

**IN THE COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPARTMENT
COUNTY OF HAMPSHIRE**

KEVIN HALE,)
CATHERINE ROBINSON,)
ANTHONY FISHEL,)
SIANNA LIEB,)
ALAN BERKENWALD,)
MIRYAM KABAKOV,)
TAMAR SHADUR,)
HERMINE ANTLMAN,)
LYNN YANIS, and)
AVIVA CHILL,)
)
residents and taxpayers of the)
City of Northampton,)
)
Plaintiffs,)
v.)
)
CITY OF NORTHAMPTON,)
NORTHAMPTON CITY COUNCIL,)
and GINA-LOUISE SCIARRA,)
in their official capacities,)
)
Defendants.)

CIVIL ACTION NO. ____
Jury Trial Requested

COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. This is a municipal taxpayer action challenging the legality of a recently adopted resolution, the “Resolution Calling for the City of Northampton to Divest from Entities Complicit in Human Rights Violations in Israel and Palestine” (the “Resolution”), R-25.314, requiring or directing the City of Northampton to divest municipal funds from certain companies based on alleged involvement in foreign human rights violations in Israel.¹

¹R-25.314, “A Resolution Calling For The City Of Northampton To Divest From Entities Complicit In Human Rights Violations In Israel And Palestine,” *available at*

2. The Resolution exceeds the municipality's lawful authority, conflicts with Massachusetts investment and fiduciary statutes, interferes with federal foreign policy, and exposes municipal funds to unlawful management.

3. Plaintiffs seek declaratory and injunctive relief to prevent the unlawful expenditure, management, and diversion of municipal funds.

JURISDICTION AND VENUE

4. This Court has jurisdiction under G.L. c. 231A (Declaratory Judgment Act), G.L. c. 214, and its inherent equitable powers.

5. Venue is proper in this Court because Defendants are municipal entities located within this county and the challenged Resolution was enacted and will be implemented here.

PARTIES

6. Plaintiff Kevin Hale is a resident, property owner, and municipal taxpayer of the City of Northampton.

7. Plaintiff Catherine Robinson is a resident, property owner, and municipal taxpayer of the City of Northampton.

8. Plaintiff Anthony Fishel is a resident, property owner, and municipal taxpayer of the City of Northampton.

9. Plaintiff Sianna Lieb is a resident, property owner, and municipal taxpayer of the City of Northampton.

10. Plaintiff Alan Berkenwald is a resident, property owner, and municipal taxpayer of the City of Northampton.

https://www.northamptonma.gov/DocumentCenter/View/34418/25314-A-Resolution-Calling-For-The-City-Of-Northampton-To-Divest-From-Entities-Complicit-In-HR-Violations-In-Israel-And-Palestine_Certified, attached as **Exhibit A**.

11. Plaintiff Miryam Kabakov is a resident, property owner, and municipal taxpayer of the City of Northampton.

12. Plaintiff Tamar Shadur is a resident, property owner, and municipal taxpayer of the City of Northampton.

13. Plaintiff Lynn Yanis is a resident, property owner, and municipal taxpayer of the City of Northampton.

14. Plaintiff Aviva Chill is a resident, property owner, and municipal taxpayer of the City of Northampton.

15. Defendant City of Northampton is a municipal corporation organized under the laws of the Commonwealth.

16. Defendant Northampton City Council is the legislative body that enacted the Resolution.

17. Defendant Mayor Gina Louise-Sciarra is responsible for execution and implementation of municipal investment policy.

18. Plaintiffs bring this action in their capacity as municipal taxpayers.

19. Massachusetts law recognizes taxpayer standing to challenge ultra vires municipal action, resolutions or ordinances exceeding statutory or constitutional authority, or illegal expenditure or management of public funds.

20. The Resolution runs afoul of all three, as the City purports to take action that falls far outside of its ambit and in excess of its legal authority and mandates or compels the unlawful management of municipal funds, conferring standing on Plaintiffs without the need to show individualized pecuniary loss.

