

Date of Hearing: July 2, 2025

ASSEMBLY COMMITTEE ON EDUCATION

Al Muratsuchi, Chair

SB 848 (Pérez) – As Amended May 23, 2025

[Note: This bill was double referred to the Assembly Public Safety Committee and will be heard by that Committee as it relates to issues under its jurisdiction.]

SENATE VOTE: 38-0

SUBJECT: Pupil safety: school employee misconduct: child abuse prevention

SUMMARY: Establishes new requirements to improve pupil safety by addressing school employee misconduct, clarifying professional boundaries, enhancing comprehensive school safety plans, expanding child abuse prevention training requirements, requiring instructional programming on abuse prevention, and creating a statewide system for tracking employee misconduct investigations. Also expands the definition and reporting responsibilities of mandated reporters. Specifically, **this bill:**

- 1) Requires all schools operated by school districts, charters, private schools, county offices of education (COE), and state special schools to adopt written policies on appropriate interactions and professional boundaries between school employees, volunteers, contractors, and pupils by July 1, 2026. Policies must clearly prohibit inappropriate electronic and social media communications during, or outside of the schoolday.
- 2) Expands comprehensive school safety plans to include procedures for supervision to prevent child abuse and requires training for employees and volunteers on these protocols.
- 3) Makes pupil instruction on sexual abuse and assault prevention mandatory beginning July 2027, covering recognition of inappropriate behaviors, reporting mechanisms, and accessing support services.
- 4) Broadens the definition of mandated reporters to explicitly include specified school volunteers, governing board members, and private school employees. Requires annual mandated reporter training covering child abuse reporting, grooming behavior identification, and maintaining professional boundaries.
- 5) Requires enhanced employment screening for certificated and classified employees, requiring LEAs to inquire specifically about prior credible allegations or substantiated misconduct investigations during hiring.
- 6) Establishes a statewide data system managed by the Commission on Teacher Credentialing (CTC) by July 1, 2027, tracking substantiated investigations of employee misconduct accessible to all LEAs for employment screening, subject to an appropriation for this purpose.
- 7) Prohibits LEAs from entering agreements or practices designed to conceal or remove credible allegations of employee misconduct from personnel records.

EXISTING LAW:

- 1) Requires local educational agencies (LEAs) to adopt and annually review comprehensive school safety plans addressing crime, violence prevention, crisis response, and safe pupil conduct. (Education Code (EC) 32280-32289)
- 2) Prohibits LEAs from entering into agreements that suppress mandatory reporting of egregious misconduct by school employees, including sexual misconduct. (EC 44939.5)
- 3) Defines specific offenses as “sex offenses” triggering mandatory reporting and disciplinary action, including suspension and revocation of teaching credentials. (EC 44010)
- 4) Prohibits employment of individuals convicted of sex offenses, requiring LEAs to conduct background checks through fingerprinting and criminal history records. (EC 44237, 45125)
- 5) Establishes procedures for LEAs to dismiss certificated employees for immoral conduct, unprofessional conduct, or crimes involving moral turpitude. (EC 44932, 44933)
- 6) Requires LEAs to maintain personnel records, including documentation of complaints, investigations, and discipline involving misconduct allegations. (EC 44031)
- 7) Defines mandated reporters as individuals whose professions involve regular contact with minors, including teachers, administrators, classified employees, and school district police officers. (Penal Code (PEN) 11165.7)
- 8) Requires mandated reporters to immediately report suspected child abuse or neglect to appropriate authorities and follow up with a written report within 36 hours. (PEN 11165.9, 11166)
- 9) Requires annual training for mandated reporters working in LEAs on recognizing and reporting child abuse and neglect. (EC 44691)
- 10) Permits LEAs to offer instruction on sexual abuse and sexual assault prevention, including information on available resources for victims and methods of reporting such incidents. (EC 51950)
- 11) Requires comprehensive sexual health education provided to pupils to include instruction on sexual harassment, sexual assault, adolescent relationship abuse, and human trafficking prevention. (EC 51930-51939)
- 12) Establishes that adults who contact or communicate with minors with the intent to commit specified sexual offenses face criminal penalties. (PEN 288.3)
- 13) Sets forth requirements regarding acceptable use policies for school district technology to restrict inappropriate communication between staff and students. (EC 51871.5)
- 14) Eliminates the statute of limitations for civil actions related to childhood sexual assault occurring on or after January 1, 2024, and previously extended the limitations period for claims occurring before 2024 to 22 years after the victim reaches majority age (Code of Civil Procedures 340.1 and 1002).

