

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

STEVE MARTINEZ,
TILLERY STAHR,
LISA NEIL,
SHANE TREADAWAY,
ALIX EMRICH,
JAMES JACOBY, and
KELSEY LUECKENHOFF,

Plaintiffs,

v.

No. D-202-CV-2024-03157

CITY OF ALBUQUERQUE,

Defendant.

**COMPLAINT FOR VIOLATIONS OF THE
WHISTLEBLOWER PROTECTION ACT**

Plaintiffs Steve Martinez, Tillery Stahr, Lisa Neil, Shane Treadaway, Alix Emrich, James Jacoby, and Kelsey Lueckenhoff (collectively “Plaintiffs”), by and through their attorneys, Huffman Wallace & Monagle, LLC (Jason T. Wallace, Shayne C. Huffman, Levi A. Monagle) for their Complaint for Violations of the New Mexico Whistleblower Protection Act state as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiffs each reside in Bernalillo County, New Mexico.
2. At all times material, Plaintiffs were employees of the Albuquerque Police Department (“APD”).
3. Defendant City of Albuquerque is a political subdivision of the State of New Mexico. APD is a department organized and operated by Defendant.
4. Defendant is a “public employer” as defined by the New Mexico Whistleblower Protection Act (“WPA”). NMSA 1978, § 10-16C-2(C)(2).

5. At all times material, Plaintiffs were “public employees” as defined by the WPA. NMSA 1978, § 10-16C-2(B).

6. The Court has jurisdiction over the parties and over the subject matter of this action pursuant NMSA 1978, Section 10-16C-4.

7. Venue in this judicial district is proper under NMSA 1978, Section 38-3-1(A).

Facts: Plaintiffs and Other APD Academy Personnel

8. The story of this case begins in August 2023 and centers around a series of events that took place at the Albuquerque Police Department Academy (hereinafter “the Academy”).

9. In August 2023, the current class of cadets at the Academy was Cadet Class 128.

10. Cadet Class 128 began training at the Academy on or about August 1, 2023.

11. Cadet Class 128 initially had over sixty (60) cadets.

12. In August 2023, Plaintiffs were APD employees assigned as training staff members at the Academy.

13. In August 2023, the Commander of the Academy was Joseph Viers.

14. In August 2023, the Lieutenant assigned to the Academy was Jennifer Chacon.

15. In August 2023, Plaintiff Steve Martinez was the Sergeant assigned to the Academy, and was responsible for supervising Plaintiffs Tillery Stahr, Lisa Neil, Shane Treadaway, Alix Emrich, James Jacoby, and Kelsey Lueckenhoff.

16. In August 2023, Plaintiffs Tillery Stahr, Lisa Neil, Shane Treadaway, Alix Emrich, James Jacoby, and Kelsey Lueckenhoff were instructors at the Academy and taught various courses to cadets at the Academy.

17. Plaintiffs Lisa Neil, Shane Treadaway, Alix Emrich, James Jacoby, and Kelsey Lueckenhoff were also each responsible for managing a team of approximately twelve (12) cadets.

18. The positions held by Plaintiffs were “tested positions,” meaning that each of the Plaintiffs had applied for the position, taken tests for the position, and been selected for the position based upon the results of those tests.

19. One of the cadets in Cadet Class 128 was a cadet named Joshua Vega (hereinafter “Cadet Vega”)

20. Cadet Vega is the son of APD Commander George Vega.

21. George Vega retired from APD as a Lieutenant in 2020, but was rehired by APD in 2022 at the rank of Commander.

Facts: Commander Viers Reinstates a Head-Shaving Policy in the Academy Handbook

22. On or shortly before August 1, 2023, Academy Commander Joseph Viers called a meeting of Academy training staff with most of the Plaintiffs present.

23. At this meeting, Commander Viers instructed the Academy training staff (including Plaintiffs) to reinstitute several “old school” policies from the Academy’s past, in the interest of building a better *esprit de corps* within the cadet class and across the department.

24. Commander Viers also told Plaintiff Steve Martinez, as the Sergeant for the training staff, that he wanted to reinstitute a more “military” style of training at the Academy.