FACTUAL BACKGROUND

A. The Resolution

21. On or about September 18, 2025, the Northampton City Council adopted the Resolution following public comments.

22. The Resolution requires or directs municipal officials and/or boards to divest current holdings and refrain from future investment in companies falling within specified prohibited categories.

23. The Resolution applies to general municipal funds, trust or reserve funds, funds managed through external investment vehicles, and, by its effects, pension or quasi-pension assets.

24. The Resolution urges or directs “the City Treasurer and the City Retirement Board to divest from, and refrain from future investments in, companies with a substantial, ongoing, and intentional complicity in violations of international law and human rights in Israel and Palestine.”

25. The Resolution further urges or directs “the City Treasurer and the City Retirement Board to refrain from making investments in the Israeli military in the form of Israel Bonds.”

26. The Resolution requires full divestment by the Northampton City Treasurer and the Northampton City Retirement Board from any assets that run counter to these ideological judgments within two years.

27. Finally, the Resolution urges or directs the Northampton City Treasurer and the Northampton City Retirement Board to “contact their respective investment advisors to request that they notify fund managers of the City’s desire to remove companies with a substantial, ongoing, and intentional complicity in violations of international law and human rights in Israel and Palestine as set out above, from all investment products.”

28. The Resolution’s criteria for which companies would be disqualified are vague and subjective. Nowhere does the Resolution define its terms, including “complicity” and “violations of . . . human rights.”

29. The Resolution requires divestment from, refusal to deposit funds with, or mandatory withdrawal from certain financial institutions and entities based on non-financial, ideological criteria, without regard to the City’s financial needs.

30. The Resolution explicitly aims to inject the City into foreign affairs, alleging that there is an “ongoing humanitarian crisis in Gaza and the West Bank,” and “seeks to avoid economically supporting such crises through the City’s financial investments.”

31. The motivation, intent, and mission of the Resolution to meddle in foreign policy, foreign affairs, and national security concerns, as well as state-level policy issues, was further articulated in the minutes of the meeting at which the Resolution was debated.

32. One supporter of the Resolution stated that they saw themselves as “stand[ing] together against this onslaught of injustice, here and abroad.”

33. Another presented the Resolution as “something concrete” the City can do to leverage power over the federal government’s foreign policy.

34. Others spoke of “inspir[ing] other towns to divest as well” and “mak[ing] ripples through other small towns to also make a difference.”

B. Federal Preemption

35. The United States Constitution commits the conduct of foreign relations exclusively to the federal government.

36. Specifically, Article VI, Clause 2 of the U.S. Constitution, known as the Supremacy Clause, declares: “This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United

States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.”

37. State and local laws that target foreign nations or entities, touch on international disputes, or seek to impose economic sanctions, boycotts, or divestment based on foreign policy objectives, are preempted even in the absence of a directly conflicting federal statute.

38. Indeed, Congress has enacted a comprehensive federal sanctions regime, administered by the Executive Branch, governing when and how economic sanctions may be imposed on foreign states, entities, and individuals.

39. A municipal divestment Resolution that conditions the placement or retention of public funds on a foreign nation’s conduct, or on a financial institution’s relationships with foreign governments or entities, constitutes an impermissible intrusion into the federal foreign-affairs power.

40. Even where federal law does not mandate engagement with a particular foreign entity, the absence of federal sanctions reflects a deliberate federal policy choice that local governments may not countermand.

41. The Resolution targets conduct with substantial foreign policy implications, including alleged “complicity” or “contribution” to “human rights violations” abroad.

42. In *Crosby v. National Foreign Trade Council*, 530 U.S. 363 (2000), the Supreme Court struck down a Massachusetts statute restricting state purchases from companies doing business with Burma (Myanmar), finding preempted state and local divestment regimes that interfere with federal foreign policy.

43. The Resolution is similarly preempted, as its purpose and effect are to influence foreign conduct through economic coercion, thereby impermissibly intruding into an area reserved exclusively to the federal government.

