



July 13, 2020

BY E-MAIL: Kevin.Arjoon@burlington.ca

Kevin Arjoon, City Clerk
The Corporation of the City of Burlington
Office of the City Clerk
426 Brant Street
Burlington, ON L7R 3Z6

Dear Sir:

RE: MUN-463-0719 Complaint against the City of Burlington

Our investigation of the above complaint against the City of Burlington has been completed, and I have enclosed the Ombudsman's report.

As you are aware, both parties were provided the opportunity to comment on the draft report. The Ombudsman then takes the comments into account and makes any modifications deemed appropriate. In this case, apart from anonymizing the final report (replacing names with titles and/or initials), the report is unchanged.

Our file in this matter is now closed.

Yours sincerely,

Peter Maniatakis
Deputy Ombuds



INVESTIGATION REPORT

Complainant: RB & LB

Complaint Reference Number: MUN-463-0719

Complaint Commenced: August 1, 2019

Date Required Information Received: April 6, 2020

Report Date: July 13, 2020

Investigator: Michael L. Maynard

Terms of Reference

This report has been prepared pursuant to the ADR Chambers Municipal Ombuds Office (ADRO) Terms of Reference for the City of Burlington, which describe the scope of ADRO's mandate, its process upon receiving Complaints, and the authority and responsibilities of an ADRO Investigator. Defined terms used below have the same meaning as in the Terms of Reference.

Complaint

The Complainants, (the "Complainants") are residents in the City of Burlington (the "City" or the "Respondent"), (collectively, the "Parties"). The Complainants are bringing this Complaint forward as the primary Complainants, but secondarily as representatives of a number of their neighbours whom they have named in their submissions (but remain anonymous in this Report).

A summary of the matters raised in this Complaint is as follows:

The Complainants claimed that a Convenience Store (the "Convenience Store" or "Store") which sits on property abutting the rear of their own property, installed, without a permit, an exhaust fan (the "Fan") on the rear wall of the Store, facing the Complainants' and their neighbours properties. The Complainants stated that the Fan was running 24 hours a day, every day, for a number of months, and that in addition to being illegally installed (i.e. without the proper permit), the Fan exceeded allowable decibel levels, creating a noise disturbance for themselves and their neighbours (the "Noise Issue").

The Complainants brought the Noise Issue to the City of Burlington's By-law Enforcement Department ("By-law Department"), but after several visits by By-law Enforcements officers, there was no resolution to the exhaust Fan noise issue. A number of the Complainants' neighbours also filed noise complaints with the City, and on several occasions engaged with City

officials on the matter. Over the summer period, there was no resolution to the Noise Issue caused by the exhaust Fan, which ran continuously.

Though the current state of affairs has changed (the full chronology of events will be explored in greater detail below), the Complainants have requested the following relief through this Municipal Ombuds review of their situation:

1. The exhaust Fan to be removed and the hole in the wall permanently closed up;
2. The Fan shut off permanently (i.e. never turned on again until such time as it is removed, per the above point);
3. The Fan directed away from their homes, with the new direction / installation to be done in consultation with the Complainants and their neighbours;
4. A formal written apology from the owners of the Convenience Store;
5. A formal written apology from the City of Burlington;
6. A review/investigation of the City of Burlington's By-law staff and process;
7. A noise mitigation "device" or measure which must be installed in consultation with, and approved by the Complainants and their neighbours.

ADRO Investigation

This Investigation was conducted by way of a review of written statements and documentation provided by the Parties, as well as through investigation interviews conducted with the Complainants on February 26, 2020 and with [NA] ("NA"), the Chief Building Official and Director of the Building & By-law Department for the City of Burlington on April 7, 2020.

Facts and Evidence

The Complainants' Statement and Evidence

The following is a summary of the oral and documentary evidence submitted by the Complainants:

The Complainants claim that on or around June 22, 2019, the owners/operators of the Convenience Store, which is adjacent to their property at the rear property line, punched a hole in the back wall of the Convenience Store and installed the Fan.

The Complainants stated that the Fan faced their property and that no sound mitigation measures had been taken by the Convenience Store owners, and therefore, the sound emitted by the Fan was directed towards their property.

Moreover, the Complainants claim that the Fan was installed without a proper permit.