25. One of the “old school” policies that Commander Viers instructed the Academy training staff (including Plaintiffs) to reinstitute was the requirement that male cadets razor-shave their heads before every “shift” – every day of instruction at the Academy.

26. Plaintiff Kelsey Lueckenhoff warned Commander Viers that the reinstatement of this policy could create “blowback” from the APD chain of command, and asked Commander Viers if he was sure he wanted to reinstitute this policy.

27. Commander Viers responded that he was sure that he wanted to reinstitute this policy.

28. As the training staff were departing this meeting, Plaintiff Steve Martinez asked Commander Viers directly whether he was sure he wanted to reinstitute this policy.

29. Commander Viers reaffirmed once again that he was sure he wanted to reinstitute this policy, and that he would “take the heat” if there were any objections from the APD chain of command.

30. At the order of Commander Viers, the policy that male cadets razor-shave their heads before every shift was officially re-incorporated in the APD Academy’s Cadet Handbook for Class 128.

31. The Academy’s Cadet Handbook for Class 128 (hereinafter “the Handbook”) also contained a provision prohibiting “Lying/Dishonesty.”

32. The Handbook classified “Lying/Dishonesty” as a “Class One Violation.”

33. The Handbook clearly stated that a “Class One Violation” such as “Lying/Dishonesty” must be reported to Internal Affairs for investigation.

34. The Handbook clearly stated that a “Class One Violation” such as “Lying/Dishonesty” could result in a cadet’s termination from the Academy.

35. A copy of the Handbook was distributed to every cadet from Cadet Class 128 at their Academy orientation.

36. Every cadet from Cadet Class 128 certified by signature that they had reviewed the Handbook and were familiar with its policies.

37. Plaintiff James Jacoby went through the Handbook page-by-page with Cadet Class 128 at their Academy orientation.

38. In the course of his page-by-page review of the Handbook with Cadet Class 128, Plaintiff James Jacoby specifically articulated APD's policy that male cadets must razor-shave their heads before every shift.

39. In the course of his page-by-page review of the Handbook with Cadet Class 128, Plaintiff James Jacoby specifically articulated APD's policy that male cadets must also razor-shave their faces before every shift.

40. In the course of his page-by-page review of the Handbook with Cadet Class 128, Plaintiff James Jacoby specifically articulated APD's policy that "Lying/Dishonesty" was a "Class One Violation" that could subject cadets to IA investigation and potential termination.

41. Cadet Vega was in attendance for the Cadet Class 128 orientation and Plaintiff James Jacoby's page-by-page review of the Handbook.

42. Cadet Vega certified by signature that he had reviewed the Handbook and was familiar with its policies.

Facts: Cadet Vega Violates APD's Policy Against Lying/Dishonesty

43. Sometime between August 1, 2023, and August 16, 2023, two male cadets from Cadet Class 128 were called out by Academy training staff for failing to razor-shave their faces before the shift.

44. These two male cadets immediately admitted that they had not razor-shaved their faces before the shift as APD policy required.

45. Academy training staff instituted corrective action by taking Cadet Class 128 to the gymnasium and having these two male cadets razor-shave their faces while the remainder of the class conducted physical training exercises (commonly referred to as a "smoke session").

46. These two male cadets suffered no other consequence or repercussion after this corrective action was complete.

47. On August 16, 2023, Plaintiff Tillery Stahr noticed during an inspection that Cadet Vega had not razor-shaved his head before the shift as APD policy required.

48. While Cadet Vega's hair was still short, it was clear to Plaintiff Tillery Stahr that he had not razor-shaved his head for multiple days.

49. Plaintiff Tillery Stahr confronted Cadet Vega with his failure to razor-shave his head before the shift as APD policy required.

50. Cadet Vega initially claimed that he had razor-shaved his head before the shift as APD policy required.

51. Plaintiff Tillery Stahr then asked two other cadets their opinions as to whether Cadet Vega had razor-shaved his head before the shift as APD policy required.

52. Both cadets indicated that they did not believe Cadet Vega had razor-shaved his head before the shift as APD policy required.