44. The Resolution creates inconsistent or fragmented sanctions across jurisdictions, undermining the uniformity essential to effective national foreign policy, creating confusion for companies doing business locally, and threatening national interests.

45. Such effects are sufficient to trigger preemption regardless of the municipality's stated intent or the Resolution's facial scope as a local fiscal measure.

46. Federal courts have repeatedly rejected attempts to recharacterize foreign-policy measures as ordinary procurement or investment decisions where the operative criteria are geopolitical or ideological.

47. Accordingly, the Resolution is preempted by federal law and unenforceable under the Supremacy Clause.

C. State Preemption and Breach of Fiduciary Duty

48. Massachusetts municipalities possess only those powers expressly granted by statutes and necessarily implied therefrom, or those essential to the municipality's declared objectives and purposes.

49. Where the State Legislature has enacted a comprehensive statutory scheme, municipal action in the same field is preempted.

50. Massachusetts state law strictly governs municipal finance and investments, including but not limited to: (i) G.L. c. 44, §§ 53, 55, 55B, which comprehensively regulate City use, disposition, and investment of funds, requiring, among other things, prudent investment to achieve the highest interest reasonably available, considering safety, liquidity, and yield; (ii) G.L.

c. 44, § 54, imposing additional restrictions on trust funds; and (iii) G.L. c. 32 and c. 32B, § 20, imposing fiduciary duties on public fund managers.

51. The State Legislature's regulatory framework governs custody of municipal funds; identity of lawful depositories; conditions under which municipal funds may be deposited, and the fiduciary responsibilities of the municipal treasurer.

52. The statutory scheme also provides for statutory safeguards and security requirements and assigns exclusive responsibility for deposit and safekeeping of municipal funds to the municipal treasurer, subject to state law and audit.

53. These statutes do not authorize municipalities to impose categorical, non-financial divestment mandates.

54. The Resolution is preempted as it attempts to add substantive eligibility criteria for City investments and deposits not found in state law, by forcing divestment from institutions that remain lawful for investment under state law.

55. Additionally, the Resolution seizes authority from the treasurer to handle deposits and investments of municipal funds as required by § 55, and reallocates that power to the municipal legislative body. The Resolution thus conflicts with the fiduciary and custodial duties on the municipal treasurer, and exposes the treasurer to liability for mismanagement of public funds.

56. The Resolution imprudently and illegally, in violation of the City's fiduciary duties, places municipal funds at risk by (i) dangerously, artificially restricting diversification; (ii) eliminating otherwise lawful and prudent investment options; (iii) subordinating financial criteria to political or moral judgments; and (iv) exposing the municipality to increased volatility and foregone returns.

57. Fiduciary obligations governing municipal funds require investment policies to be based on objective financial criteria, including safety, liquidity, diversification, and expected return. The Resolution instead conditions investment decisions on political and ideological judgments relating to the State of Israel. Measures that single out Israel in this manner risk stigmatizing Jewish constituents and undermining the City's stated commitment to maintaining a safe, inclusive, and non-discriminatory civic environment for all residents.

58. By directing municipal fiduciaries to pursue politically motivated divestment policies unrelated to financial prudence or beneficiary interests, the Resolution undermines the overall wellbeing of the City's diverse community and conflicts with Northampton's stated commitment to fostering an inclusive civic environment for residents of all backgrounds.

59. Municipal treasurers and public fund managers act as fiduciaries and are held to strict duties of care, prudence, and loyalty in safeguarding and investing public funds.

60. Municipal treasurers are considered fiduciaries who must manage public funds with the highest standard of care. This involves acting solely in the interest of the public and safeguarding assets.

61. In addition to duties of care and prudence, municipal fiduciaries and public fund trustees are subject to a strict duty of loyalty, requiring that investment decisions be made in the interests of the beneficiaries of the funds and the taxpayers whose assets are entrusted to them.