- 15) Exempts, permanently childhood sexual assault claims from the Government Tort Claims Act's presentation requirement, allowing claims to go directly to litigation without prior administrative claims filing. (Government Code (GOV) 905, 935)
- 16) Allows courts to order public agencies facing judgments causing unreasonable financial hardship to pay those judgments in annual installments over a maximum of 10 years. (GOV 970.6)
- 17) Requires the CTC to suspend or revoke credentials of school employees for specified misconduct, including sexual misconduct involving pupils. (EC 44421, 44425, 44426)
- 18) Requires LEAs to provide public access to reports of findings from investigations of employee misconduct resulting in discipline. (EC 44932, 45113)
- 19) Defines egregious misconduct as immoral conduct that is the basis for an offense related to sex offenses; child abuse and neglect offenses; and controlled substance offenses, as specified. (EC 44932)
- 20) Requires the governing board of any school district to require each person to be employed in a position not requiring certification qualifications, to be fingerprinted and to receive results from the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI). (E45125)
- 21) Requires a school district, COE, or charter school that has made a report of an employee's egregious misconduct to the CTC to disclose this fact to a school district, COE, or charter school considering an application for employment from the employee, upon inquiry. (EC 44939.5)
- 22) Establishes jurisdiction for the Committee on Credentials (COC) to have jurisdiction to commence an initial review upon receipt of any of the following, among others:
 - a) A statement from an employer notifying the CTC that, as a result of an allegation of misconduct, or while an allegation of misconduct is pending, a credentialholder has been dismissed, nonreelected, suspended for more than 10 days, or placed pursuant to a final adverse employment action on unpaid administrative leave for more than 10 days, or has resigned or otherwise left employment; and
 - i) The employer shall provide the notice described in subparagraph (A) to the CTC not later than 30 days after the dismissal, nonreelection, suspension, placement on unpaid administrative leave, resignation, or departure from employment of the employee.
 - b) A notice from an employer that a complaint was filed with the school district alleging sexual misconduct by a credentialholder. Results of an investigation by the COC shall not be considered for action by the committee unless there is evidence presented to the COC in the form of a written or oral declaration under penalty of perjury that confirms the personal knowledge of the declarant regarding the acts alleged to constitute misconduct. (EC 44242.5)
- 23) Requires the superintendent of an employing school district to report a change in employment status to the CTC not later than 30 days after the final employment action

whenever a credential holder, working in a position requiring a credential, as a result of an allegation of misconduct or while an allegation of misconduct is pending:

- a) Is dismissed or non-reelected;
- b) Resigns;
- c) Is suspended or placed on unpaid administrative leave as a final adverse employment action for more than 10 days;
- d) Retires;
- e) Is otherwise terminated by a decision not to employ or re-employ; or is
- f) “Otherwise terminated by a decision not to employ or re-employ.”

FISCAL EFFECT:

According to the Senate Appropriations Committee:

- While the development of the statewide tracking system would be contingent upon an appropriation, the CTC estimates that this bill could result in General Fund costs of \$621,000 in the first year and \$613,000 thereafter. Specifically, the CTC indicates it would need 2.0 Information Technology Specialist positions to develop, implement, and maintain the employee database and 2.0 additional positions to provide guidance and technical support, and respond to inquiries from schools.
- By requiring LEAs to add new procedures to their school safety plans, this bill could result in a reimbursable state mandate. The extent of these costs is unknown, but based on the existing Comprehensive School Safety Plan I and II mandates, the Proposition 98 General Fund costs could be in the tens of thousands of dollars each year. A precise amount would ultimately depend on the scope of the activities that LEAs would need to comply.
- The bill’s requirements for LEAs to have enhanced employment screening for certificated and classified employees and provide annual training to mandated reporters on child abuse reporting, grooming behavior identification, and maintaining professional boundaries are likely to be deemed reimbursable state mandated activities. The extent of the costs is unknown, but could be in the hundreds of thousands to low millions of dollars each year. (Proposition 98 General Fund)
- There could be unknown, potentially significant costs (local funds, General Fund) to counties by expanding the class of individuals who are mandated reporters and are legally obligated to report specified conduct. Subdivision (c) of Penal Code section 11166 makes failing to report a misdemeanor punishable by up to six months confinement in a county jail, a \$1,000 fine, or by both. The average annual cost to incarcerate one person in county jail is approximately \$77,252 per year. Actual incarceration costs to counties will depend on the number of convictions and the length of each sentence. Although county incarceration costs are generally not considered reimbursable state mandates pursuant to Proposition 30 (2012), overcrowding in county jails creates cost pressure on the General Fund because the state has

