No. 14-1212

IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

IN RE: CITY OF DETROIT, MICHIGAN,
Debtor in Possession.

RETIRED DETROIT POLICE & FIRE FIGHTERS ASSOCIATION ET AL.,
Appellants,

v.

CITY OF DETROIT, MICHIGAN,
Appellee.

On Direct Appeal from the United States Bankruptcy Court
for the Eastern District of Michigan, No. 13-53846 (Hon. Steven W. Rhodes)

BRIEF AMICUS CURIAE OF AARP IN SUPPORT OF APPELLANTS

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DISCLOSURE OF CORPORATE AFFILIATIONS AND FINANCIAL INTEREST

Sixth Circuit
Case Number: 14-1212

Case Name: In re: Retired Detroit Police & Fire, et al. v. City of Detroit, Michigan

Name of Counsel: Mary Ellen Signorille

Pursuant to 6th Cir. R. 26.1, AARP makes the following disclosure:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If Yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party:

   No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest:

   No.

CERTIFICATE OF SERVICE

I certify that on April 30, 2014, the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.

s/Mary Ellen Signorille
Mary Ellen Signorille

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STATEMENT OF INTEREST[1]

AARP is a nonpartisan, nonprofit organization with a membership that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. In its efforts to foster the economic security of individuals as they age, AARP seeks to increase the availability, security, equity, and adequacy of public and private pension, health, disability and other employee benefits.

AARP has over 46,000 members within the city limits of Detroit. Many of these members receive retirement benefits from the City's Retirement Systems; they use these benefits to pay for goods and services within the City of Detroit. It is important to AARP members and the City's retirement plan participants to be able to rely upon these benefits and the purchasing power conferred by their plans.

Although Appellants' respective interests in these appeals are distinct from one another, AARP's arguments are applicable to all of the appeals. AARP's amicus curiae brief supports the decision of Michigan voters to protect the

[1] Counsel for AARP states that no counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than amicus, their members, or their counsel made a monetary contribution to the preparation or submission of this brief. All parties have consented to the filing of this brief. AARP is not requesting to participate in oral argument.

pensions of state and local government employees through their ratification of the 1963 State Constitution. Mich. Const. art. IX, §24; *cf. Schuette v. Coal. to Defend Affirmative Action*, 188 L. Ed. 2d 613 (2014) (upholding voters' referendum to ban affirmative action). The voters understood the economic impact on individuals if accrued pension benefits are not protected. Accordingly, AARP will discuss the economic implications of the proposed benefit reductions on the City's workers and retirees as well as on the City of Detroit itself. AARP has a substantial interest in the resolution of the issues herein, which will have a direct and vital bearing on AARP members' economic security.

ARGUMENT

I. DETROIT CITY EMPLOYEES HAVE EARNED THEIR MODEST PENSION BENEFITS AS A FORM OF DEFERRED COMPENSATION AND ANY REDUCTION TO THOSE BENEFITS WILL SIGNIFICANTLY DECREASE THEIR PURCHASING POWER.

A. An Employee Receives Pension Benefits As A Form Of Deferred Compensation.

Employer-sponsored pension plans provide employees with insurance against economic insecurity during retirement. *See generally* Zvi Bodie, *Pensions as Retirement Income Insurance*, 28 J. Econ. Literature 28, 31 (1990). "Through a combination of employer and[/or] employee contributions, part of the employee's total compensation earned during the working years is deferred until retirement." *Id.* at 5. An employee receives less of the income to which he or she is presently entitled in exchange for a steady and predictable source of monthly income during retirement. Accordingly, the pension check a retiree receives each month is money that was earned previously,[2] and it rightfully belongs to the employee. If the City of Detroit reduces a retiree's earned pension benefit, the City will be reaching its hand into someone's bank account and taking money out.