62. The duty of loyalty prohibits fiduciaries from subordinating the financial interests of beneficiaries to unrelated policy objectives or moral preferences, including attempts to influence foreign affairs or international political disputes through investment decisions.

63. Treasurers must use the care, skill, prudence, and diligence that an “ordinarily prudent person” in a similar position would exercise. This includes diversifying investments to minimize the risk of large losses.

64. The Resolution places the municipal treasurer in an untenable and legally perilous position. By compelling the treasurer to make investment and depository decisions that conflict with state-law prudence standards, the Resolution exposes the treasurer to potential personal surcharge, audit findings, and civil liability for breach of statutory fiduciary duties. Compliance with the Resolution therefore risks personal and professional liability for the treasurer, while noncompliance risks municipal enforcement, an irreconcilable conflict created by the City’s unlawful action.

65. The Resolution inflicts irreparable harm by forcing municipal fiduciaries to choose between violating binding state fiduciary law and violating the Resolution. This type of forced statutory conflict, exposure to personal liability, and compelled unlawful conduct constitutes irreparable harm that cannot be remedied by money damages.

66. Deprivation of statutory investment authority and interference with the treasurer’s exclusive statutory powers constitutes irreparable harm as a matter of law, because it strips state-created rights and duties that cannot be restored retroactively.

67. The forced elimination of lawful, diversified investment options and the compelled concentration of municipal funds in a narrower pool of depositories causes ongoing structural harm to the City’s investment program, increasing risk and reducing diversification in ways that cannot be undone after the fact.

68. The Resolution is therefore preempted by both federal and state law.

69. The Resolution is also ultra vires, invalid, and unenforceable.

70. The balance of equities overwhelmingly favors immediate injunctive relief. Absent an injunction, municipal fiduciaries will be compelled to violate binding state-law duties on an ongoing basis, exposing both public officials and public funds to irreparable legal and financial harm. The public interest strongly favors halting enforcement of an unlawful Resolution and preserving the integrity of uniform statewide investment standards designed to protect public monies.

CLAIMS FOR RELIEF
COUNT I
Ultra Vires Municipal Action
(G.L. c. 43B; Mass. Const. art. LXXXIX)

71. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

72. Municipalities possess only those powers conferred by statute or consistent with statute.

73. No Massachusetts statute authorizes municipalities to mandate divestment based on political, moral, or ideological criteria.

74. The Resolution exceeds municipal authority and is void ab initio.

COUNT II
Violation of Massachusetts Investment Statutes
(G.L. c. 44, §§ 54, 55B)

75. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

76. Section 55B requires municipal officials to invest prudently to obtain the highest reasonable return considering safety, liquidity, and yield.

77. The Resolution mandates exclusions unrelated to these statutory criteria.

78. Compliance with the Resolution necessarily conflicts with statutory investment duties.

COUNT III
Breach of Fiduciary Duty / Unlawful Interference with Fiduciary Duties
(G.L. c. 32; c. 32B § 20)

79. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

80. Municipal officials and trustees are fiduciaries subject to strict prudent-investor standards.

81. The Resolution pressures or compels fiduciaries to act for non-financial purposes, contrary to their statutory obligations.

82. Such interference is unlawful and exposes fiduciaries and the municipality to liability.

COUNT IV
Federal Preemption – Supremacy Clause
(U.S. Const. art. VI)

83. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

84. The Resolution targets conduct with substantial foreign policy implications, including alleged “human rights violations” abroad.

85. Under *Crosby v. National Foreign Trade Council*, state and local divestment regimes that interfere with federal foreign policy are preempted.

86. The Resolution intrudes into an area reserved exclusively to the federal government.

COUNT V
State-Law Preemption & Ultra Vires Municipal Divestment
(G.L. c. 44, § 54)

87. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

88. G.L. c. 44 establishes a comprehensive and mandatory scheme governing the custody of municipal funds; the identity of lawful depositories; the conditions under which municipal funds may be deposited; and the fiduciary responsibilities of the municipal treasurer.

