available to substantiate any violation of
7 NRS or NAC 645C or the Uniform Standards of Appraisal Practice ("USPAP").

8 3. On May 24, 2018, the Division mailed the Respondent a letter indicating that
9 Case No. 2017-868, AP 17.031.S had been closed, the letter also stated "The decision to
10 close this matter is made without prejudice. The Division reserves the right to reopen its
11 investigation should such action be warranted."

12 4. On July 19, 2018, the Division received an email from the complainant
13 requesting the Division re-investigate all the complaints he had filed with the Division and
14 included a copy of a letter from the Respondent to the complainant which alleged damages
15 and demanded restitution.

16 5. The Division commissioned a Standard 3 Review of the underlying appraisal
17 performed by the Respondent.

18 6. On July 31, 2018, the Division re-opened this case and the Respondent
19 requested that this matter be heard by the Appraisal Advisory Review Committee
20 ("AARC").

21 7. The case was initially scheduled for April 29, 2019, but the AARC ran out of
22 time to hear the case, which was then rescheduled for August 6, 2019.

23 8. At the August 6, 2019, AARC meeting, the Respondent requested that this
24 matter be heard by the Nevada Commission of Appraisers of Real Estate ("Commission").

FACTUAL ALLEGATIONS

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26 1. The Respondent has been licensed by the Division as a Certified Residential
27 Appraiser, License No. A.0007555-CR since October 16, 2007.

28 2. The Respondent's Appraisal Report was prepared for a single-family residence

1 located at 3417 Perching Bird Lane, North Las Vegas, Nevada 89084, APN 124-20-213-064
2 (“Property”), built in 2007.

3 3. The gross living area of the Property recorded as 2,207 sq. ft.

4 4. The assignment type is identified as “Purchase Transaction,” and the
5 lender/client is identified as “Cross-country Mortgage, Inc.”

6 5. The effective date of Respondent’s Appraisal Report is identified as April 1,
7 2017, and the signature date is April 7, 2017.¹

8 6. The Respondent’s Appraisal Report states the appraised value is \$250,000.00.

9 7. The report included with the work file indicates a sale price of \$252,000.00,
10 which was changed by a supplemental addendum.

11 8. The complaint’s attached appraisal indicates a sale price of \$259,000.00.

12 9. A copy of the appraisal with the \$259,000.00 sales prices was not included in
13 the work file.

14 10. The Respondent’s Appraisal Report arrived at a Cost Approach value of
15 \$247,629.00.

16 11. The Cost Approach refers to a 1-story home in the Sunrise Mountain area,
17 whereas the Property is a 2-story home design.

18 12. The Standard 3 Reviewer indicated that Sunrise Mountain is not nearby the
19 subject property.

20 13. The Cost Approach indicates a site value of \$20,000.00.

21 14. The work file contains no site value supporting information, no extraction
22 method calculations, or evidence of other methods for estimating site value.

23 15. The Cost Approach reported the “as is” value of site improvements as
24 \$20,000.00.

25 16. The work file does not contain information as to the development or
26 quantification of the site improvements.

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28 ¹ The 2016-2017 edition of the Uniform Standards of Professional Appraisal Practice (“USPAP”) is applicable here.

1 17. The Cost Approach included external depreciation of \$2,094.00.

2 18. The work file does not contain evidence supporting an analysis and/or
3 calculation for external depreciation.

4 19. The work file does not contain evidence of analysis or reconciliation of the as-
5 is value of the site improvements.

6 20. The work file includes no analysis of available cost data to estimate the
7 difference between the cost new and the present worth of the improvements, to support
8 accrued depreciation.

9 21. The Respondent's Appraisal Report stated in several places that the market
10 has been stable since 2013.

11 22. The Standard 3 Reviewer's findings indicated the market is increasing at 16%
12 per annum on a gross sales price basis, and 9 % per annum on a price per square foot basis.

13 23. In utilizing the Respondent's search criteria, the reviewer identified 40
14 comparable sales within the defined market, whereas the Respondent's 1004MC indicated
15 only 12 sales occurred within the past twelve months.