historically granted new funding to counties to offset overcrowding resulting from 2011 public safety realignment.

- There could be unknown, potentially significant cost pressures (local funds, General Fund) to county probation departments if individuals convicted of offenses under this bill are supervised locally in the community in lieu of or in addition to incarceration. To the extent this bill leads to supervision of individuals who otherwise would not have been charged with a crime, this bill would create workload and costs pressures for probation departments, namely ensuring the defendant attends the required court ordered counseling. Annual supervision costs could range from approximately \$4,000 to \$15,000 per person. Actual costs would depend on the cost of supervision by each county probation department and how many individuals are granted probation. General Fund costs will depend on whether the duties imposed on county probation departments by this bill are considered a state reimbursable mandate by the Commission on State Mandates. In addition, these costs may be paid by the state pursuant to Proposition 30 (2012). Proposition 30 provides that legislation enacted after September 30, 2012, that has an overall effect of increasing the costs already borne by a local agency for programs or levels of service mandated by realignment applies to local agencies only to the extent the state provides annual funding for the cost increase.
- To the extent that the bill's provisions lead to a reduction in claims of sexual misconduct in schools, it could lead to long-term savings for school districts by reducing the financial liabilities that could result from these cases.

COMMENTS:

Need for the bill. According to the author, “More than 75% of states have enacted laws to prevent educator sexual misconduct. California has taken significant steps in this area by implementing policy changes to safeguard both students and employees, and enhance transparency. However, several high profile cases continue to highlight systemic failures and underscore the urgent need for stronger preventive measures and mandates to protect children.

A series of articles published in 2023 and 2024, an investigative reporter uncovered a 40-year history of sexual misconduct at a single California high school, where dozens of educators engaged in behavior ranging from inappropriate comments to sexual relationships with students. This is not an isolated incident. According to the Fiscal Crisis and Management Assistance Team (FCMAT), a 2023 report found that claims originated in 48 of 58 California's counties with the majority of offences (50%) occurred in classrooms, with 68% taking place during general education, 14% in athletics, and 6% in before- or after-school programs. While severe forms of sexual misconduct account for less than 1%, according to a 2022 survey reflecting national trends, this still translates to hundreds of thousands of cases, exposing systemic deficiencies that contribute to educator sexual misconduct.

SB 848 implements stronger preventative measures, as recommended by FCMAT, to fully protect children by establishing professional boundaries, improving work history verification, and creating an electronic database of school employee misconduct. It also mandates comprehensive training, requires abuse awareness education for students, and ensures reporting of egregious misconduct, amongst other mandates.”

Legislative history and the Fiscal Crisis and Management Assistance Team (FCMAT) AB 218 report. Recent legislative changes have significantly reshaped California’s legal landscape around childhood sexual assault claims, profoundly affecting schools and public agencies. Assembly Bill 218 (Gonzalez) Chapter 861, Statutes of 2019, dramatically increased liability exposure for schools by extending and, in many cases, reviving expired statutes of limitation for childhood sexual assault claims against educational agencies. Subsequently, AB 452 (Addis) Chapter 655, Statutes of 2023, permanently eliminated these statutes of limitation for claims arising after January 1, 2024. In response to concerns about substantial fiscal impacts on public agencies—estimated by FCMAT to be between \$2–\$3 billion for California schools alone—the Legislature enacted SB 153 (Committee on Budget and Fiscal Review, Chapter 38 Statutes of 2024), mandating FCMAT to analyze the financial implications and provide recommendations to strengthen prevention, accountability, and fiscal management related to childhood sexual assault in public entities.