89. The statutory scheme further requires that all municipal funds be deposited only with lawful depositories authorized by state law; deposits be made in the name of the municipality; and deposits be subject to statutory safeguards and security requirements.

90. The statute assigns exclusive responsibility for deposit and safekeeping of municipal funds to the municipal treasurer, subject to state law and audit.

91. The municipality adopted an Resolution requiring divestment from, or refusal to deposit funds with, certain financial institutions based on non-financial or ideological criteria; and/or mandatory withdrawal of funds from otherwise lawful depositories.

92. The Resolution does not account for safety, liquidity, or yield and seeks to inject unauthorized criteria with respect to the statutory eligibility of an investment vehicle under state law.

93. G.L. c. 44 occupies the field of municipal custody and deposit of public funds, and investment of municipal funds.

94. The Resolution conflicts with G.L. c. 44 by adding substantive eligibility criteria for depositories not found in state law; reallocating authority from the treasurer to the legislative body; and forcing divestment from institutions that remain lawful under state statute.

95. The Resolution places municipal officers in an untenable position by requiring violation of state law and exposure to personal liability for mismanagement of public funds.

96. Such interference with statutorily assigned duties independently renders the Resolution unlawful.

97. The Resolution is therefore ultra vires, invalid, and unenforceable.

COUNT VI
Void for Vagueness and Arbitrary Enforcement
(Mass. Const.; U.S. Const. amend. XIV)

98. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

99. The Resolution fails to define key operative terms with objective standards.

100. It invites arbitrary, inconsistent, and politically motivated enforcement.

101. The Resolution therefore violates due process.

COUNT VII
Federal Declaratory Judgment Act
(28 U.S.C. § 2201)

102. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

103. An actual controversy exists concerning the legality and enforceability of the Resolution.

104. Plaintiffs seek a declaration that the Resolution is unlawful and unenforceable.

COUNT VIII
Massachusetts Declaratory Judgment Act
(G.L. c. 231A)

105. Plaintiffs repeat and reallege each of the foregoing allegations with the same force and effect as if more fully set forth herein.

106. An actual controversy exists concerning the legality and enforceability of the Resolution.

107. Plaintiffs seek a declaration that the Resolution is unlawful and unenforceable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Declare the Resolution invalid, ultra vires, and unenforceable;
- B. Enjoin Defendants from implementing or enforcing the Resolution;
- C. Grant preliminary and permanent injunctive relief; and
- D. Award Plaintiffs costs and such other relief as the Court deems just and proper.

Respectfully submitted;

/s/ Douglas S. Brooks
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Dated: March 26, 2026.

*admission *pro hac vice* forthcoming

Exhibit A



City of Northampton
MASSACHUSETTS

In the City Council, September 18, 2025

Upon the Recommendation of: Councilors Jeremy Dubs, Rachel Maiore and Stanley W. Moulton III

R-25.314 A Resolution Calling For The City Of Northampton To Divest From Entities Complicit In Human Rights Violations In Israel And Palestine

WHEREAS, the City Council recognizes the importance of peace and justice for all communities and nations around the world regardless of national, ethnic or religious affiliations, and advocates for the safety, dignity, freedom, and equality of all people; and

WHEREAS, the City Council recognizes that all human life is precious; and recognizes the ongoing humanitarian crisis in Gaza and the West Bank in particular, and seeks to avoid economically supporting such crises through the City's financial investments; and

WHEREAS, on February 1, 2022, Amnesty International concluded that Israel has imposed a system of oppression and domination over Palestinians wherever it exercises control over their rights, across Israel and in the Occupied Palestinian Territories, and that it enforces segregation in a systematic and highly institutionalized manner through laws, policies, and practices, which amounts to the international wrong of apartheid, as a violation of human rights and international law;¹ and

WHEREAS, on July 19, 2024, the International Court of Justice (ICJ) ruled that Israel's occupation of Gaza, the West Bank, and East Jerusalem is illegal and must end immediately; that Israel must halt all settlement construction, evacuate settlers, pay reparations to Palestinians, and allow them the right of return; that Israel is committing

