*Office of the New York State Attorney General Letitia James*
Office of Special Investigation

March 6, 2025

# Report on the Investigation into the Death of Qian Adams

## SUMMARY

New York Executive Law Section 70-b (Section 70-b) authorizes the Office of the Attorney General, acting through its Office of Special Investigation (OSI), to investigate and, if warranted, prosecute offenses arising from any incident in which the death of a person is caused by a police officer. When OSI, as in this case, does not seek charges, Section 70-b requires the issuance of a public report. This is the public report regarding the death of Qian Adams.

At 12:52 a.m. on December 11, 2023, City of Syracuse Police Department (SPD) Patrol Officer Christopher Cramer was dispatched to a larceny in progress. The route to the larceny call had Officer Cramer traveling southwest on West Bear Street in the City of Syracuse. Based on security videos from cameras on nearby buildings, Officer Cramer turned left onto Liberty Street from West Bear Street and struck and killed Qian Adams, who was riding a Veo Cosmo e-bike north on Liberty Street.

After a thorough investigation and legal analysis, OSI concludes that the evidence is insufficient to prove beyond a reasonable doubt that Officer Cramer committed a crime. OSI therefore will not seek charges against him and closes the matter with the publication of this report.

## FACTS

### Background

West Bear Street and Liberty Street intersect at an angle: West Bear Street is a four-lane, two-way road that runs northeast/southwest at Liberty Street with a posted speed limit of 40 mph; Liberty Street is a two-lane road that runs north/south. At the intersection, West Bear Street had a (fifth) marked turning lane for left turns when traveling southwest, and Liberty Street had a stop sign that required northbound travelers to stop before entering the intersection. The intersection was lighted by streetlights. At the time of the collision, the outside temperature was 36 degrees, and the roadway was wet due to light rain and snow.

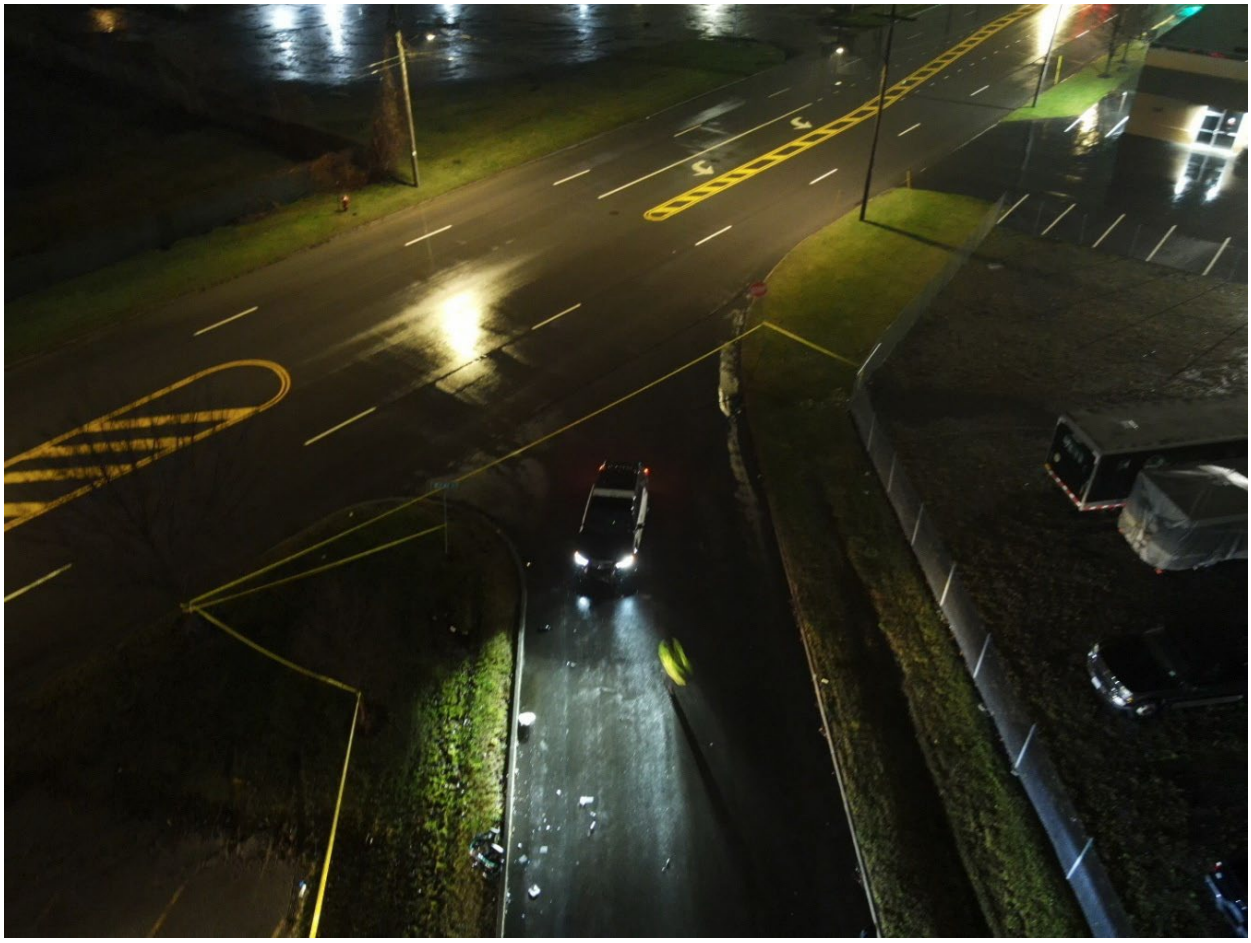
Officer Cramer was appointed to SPD on February 26, 2022. According to SPD records, Officer Cramer's shift began at 8:30 p.m. on December 10, 2023, and he was operating SPD SUV 452. The SUV was marked with SPD badging and equipped with a heavy-duty push bumper on the front and with emergency lights and siren. According to SPD records, at 12:54 a.m. on December 11, 2023, Officer Cramer was enroute to a larceny call.