16 24. The Respondent failed to adequately identify and analyze the market trends.

17 25. The appraisal report and work file do not contain evidence of any analysis,
18 including paired sales, statistical analysis, or supported cost data to support the
19 adjustment or non-adjustment of comparable sales.

20 26. The Respondent's work-file mentions the source of the cost data as the Blue
21 Book and local builder costs but contains no evidence of analysis or reconciliation of the
22 cost's sources.

23 27. The addendum fails to provide economic or market data support for the claim
24 that the Las Vegas market has been stable since October 2013.

25 28. The Standard 3 Reviewer's research indicated values in the market area were
26 increasing at a 16% per annum on gross sales prices basis and 9% per annum on a price
27 per square foot basis.

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1 29. The Respondent omitted the quantifiable value increase in the Las Vegas
2 market over the prior twelve months.

3 30. The Standard 3 Reviewer determined the externality impact of the Property
4 backing to a freeway at 5.5%.

5 31. The Standard 3 Reviewer found that the Respondent failed to analyze two
6 similar freeway exposure externalities.

7 32. The Respondent made a series of errors by failing to make adjustments for the
8 seller paid concessions, contract date, bathroom count, and landscaping.

9 33. The Standard 3 Reviewer indicated that seller's concessions occurred in only
10 30% (12 of 40) of sales within the subject's market area with median sales concession being
11 1.57%.

12 34. The Respondent reported 0 to 3.5%, noting adjustments are recognized over
13 that threshold.

14 35. The Respondent did not follow the scope of work, failing to fully analyze the
15 market, as evidenced by the lack of adjustments for market conditions/contract date,
16 concessions, bathroom count and landscaping.

17 36. The Respondent's work file does not contain evidence as to how the
18 adjustments were developed or quantified for location, site area, gross living area, balcony,
19 and pool, and therefore lacks credibility.

20 37. The Respondent's Appraisal Report noted in the Cost Approach section, "[t]he
21 Cost Approach is not considered reliable nor relevant," but the reconciliation section noted
22 "[g]reatest weight is given to the Sales Comparison Approach. The Cost Approach supports
23 the value."

24 38. The Appraisal Report failed to adequately describe the reasoning supporting
25 the analyses, opinions, and conclusions.

26 39. The highest and best use of the subject was reported as the current use, but
27 the Respondent failed to describe and support the rationale for the highest and best use.

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1 40. On August 6, 2018, the Division sent the Respondent a certified letter
2 indicating it had re-opened its investigation in Case No. 2017-868, AP 17.031.S.

3 **VIOLATIONS OF LAW**

4 The Respondent failed to prepare the appraisal report for the Property in
5 Compliance with the Standards of the Appraisal Foundation. These Standards are
6 published in the Uniform Standards of Professional Appraisal Practice (“USPAP”) adopted
7 by the Appraisal Standards Board of the Appraisal Foundation, as authorized by Congress,
8 and adopted in Nevada by NAC 645C.400.²

9 **First Violation**

10 The USPAP ETHICS RULE requires that an appraiser must not perform an
11 assignment in a grossly negligent manner.

12 Respondent violated the USPAP ETHICS RULE, as codified in NAC 645C.405(1), by
13 performing the assignment in a grossly negligent matter. The work file contains no
14 information as to how the adjustments or non-adjustments were developed or quantified.
15 The Respondent misstated the volume of sales in the Appraisal Report. The Respondent’s
16 actions constitute unprofessional conduct, pursuant to NRS 645C.470(2) and grounds for
17 disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

18 **Second Violation**

19 The USPAP RECORD KEEPING RULE requires that an appraiser must prepare a
20 work file for each appraisal review assignment. The work file must be in existence prior to
21 the issuance of any report or other communication of assignment results. The work file
22 must include true copies of all written reports along with all other data, information, and
23 documentation necessary to support the appraiser’s opinions and conclusions and to show
24 compliance with USPAP, or references to the location(s) of such other data, information,
25 and documentation.