B. Thousands Of Retirees Receive Modest Pension Benefits Through The Detroit City Retirement Systems.

As of June 30, 2012, the average annual individual pension paid from the General Retirement System (GRS) was $19, 213, or $1,601 per month. *Annual Report of the Board of Trustees for the Year Ended June 30, 2012, Actuarial & Statistical Section* 17-19 (2013), http://www.rscd.org/actuarial_2012%20GRS%20Annual%20Report.pdf. As of the same date, the average annual individual pension paid from the Police & Fire Retirement System (PFRS) was $30,607, or $2,550 per month. *Annual Report of the Board of Trustees for the Year Ended June 30, 2012, Actuarial & Statistical Section* 21-24 (2013), http://www.pfrsdetroit.org/images/pdf/Actuarial%20PFRS%202012%20annual%20rpt.pdf.

[2] Cost of living adjustments earned during tenure of employment are part of the pension benefit. *Cf. Thornton v. Graphic Commc'ns Conference of the Int'l Bhd. of Teamsters Supplemental Ret. & Disability Fund*, 566 F.3d 597, 616 (6th Cir. 2009) (under ERISA, cost of living adjustments added to the plan were not an accrued benefit for those employees who retired before the amendment; but COLAs earned during tenure of employment are accrued benefits).

A comparison between the current pension benefits paid from the Detroit Retirement Systems to those paid from the retirement systems of similarly sized cities demonstrates that Detroit's retirees receive no more, and in many instances less, than other retirees in similarly sized cities. Melanie Hicken, *Just How Generous are Detroit's Pensions?*, CNN Money (July 23, 2013), http://money.cnn.com/2013/07/23/retirement/detroit-pensions/index.html (for example, retired police and firefighters in Kansas City, Mo. – roughly two-thirds the population of Detroit with a similar cost of living – receive average annual payments of almost $42,500). By any measure, the pension benefits paid from Detroit's Retirement Systems are modest to begin with. *Id.* Thus, any reductions to the current pension or cost of living adjustment formulas will result in sub-par pension amounts for pensioners of a city of Detroit's size.

C. Under Either The Original Or The Modified Plan Of Adjustment, City Retirees Will Receive Less In Pension Benefits Than The Amounts That They Had Actually Earned.[3]

Under the original plan of adjustment, the City proposed that no retiree of any Detroit Retirement System should receive a cost of living adjustment for at least ten years. *See infra* Section I.D for an explanation of the impact on a retiree's purchasing power. Under the original plan, the pensions of PFRS participants also would be reduced by 10%. Under that scheme, the already modest average PFRS

[3] AARP has used the original plan of adjustment as well as the April 2014 modified plan of adjustment to develop the analysis used in this brief.

pension benefit would be reduced to $2,296 per month, resulting in an annual loss of one month's worth of income. Under the original plan for the GRS retirees, the City proposed a pension reduction of 34%. The already modest average GRS pension amounts would be reduced to $1,057 per month, resulting in an annual loss of four months' worth of income. Nathan Bomey, Matt Helms & Brent Snavely, *Detroit's Bankruptcy Exit Plan Includes Pension Cuts, Millions for Blight Removal*, *Technology*, Detroit Free Press, Feb. 21, 2014, http://www.freep.com/article/20140221/NEWS01/302220007/Detroit-Chapter-9-bankruptcy-plan-of-adjustment-Steven-Rhodes-Kevyn-Orr.

Under the modified plan, Police and Firefighters' pensions would not be reduced, but their cost of living adjustments would be capped at 1%, regardless of actual inflation. But, under this plan, GRS pensions would be reduced by 4.5% with no cost of living adjustments for at least ten years. The already modest average GRS pension amounts would be reduced to $1,529 per month, resulting in an annual loss of one-half month's worth of income – enough to pay for prescription drugs, food or gas. Monica Davey, *Pension Deals Reached in Detroit Bankruptcy*, N.Y. Times, Apr. 16, 2014, at A1.

D. The Reduction In Both Pension Benefits And Cost Of Living Adjustments Will Significantly Decrease The Purchasing Power Of The City's Retirees.

Cost of living adjustments to the amount of retirees' pension benefits are of vital concern to them since inflation drastically reduces the buying power of static pension benefits over time. Inflation can severely erode the purchasing power of a fixed pension throughout a worker's retirement years. Jeremy I. Bulow, *The Effect of Inflation on the Private Pension System*, *in* Inflation: Causes and Effects 123, 124 (Robert E. Hall, ed., 1982), *available at* http://www.nber.org/chapters/c11455.pdf.

