

NEW YORK STATE
DEPARTMENT OF ECONOMIC DEVELOPMENT
207 GENESEE STREET
UTICA, NEW YORK 13501

In the Matter

- of -

the Application of E&A Restoration, Inc. dba E&A Construction

for

**Certification as a Woman-owned Business Enterprise
pursuant to Executive Law Article 15-A.**

NYS DED File ID No. 57680

RECOMMENDED ORDER

-by-



David A. Murad
Administrative Law Judge
March 18, 2025

This matter considers the appeal by E&A Restoration, Inc. dba E&A Construction (“E&A” or “applicant”) pursuant to New York State Executive Law Article 15-A and Title 5 of the Official Compilation of Codes, Rules and Regulations of the State of New York (5 NYCRR) parts 140-144, challenging the determination of the Division of Minority and Women’s Business Development (“Division”) of the New York State Department of Economic Development (“DED”) that the business enterprise does not meet the eligibility criteria for certification as a woman-owned business enterprise (“WBE”).

PROCEDURAL HISTORY

1. On January 5, 2024, Ms. Jenny Sakalis as President, applied on behalf of E&A for certification as a woman-owned business enterprise (“WBE”). (DED Exhibit 1)
2. On March 29, 2024, the Division denied the application on the following grounds (DED Exhibit 2):
 - (a) Minority group members or women relied upon for certification must possess adequate, industry-specific competence to make critical business decisions without relying upon other persons, as required under 5 NYCRR §144.2(c)(1);
 - (b) Minority group members or women relied upon for certification must make operational decisions on a day-to-day basis with respect to the critical functions of the business enterprise, as required under 5 NYCRR §144.2(c)(2); and
 - (c) Minority group members or women relied upon for certification must be the highest-ranking officer of the business enterprise for which certification is sought, and, where applicable, control the board of directors, as required under 5 NYCRR §144.2(d)(1).
3. On April 26, 2024, E&A submitted a Request to Appeal via a Hearing by its attorney, Alex McBride, Esq. of Davidoff, Hutcher & Citron, LLP. (DED Exhibit 3)
4. On October 10, 2024, a Notice of Hearing was sent to all parties. (DED Exhibit 4)

5. A hearing was held and concluded on February 27, 2025. Written closing statements were submitted by applicant (Tribunal Exhibit 1) and the Division (Tribunal Exhibit 2), on March 7, 2025.

FINDINGS OF FACT

6. E&A is engaged in the business of general construction and construction management services. (DED Exhibit 1)
7. Ms. Jenny Sakalis is the President, and 51% owner of E&A. Mr. Antonios Vournou is the CEO and 49% owner of E&A. (DED Exhibit 1)
8. Jenny Sakalis' resume indicates that she has degrees in Psychology and Education. Prior to becoming President of the Company, her duties at E&A were receptionist, office administrator, finance, human resources, office manager, and owner's representative. Her duties as President include "oversees budgets, staff, executive, finance, marketing, human resources", "manages personnel, hiring, firing", "handles all related to Payroll, insurance, bonding", and "negotiates purchasing agreements for equipment and supplies." (DED Exhibit 8; APP Exhibit 2) In her interview with the Division, she stated that as President she is responsible for bonding, insurance, banking, payroll, purchasing, managing the website and preparing brochures and pamphlets (DED Exhibit 10; APP Exhibit 19)
9. Antonios Vournou's resume indicates that he has a Bachelor of Science degree in Architectural Technology. Prior to becoming the CEO, his roles at E&A included carpenter, project manager, and project executive. "Antonio has over 20 years' experience in aspects of general construction and construction management. He has served at every level of construction work from an early age to recently becoming the CEO." (DED Exhibit 9) Mr. Vournou supervises field operations and manpower on all ongoing projects. (DED Exhibit 7 at PDF page 426)