26
27 ²The 2016-2017 edition of USPAP, effective January 1, 2016 through December 31, 2017, is applicable
28 to and utilized for this Complaint.

1 The Respondent violated the USPAP RECORD KEEPING RULE, as codified in NAC
2 645C.405(1), by failing to: (1) include a copy of the report with sales price of \$259,000; (2)
3 support the site value conclusion in the work file; (3) keep and maintain true copies of all
4 written reports, documented on any type of media and all other data, information, and
5 documentation necessary to support the appraiser's opinions and conclusions, and to show
6 compliance with USPAP, or references to the location(s) of such other data, information or
7 documentation; (4) fail to provide supporting information for the comparable adjustments
8 including age, bathroom count, gross living area ("GLA"), size of site, and externality
9 caused by adjacent freeway. The Respondent also failed to include copies of the original
10 Appraisal Report, amendment request, and purchase contract. The Respondent's actions
11 constitute unprofessional conduct, pursuant to NRS 645C.470(2) and grounds for
12 disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

13 **Third Violation**

14 USPAP Standards Rule 1-1(a) requires that in developing a real property appraisal,
15 an appraiser must: (a) be aware of, understand, and correctly employ those recognized
16 methods and techniques that are necessary to produce a credible appraisal.

17 The Respondent violated USPAP Standards Rule 1-1(a), as codified in NAC
18 645C.405(1), by failing to accurately report the market as increasing and failing to support
19 adjustments in the work file or appraisal report. This is unprofessional conduct pursuant
20 to NRS 645C.470(2) and grounds for disciplinary action, pursuant to Nevada Revised
21 Statutes ("NRS") 645C.460(1)(a) and/or (b).

22 **Fourth Violation**

23 USPAP Standards Rule 1-1(b) requires that in developing a real property appraisal,
24 an appraiser must: (b) not commit a substantial error or omission or commission that
25 significantly affects the appraisal.

26 The Respondent violated USPAP Standards Rule 1-1(b), as codified in NAC
27 645C.405(1), by making several errors in the appraisal including failing to accurately
28 report the externality impact of backing up to the freeway. This is unprofessional conduct

1 pursuant to NRS 645C.470(2) and grounds for disciplinary action, pursuant to Nevada
2 Revised Statutes ("NRS") 645C.460(1)(a) and/or (b).

3 **Fifth Violation**

4 USPAP Standards Rule 1-1(c) requires that an appraiser must not render services
5 in a careless or negligent manner, such as by making a series of errors that, although
6 individually might not significantly affect the results of an appraisal, in the aggregate
7 affects the credibility of those results.

8 The Respondent violated USPAP Standards Rule 1-1(c), as codified in NAC
9 645C.405(1), by using adjustments with no market support in the report or work file, failing
10 to make accurate adjustments for seller's concessions. The Respondent's actions constitute
11 professional incompetence pursuant to NRS 645C.470(3) and grounds for disciplinary
12 action pursuant to NRS 645C.460(1)(a) and/or (b).

13 **Sixth Violation**

14 USPAP Standards Rule 1-2(h) requires an appraiser to determine the scope of
15 work necessary to produce credible assignment results in accordance with the SCOPE OF
16 WORK RULE.

17 The Respondent violated USPAP Standards Rule 1-2(h), as codified in NAC
18 645C.405(1), because the Respondent failed to fully analyze the market including: (1)
19 failing to adjust for market conditions; (2) support size of site adjustments; (3) support GLA
20 adjustments; (4) support lack of age adjustments; (5) support lack of bath count
21 adjustments; or (6) accurately analyze freeway externality impact. The Respondent's
22 actions constitute professional incompetence pursuant to NRS 645C.470(3) and grounds for
23 disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

24 **Seventh Violation**

25 USPAP Standards Rule 1-3(a) requires an appraiser to identify and analyze the
26 effect on use and value of existing land use regulations, reasonable probable modification
27 of such land use regulations, economic supply and demand, the physical adaptability of real
28 estate, and market area trends.