The resulting FCMAT AB 218 report underscores the urgent need for enhanced statewide measures, including clearer boundary policies, mandated comprehensive training, improved oversight, and more rigorous employment screening practices, all aimed explicitly at preventing misconduct and mitigating substantial legal and financial risks to California’s educational institutions. This bill directly aligns with and implements these critical recommendations, offering a comprehensive legislative response to the concerns and gaps highlighted by FCMAT.

Persistent risks of adult-to-student misconduct and the need for clear boundaries. Despite existing mandated reporting laws and criminal penalties, adult-to-student misconduct remains alarmingly prevalent in schools. Research indicates approximately 10% of students in grades 8–11 experience sexual misconduct by educators. Of these cases, roughly 70% involved grooming, where offenders manipulate students gradually through inappropriate boundary crossing, especially through electronic communication (Shakeshaft, 2018). This bill directly addresses these risks by requiring explicit, written professional boundary policies in all LEAs, significantly reducing ambiguity about acceptable adult behaviors toward students.

Effectiveness of mandated reporter training in reducing abuse and increasing reporting. Effective mandated reporter training significantly improves identification and timely reporting of abuse. According to data from the U.S. Department of Health and Human Services, comprehensive mandated reporter training leads to a significant increase in reporting accuracy and frequency, thus enhancing child protection outcomes. Nonetheless, the U.S. Government Accountability Office (GAO) reports ongoing challenges, including inconsistent training quality and clarity around reporting responsibilities. This bill addresses these gaps explicitly, expanding mandated reporting responsibilities to volunteers, governing board members, and private school employees, while requiring detailed annual training to improve accuracy and consistency of abuse reporting.

The necessity of a centralized statewide misconduct database. Currently, fragmented recordkeeping and inconsistent reporting practices allow individuals with substantiated misconduct histories to move between school employers, particularly in noncertificated positions, without detection. The FCMAT report identified this lack of a coordinated, statewide system as a major vulnerability in pupil protection efforts.

Fiscal impact of preventing versus responding to abuse cases. Beyond human costs, ineffective abuse prevention measures impose severe financial consequences on educational agencies.

According to the recent FCMAT AB 218 report, California's public schools face a liability exposure estimated between \$2 to \$3 billion due to historical claims of sexual misconduct, highlighting the unsustainable financial implications of inadequate prevention and reporting structures. This bill's proactive measures, such as clear boundary policies, robust training, and mandatory abuse prevention instruction, represent cost-effective strategies that substantially reduce liability risks and mitigate potential fiscal impacts on LEAs.

Explicit digital communication policies as an essential protection. Digital platforms have become prominent venues for grooming and exploitation. According to a recent national report, over 60% of online exploitation cases involving minors included initial contact through social media or other digital channels (National Center for Missing & Exploited Children). California's current statutes inadequately address specific digital communication platforms, complicating prosecution efforts. This bill explicitly expands criminal penalties related to inappropriate electronic communications, clearly defining digital interactions via social networking platforms as criminal misconduct, strengthening law enforcement capabilities to prosecute these offenses effectively.

What does this bill do with regard to non-certificated employees? This bill creates a database for school employers to access and track non-certificated employees who have had substantiated investigations of egregious misconduct with children. Currently, when a school employer hires a classified employee, they obtain fingerprints, arrest, and conviction records from the DOJ and the FBI, however, they do not have information regarding whether the employee has been investigated at a previous school employer for egregious misconduct with children that did **not** result in an arrest or conviction.

If a teacher (certificated employee) is investigated for egregious misconduct and leaves employment for any reason, the public school employer is required to notify the CTC and the CTC completes an investigation and can take action on the teacher's credential. Because a statewide entity investigates and potentially takes action against a teacher's credential, it is not possible for a teacher to have substantiated investigations of egregious misconduct with children that did **not** result in an arrest or conviction to work for another school employer.

This statewide process protects children. A system such as this does **not** exist for non-certificated employees, and therefore, a classified employee could be hired by a school employer without the employer knowing this important history. Because of this, a person who has had a substantiated investigation for egregious misconduct could quit their current job and go work for another school employer without the employer knowing this information, potentially putting children at risk.

Private schools and school management groups have expressed concerns about school liability when an employee is listed in the state database for substantiated misconduct. ***The author may wish to consider*** addressing these concerns in future amendments.