53. Plaintiff Tillery Stahr then asked Cadet Vega's cadet team leader (Cadet Khasani) to come up with a plan of action to address Cadet Vega's Handbook violation.

54. Cadet Khasani recommended a "smoke session" – a physical training session for the remainder of the class while Cadet Vega's violation was addressed and corrective action instituted.

55. Following a short meeting as to how to proceed, Plaintiffs called Cadet Class 128 into the gymnasium.

56. Plaintiffs Tillery Stahr and Lisa Neil questioned Cadet Vega about his Handbook violation in front of the gym while the remainder of the class performed physical training.

57. Initially, Cadet Vega maintained that he had razor-shaved his head before the current shift as APD policy required.

58. This struck Plaintiffs as impossible, based on the length of Cadet Vega's hair.

59. In an effort to resolve the situation, Plaintiffs brought Cadet Vega a razor and shaving cream, had another cadet hold a mirror for him, and directed Cadet Vega to demonstrate how he had razor-shaved his head.

60. It quickly became clear to Plaintiffs that Cadet Vega did not know how to razor-shave his head.

61. Once it became clear to Plaintiffs that Cadet Vega did not know how to razor-shave his head, Plaintiffs sent Cadet Vega to the locker room with another cadet and instructed this the cadet to show Cadet Vega how to razor-shave his head.

62. When Cadet Vega returned from locker room with his head properly razor-shaven, Plaintiff Tillery Stahr questioned Cadet Vega whether he had really razor-shaved his head before the shift as APD policy required.

63. At this point, Cadet Vega admitted that he had not razor-shaved his head before the shift as APD policy required.

64. At this point, Cadet Vega also admitted that he had been dishonest about his failure to razor-shave his head before the shift as APD policy required.

65. Upon hearing this admission from Cadet Vega, Plaintiffs dismissed Cadet Vega and the rest of Cadet Class 128.

Facts: Plaintiffs Report Cadet Vega's Policy Violation and Cadet Vega is Terminated

66. Plaintiffs knew they had witnessed Cadet Vega openly admit a Class One Violation as to "Lying/Dishonesty" in front of the entire cadet class.

67. “Failure to report a Class One Violation” is itself a Class One Violation in the Handbook.

68. Pursuant to APD policy, Plaintiffs were each obligated to report this Class One Violation up the chain of command through their respective supervisors.

69. Plaintiffs Tillery Stahr, Lisa Neil, Shane Treadaway, Alix Emrich, James Jacoby, and Kelsey Lueckenhoff gathered and reported to their Sergeant (Steve Martinez) that they had witnessed Cadet Vega openly admit a Class One Violation as to “Lying/Dishonesty” in front of the entire cadet class.

70. Plaintiff Steve Martinez then reported Cadet Vega’s Class One Violation as to “Lying/Dishonesty” to his own supervisor, Lieutenant Jennifer Chacon.

71. Upon information and belief, Lieutenant Jennifer Chacon then reported Cadet Vega’s Class One Violation as to “Lying/Dishonesty” to her own supervisor, Commander Joseph Viers.

72. Upon information and belief, Commander Viers then reported Cadet Vega’s Class One Violation as to “Lying/Dishonesty” to APD Internal Affairs, as APD policy required.

73. Investigators from APD Internal Affairs were dispatched to the Academy and began their investigation on the afternoon of Wednesday, August 16, 2023.

74. APD’s Internal Affairs investigators concluded their investigation on Thursday, August 17, 2023.

75. APD’s Internal Affairs investigators determined on August 17, 2023, that Cadet Vega had indeed committed a Class One Violation as to “Lying/Dishonesty.”

76. APD’s Internal Affairs investigators reported their determination to Commander Viers on August 17, 2023.

77. On August 17, 2023, Commander Viers made the decision to terminate Cadet Vega from the Academy.

78. Prior to informing Cadet Vega of his decision, Commander Viers conferred with Deputy Chief Michael Smathers about the decision.

79. In the course of this conversation, Deputy Chief Smathers repeatedly asked Commander Viers “are you sure you want to do this?”