Detroit retired employees will be irreparably harmed if cost of living adjustments are eliminated or are less than the rate of inflation. Based on a recent analysis of both plans, under the original plan, which eliminated all cost of living adjustments, the GRS 2014 average annual pension benefit of $19,213 would be worth only about $10,356 in 2024. Adding together the 34% cut in initial benefits and elimination of the cost of living adjustments, those GRS retirees would see the purchasing power of their pensions decline by 46.1% over 10 years. Similarly, under the modified plan, the GRS 2014 average annual pension benefit of $19,213 would be worth only about $14,986 in 2024. Those GRS retirees would see the purchasing power of their pensions reduced by 22% over 10 years, combining both the 4.5% cut in initial benefits with elimination of the cost of living adjustments.[4]

PFRS retirees receive either a simple or compounded cost of living adjustment depending on their date of retirement. Totaling the original proposed benefit cut of 10% with elimination of the cost of living adjustments, the range of reduction of purchasing power for their pensions is 26.5% to 28%. For those PFRS retirees who currently receive the average benefit of $30,607, the loss in benefits over 10 years ranges between $21,600 and $22,050. Under the modified plan, capping of the cost of living adjustment at 1% for PFRS pension benefits would result in a range of reduction of purchasing power of 10.2% to 11.6% over the next 10 years.[5]

II. NOT ONLY WILL RETIREES FACE REDUCED PENSION BENEFITS AND COST OF LIVING ADJUSTMENTS, BUT THEY WILL BEAR PRIMARY RESPONSIBILITY FOR ANY INCREASES IN HEALTH CARE COSTS.

A. Projections Indicate That The Annual Rate Of Growth For National Health Care Expenditures Will Continue To Increase.

For more than a decade, the annual growth in national health care expenditures has been substantial, sometimes growing at a rate of more than

[4] Gary Koenig, AARP Pub. Policy Inst., *Calculation of Loss of GRS and PFRS Pensions' Purchasing Power Due to Lack of Cost of Living Adjustments* (Apr. 22, 2014) (unpublished analysis) (on file with counsel).

[5] *Id.*

double the gross domestic product. Ctrs. for Medicare & Medicaid Servs., *National Health Expenditure Data, Table* 4 (2013), *available at* https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/National HealthExpendData/Downloads/tables.pdf (tracking of aggregate level and growth of spending on health care in the economy). Projections anticipate that the national rate of growth will increase to 6.1% in 2014, leveling off at approximately 6.2% from 2015 through 2022.[6] Ctrs. for Medicare & Medicaid Servs., *National Health Expenditure Projections 2012-2022* 1 (2013), *available at* https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/National HealthExpend Data/Downloads/Proj2012.pdf.

B. Consistent With National Trends, Detroit Residents Paid More For Their Health Care Over The Last Eight Years.

During the period of 2003 to 2011, total average health insurance premiums for Detroit residents increased 39% for single coverage and 50% for family coverage. Jacob A. Lippa & Cathy Schoen, The Commonwealth Fund, *Trends in Employer-Sponsored Health Insurance Premiums and Employee Contributions in Major Metropolitan Areas, 2003-2011* 5 (2012), *available at* http://www.commonwealthfund.org/~/media/Files/Publications/Data%20Brief/2012/1649_Lippa_

[6] According to the latest retiree health care costs estimate calculated by Fidelity Benefits Consulting, a 65-year old Medicare-eligible couple retiring in 2013 is estimated to need $220,000 to cover out of pocket medical expenses throughout retirement. Fidelity Viewpoints, *Retiree health costs fall*, May 15, 2013, https://www.fidelity.com/viewpoints/retirement/retirees-medical-expenses.

trends_ESI_premiums_metro_areas_2003_2011_data_brief_v3.pdf. The average employee contribution to the premium for single coverage increased 122% over these eight years from $538 (14% of premium in 2003) to $1,193 (23% of premium in 2011). *Id*. at 6. For family coverage, the average employee contribution increased 96% over the period from $1,774 (18% of premium in 2003) to $3,472 (24% of premium in 2011). *Id*. at 7.