What is egregious misconduct? Existing law prohibits school districts, COEs, and charter schools from expunging complaints or entering into an agreement that would authorize expunging complaints of egregious misconduct from a personnel file. Egregious misconduct is conduct that is the basis for an offense of specified sex offenses; controlled substance offenses; and, child abuse and neglect offenses.

AB 215 (Buchanan), Chapter 55, Statutes of 2014, established the definition of egregious misconduct and the prohibition on expunging these records, in response to the fact that some school districts historically had collective bargaining agreements that contained language requiring the removal of all complaints from an employee's personnel file, regardless of the nature, after a specified amount of time.

School districts must report teacher employment changes due to allegations of misconduct to the state. Under current law, the superintendent of an employing school district must report a change in employment status of any teacher to the CTC no later than 30 days after the final employment action whenever a credential holder, working in a position requiring a credential, as a result of an allegation of misconduct or while an allegation of misconduct is pending, is dismissed, resigns, is suspended or placed on administrative leave, retires, or is otherwise terminated. Among the information that must be reported for these individuals is an explanation of the allegation of misconduct, contact information for all persons who may have information relating to the alleged misconduct, and all documentation related to the case.

School safety plans as a key component of school safety. Comprehensive school safety plans are a key component of school safety and are required by state law. Safety plans are a collection of procedures for schools to use in the event of an emergency, as well as policies to promote a safe learning environment. Each school district and COE is responsible for the overall development of all safety plans for its schools that operate kindergarten or any grades 1 through 12. A charter school's petition is required to include the development of a school safety plan which largely mirrors the requirements for the school district and COE plans. The comprehensive school safety plan is developed by the schoolsite council or a safety. This bill would add a requirement that the safety plans include procedures designed to address the supervision and protection of children from child abuse and sex offenses.

Arguments in support. The Riverside County Superintendent of Schools states, "In large part, the provisions in SB 848 are based on recommendations made in a recent report by the Fiscal Crisis Management and Assistance Team (FCMAT) – *Childhood Sexual Assault: Fiscal Implications for Public Agencies*. Released in January 2025, the report delivered a concise, clear picture of the fiscal impact resulting from changes in the statute of limitations and assignment of liability for childhood sexual assault claims through various laws enacted in recent years. Just as importantly, the FCMAT report included a number of recommendations designed to prevent childhood sexual assault from occurring at schools.

In particular, there is one provision in the bill that we strongly support and is reflected in Section 7. Unlike teaching (certificated) positions, there is no current statewide employment database to track the employment history for classified employees. School employers, despite best efforts to conduct thorough background checks, sometimes lack important information if the applicants do not disclose their full employment history or prior investigations for egregious misconduct. SB 848 takes a number of steps to address those gaps, including requiring all applicants for a classified position to disclose any prior local educational agency (LEA) or private school-based employment; and establishing a statewide database to collect classified position employment data prospectively, including the position held and dates, which would be accessible to hiring LEAs. Most importantly, the database would include any substantiated reports resulting from egregious misconduct (as defined in Education Code Section 44932) at prior schools where the individual was employed. Egregious misconduct includes the most serious sex, drug, or abuse-related offenses involving a minor."

Recommended Committee Amendments. *Staff recommends the bill be amended as follows:*

- 1) Authorize, instead of require instruction to pupils on prevention of abuse, including sexual abuse and assault, and delete the reference that the instruction be in person.
- 2) Establish jurisdiction for the CTC to investigate credential holders included in the database.
- 3) Clarify that private schools shall report all employees under investigation for egregious misconduct to the statewide database.
- 4) Require contractors who have contact with pupils at a state special school to be a mandated reporter.
- 5) Require an LEA or private school to report to the CTC if a previously substantiated report is later determined by its governing board or body or by a third party to be unfounded or inconclusive, the LEA shall notify the CTC within 10 days. Upon receiving such notification, the CTC shall remove the report from the statewide database..
- 6) Technical amendments in Section 3 to clarify that this measure's changes to the school safety plan apply to school districts and county offices of education and remove references to charter schools. Further technical amendments in Section 4 to align the changes to school safety plan requirements for school districts and county offices of education to also apply to charter schools.
- 7) Technical amendments to revert the responsibilities in Section 44691 to the department rather than the SPI; clarify that the definition of volunteer in Penal Code Section 11165.7 applies to Section 44691; clarify that a certificate of completion from the Department of Social Services for mandated reporter training within the last 12 months shall satisfy this requirement; and clarify that the intent of the bill is not to increase the length of mandated reporter training.