10. Dino Rossi is E&A's VP of Operations and has direct oversight over all the projects. He has studied civil engineering and is a NYC certified Site Safety Manager. He has over 40 years' experience in project management, supervision of construction work and construction safety. He has worked as a Project Manager and Project Executive on E&A's projects and has been with E&A for 19 years.(Hearing Testimony of Dino Rossi; DED Exhibit 10)
11. James Sorge is the Project Executive/General Superintendent at E&A. His duties include "Supervision of all construction activities. Direction and coordination of subcontractors and field crews." He "is a New York State Professional Engineer and licensed superintendent with over 33 years of experience in construction project management, supervision and safety." (DED Exhibit 7 at PDF page 436)
12. Giovanni Oliveri is a Certified LEED Professional/ Estimator. His duties include "Prepare and submit LEED documentation, prepare estimates and take offs under the supervision of the chief estimator, assist with entire bidding process, transmit & discuss drawings and specifications with various subcontractors." He has a BS in Construction Management, Engineering and Technology and has a LEED Green Associate Certification. (DED Exhibit 7 at PDF page 426)
13. Section 4A of the application reflects that Ms. Sakalis is responsible for financial decisions, negotiating bonding and insurance, marketing and sales, hiring and firing, purchasing equipment/sales, managing and signing payroll, and as signatory for business accounts. James Sorge and Giovanni Oliveri are responsible for estimating. Giovanni Oliveri is responsible for preparing bids. Antonois Vournou is responsible for negotiating contracts. James Sorge and Dino Rossi are responsible for supervising field operations. (DED Exhibit 1)

14. A Shareholders' Agreement dated December 31, 2021, was submitted with the application. Section 3(b) of the agreement states that Ms. Sakalis "shall be responsible for the day-to-day administrative, back office and marketing efforts of the Corporation" and Mr. Vournou "shall be responsible for the day-to-day field decisions and construction operations." (DED Exhibit 12; APP Exhibit 5)
15. Section 2(a) of the Shareholders' Agreement states "The Shareholders, in their capacity as shareholders of the Corporation, hereby agree that the current size of the Board of Directors shall be set at two (2), until such time as the Board is increased or decreased in size by resolution of the Board and in accordance with the By-Laws of the Corporation..." (DED Exhibit 12; APP Exhibit 5)
16. Section 1 of the Bylaws states "The number of directors which shall constitute the entire board shall be between one (1) and three (3) ...The number of Directors constituting the entire Board of Directors may be increased or decreased from time to time by resolution of the shareholders or adopted by a majority of the Board. Any director may be removed from office at any time by the affirmative vote of the shareholders of record holding a majority of the outstanding shares of stock of the corporation entitled to vote..." Section 2 states "Each Director may be removed (i) for cause by vote of the shareholders or the Board of Directors, or (ii) without cause by vote of the shareholders." Article IV Section 4 provides that a majority of the entire Board is necessary to constitute a quorum, and that the vote of a majority of the Directors present at a meeting where a quorum is met, is necessary to be the act of the Board of Directors. (DED Exhibit 14; APP Exhibit 4)
17. A Unanimous Written Consent In Lieu of Meeting of the Board of Directors dated December 31, 2021, appointed Jenny Sakalis as President, Treasurer and Chief Operations

Officer, and Antonios Vournou as Chief Executive Officer, Secretary and Chief Construction Officer. (DED Exhibit 13)

APPLICABLE LAW

5 NYCRR §144.2(c) states in relevant part as follows:

Operation. Minority group members and women relied upon for certification must make day-to-day decisions concerning the operation of the business enterprise for which certification is sought. The division shall evaluate whether minority group members or women operate a business enterprise for which certification is sought based upon the following criteria:

- (1) Competence in the industry. Minority group members and women relied upon for certification must possess adequate, industry-specific competence to make critical business decisions without relying upon other persons. This requirement cannot be satisfied by expertise or experience in office management or general business administration, among other things. In evaluating whether a minority group member or woman possesses adequate, industry-specific competence, the division shall consider factors including, but not limited to:
 - (i) Whether individuals employed by the business enterprise for which certification is sought are required to obtain licenses or certifications to provide products or services to the clients of the business enterprise;
 - (ii) The extent to which academic credentials exist for persons employed in the industry; and
 - (iii) The extent to which industry-specific expertise may be obtained via direct work experience.
- (2) Operational decisions. Minority group members and women relied upon for certification must make operational decisions on a day-to-day basis with respect to the functions of the business enterprise for which certification is sought. The critical functions of a business enterprise shall be determined by the division based upon the following factors, but is not limited to:
 - (i) The products or services the business enterprise provides to clients; and
 - (ii) The means by which the business enterprise obtains contracts or orders.