1 The Respondent violated USPAP Standards Rule 1-3(a), as codified in NAC
2 645C.405(1), because the Respondent failed to accurately identify and analyze market
3 trends. The Respondent's actions constitute professional incompetence pursuant to NRS
4 645C.470

5 **Eighth Violation**

6 USPAP Standards Rule 1-4(a) states that in developing a real property appraisal,
7 an appraiser must collect, verify, and analyze all information necessary for credible
8 assignment results. When a sales comparison approach is necessary for credible
9 assignment results, an appraiser must analyze such comparable sales data as are available
10 and indicate a value conclusion.

11 Respondent violated USPAP Standards Rule 1-4(a), as codified in NAC 645C.405(1),
12 with failing to analyze sales similar freeway backing externality and by reporting 12
13 comparable sales when there were many more. The Respondent's actions constitute
14 unprofessional conduct pursuant to NRS 645C.470(2) and grounds for disciplinary action
15 pursuant to NRS 645C.460(1)(a) and/or (b).

16 **Ninth Violation**

17 USPAP Standards Rule 1-4(b) states that in developing a real property appraisal,
18 an appraiser must collect, verify, and analyze all information necessary for credible
19 assignment results. When a cost approach is necessary for credible assignment results, an
20 appraiser must: (i) develop an opinion of site value by an appropriate appraisal method or
21 technique.

22 Respondent violated USPAP Standards Rule 1-4(b)(i), as codified in NAC
23 645C.405(1), by failing to discuss or explain the site value development in the report and
24 to develop support in the work file for the site value estimate. The Respondent's actions
25 constitute unprofessional conduct pursuant to NRS 645C.470(2) and grounds for
26 disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

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Tenth Violation

USPAP Standards Rule 2-1(a) requires each written or oral real property appraisal report to set forth the appraisal clearly and accurately in a manner that will not be misleading.

Respondent violated USPAP Standards Rule 2-1(a), as codified in NAC 645C.405(1), because the Respondent failed to make adjustments for (1) comparable seller concessions; (2) market conditions; (3) size of site; (4) GLA; (5) age; (6) bath count; or (7) freeway externality impact. The Respondent's actions constitute unprofessional conduct pursuant to NRS 645C.470(2) and grounds for disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

Eleventh Violation

USPAP Standards Rule 2-2(a)(viii) requires the content of an appraisal report to be consistent with the intended use of the appraisal and, at a minimum: (viii) summarize the information analyzed, the appraisal methods and techniques employed, and the reasoning that supports the analyses, opinions, and conclusions; exclusions of the sales comparison approach, cost approach, or income approach must be explained. The appraiser must provide sufficient information to enable the client and intended users to understand the rationale for the opinions and conclusions, including reconciliation of the data and approaches, in accordance with Standards Rule 1-6.

Respondent violated USPAP Standards Rule 2-2(a)(viii), as codified in NAC 645C.405(1), by failing to describe reasoning that supports the analyses, opinions, and conclusions. The Respondent's actions constitute unprofessional conduct pursuant to NRS 645C.470(2) and grounds for disciplinary action pursuant to NRS 645C.460(1)(a) and/or (b).

Twelfth Violation

USPAP Standards Rule 2-2(a)(x) requires when an opinion of highest and best use was developed by the appraiser, it must describe the support and rationale for that opinion.

Respondent violated USPAP Standards Rule 2-2(a)(x), as codified in NAC

1 645C.405(1), by failing to include a discussion in the report or evidence in the work file as
2 to how the highest and best use was determined. The Respondent's actions constitute
3 unprofessional conduct pursuant to NRS 645C.470(2) and grounds for disciplinary action
4 pursuant to NRS 645C.460(1)(a) and/or (b).

5 DISCIPLINE AUTHORIZED

6 1. Pursuant to NRS 645C.460(2), if grounds for disciplinary action against an
7 appraiser are found to exist for unprofessional conduct, the Commission may revoke or
8 suspend the certificate, place conditions upon the certificate, deny the renewal of his or her
9 certificate, and/or impose a fine up to \$10,000.00 per violation. NRS 645C.480(1)(a) is
10 identified as an additional act of unprofessional conduct.