OSI requested to interview Officer Cramer, but, through his attorney, he refused.

Mr. Adams was a City of Syracuse resident whose home address was less than half a mile from the scene of the collision. According to Mr. Adams's family, he left his residence by foot to go to a convenience store shortly after midnight on December 11, 2023. Nearby security video showed him walking on West Belden Avenue and then north on Liberty Street. Another video camera showed that, after he rented a Veo Cosmo e-bike at 509 Liberty Street, he rode it north on Liberty Street. The intersection of West Bear Street and Liberty Street is an eighth of a mile from 509 Liberty Street. Mr. Adams was wearing a black hooded sweatshirt and black pants.

*Sample images of the kind of Veo e-bike that Mr. Adams rented and was riding at the time of the collision.*

*Google map of area of collision*



*SPD drone photograph showing the West Bear Street/Liberty Street intersection and the SUV driven by Officer Cramer, taken post-collision.*

Video

Based on security videos OSI collected and reviewed, Officer Cramer did not have his emergency lights or sirens activated.

OSI obtained security video from Rumetco, 610 West Bear Street, directly across the street from the intersection: the camera captured video and sound. It should be noted that the camera is far enough away from the intersection that the sound is slightly delayed. The Rumetco video showed the small LED light on the e-bike as Mr. Adams rode north on Liberty. The video does not appear to show that that Mr. Adams slowed the e-bike near or at the stop sign at the intersection. The video showed Officer Cramer's SUV making the left turn from West Bear Street onto Liberty Street and colliding with Mr. Adams on the e-bike. On the video, it did not appear that Officer Cramer braked until the moment of, or just after, the collision.

*SPD photograph after the collision looking south on Liberty Street from West Bear Street, showing Officer Cramer's SUV. The photo shows the point of view Officer Cramer would have had when he made the left turn.*

The Rumetco video showed that Officer Cramer stopped his SUV immediately after the collision. Officer Cramer activated his body worn camera (BWC) before he got out of his car and, according to SPD records, radioed the accident information to dispatch and asked for EMS, saying they should make their best time.

Officer Cramer's BWC showed that he got out of his SUV, went to Mr. Adams, rolled him over and began to administer first aid. A minute and a half later Officer Cordero arrived and took over aid. EMS arrived two minutes later and took over aid. EMS's arrival was at 12:59 a.m., five minutes after the collision.

BWC footage captured statements Officer Cramer made to responding officers and EMS personnel. When the first SPD officer arrived, Officer Cramer said, "He was in the middle of the fuckin road." He said the same thing to the second SPD officer on scene. When an EMS worker asked Officer Cramer what happened, he said, "I came around the corner and he was in the middle of the road and I hit him head on." Shortly after that, an SPD officer told Officer Cramer to turn off his camera.