After the Fan was installed, and despite multiple noise and permit-related complaints being submitted to the City by the Complainants and several of their neighbours, the Fan ran unabated, day and night, for the rest of the summer and most of the autumn.

The Complainants stated that they took their own decibel readings using mobile device apps, and that the readings showed the noise at around 72 decibels. They advised that their neighbours had done likewise with the same results.

In addition to the readings from their device apps, the Complainants stated that "[...] the noise is intolerably loud" to their ears.

According to the Complainants, the layout of the residences is such that many principle rooms are at the rear of the dwellings, and according are directly exposed to the noise from the Fan, thereby severely impacting the quality of life of the residential occupants.

According to the documents submitted by the Complainants, one of the neighbours described the noise as sounding "[...] like a prop plane is in her backyard".

The evening of the Fan installation (being June 22, 2019) Complainant [LB] ("LB") went to the Convenience Store and requested that they turn the Fan off. The Fan was subsequently turned off for approximately 1/2 an hour but was then turned on again and ran almost continuously (with few brief exceptions) for a number of months thereafter.

On or around June 24, 2019, the Complainants called the City of Burlington's By-law Department to register a complaint about the Noise Issue.

On or around June 25, 2019, a By-law Enforcement Officer named [SVB] ("Officer SVB") met with the owners of the Convenience Store. However, the Complainants stated that that Officer SVB did not communicate with them about such visit.

The following day being June 26, 2020, Complainant [RB] ("RB") followed up with the By-law Department. An employee there stated that Officer SVB's opinion following her inspection was that the noise level was "okay". Despite arriving at such opinion, there was, according to the Complainants, no objective measure by which Officer SVB could make such a determination. For instance, there were no sound measurements taken. The Complainants question the validity of arriving at such an opinion without the proper equipment to scientifically verify the noise level of the Fan.

The Complainants, being thus far unsatisfied with the process for resolving their issue, contacted their City Councillor, who arranged to have a second visit by a By-law Officer, and also arranged for a meeting between the neighbours and attempted to include a representative of the Convenience Store (though the Convenience Store representative demurred, and instead provided contact information for their business partner, who was contacted by the City Councillor the following day).

The next By-law Department representative to visit the site was Officer [CS], the By-law Enforcement Supervisor for the City ("Supervisor CS"). Supervisor CS visited the site on June 26, 2019, however at that time the Fan was briefly turned off (which, according to the Complainants was an extraordinarily rare occurrence) and as such Supervisor CS could not complete a noise inspection.

On or around June 27, 2019, the City Councillor spoke with one of the owners of the Convenience Store about the Noise Issue. According to the documents on file, the Councillor ascertained from that meeting with the Store owner that the rooftop air conditioner at the Store was in disrepair and not functioning, and as such the Convenience Store owners determined that the Fan must continue to run to avoid overheating in the Store. The owner also advised the Councillor that they were informed by the City that he "[...] is operating within the legal standards".

The Complainants indicated their scepticism with any claim that the City could determine the Fan to be operating within the "legal standards" as there had been no objective, scientifically acceptable measurement of the noise level taken by any City official.

The so-called "legal standard" being referenced was, according to the Complainants, based solely on Officer SVB's opinion, and, per their written submissions, it was confirmed to the neighbours in a phone call with [GZ] ("GZ") the Manager of By-law Enforcement at the City of Burlington, that the City was not capable of measuring decibel levels as it lacked the necessary equipment to do so.

The Complainants assert that the City should have the proper equipment and ought to be able to do noise testing if it is to even be able to properly enforce the Noise By-law (The *Nuisance and Noise Control By-law 019-2003*, hereinafter the "Noise By-law") and also to comply with Provincial policy NPC-300 (which is the current applicable environmental noise policy established by the Ministry of the Environment).

The Complainants also made the point during their interview in February 2020 that the air conditioning unit on the roof of the Convenience Store has since been fixed. They stated that in the opinion of an HVAC installer (who is an acquaintance and former neighbor of theirs, and whose opinion they canvassed), the Fan at the back of the store is only circulating air and would not help with refrigeration as it is not an air conditioning unit.

The Complainants noted that both GZ and their City Councillor have indicated to them in writing that there is nothing they can do to have the Fan turned off. This is even despite the Fan having been installed without a permit, and despite the City having a Noise By-law in effect.

The Complainants further stated that City officials have advised them that By-law Officers can determine which articles of By-laws to enforce.