¹ Amnesty International, Israel's Apartheid Against Palestinians: Cruel System of Domination and Crime Against Humanity (Feb. 1, 2022), <https://www.amnesty.org/en/documents/mde15/5141/2022/en/>

racial segregation and discrimination; and that all states and international organizations have a legal obligation not to recognize or assist the occupation;² and

WHEREAS, as of Jan.3, 2025, Northampton had an estimated \$71,010 invested in companies identified by the American Friends Service Committee as complicit in substantial, ongoing and intentional violations of international law and human rights in Israel and Palestine, based on information provided by the City Treasurer; and

WHEREAS, on February 27, 2024 the City Council passed a resolution calling for a ceasefire in Gaza; and

WHEREAS, on November 7, 2024, the City Council expressed its support for the proposed Congressional Joint Resolutions of Disapproval to block the sale of more than \$20 billion of offensive U.S. weapons to Israel, and called for the introduction of legislation to impose an embargo on unrestricted sales and shipment of U.S. weapons to Israel; and

WHEREAS, the City Council believes that the City's finances should align with our values; and

WHEREAS Northampton has a precedent for divesting from entities that do not align with our city's values. For example, on September 26, 2018, the mayor issued an Executive Policy Order enacting a policy that the City shall not contract with companies that are directly involved in the manufacture or maintenance of nuclear weapons, and shall work to eliminate and avoid any investments in companies involved in the manufacture or maintenance of nuclear weapons; and

WHEREAS another example occurred on July 22, 2013, when the City Council passed a resolution urging the City to divest from fossil fuel companies, and adopt policies precluding new investments in fossil fuel companies.

THEREFORE BE IT RESOLVED, the City Council urges the City Treasurer and the City Retirement Board to divest from, and refrain from future investments in, companies with a substantial, ongoing, and intentional complicity in violations of international law and human rights in Israel and Palestine, including through their involvement in:

² *Legal Consequences Arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem*, No. 186, International Court of Justice (ICJ), 19 July 2024, <https://www.icj-cij.org/case/186>

- The Settlement Industry;
- Exploitation of Natural Resources;
- Walls and Checkpoints;
- Weapons and Military Equipment; and
- Discrimination

consistent with the American Friends Service Committee's investigative human rights rating system;³ and

BE IT FURTHER RESOLVED, that the City Council urges the City Treasurer and the City Retirement Board to refrain from making investments in the Israeli military in the form of Israel Bonds; and

BE IT FURTHER RESOLVED, that the City Council urges the City Treasurer and the Retirement Board to divest from any assets included in the above clauses within two years, and

BE IT FURTHER RESOLVED, that the City Council urges that the City Treasurer and the Retirement Board contact their respective investment advisors to request that they notify fund managers of the City's desire to remove companies with a substantial, ongoing, and intentional complicity in violations of international law and human rights in Israel and Palestine as set out above, from all investment products; and

BE IT FURTHER RESOLVED, that the clerk of the City Council will send this resolution to Northampton Mayor Gina-Louise Sciarra, Northampton City Treasurer Kristine Bissell, Northampton Retirement Board Chair Charlene Nardi, State Representative Lindsay Sabadosa, State Senator Jo Comerford, Congressman Jim McGovern, U.S. Senator Elizabeth Warren, U.S. Senator Ed Markey, Governor Maura Healey, and Treasurer Deborah Goldberg of the Commonwealth.

In City Council, September 18, 2025
Adopted in Final Reading on Roll Call Vote of 7 Yes, 0 No, 2 Absent (Councilor Elkins and Councilor Perry)

Attest: Laura Krutzler, Clerk of Council

I hereby certify that the above Resolution was adopted by the Northampton City Council on September 18, 2025

Rules suspended, passed final reading and enrolled.

³ American Friends Service Committee, Investigate: Occupations, <https://investigate.afsc.org/occupations>

Attest: Laura Krutzler, Clerk of Council