*SPD photograph of the damage to the SUV driven by Officer Cramer, taken at the scene post-collision.*

Declaration of Death, Sobriety Testing, and Autopsy

Following the collision, Mr. Adams was taken via ambulance to Upstate University Hospital, arriving at 1:22 a.m. He was declared dead a few minutes later.

Officer Cramer was eventually taken to the public safety building and evaluated. At no point was he administered any field sobriety tests. According to SPD records, no officer observed any signs of impairment by Officer Cramer that would have warranted such tests.

On December 12, 2023, an autopsy of Mr. Adams was performed at the Onondaga County Medical Examiner's Office by Chief Medical Examiner Carolyn H. Revercomb. OSI personnel discussed the findings with Dr. Revercomb, who opined that the multiple blunt force injuries she observed were consistent with a head-on pedestrian-vehicle collision. She determined the cause of death to be “multiple blunt impact injuries”, and deemed the manner of death to be “Accident.” Dr. Revercomb noted that Mr. Adams’s injuries included a complete laceration of the descending aorta, scalp hemorrhage, and skeletal trauma. Toxicological analysis of his blood showed cannabinoids, including Delta-9 THC at a concentration of 130 ng/mL.

Studies indicate that THC impairs cognition, psychomotor function, and driving performance in a dose-related manner, with slight impairment of performance on standardized field sobriety tests at concentrations between 2 and 5 ng/mL, and notable impairment at concentrations between 5 and 10 ng/mL. ("Analysis of Δ9-tetrahydrocannabinol Driving Under the Influence of Drugs in Colorado from January 2011 to February 2014," *Journal of Analytical Toxicology*, Vol 38, Iss 8, Oct. 2014, pp 575-581, https://doi.org/10.1093/jat/bku089.)

Collision Reconstruction

A collision reconstruction was done by SPD Investigator Lonnie Dotson. He is certified in Motor Vehicle Collision Investigation and Crash Reconstruction and was assigned to SPD's Collision Reconstruction Unit. Inv. Dotson responded to the scene, collected physical evidence, made measurements with Leica Total Station (an electronic surveying instrument), and made measurements by hand. Inv. Dotson also reviewed BWC and security video. Although Officer Cramer's SUV was equipped with an Airbag Control Module type Event Data Recorder (EDR), Inv. Dotson noted that the airbags did not deploy and, as a result, no collision-related events were recorded by the EDR.

Inv. Dotson concluded that the collision was caused by a combination of factors: Officer Cramer's too-sharply angled left turn onto Liberty Street; Mr. Adams's riding in the middle of Liberty Street, rather than by the curb; and Officer Cramer's obscured visibility to Mr. Adams, resulting from Mr. Adams's dark clothing, the angle of the "A" pillar in the SUV, and the angle of the intersection.

Based on evidence collected at the scene, specifically the gouge marks in the roadway left by the e-bike, and projection angles from measurements taken during the investigation, Inv. Dotson was able to make projections and create a 2D model image of the path of travel of Officer Cramer's SUV, and to compare that projected path (the actual path, per the reconstruction) to the proper path of travel Officer Cramer should have taken for the left-hand turn, as shown in the first diagram below. He was also able to determine where on the roadway Mr. Adams was riding, as shown in the second diagram below.