The Complainants stated that the point was further made to them by the City that the issue was being taken up by "building and building permits" (i.e. that a permit application process was

being undertaken) and so the Complainants would have to accept and follow the building permit process rather than continue with By-law Enforcement as a means to resolve the matter.

According to the Complainants, the noise from the Fan has caused a "physical and emotional toll" on themselves and many of their neighbours. They have also stated that there are additional financial costs involved with the potential for decreased property values due to the constant disturbance, and increased hydro bills on account of needing to operate their own air conditioning units more frequently than usual, both for cooling their homes (because they cannot open the windows due to the noise of the Fan).

In an addendum to their initial complaint documents the Complainants noted that the Noise Issue had continued mostly unabated through September and into October.

It was noted, however, that on or around October 3, 2020 the Complainants and their neighbors were advised by the Mayor's Chief of Staff (with whom they had been communicating) that the Convenience Store owner had been charged by the City for noise violations, and that a court date had been set for November 8, 2019.

The scheduled court date was postponed, however, due to the Convenience Store owner's legal counsel (according to the Complainants) not being ready to proceed on that date. The case was rescheduled for December 13, 2019.

On the second scheduled court date (December 13, 2019), the lawyer for the Convenience Store asked for a further extension, and a second postponement which was granted by the Court, with the new hearing date set for January 10, 2020.

The Complainants noted at that time that the noise violation charge brought against the Convenience Store owners was limited to the period between June and September 2019, even though the Fan was operating past September. They raised this concern with the Mayor's Chief of Staff on December 13, 2019 via email.

The Chief of Staff advised, in part, via reply email on December 16, 2019 that Officer SVB had not received any formal complaints regarding the new Fan (which had been installed sometime in October) or since the noise logs had been submitted (in September 2019). She also advised in her reply email of the same date, however, that further charges could potentially be brought for further infractions.

The neighbour who initiated this email discussion with the Mayor's Chief of Staff wrote again on December 16, 2019 replying, in part, that the reason no new noise complaints were brought forward after September is that Officer SVB had in or around October 2019 advised the neighbours that no new complaints were necessary due to the matter being dealt with through legal proceedings. The neighbour also stated that the group of neighbours (which includes the Complainants) believed the legal proceedings would deal with the Noise Issue itself (i.e. result in action to cease the noise) rather than merely result in a monetary fine for the Convenience Store.

At this point, the Mayor's Chief of Staff requested that a member of Burlington City staff, [MG] ("MG"), be brought in to assess and assist the neighbours. There was nothing notable in the documentation arising from MG's involvement.

On January 10, 2020 the court case against the Convenience Store proceeded. The Convenience Store owners pleaded guilty and received a fine which the Complainants, in their documentation, state they believed to be in the region of \$650.00 for each of the two owners/operators of the Convenience Store (though it is noted the City's documentation that the fine was \$500.00).

The Complainants have stated that, even though the Noise Issue resulted in fines for the Convenience Store, it was many months after their initial complaints were lodged with the City before the noise issue itself was resolved (and it was not known by the Complainants as of February 2020 whether the Noise Issue was even resolved permanently, as it was in winter and the Fan had not been running).

The Complainants have submitted this complaint to the Ombudsman to see if the issue can be resolved in a more practical way and to their greater satisfaction, and have accordingly set forth a number of potential resolutions satisfactory to them (which were indicated above).

The Respondent's Statement and Documents

The following is a summary of the oral and documentary evidence provided by the Respondent:

Re: Noise Complaint

The City of Burlington provided a chart which detailed the various steps that have been taken in order to resolve the issue from the perspective of the By-law Department.

Is noted in the log that Officer SVB began looking into the matter almost immediately, and initially called the Complainants on June 24, 2019. It was also noted that when Officer SVB spoke with RB about the matter he appeared to be very agitated. He was referred to Officer SVB's Supervisor, CS.

Officer SVB inspected the Fan several times after the complaint was received by the City, with log notes indicating an inspection had been conducted on both July 5 and July 6, 2019. The log notes indicate that the Fan was inspected in the evenings of each of those days, and that during both inspections, noise could not be heard from the sidewalk in front of the Complainants' house, but could be heard from the side of the Convenience Store.