5 NYCRR §144.2(d) (1) states as follows:

Control. Minority group members or women relied upon for certification must have the power to control the business enterprise for which certification is sought. The division shall assess whether minority group members and women possess such control based upon the following criteria:

- (1) Control of business management. A minority group member or woman relied upon for certification must be the highest-ranking officer of the business

enterprise for which certification is sought, and, where applicable, control the board of directors or serve as a general partner. Any agreements describing the management of the business enterprise shall be consistent with the foregoing.

STANDARD OF REVIEW

On this administrative appeal, applicant bears the burden of proof to establish that Division staff's determination to deny the application filed by E&A for certification as a WBE is not supported by substantial evidence (*see* State Administrative Procedure Act § 306[1]). The substantial evidence standard "demands only that a given inference is reasonable and plausible, not necessarily the most probable," and applicant must demonstrate that Division staff's conclusions and factual determinations are not supported by "such relevant proof as a reasonable mind may accept as adequate to support a conclusion or ultimate fact." (*Matter of Ridge Rd. Fire Dist. v Schiano*, 16 NY3d 494, 499 [2011]).

The review is limited to such information that was before the division at the time of the denial determination (5 NYCRR 145.2(b)(1)). Evidence that seeks to clarify and explain previously submitted materials will be considered, however new evidence will not be considered. (*See Scherzi Systems, LLC v. White*, 197 A.D.3d 1466 (3d Dept 2021))

DISCUSSION

Mr. Alexander P. McBride, Esq. and Nicholas T. Terzulli, Esq. of Davidoff, Hutcher & Citron, LLP, appeared on behalf of E&A. The following witnesses testified on behalf of E&A: Ms. Jenny Sakalis, President of E&A, and Mr. Dino Rossi, VP of Operations of E&A. E&A offered APP Exhibits 1-5, 8, 9, and 15-19, which were admitted into evidence. E&A did not offer APP Exhibits 6, 7, and 10-14.

Ms. Lisa Berk, Counsel, Department of Economic Development, appeared at the hearing on behalf of the Division. The following witness testified on behalf of the Division: Folashade Olatunbosun, Associate Certification Director, Division of Minority and Women Business

Development. The Division offered the following exhibits which were admitted into evidence: DED Exhibits 1 - 15. The Division stated that DED Exhibit 13 is the Meeting Minutes and DED Exhibit 14 are the By-laws.

I. Operation

The Division found that the woman-owner does not possess adequate, industry-specific competence to make critical business decisions without relying upon other persons, as required by 5 NYCRR §144.2(c)(1).

The Division also found that the woman-owner did not make operational decisions on a day-to-day basis with respect to the critical functions of the business, as required by 5 NYCRR §144.2(c)(2). The regulation states that “The critical functions of a business enterprise shall be determined by the division based upon the following factors but is not limited to: (i) the products or services the business enterprise provides to clients; and (ii) the means by which the business enterprise obtains contracts or orders”. The woman-owner “must exercise independent operational control over the core functions of the business in order to establish the requisite control for WBE certification”. See *J.C. Smith, Inc. v. New York State Department of Economic Development*, 163 AD3d, 1517 (4th Dept. 2018).

The eligibility criteria for WBE certification requires that the woman owner “exercises the authority to control independently the day-to-day business decisions of the enterprise”. See *In the Matter of Upstate Electrical, LLC v. New York State Department of Economic Development*, 179 AD 3d 1343 (3rd Dept. 2020). The minority/woman-owner “must exercise independent operational control over the core functions of the business in order to establish the requisite control for WBE certification...” *J.C. Smith, Inc. v. New York State Department of Economic Development*, 163 AD 3d 1517 (4th Dept. 2018).

Jenny Sakalis' resume indicates that she has degrees in Psychology and Education. Prior to becoming President of the Company, her duties at E&A were receptionist, office administrator, finance, human resources, office manager, and owner's representative. Her duties as President include "oversees budgets, staff, executive, finance, marketing, human resources", "manages personnel, hiring, firing", "handles all related to Payroll, insurance, bonding", and "negotiates purchasing agreements for equipment and supplies." (DED Exhibit 8; APP Exhibit 2) In her interview with the Division, she stated that as President she is responsible for bonding, insurance, banking, payroll, purchasing, managing the website and preparing brochures and pamphlets (DED Exhibit 10; APP Exhibit 19)

Antonios Vournou's resume indicates that he has a Bachelor of Science degree in Architectural Technology. Prior to becoming the CEO, his roles at E&A included carpenter, project manager, and project executive. "Antonio has over 20 years' experience in aspects of general construction and construction management. He has served at every level of construction work from an early age to recently becoming the CEO." (DED Exhibit 9) Mr. Vourmou supervises field operations and manpower on all ongoing projects. (DED Exhibit 7 at PDF page 426)