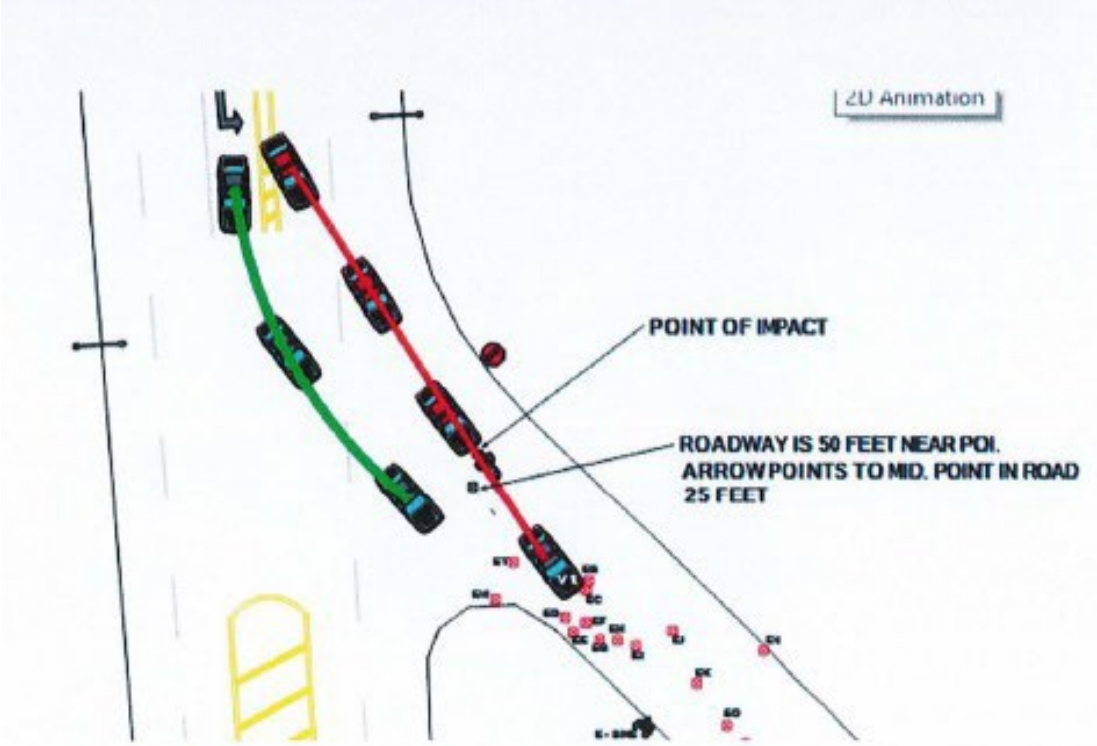



*Diagram from Inv. Dotson's report showing Officer Cramer's projected path (in red) and the proper path (in green).*

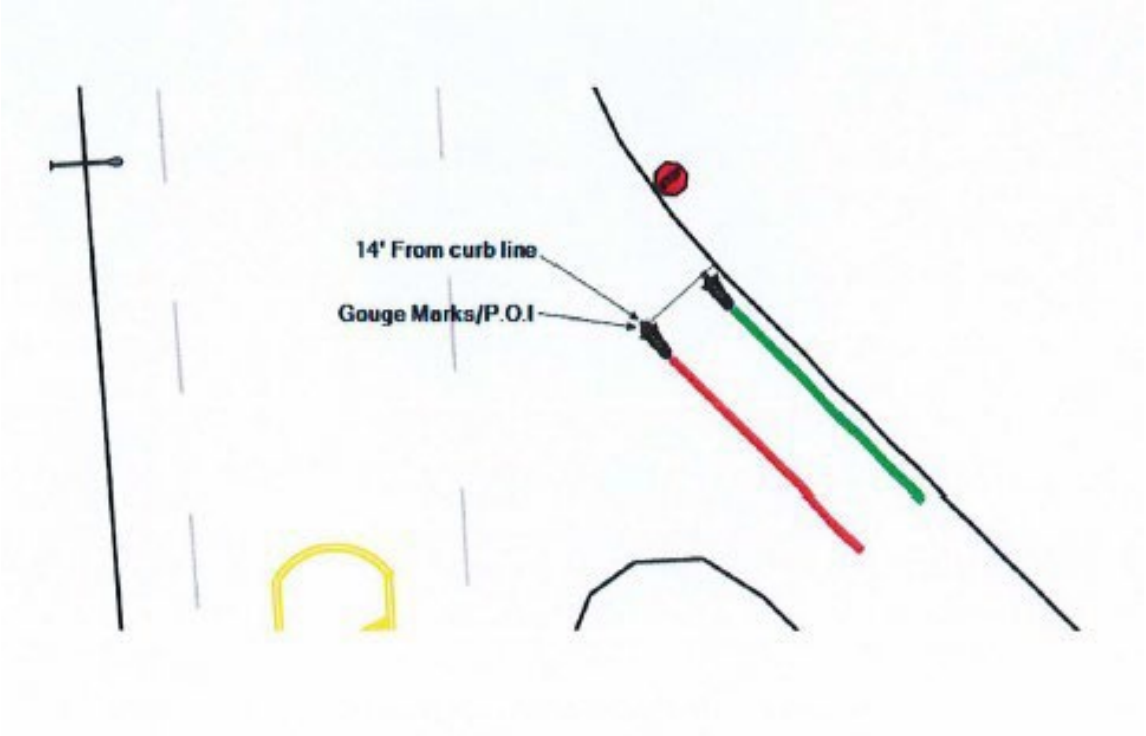



*Diagram showing Mr. Adams's path (in red) and the proper path (in green), according to VTL 1234(a)*

Inv. Dotson determined that Officer Cramer was traveling 29 to 35 mph at the moment of impact, based on the Searle Pedestrian Throw Formula (Searle formula). By Inv. Dotson's measurement, Mr. Adams landed 65 feet south of gouge marks left in the pavement by the e-bike's front wheel fork, which defined the point of impact on Liberty Street. Applying the Searle formula to the distance Mr. Adams was thrown, Inv. Dotson determined Officer Cramer's speed.