11 2. Additionally, under NRS Chapter 622.400, the Commission is authorized to
12 impose the costs of the proceeding upon the Respondent, including investigative costs and
13 attorney's fees, if the Commission otherwise imposes discipline on the Respondent.

14 3. Therefore, the Division requests the Commission to impose such discipline as
15 it determines is appropriate under the circumstances and to award the Division its costs
16 and attorney's fees for this proceeding.

17 SETTLEMENT AGREEMENT

18 The parties desire to compromise and settle the instant controversy upon the
19 following terms and conditions:

20 1. Respondent admits to the facts as stated above; however, Respondent does not
21 admit to the above violations.

22 2. Respondent agrees to take a minimum of forty-two (42) hours of Continuing
23 Education Credits ("CEC") in each of the following areas: (i) not less than 14 hours of
24 Valuation and Cost Approach; (ii) not less than 4 hours of Ethics, Competence, and
25 Negligence; and (iii) not less than 15 hours of Residential Market Analysis and Highest and
26 Best Use; and (iv) not less than 4 hours of Adjustments; and not less than 5 hours in Work
27 File. The total forty-two (42) hours of CEC shall be completed within 18 months of the date of
28 the effective date of the Commission's order accepting this Agreement and may be taken live,

1 online, or remotely. These courses will not count toward the Respondent's continuing
2 education requirements. Proof of completion must be submitted to the Division upon
3 completion of all the required education.

4 3. Respondent agrees to pay the Division a monetary penalty of TWO
5 THOUSAND, EIGHT-HUNDRED AND FORTY-FOUR AND 44/100 CENTS (\$2,844.44),
6 comprised of a fine of \$1,800.00 and administrative investigatory costs of \$1,044.44. The total
7 penalty shall be paid in 12 monthly installments of \$237.04. The first payment shall be made
8 within 30 days of the effective date of the Commission's order accepting this Agreement.

9 4. If the payment is not timely received by the Division, pursuant to the terms
10 of this agreement, it shall be construed as an event of default.

11 5. If proof of completion of the forty-two (42) hours of CEC is not received by the
12 Division within 18 months, it shall be construed as an event of default.

13 6. In the event of default, Respondent agrees that his license shall be
14 immediately suspended, and the Division may rescind this Agreement.

15 7. The Respondent and the Division agree that once this Agreement is approved
16 and fully performed, the Division will close its file in this matter and the Division agrees not
17 to pursue any other or greater remedies or fines in connection with Respondent alleged
18 conduct referenced herein. The Division further agrees that unless Respondent fails to
19 make timely payment, the Division will not bring any claim or cause directly or indirectly
20 based upon any of the facts, circumstances, or allegations discovered during the Division's
21 investigation and prosecution of this case.

22 8. The Respondent understands that the public records law may require the
23 Division to make available for inspection this Agreement and related documents. The
24 Respondent also understands that the Division may share the contents of this Agreement and
25 related documents with any governmental or professional organization.

26 9. This Agreement is contingent upon approval by the Commission at a public
27 meeting.

28 10. Respondent agrees and understands that by entering into this Agreement,

1 Respondent is waiving his right to a hearing at which Respondent may present evidence in
2 defense, waiving his right to a written decision on the merits of the complaint, waiving
3 his rights to reconsideration and/or rehearing, appeal and/or judicial review, and all other
4 rights which may be accorded by the Nevada Administrative Procedure Act (NRS 233B),
5 the Nevada Appraisers of Real Estate And Appraisal Management Companies laws (NRS
6 645C & NAC 645C), as well as the federal and state Constitutions. Respondent agrees and
7 understands that the Commission members who review this matter for approval of this
8 Agreement may be the same members, who ultimately hear, consider, and decide the
9 Complaint if this Agreement is either not approved by the Commission or is not timely
10 performed by Respondent. Respondent fully understands that he has the right to be
11 represented by legal counsel in this matter at his own expense.

12 11. Each party shall bear its own attorney's fees and costs.