Dino Rossi is E&A's VP of Operations and has direct oversight over all the projects. He has studied civil engineering and is a NYC certified Site Safety Manager. He has over 40 years' experience in project management, supervision of construction work and construction safety. He has worked as a Project Manager and Project Executive on E&A's projects. and has been with E&A for 19 years. (Hearing Testimony of Dino Rossi; DED Exhibit 10)

James Sorge is the Project Executive/General Superintendent at E&A. His duties include "Supervision of all construction activities. Direction and coordination of subcontractors and field crews." He "is a New York State Professional Engineer and licensed superintendent with over 33

years of experience in construction project management, supervision and safety.” (DED Exhibit 7 at PDF page 436)

Giovanni Oliveri is a Certified LEED Professional/ Estimator. His duties include “Prepare and submit LEED documentation, prepare estimates and take offs under the supervision of the chief estimator, assist with entire bidding process, transmit & discuss drawings and specifications with various subcontractors.” He has a BS in Construction Management, Engineering and Technology and has a LEED Green Associate Certification. (DED Exhibit 7 at PDF page 426)

Section 4A of the application reflects that Ms. Sakalis is responsible for financial decisions, negotiating bonding and insurance, marketing and sales, hiring and firing, purchasing equipment/sales, managing and signing payroll, and as signatory for business accounts. James Sorge and Giovanni Oliveri are responsible for estimating. Giovanni Oliveri is responsible for preparing bids. Antonois Vournou is responsible for negotiating contracts. James Sorge and Dino Rossi are responsible for supervising field operations. (DED Exhibit 1)

A Shareholders’ Agreement dated December 31, 2021, was submitted with the application. Section 3(b) of the agreement states that Ms. Sakalis “shall be responsible for the day-to-day administrative, back office and marketing efforts of the Corporation” and Mr. Vournou “shall be responsible for the day-to-day field decisions and construction operations.” (DED Exhibit 12; APP Exhibit 5)

Jenny Sakalis testified that she “is in charge of everything” including marketing, bidding, estimating, contracts, bonding and insurance, hiring/firing and legal matters. She “makes the final call on what to bid on and reviewing bid estimates.” She testified that any disputes or issues on the jobsite are reported to her. She makes all financial decisions, signs checks, and authorizes payments. She admitted she doesn’t have an OSHA 10 or OSHA 30 certificate and has not supervised work in the field. (Hearing Testimony of Jenny Sakalis) During her interview as part

of the application, she stated that she handles bonding, insurance, banking, payroll, and purchasing; and Antonois Vournou “meets with clients, pitches new clients, and “sells” the business, and he is the “face of the business.” (DED Exhibit 10)

Dino Rossi testified that “Jenny has ultimate authority.” He stated that preparing contracts, bids and estimates are “all finally reviewed and approved by Jenny.” He testified that Ms. Sakalis has final approval for marketing, contracts, bidding, financial matters, bonding, insurance, jobsite disputes, legal matters, payroll, and hiring/firing. (Hearing Testimony of Dino Rossi)

Folashade Olatunbosun testified that Ms. Sakalis’ resume reflects office management experience, which is insufficient to show industry specific competence. She stated the core revenue generating functions of E&A are estimating, preparing bids, supervising field operations, and negotiating contracts. She testified that Section 4A of the application shows that James Sorge and Giovanni Oliveri are responsible for estimating, Giovanni Oliveri is responsible for preparing bids, Antonois Vournou is responsible for negotiating contracts, and James Sorge and Dino Rossi are responsible for supervising field operations. She noted that Ms. Sakalis does not have the necessary OSHA 10 or OSHA 30 certifications in order to supervise the jobsite and does not have the education or work experience to competently supervise field operations. She further testified that Ms. Sakalis does not make the operational decisions regarding the critical revenue generating functions of construction and construction management on a day-to-day basis without relying on Mr. Sorge, Mr. Rossi and Mr. Vournou. She testified that Section 3(b) of the Shareholders’ Agreement reflects “the separation of powers with respect to managerial functions”; that Ms. Sakalis is responsible for the day-to-day administrative, back office and marketing efforts and Mr. Vournou is responsible for the day-to-day field decisions and construction operations.” (Hearing Testimony of Folashade Olatunbosun)