The Commonwealth Fund Report also found that in 2011 the total average family premium for Detroit residents was $14,639. It projects this amount will increase to $18,273 in 2015 and to $24,109 in 2020. *Id*. at 9.

Predictably, health care premiums and the amounts that individuals pay toward their health care in Detroit will continue to increase over the next ten years.

C. Both The Original And Modified Plans Of Adjustment Shift The Majority Of Health Care Costs Onto The Backs Of City Retirees.

Both the original and modified plans of adjustment propose deep cuts in health care coverage for retirees resulting in retirees paying significantly more for their health care. These plans transfer the risk of rising health care costs to the retirees through increased premiums, copayments and deductibles.

This year's retiree health care coverage illustrates the impact on the reductions to retirees. Non-Medicare eligible retirees and beneficiaries must purchase their own insurance. They are receiving a subsidy from the City depending on their choice of providers. They can purchase coverage through either the Affordable Care Act Exchanges or a new City sponsored health plan. Joe Guillen, *Detroit Retirees and City Reach Settlement on Health Care Cuts*, Detroit Free Press, Jan. 31, 2014, http://www.freep.com/article/20140131/NEWS01/301310083/Detroit-retiree-health-care-settle.

The revised coverage is less robust than the coverage previously provided,[7] and the premiums and out of pocket expenses are significantly greater than the amounts Detroit retirees were previously paying.[8] *Id*. (younger retirees found the stipend fell woefully short of covering their costs).

Both the original and modified plans of adjustment call for the establishment of a separate Voluntary Employees Beneficiary Association (VEBA) for each Retirement System in order to provide health care benefits to all current and future

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[7] Coverage through State Exchanges has generally proved to be less robust than employer provided coverage. Jon R. Gabel et al., *More Than Half Of Individual Health Plans Offer Coverage That Falls Short Of What Can Be Sold Through Exchanges As Of 2014*, 31 Health Aff. 1339, 1343 (2012) (finding most employer plans in 2010 would qualify as highly rated "gold" plans in the exchanges versus individual policies at the "bronze" level).

[8] For example, as of March 31, 2014, Gold level plans offered on the Michigan Marketplace for Wayne County have a monthly premium range of $385-$872 at age 55 and $518-$896 at age 64. The Bronze level plans, which have lower premium costs, have a monthly premium range of $249 to $576 at age 55, and $395-$731 at age 64. However, the out-of-pocket deductibles for the Bronze level plans may be as high as $6,350 for single coverage. See Gerry Smolka, AARP Pub. Policy Inst., *Charts Analyzing High, Medium, and Low Priced Gold, Silver, and Bronze Detroit Plans for 55 Year-Olds and Chart of High, Medium, and Low Priced Gold, Silver, and Bronze Detroit Plans for 64 Year-Olds from Michigan Health Exchange as of March 31, 2014* (Apr. 9, 2014) (unpublished analysis) (on file with counsel).

City retirees. Each such trust will hold the funding for the obligations toward retiree health care and will determine how much health care coverage, if any, retirees will receive. Nathan Bomey et al., *Detroit Pension Leaders, City Reach Landmark Deal on Retiree Cuts*, Detroit Free Press, Apr. 16, 2014, http://www.freep.com/article/20140415/NEWS01/304150090/Detroit-bankruptcy-pension-deal-Kevyn-Orr. It is unknown whether the VEBAs will provide actual health insurance coverage or offer a subsidy to enable retirees to purchase their own coverage. In any event, it is expected that the current level of retiree health benefits will be significantly reduced under each VEBA. *Id.*

Under any scenario, Detroit retirees will be paying more in premiums, higher deductibles and co-payments, and receiving significantly less health coverage compared to their previous coverage. Guillen, *supra*. Detroit retirees will pay more for less coverage.