80. Commander Viers told Deputy Chief Smathers that he had little choice but to terminate Cadet Vega, and that he would lose credibility if he did not.

81. Commander Viers then called Cadet Vega to his office, where he personally informed Cadet Vega that he was being terminated from the Academy.

82. Plaintiff Steve Martinez was present for this meeting where Commander Viers terminated Cadet Vega.

83. Cadet Vega did not protest his termination to Commander Viers in this meeting.

84. Following this meeting, Plaintiff Steve Martinez specifically asked Commander Viers if he knew that Cadet Vega was the son of Commander George Vega.

85. Commander Viers indicated that he did know who Cadet Vega’s father was, but that he knew Commander Vega and Commander Vega would understand his decision.

Facts: Cadet Vega is Reinstated and Plaintiffs Suffer Retaliation

86. Upon information and belief, Commander Viers had a phone call with Commander George Vega on the evening of Thursday, August 17, 2023.

87. On the morning of Friday, August 18, 2023, Cadet Vega had a meeting with Commander Viers, APD Deputy Chief Smathers, and APD HR Director Karmela Ortiz.

88. This meeting took place in Commander Viers' office at the Academy and lasted for more than an hour.

89. On Friday, August 18, 2023 – immediately following this meeting with Deputy Chief Smathers – Commander Viers reversed his decision to terminate Cadet Vega and Cadet Vega was reinstated to Cadet Class 128.

90. On Friday, August 18, 2023 – shortly after Cadet Vega's reinstatement to Cadet Class 128 – Plaintiffs were ordered to report to the downtown office of APD Internal Affairs.

91. Upon reporting to the downtown office of APD Internal Affairs on the afternoon of August , Plaintiffs were informed that they were being removed from their tested positions at the Academy.

92. Plaintiffs were then ordered to report to various assignments within the Field Services Bureau.

93. Plaintiffs were given no explanation for their removal from the Academy.

94. Plaintiffs were given no explanation for their reassignment to Field Services.

95. The removal of APD officers from tested positions without explanation, notice, or opportunity to be heard is highly unusual and a violation of the APD collective bargaining agreement.

96. Plaintiffs logically deduced that they had been removed from the Academy due to their reporting of Cadet Vega's Class One Violation for "Lying/Dishonesty."

97. Plaintiffs logically deduced that Commander George Vega had intervened with the APD chain of command and/or Commander Viers on behalf of his son Joshua Vega.

98. A decision to formally terminate a cadet from the Academy had never before been reversed in less than 24 hours.

99. The child of an APD Commander had never before been terminated from the APD Academy.

Facts: Plaintiffs Report the Nepotistic Reinstatement of Cadet Vega to Chief Medina

100. On August 24, 2023, Plaintiffs sent a letter to APD Chief of Police Harold Medina.

101. This letter was signed by all seven Plaintiffs.

102. This letter was sent to Chief Medina through APOA union representative Shaun Willoughby.

103. A copy of Plaintiffs' letter to Chief Medina is attached as Exhibit 1 to this Complaint.

104. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that they were writing "to inform [Chief Medina] of nepotism constituting an abuse of authority at the APD Academy."

105. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that they had "witnessed and provided information regarding serious violations of the Academy Handbook by a cadet named Joshua Vega."

106. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that "Cadet Vega's initial violations of the Handbook related to APD-approved grooming standards, which all cadets are expected to follow without exception."

107. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that "subsequently, and more importantly, Cadet Vega was dishonest with us about the reasons for his initial violations, and subsequently confirmed his dishonesty upon questioning."

108. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “Lying/Dishonesty constitutes a Class One Violation under the Academy Handbook, requiring investigation by IAPS.”

109. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “upon the confirmation of these violations by Internal Affairs, Academy Commander Joe Viers made the decision to terminate Cadet Vega from the Academy.”

110. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “Cadet Vega was terminated on August 17, 2023.”

111. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “on August 18, 2023, Cadet Vega was reinstated to the Academy.”

112. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “we believe this reinstatement was effectuated by the direct intervention of [Cadet Vega’s] father, Commander George Vega.”

113. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “the direct intervention of Commander Vega in his son’s departmental disciplinary affairs is completely inappropriate, nepotistic, and constitutes an abuse of authority under New Mexico law.”

114. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “each of us is familiar with numerous examples of cadets being disciplined or terminated for similar violations of the Handbook without issue; the only difference is that none of those cadets were the sons or daughters of an APD commander.”

115. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “in response to our efforts to uphold the Handbook and the high standards of honesty and integrity that it

mandates, we have been informed that the Department intends to remove us from the Academy and reassign us to the Field Services Bureau.”

116. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “if this happens, we believe it will be in retaliation for providing information regarding Cadet Vega’s violations in the context of a formal IAPS investigation.”

117. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “the mass reassignment of the undersigned officers – the entire Academy training team – would eliminate the ‘Specialized Law Enforcement Instructors’ necessary to train cadets in ‘high-risk’ and ‘technical’ subjects specified under state law.”

118. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “the training of cadet classes by ‘Specialized Law Enforcement Instructors’ is required under the New Mexico Administrative Code, and attempting to train a cadet class without certified ‘Specialized Law Enforcement Instructors’ would risk compromising the education (and eventual certification) of the entire cadet class.”

119. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “this course of action would not only create tremendous hardship for the cadets themselves, it would constitute gross mismanagement and a serious waste of public funds.”

120. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “we have acted to report ethical violations and to protect the public interest in ethically trained law enforcement officers, and we should not suffer retaliation for doing so.”

121. In their August 24, 2023 letter to Chief Medina, Plaintiffs stated that “we respectfully request your intervention in this matter, and ask that this proposed punitive mass-reassignment be rescinded immediately.”

122. Plaintiffs received no response to their August 24, 2023 letter.

Facts: APD Investigates Plaintiffs for Hazing

123. On September 25, 2023, Plaintiffs each received a letter from Chief Medina notifying them that “an investigation will be conducted – through a third party – regarding alleged inappropriate conduct, to possibly include hazing, towards a cadet.”

124. Plaintiffs were each informed through these letters that they were a target of this investigation.

125. APD subsequently conducted this investigation through an Albuquerque attorney named Jean Bannon.

126. Ms. Bannon commenced her third-party investigation in September 2023.

127. Ms. Bannon concluded her third-party investigation in December 2023.

128. Ms. Bannon conveyed the results of her third-party investigation to Defendant City of Albuquerque in December 2023.

129. To date, no Plaintiff has been informed of the results of Ms. Bannon’s third-party investigation.

130. The City has refused to provide Plaintiffs with a copy of the report generated by Ms. Bannon’s third-party investigation.

131. Upon information and belief, Ms. Bannon’s third-party investigation found that no Plaintiff had engaged in “hazing” of any kind.

132. The results of Ms. Bannon’s third-party investigation into Plaintiffs’ allegations of nepotism involving Commander George Vega are unknown to anyone but the City.

133. On January 17, 2024, all seven Plaintiffs were sent letters issuing them “verbal reprimands” for unspecified violations of City policy.

134. On January 22, 2024, APD ordered Plaintiffs Lisa Neil and Shane Treadaway to return to the Academy.

135. APD subsequently ordered Plaintiff Steve Martinez to return to the Academy.

COUNT I – VIOLATIONS OF THE NEW MEXICO WHISTLEBLOWER PROTECTION ACT

136. Plaintiffs incorporate all the foregoing paragraphs as though fully set forth herein.

137. Through their communications to their supervisors regarding their belief that Cadet Vega had committed a Class One Violation related to “Lying/Dishonesty,” Plaintiffs communicated to Defendant and/or its officers information that Plaintiffs believed in good faith constituted an unlawful or improper act.

138. As a result of Plaintiffs’ initial protected communications, Defendant took retaliatory action against all Plaintiffs by abruptly removing them from their tested positions at the Academy without explanation or hearing (in violation of their rights under the APD collective bargaining agreement).