Ms. Sakalis' resume, along with the narrative submitted with the application, recorded field interview, and her testimony shows that she has no experience doing, directing, or supervising construction work, or construction project management, or interpreting plans, specifications, and drawings in order to negotiate and estimate construction costs. Additionally, Ms. Sakalis relies on Mr. Vournou, Mr. Oliveri including the estimating team, Mr. Rossi, the Project Managers, and the Project Executives to make critical business decisions concerning the core revenue generating functions of estimating, bidding, contract negotiations and field supervision. (DED Exhibits 8, 10 and 11; APP Exhibits 2 and 19; Hearing Testimony of Jenny Sakalis)

Based on the foregoing, I find that the Division's determination to deny E&A's application under 5 NYCRR §§144.2(c)(1) and 144.2(c)(2) was based on substantial evidence.

II. Control

The Division also denied certification on the ground that Jenny Sakalis is not the highest-ranking officer, and does not control the board of directors, as required under 5 NYCRR §144.2(d)(1).

Section 2(a) of the Shareholders' Agreement states "The Shareholders, in their capacity as shareholders of the Corporation, hereby agree that the current size of the Board of Directors shall be set at two (2), until such time as the Board is increased or decreased in size by resolution of the Board and in accordance with the By-Laws of the Corporation..." Section 4 states "The Corporation may terminate the Shareholder's employment services and remove them from the Board of Directors "for cause..." (DED Exhibit 12; APP Exhibit 5).

Article III, Section 1 of the Bylaws states "The number of directors which shall constitute the entire board shall be between one (1) and three (3) ... The number of Directors constituting the entire Board of Directors may be increased or decreased from time to time by resolution of the

shareholders or adopted by a majority of the Board. Any director may be removed from office at any time by the affirmative vote of the shareholders of record holding a majority of the outstanding shares of stock of the corporation entitled to vote...” Section 2 states “Each Director may be removed (i) for cause by vote of the shareholders or the Board of Directors, or (ii) without cause by vote of the shareholders.” (DED Exhibit 14; APP Exhibit 4)

A Unanimous Written Consent In Lieu of Meeting of the Board of Directors dated December 31, 2021, appointed Jenny Sakalis as President, Treasurer and Chief Operations Officer, and Antonios Vournou as Chief Executive Officer, Secretary and Chief Construction Officer. (DED Exhibit 13)

Jenny Sakalis testified that the Bylaws provide that there can be just one Director and that she can remove Mr. Vournou without cause by voting her majority shares, leaving her as sole Director and therefore in charge of the Board. She stated that as President, she is “the head of the Corporation in charge of everything”, and therefore she is the highest-ranking Officer of E&A. She referenced the Bylaws Article IV Section 7 which gives her as President “general and active management and control of the business and affairs of the Corporation, subject to the control of the Board.” (Hearing Testimony of Jenny Sakalis; DED Exhibit 14; APP Exhibit 4)

Folashade Olatunbosun testified that Mr. Vournou is the CEO and therefore the highest-ranking officer of E&A. She stated that the corporate organizational chart included in DED Exhibit 6 shows the President and CEO are on the same level. Therefore, either way, the President is not the highest-ranking officer of E&A. She testified that the owner relied upon for certification must hold the highest-ranking position, not share it with another individual. She referenced the Bylaws Article VI Section 7, which states that the President shall be the CEO unless otherwise determined by the Board of Directors. She referenced DED Exhibit 13, Unanimous Written Consent In Lieu of Meeting of the Board of Directors dated December 31, 2021, which appointed Jenny Sakalis as

President, Treasurer and Chief Operations Officer, and Antonios Vournou as Chief Executive Officer, Secretary and Chief Construction Officer. Therefore, either Antonois Vournou, as CEO, is the highest-ranking officer of E&A, or Jenny Sakalis and Antonios Vournou are equally the highest-ranking officers of E&A (Hearing Testimony of Folashade Olatunbosun; DED Exhibit 6 at PDF page 51).