III. PENSION REDUCTIONS, DECREASED COST OF LIVING ADJUSTMENTS AND INCREASED HEALTH CARE COSTS MAY PUSH DETROIT CITY RETIREES BELOW THE POVERTY LINE.

Defined benefit pensions enable employees to plan for retirement with a high degree of certainty because ordinarily retirees know exactly how much money they will receive each month. Indeed, for the 30% of retired public employees who are not otherwise eligible for Social Security, like Detroit's police and firefighters, public pensions are frequently the sole source of retirement income. *See* Thomas

Margenau, Int'l Found. of Emp. Benefit Plans, *Social Security Offsets: Policies Public Employees Love to Hate and Don't Understand*, The Contributor 2, 5-6 (2007), *available at* http://www.nagdca.org/content.cfm/id/contributor32007 social_security_offsets_policies_public_employees_love_to_hate_and_dont_ understand.

A recent study found that the poverty rates among older households without defined benefit pension income were about nine times higher than those with such income.[9] Frank Porell & Diane Oakley, Nat'l Inst. On Ret. Sec., *The Pension Factor 2012: The Role of Pensions in Reducing Elder Economic Hardships* 1 (2012), *available at* http://www.nirsonline.org/index.php?option=com_content& task=view&id=713&Itemid=48. Older households with lifetime pension income are far less likely to experience food, shelter, and health care hardship, and are less reliant on public benefits. *Id*. at 1, 13-14, 20. Data also indicates that pensions are a factor in preventing middle class Americans from slipping into poverty during retirement. *Id*. at 15, 19-20. In fact, 4.7 million households avoided "poor" or "near poor" classifications in 2010 due to their pension incomes. *Id.* at 1, 19-21. Not counting Medicaid reimbursements, governments spent about 7.9 billion dollars

[9] In 2013, the poverty rate for an individual is $11,892. U.S. Census Bureau, *Preliminary Estimate of Weighted Average Poverty Thresholds for 2013* (2014), *available at* http://www.census.gov/hhes/www/poverty/data/threshld/index.html.

less on public benefits to older households because of their defined benefit pension income. *Id*. at 1, 15, 21.

With the proposed reductions to pension benefits and cost of living adjustments, many of Detroit's retired public workers will be unable to maintain their pre-retirement standards of living. Under the original plan, an estimated 20% of the City's pensioners are predicted to fall into poverty over the next 10-years as a result of the proposed benefits cuts. Khalil AlHajal, *Detroit Retirees Say Bankruptcy Plan Would Send 20 Percent of Pensioners into Poverty*, MLIVE (Feb. 21, 2014), http://www.mlive.com/news/detroit/index.ssf/2014/02/detroit_retirees_say_bankruptc.html. The proposed cuts to the City's pension obligations will occur in conjunction with the City's decision to slash spending on retiree health care benefits by approximately 85%. *Id.* A significant number of the City's retirees will inevitably fall into poverty and perhaps resort to public benefits as they are forced to cope with increased medical bills due to increased medical costs. *See* Alana Semuels, *Detroit Bankruptcy Plan Includes Deep Pension Cuts,* L.A. Times, Feb. 22, 2014, http://www.latimes.com/nation/la-na-detroit-bankruptcy-20140222,0,3941443.story#axzz30BsHWP4d. With the income and cost vectors moving in different directions, retirees will need to make difficult choices. *Id.* (Donald Smith receiving $850 monthly pension says that he "already ha[s] to make choices between food and medicine" before factoring in benefit reductions).

Indeed, more City of Detroit pensioners may be pushed below the poverty line every year a cost-of-living adjustment is delayed, potentially leading to more foreclosures, more blight, and a shift to the use of state and federal support systems to enable Detroit pensioners to make ends meet. The elimination or reduction of the cost of living adjustments along with the increases in health care costs creates a recipe for drastically reducing the standard of living of a median income retiree to an income that will hover above, and in many instances that will fall below, the poverty level.

Consequently, absent the promised pension benefits and cost of living adjustments from the Detroit Retirement Systems, it is clear that the chance of an affected individual falling into poverty greatly increases. No employee of the City of Detroit should have to suffer that fate when it is completely avoidable.