It is also noted that on or around July 6, 2019, GZ went to speak personally to the Complainants to advise them that the matter would be investigated and that everything would be done within the regulatory framework to have the Fan brought into compliance with the Noise By-law.

During his interview, NA noted that on one of the logged dates in early July, the owner of the Convenience Store stated that he would be applying for a building permit for the Fan. NA explained that because a permitting process was being undertaken at that time, the issue of noise

would be tied up with that process (i.e. that the installation would have to be inspected and approved) and accordingly, the issue of the Fan would ultimately fall under the purview of the Building Permits Department as a building issue.

Nevertheless, it was also noted by NA that, as an interim measure, noise logs were issued to the Complainants and their neighbours on or around July 9, 2019.

Follow-up meetings with the Convenience Store operators were conducted by the City on July 10 and July 24, 2019, and on both occasions the operators of the Convenience Store indicated they would be applying for a permit, and specifically on the latter date, that such would be undertaken that very week.

The noise logs were received back from the Complainants and their neighbours over several days between September 11 and 18, 2019, which resulted in charges being brought against the Convenience Store on September 24, 2019 for violating the Noise By-law.

Over the course of several months, between September and November 2019, several additional Complaints had been lodged by various of the neighbours regarding other potential By-law infractions related to noise, gaseous substance, and light emissions, including construction noise (which was investigated and found to be within acceptable tolerance), the emission of a yellow gas (which did not appear to continue), and an issue related to a motion sensor light (which had been installed by the Convenience Store following an act of vandalism, and was redirected away from the Complainants' property following their complaint about it).

It was also noted that, as of the date of an inspection conducted on November 5, 2019, a metal hood was observed on the Fan (which had been installed on some date prior thereto).

It is lastly noted in the logs that on January 10, 2020, a guilty plea was entered and a fine issued to the Convenience Store operators for the noise infractions related to the Fan.

Re: Permit

The City's log also notes the various work that had been done by City staff in relation to the building permit issue (which is noted separately from the noise complaint issue).

It is noted that one of the neighbours complained on or around July 3, 2019 to the City about HVAC work being done to the Convenience Store property which was apparently being carried out without a permit.

On or around that same day (July 3, 2019) a building inspector visited the site and spoke with the owners of the Convenience Store and "educated them" about the need for a permit for that type of work. It is also noted in the log that the owner agreed to do whatever was necessary to bring the Fan into compliance.

On July 8, 2019, the owner of the Convenience Store spoke with an individual in the Building Permit Office at the City, though the specific City staff member they needed to speak with at that time was not available.

On or around July 19, 2019, GZ followed up with the Building Permit Department to see if there was any progress regarding the Convenience Store operators making their application.

At that time, no permit application had yet been forthcoming. Therefore, a plan was put in place to follow up with the Convenience Store.

On July 22, 2019, City staff contacted the Convenience Store operators and were advised by them that the architect who had been hired by the Store was in the process of completing his plans to be included in the Store's application for the permit. City staff were further advised by the Store operators that they intended to get drawings of other plans for similar units from City Hall to facilitate their own planning process. The Convenience Store operators lastly advised that they anticipated making their permit application that week.

On or around August 9, 2019, the operators of the Convenience Store attended with their architect at City Hall to apply for the permit. However, it was determined by City staff that the drawings were incomplete, and accordingly the permit application process could not yet be finalized.

Further discussions about the permit process took place between City staff and the Convenience Store operators on August 16, 2019, at which point it was indicated to the Convenience Store owners that they should attend at City Hall on August 19, 2019 (i.e. Monday of the following week) to complete the application process. This was done as instructed.

The permit application review process was carried out over September and October of 2019, with revisions being sent back to the owners of the Convenience Store on two occasions.

On November 4, 2019, the permit was issued.

On December 13, 2019, an inspection of the rough-in was conducted by City officials.

The permit process was completed with a final inspection of the installed unit which resulted in an approval of the Fan installation by the City's mechanical team on February 7, 2020.

As it has been determined by the mechanical team that the Fan is properly installed and working correctly, and therefore is compliant and accepted by the City, it follows that any noise now generated by the unit, so long as it remains in good repair, would be considered to be within acceptable tolerance levels (as this is a requirement of receiving the permit).