Related legislation. SB 577 (Laird) of the 2025-26 Session would make a series of changes to relevant law to mitigate the fiscal impact of childhood sexual assault claims against public entities, including limitations on refiling actions and shortening relevant statutes of limitations, reforms to the remittitur process, recovery of defense costs, and flexibility in paying judgments and issuing financing bonds.

AB 1233 (Hoover) of the 2025-26 Session, requires the California School Information Services (CSIS), by July 1, 2027, to develop a non-certificated position statewide data system for tracking hiring data for such positions, including any egregious employee misconduct investigations resulting in a substantiated report by an LEA and requires an LEA review the data system before hiring an individual for a non-certificated position. This bill was held in the Assembly Appropriations Committee.

SB 832 (Allen) of the 2025-26 Session, amends existing civil liability statutes related to childhood sexual assault and establishes that plaintiffs may recover treble damages in cases where childhood sexual assault is found to have been intentionally concealed by an entity responsible for the victim's care or oversight. The bill also introduces procedural safeguards

requiring plaintiffs aged 40 or older at the time of filing to submit certificates of merit to ensure the credibility and factual basis of their claims.

AB 2534 (Flora), Chapter 570, Statutes of 2024, requires teachers applying for jobs at a new school district, COE, charter school, or state special school to disclose where the applicant has previously been employed; and requires the school district, COE, charter school, or state special school to inquire with all previous employing agencies whether the applicant had credible complaints, investigations, or discipline for egregious misconduct that were required to be reported to the CTC.

AB 2708 (Wicks) of the 2021-22 Session would have prohibited, on or after January 1, 2023, a LEA, and any officer or employee of a LEA, from entering into, extending or renewing, a confidentiality agreement with an employee under investigation for complaints of misconduct related to harassment or assault of a pupil or who has had complaints of misconduct related to harassment or assault of a pupil substantiated against them by an investigation. Further the measure would have prohibited a LEA from providing a favorable recommendation for, or otherwise facilitating or promoting, the employment of an employee with another LEA who is under investigation for complaints of misconduct related to harassment or assault of a pupil, or who has had complaints of misconduct related to harassment or assault of a pupil substantiated against them by an investigation. This bill was held in the Assembly Education Committee.

AB 1456 (Morrell) of the 2017-18 Session would have established the Sexual Abuse-Free Education Act, which would have: (1) prohibited public and private school entities from hiring individuals who would have direct contact with children if they were previously convicted of child abuse or sexual misconduct with a child, (2) required applicants for school entity positions that would have direct contact with children to provide specified information about whether the applicant had ever been the subject of an investigation concerning child abuse or sexual misconduct with a child, and (3) required school entities to conduct reviews of the information provided by the applicants, including obtaining specified information from the current and each former employer. This bill was held in the Senate Judiciary Committee.

AB 709 (Morrell) of the 2019-20 Session would have established the Sexual Abuse-Free Education Act, which would have: (1) prohibited public and private school entities from hiring individuals who would have direct contact with children if they were previously convicted of child abuse or sexual misconduct with a child, (2) required applicants for school entity positions that would have direct contact with children to provide specified information about whether the applicant had ever been the subject of an investigation concerning child abuse or sexual misconduct with a child, and (3) required school entities to conduct reviews of the information provided by the applicants, including obtaining specified information from the current and each former employer. This bill was held in the Senate Education Committee.

AB 1452 (Hadley), Chapter 59, Statutes of 2015, prohibits school districts, COEs and charter schools from expunging from an employee's personnel file credible complaints of, substantiated investigations into, or discipline for, egregious misconduct.

AB 215 (Buchanan), Chapter 55, Statutes of 2014, makes various changes to the dismissal process for certificated employees and establishes the definition of egregious misconduct.

REGISTERED SUPPORT / OPPOSITION:

Support

3strands Global Foundation
Association of California School Administrators
California Association of School Business Officials
Child Empowerment and Safety
Enough Abuse
Los Angeles County District Attorney's Office
Office of the Riverside County Superintendent of Schools
Schools Excess Liability Fund

Opposition

Californians United for a Responsible Budget
California Youth Defender Center

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