139. Through their communications to Chief Medina in their letter of August 24, 2023 (as specifically detailed at ¶¶ 100-116 of this Complaint), Plaintiffs communicated to Defendant and/or its officers information that Plaintiffs believed in good faith constituted an unlawful or improper act.

140. As a result of Plaintiffs’ protected communications to Chief Medina on August 24, 2023, Defendant took retaliatory action against all Plaintiffs by subjecting them to a groundless, pretextual, and disparaging investigation for “hazing.”

141. As the proximate and direct result of Defendant's retaliatory actions, Plaintiffs have suffered and continue to suffer damages, including but not limited to lost wages, emotional distress, and reputational harm.

WHEREFORE, Plaintiffs respectfully requests that the Court award them compensatory and special damages, emotional distress damages, reputational damages, statutory damages (including actual damages such as lost wages, as well as the "double back pay" required by the Whistleblower Protection Act), reasonable attorney fees, litigation costs, pre- and post-judgment interest as provided by law, and any further relief the Court deems just and proper.

Respectfully Submitted,

Huffman Wallace & Monagle, LLC

/s/ Levi A. Monagle 04/17/24

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Chief Medina:

We are writing to inform you of nepotism constituting an abuse of authority at the APD Academy.

On August 16, 2023, the undersigned members of the APD Academy team witnessed and provided information regarding serious violations of the Academy Handbook by a cadet named Joshua Vega. Cadet Vega is the son of APD Commander George Vega.

Cadet Vega's initial violations of the Handbook related to APD-approved grooming standards, which all cadets are expected to follow without exception. Subsequently, and more importantly, Cadet Vega was dishonest with us about the reasons for his initial violations, and subsequently confirmed his dishonesty upon questioning. "Lying/dishonesty" constitutes a "Class One Violation" under the Academy Handbook, requiring investigation by IAPS. As such, we reported these violations to IAPS, and IAPS investigated them. Upon the confirmation of these violations by Internal Affairs, Academy Commander Joe Viers made the decision to terminate Cadet Vega from the Academy. Cadet Vega was terminated on August 17, 2023.

On August 18, 2023, Cadet Vega was reinstated to the Academy. We believe this reinstatement was effectuated by the direct intervention of his father, Commander George Vega. The direct intervention of Commander Vega in his son's departmental disciplinary affairs is completely inappropriate, nepotistic, and constitutes an abuse of authority under New Mexico law. Each of us is familiar with numerous examples of cadets being disciplined or terminated for similar violations of the Handbook without issue; the only difference is that none of those cadets were the sons or daughters of an APD commander.

Now, in response to our efforts to uphold the Handbook and the high standards of honesty and integrity that it mandates, we have been informed that the Department intends to remove us from the Academy and reassign us to the Field Services Bureau. If this happens, we believe it will be in retaliation for providing information regarding Cadet Vega's violations in the context of a formal IAPS investigation.

To make matters worse, the mass reassignment of the undersigned officers – the entire Academy training team – would eliminate the certified "Specialized Law Enforcement Instructors" necessary to train cadets in "high-risk" and "technical" subject areas specified under state law, including use of force, crowd control, emergency vehicle operations, unarmed self-defense, firearms, accident investigation, child abuse, electronic surveillance, crisis intervention, crime prevention, homicide investigation, and search and seizure law. The training of cadet classes by "Specialized Law Enforcement Instructors" is required under the New Mexico Administrative Code, and attempting to train a cadet class without certified "Specialized Law Enforcement Instructors" would risk compromising the education (and eventual certification) of the entire cadet class. This course of action would not only create tremendous hardship for the cadets themselves, it would constitute gross mismanagement and a serious waste of public funds.





We have done nothing wrong. We have acted to report ethical violations and to protect the public interest in ethically trained law enforcement officers, and we should not suffer retaliation for doing so. We respectfully request your intervention in this matter, and ask that this proposed punitive mass-reassignment be rescinded immediately.

Thank you.


Sincerely,

 Lisa Neil


 Alix Emrich (Mayfield)

 Tillery DiCenzo

 SHANE TREADAWAY

 JAMES JACOBY

 Kelsey Luckenhoff

 Steve Martinez