13 RELEASE

14 In consideration of execution of this Agreement, the Respondent, or his heirs,
15 executors, administrators, successors, and assigns, hereby release, remise, and forever
16 discharge the State of Nevada, the Department of Business and Industry of the State of
17 Nevada, the Division, and each of their members, agents, and employees in their individual
18 and representative capacities, from any and all manner of actions, causes of action, suits,
19 debts, judgments, executions, claims, and demands whatsoever, known and unknown, in
20 law or equity, that the Respondent ever had, now has, may have, or claim to have against
21 any or all of the persons or entities named in this section, arising out of or by reason of the
22 Division's investigation, disciplinary action, and all other matters relating thereto.

23 INDEMNIFICATION

24 The Respondent hereby indemnifies and holds harmless the State of Nevada, the
25 Department of Business and Industry, and the Division, and each of their members, agents,
26 and employees in their representative capacities against any and all claims, suits and
27 actions brought against said persons and/or entities by reason of the Division's prosecution
28 of Case No. 2018-1363, AP 19.005.S, and against any and all expenses, damages, and costs,

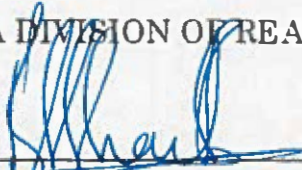
1 fees, which may be sustained by the persons and/or entities named in this section as a
2 result of said claims, suits, and actions incurred subsequent to the entry of the Agreement.

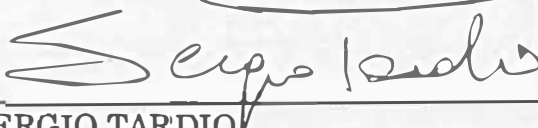
3 **IT IS SO STIPULATED.**

4 DATED this 11 day of January 2021.

DATED this __ day of January 2021.

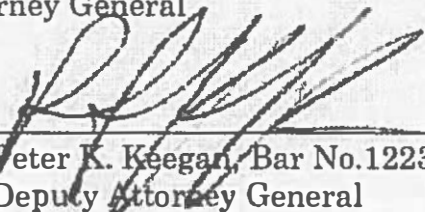
6 NEVADA DIVISION OF REAL ESTATE

7
8 By: 
9 Sharath Chandra
Administrator

By: 
SERGIO TARDIO
Respondent

11 Approved as to form:

12 AARON D. FORD
13 Attorney General

14
15 By: 
16 Peter K. Keegan, Bar No.12237
17 Deputy Attorney General
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19 Carson City, Nevada 89701
20 Tel: (775) 684-1153
21 pkeegan@ag.nv.gov
22 *Attorneys for the State of Nevada*

1 **BEFORE THE COMMISSION OF APPRAISERS OF REAL ESTATE**
2 **STATE OF NEVADA**

3 SHARATH CHANDRA , Administrator,
4 REAL ESTATE DIVISION,
5 DEPARTMENT OF BUSINESS AND
6 INDUSTRY,
7 STATE OF NEVADA,

8 Petitioner,

9 vs.

10 SERGIO TARDIO
11 (License No. A.00007555-CR),

12 Respondent.

Case No. 2017-868, AP17.031.S

**ORDER APPROVING STIPULATION
FOR SETTLEMENT OF
DISCIPLINARY ACTION**

FILED

JAN 15 2021

NEVADA COMMISSION OF APPRAISERS

Kelley Valadez

13 The Stipulation for Settlement of Disciplinary Action having come before the Nevada
14 Commission of Appraisers of Real Estate, Department of Business and Industry, State of
15 Nevada, during its regular agenda on January 12, 2021, and the Commission being
16 fully apprised of terms and good cause appearing,

17 **IT IS HEREBY ORDERED** that the Stipulation for Settlement of Disciplinary Action
18 in this matter is approved in full.

19 This Order shall become effective on the 15th day of February 2021.

20 NEVADA COMMISSION OF APPRAISERS OF
21 REAL ESTATE

22
23
24 By: 

25 [Print Name] Larry Michael Gandy
26 Commission President
27
28