Ms. Olatunbosun testified that the Bylaws Article IV Section 4 provides that a majority of the entire Board is necessary to constitute a quorum, and that the vote of a majority of the Directors present at a meeting where a quorum is met, is necessary to be the act of the Board of Directors. Therefore, she opined that Ms. Sakalis does not control the Board because it is necessary to have Mr. Vournou's presence and affirmation of any act of the Board. She stated that Section 3 of the Shareholders' Agreement (DED Exhibit 12; APP Exhibit 5) provides that the Shareholders and the Corporation agreed not to make "Major Decisions" without the consent of both Shareholders, and therefore, Ms. Sakalis does not have sole control over the major decisions of the business and does not control the Board because of that limitation. She stated that contrary to Ms. Sakalis' claim, she cannot fire Mr. Vournou without cause. She stated that Section 2 of the Shareholders' Agreement states that Ms. Sakalis and Mr. Vournou shall serve on the board until he or she resigns or voluntarily or pursuant to the Shareholders' Agreement. Section 4 states that the Corporation may only remove a Shareholder from the Board of Directors "for cause", and that the Shareholders' Agreement contractually binds the Corporation and its shareholders to the terms of that agreement. (Hearing Testimony of Folashade Olatunbosun; DED Exhibit 12; APP Exhibit 5)

Ms. Sakalis is not the highest-ranking officer of E&A. Either Mr. Vournou, as CEO, is the highest-ranking officer, or Ms. Sakalis and Mr. Vournou are equally the highest-ranking officers of E&A. Ms. Sakalis also does not control the board of directors as both directors are needed to constitute a quorum and vote for the transaction of business on behalf of E&A.

The Division's determination that E&A failed to demonstrate that Jenny Sakalis is the highest-ranking officer and does not control the Board of Directors, as required under 5 NYCRR §144.2(d)(1), is supported by substantial evidence.

CONCLUSION

E&A did not meet its burden to demonstrate that the Division's determination to deny its application for certification as a woman-owned business enterprise with respect to the eligibility criteria at 5 NYCRR §§ 144.2(c)(1), 144.2(c)(2), and 144.2(d)(1), was not based on substantial evidence.

RECOMMENDATION

For the reasons set forth above, I recommend that the Director affirm the Division's determination to deny E&A's application for certification as a woman-owned business enterprise.

In the Matter of E&A Restoration, Inc. dba E&A Construction
DED File ID No. 57680
Exhibit Chart

Exhibit #:	Description of the Exhibits	Offered (Yes/No)	Admitted (Yes/No)
Tribunal 1	Applicant's Closing Statement	Y	Y
Tribunal 2	Division's Closing Statement	Y	Y
APP 1	E&A Certification Application and supporting documentation	Y	Y
APP 2	Jenny Sakalis Resume	Y	Y
APP 3	Jenny Sakalis Stock Certificate	Y	Y
APP 4	E&A Bylaws	Y	Y
APP 5	12/31/21 Shareholder Agreement	Y	Y
APP 6	E&A Shareholder Schedule	N	N
APP 7	Stock Info Marcum 2022	N	N
APP 8	Company Description	Y	Y
APP 9	Employee Description	Y	Y
APP 10	Nassau County WMBE Certification letter	N	N
APP 11	History of WMBE Certification	N	N
APP 12	WMBE Certification status	N	N
APP 13	Suffolk County WMBE Certification	N	N
APP 14	List of Projects for government agencies	N	N
APP 15	2022 distributions to Ms. Sakalis and Mr. Vournou	Y	Y
APP 16	Minutes of 2000 Board of Directors Meeting	Y	Y

APP 17	Subcontractor payments	Y	Y
APP 18	Construction Agreement dated January 18, 2023	Y	Y
APP 19	Jenny Sakalis Interview Transcript/Recording	Y	Y
DED 1	Certification Application	Y	Y
DED 2	Denial Letter	Y	Y
DED 3	Request to Appeal	Y	Y
DED 4	Notice of Hearing	Y	Y
DED 5	Nassau County Public Works Contract No. B90400-04GR1	Y	Y
DED 6	City of New York Dept. of Design and Construction Contract	Y	Y
DED 7	Nassau County Family Court Contract	Y	Y
DED 8	Jenny Sakalis Resume	Y	Y
DED 9	Anthony Vournou Resume	Y	Y
DED 10	Recorded Video Interview with Jenny Sakalis	Y	Y
DED 11	Appellant's narrative dated 2/2/24	Y	Y
DED 12	Shareholders' Agreement	Y	Y
DED 13	Unanimous Written Consent & First Board Meeting Minutes	Y	Y
DED 14	E&A Bylaws	Y	Y
DED 15	Licenses and Certifications for Key Employees	Y	Y