When asked about the prosecution process and why only the Noise Issue was prosecuted by the City, NA advised that the purpose of By-law enforcement is to achieve compliance with the law, and the permit process was being undertaken in furtherance of achieving such compliance. It

would therefore not have been a productive use of the Court's time to bring that issue in addition to the Noise issue.

The City of Burlington denies that its staff mishandled this file and points to the fact that legal proceedings were brought against the Convenience Store and a guilty plea by the Store's operators resulted in a fine. The City also points to the fact that a permit process was undertaken, and the Fan has since been found to be compliant following an inspection at the end of that process. Accordingly, compliance has been achieved through the City's actions in following up on the complaints received by them from the Complainants and their various neighbours.

The Law

The City of Burlington's *Nuisance and Noise Control By-law* (By-law 019-2003) states:

Nuisances

4. No person shall cause a nuisance within the City of Burlington without limiting the generality of the foregoing:

[...]

(2) No noise or vibrations shall be made, caused or created so as to be heard or felt or otherwise perceived outside the property and which are, in the view of all the circumstances including the nature of the neighbourhood and the use to which adjoining properties are put and the time of day during which such noise or vibrations are made, caused or created excessive or which are, or may cause a nuisance to the public generally or to others residing or carrying on a manufacture, trade or business in the vicinity.

[...]

6. No person shall emit or cause or permit the emission of any sound:

(1) from a stationary source such that the level of resultant sound at a point of reception exceeds the applicable sound level limit prescribed in Schedule 4 – Publications, Publication NPC-205;

It is noted that the Noise By-law is out of date and references an earlier version of the Ministry of the Environment's noise guideline.

Ontario's current Environmental Noise Guideline *NPC-300* consolidated and superseded a number of previous Noise Guidelines, including NPC-205.

It states in respect of stationary sources of noise (Section B3) that:

B3 Noise Impact Assessment

The impact assessment of noise produced by stationary sources is done by either prediction or **measurement**, or a combination of both. **The noise impact assessment descriptor is the One-Hour Equivalent Sound Level (Leq), and the noise impact is evaluated at representative points of reception.**

[**Emphasis** added]

It also set outs allowable noise levels (which are highly technical and not necessary to recount here).

In addition to the above By-law and Ministry policy document (*NPC-300*), there is case law which deals with the external review of by-law enforcement (as has been requested by the Complainants in this present matter) which is compelling and must be considered.

The leading case in determining the reviewability of a municipality's by-law enforcement actions is *Foley v. Shames*, in which the Ontario Court of Appeal held:

"For it is one thing to say a municipality has a duty to enforce its by-laws. The way it enforces them is quite another thing. As I read the case law, a municipality has a broad discretion in determining how it will enforce its by-laws, as long as it acts reasonably and in good faith. That makes common sense. The manner of enforcement ought not to be left to the whims or dictates of property owners."

ADRBO Analysis

The questions to be addressed in this matter are as follows:

1. Did the City of Burlington mishandle the noise infraction issue or improperly respond to the complaint?
2. Did the city of Burlington mishandle the building permit issue or improperly respond to the complaint?
3. What recommendations, if any, can be made to improve this process in the future?

Did the city of Burlington mishandle the noise infraction issue?

The Complainants have stated that they had to live with the noisy Convenience Store Fan for a number of months as the City determined not to require the Store operators to shut the Fan down, despite it being overly noisy and having been installed without a permit.

The City has asserted that it responded appropriately to the issue. A By-law officer inspected the Fan within a day of receiving the complaint and followed up several times over the course of the next two weeks. Noise logs were issued to the various neighbours and were eventually acted upon with charges brought against the Convenience Store for the noise infraction.

With respect to shutting the Fan down or taking additional measures, it was noted by the City that not long after the complaint was made, the Convenience Store owners indicated that they intended to apply for a permit for the Fan, which, while not an ideal scenario, is nevertheless an accepted one (particularly in view of the City's stated goal being to bring non-compliant units into compliance).

Decision

The question being raised here is one of reasonableness in the City's response to this issue.

The Court of Appeal's decision in *Foley v. Shamess* confirms the broad discretion a municipality possesses in determining the enforcement of its own By-laws, and so long as City meets the tests of acting "[...] reasonably and in good faith", such discretion ought not to be infringed.

In my view the City of Burlington acted both reasonably (though not perfectly) and in good faith.