IV. THE REDUCTIONS IN PENSION AND HEALTH BENEFITS ARE HARMFUL TO THE CITY'S ECONOMY.

Obviously, the reductions to pension benefits will be devastating to the individuals affected as well as their families. Not to be underestimated, however, is the negative impact these reductions will have on the City of Detroit itself.

Reducing pension benefits will have a serious impact on the economy of the City of Detroit by damaging employment, reducing retail and other local spending, and lowering tax revenues. Clearly, these pension recipients will have less money to spend on local goods and services. The businesses that typically receive these dollars will have less to pay their owners and employees, purchase items to sell, and pay rent, taxes, and other normal costs of doing business. In turn, the suppliers of these businesses will have less revenue to pay their employees, suppliers and so forth. *Cf.* Ilana Boivie, Nat'l Inst. on Ret. Sec., *Pensionomics 2012: Measuring the Economic Impact of DB Pension Expenditures: Michigan* 2 (2012), *available at* http://www.nirsonline.org/storage/nirs/documents/factSheetsPreviews/Factsheet_MI.pdf (calculating that every dollar paid to a retiree in Michigan supported $1.58 of economic output); Ilana Boivie, Nat'l Inst. on Ret. Sec., *Pensionomics 2012: Measuring the Economic Impact of DB Pension Expenditures* 12-21 (2012), *available at* http://www.nirsonline.org/storage/nirs/documents/2012_pensionomics_report.pdf (demonstrating that benefits provided by state and local government pension plans have a sizable economic impact that ripples through every state); Gary Koenig & Al Myles, AARP Pub. Policy Inst., *Social Security's Impact on the National Economy* 1-2, 4-7 (2013), *available at* http://www.aarp.org/content/dam/aarp/research/public_policy_institute/econ_sec/2013/social-security-impact-national-economy-AARP-ppi-econ-sec.pdf (establishing that every dollar of Social Security benefits generates $2 of economic output).

Moreover, lower-income households (which would include those pension recipients receiving the average pension amount) tend to spend most of their benefits, meaning there will be less money circulating in the Detroit economy.

Koenig & Miles, *supra*, at 6; *see generally* Brent Snavely et al., *Retirees Brace for Pension Cuts in Wake of Detroit Bankruptcy Ruling*, Detroit Free Press, Dec. 3, 2013, http://www.freep.com/article/20131203/NEWS01/312030159/Detroit-pensions-Judge-Rhodes-Kevyn-Orr (intimating that some City retirees may need to file for bankruptcy). Finally, if retirees move out of the City of Detroit they will not be spending their monies in the local community so that there is no local multiplier effect at all. *See, e.g.*, Jeff Karoub, *Detroit Retirees Worry About Possible Pension Cuts*, Associated Press, Jul. 23, 2013, *available at* http://bigstory.ap.org/article/detroit-retirees-worry-about-possible-pension-cuts (suggesting that retirees may be forced to sell their homes in Detroit); Snavely, *supra* (implying that some City retirees may lose their homes).

Quite simply, the proposed pension and health benefit reductions will significantly diminish the positive multiplier effect of pension monies spent in the City of Detroit.

CONCLUSION

For the foregoing reasons, the bankruptcy court's decision that the City may impair, diminish or discharge pension obligations by means of a plan of adjustment in contravention of the Michigan Constitution should be reversed, and the case should be remanded for further proceedings consistent with this decision.

Dated: April 30, 2014

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

This brief complies with the type-volume limitation of Fed. R. App. P. 32(a)(7)(B) because the brief contains 3,621 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(a)(7)(B)(iii).

This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionately spaced typeface using Microsoft Word 2010 in 14-point font size in Times New Roman.

s/Mary Ellen Signorille
Mary Ellen Signorille

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2014, the foregoing Brief Amicus Curiae of AARP in Support of Appellants was electronically filed with the Court via the Court's appellate CM/ECF system, and a copy of the brief was served on all counsel of record by operation of the CM/ECF system on the same date.

s/Mary Ellen Signorille
Mary Ellen Signorille