I note, for instance, that the City's response time was rapid, with a By-law Officer dispatched very shortly after receiving the first complaints. I also note that several levels of staff (a By-law Officer, a Supervisor and a Manager) were all involved in the decision-making process and in working with the residents who were affected by the Fan noise. Lastly, I note that compliance was ultimately achieved, and though it took a number of months for that to happen, that is of no particular fault of the City of Burlington; rather, it is simply a function of following through with complex governance systems (i.e. the permit application process, and the legal system).

I do, however, also note the City stated it did not have the proper equipment to conduct a scientifically valid noise assessment, and therefore could only rely the naked ear perception and opinion of a By-law Enforcement officer. On this point, the Complainants stated that they believed the City should have the proper equipment to carry out sound measurements and properly determine whether a noise is within allowable tolerances. I agree with the Complainants on this point.

Without a scientifically valid means of testing for noise issues, such as by lacking either (or both) the proper equipment or properly trained staff, there is a clear deficiency in the City's Noise By-law Enforcement process.

While, as per the decision in *Foley v. Shamess*, it is not the place of the Ombudsman to direct By-law Enforcement protocols or re-write By-law Enforcement decisions, it is within due bounds of the Ombudsman to point out administrative issues (such as improper equipment, untrained staff, misinterpretations of law, etc.) which bring about deficiencies in the City's ability to properly enforce its By-laws. Such is the case in this instance with respect to the City's

inability to properly test noise levels due to a stated lack of necessary equipment. Accordingly, the process could be improved were such equipment (and staff capable of using it) available.

Did the city mishandle the building permit issue?

As noted above, the City Building Inspector began inspecting this issue in early July, several days after the noise complaints had been lodged, and immediately after receiving the complaint about the non-permitted Fan installation.

A process was quickly commenced to ensure that the owners of the Convenience Store applied for a permit and thereby brought their Fan into compliance.

There were certainly delays in the permitting process as noted in the logs and notes submitted by both the Complainants and the City. However, the City did, according to their logs, follow up with the Store operators several times, and worked with them to ensure that the process was carried out. Once again noting that the purpose of By-law enforcement is to achieve compliance, which the City has asserted and with which view I am in agreement, it is noteworthy that compliance is what was ultimately achieved with a final inspection approving the Fan installation and operation in February of 2020.

It is regrettable that the Complainants and their neighbours had to bear with the Noise for the period from Early summer until late fall of 2019. That disruption falls four-square on the shoulders of the Convenience Store who acted improperly, was fined for doing so, and was required to go back and carry out the proper permitting and inspection process that they ought to have carried out from the start.

However, I cannot attribute the suffering of the Complainants and their neighbours to unreasonableness on the part of the City, which I find acted reasonably and in good faith to achieve compliance from the Convenience Store.

What recommendations can be made?

On review of this issue and in the context of the law (as demonstrated in case law noted above) I have not found that the City of Burlington acted improperly.

As noted, unless there is a finding of unreasonableness or bad faith on the part of the City, it is not the Ombudsman's place determine how a By-law ought to be enforced.

Notwithstanding the immediately preceding conclusion, however, the Ombudsman is certainly empowered to point out and recommend actions to rectify deficiencies or errors, such as that found in this matter with the City's lack of proper sound testing equipment as noted by the Parties.

Therefore: (i) acquiring such equipment as is necessary to properly conduct sound measurements; and (ii) ensuring there are enough trained individuals to use such equipment properly, are both reasonable recommendations in the circumstances.

I am not, however, in a position to recommend any of the resolutions put forward by the Complainants, as each of them would require me to direct the City of Burlington on By-law enforcement matters contrary to the decision in *Foley v. Shamess* which establishes that the City has broad discretion on matter of enforcement as a reasonable and good-faith actor.

Recommendation

I recommend that that the City of Burlington acquire the necessary sound measurement equipment, and that it properly train enough staff (which number is left to the City's discretion to determine) to use such equipment, in accordance with the standards set out in *NPC-300*, so that the City may properly carry out any necessary noise testing required to enforce its Noise By-law.

As it was additionally noted that the City's Noise By-law is out of date and references expired Provincial guidelines, it is recommended that the City of Burlington update its Noise By-law at the earliest opportunity the legislative agenda for City Council allows.

Yours Truly,
ADR Chambers Inc.

Michael L. Maynard
ADRO Investigator