Inv. Dotson also examined the factors affecting Officer Cramer's ability to see Mr. Adams prior to the collision. Mr. Adams was wearing dark-colored, non-reflective clothing. The e-bike was equipped with a small LED light and reflectors on the pedals. The part of Liberty Street where Mr. Adams was operating the e-bike was not particularly well lighted. Investigator Dotson also considered the angle of the intersection, the angle of the "A" pillar in the SUV (the pillar between the windshield and the front door), and the relative size of the e-bike. Based on these factors, Inv. Dotson concluded it was highly likely that Officer Cramer did not see Mr. Adams before turning: the left "A" pillar could have obstructed his view of traffic on Liberty Street, because the roadway would have lined up with the "A" pillar during the turn. As bicycles are smaller than cars, they are more likely to be visually obscured by the "A" pillar. As outlined in his report, Inv. Dotson performed controlled experiments with an e-bike similar to what Mr. Adams was riding, a rider with reflective clothing, and the same SUV Officer Cramer was driving. His findings were consistent with the "A" pillar causing a significant visual obstruction.

Inv. Dotson's concluded that the primary contributing factor for the collision was Officer Cramer's turning improperly. Secondary contributing factors included the limited or obstructed view from Officer Cramer's SUV caused by the "A" pillar, and the darkness and poor weather conditions. Additional contributing factors included low bicyclist visibility and Mr. Adams's failure to keep close to the right curb, as required for cyclists.

## LEGAL ANALYSIS

Given the circumstances as they existed, there is some question whether Officer Cramer was in "emergency operation" as defined by Vehicle & Traffic Law Section (VTL) 114-B, which defines "Emergency Operation" to include "the operation…of an authorized emergency vehicle, when such vehicle is engaged in… pursuing an actual or suspected violator of the law. " Officer Cramer was responding to a 911 call alleging attempted larceny. Reportedly, three men were pulling on car door handles around 443 Bryant Avenue in Syracuse. Officer Cramer was driving his SUV to that area at the time of the collision. He was not utilizing his lights and siren. Because such ambiguity is present, the legal analysis is two-pronged. First, we assume that the officer was not responding to an emergency as defined by VTL 114-B, and therefore consider whether his conduct criminally negligent, *i.e.*, whether the evidence is sufficient to establish Criminally Negligent Homicide. Then we assume he was responding to

an emergency and apply a legal analysis for criminally reckless conduct, *i.e.*, whether the evidence is sufficient to establish Manslaughter in the Second Degree.

Criminally Negligent Homicide, Penal Law Section (PL) 125.10

> "A person is guilty of Criminally Negligent Homicide when, with criminal negligence, that person causes the death of another person."

PL 15.05(4) defines "criminal negligence" this way:

> A person acts with criminal negligence with respect to a result [e.g., death] … when he fails to perceive a substantial and unjustifiable risk that such result will occur…. The risk must be of such nature and degree that failure to perceive it constitutes a gross deviation from the standard of care that a reasonable person would observe in the situation…." [emphasis added]

In *People v Boutin,* 75 NY2d 692, 696 (1990), the Court of Appeals interpreted the statutory definition of criminal negligence and made clear that "failure to perceive a substantial and unjustifiable risk" is, by itself, insufficient to establish criminal culpability. Instead, "criminally negligent homicide requires not only a failure to perceive a risk of death, but also some serious blameworthiness in the conduct that caused it." Therefore, unless a defendant has engaged in blameworthy conduct creating or contributing to the substantial and unjustifiable risk of death, there will be no criminal culpability (*Id.*). Stated differently, "'nonperception' of a risk, even if death results, is not enough," to establish criminal negligence (*Id*.). *Boutin* also emphasized just how negligent a defendant's conduct must be to fall within the ambit of the statute: "[C]riminal liability cannot be predicated on every act of carelessness resulting in death…. [T]he carelessness required for criminal negligence is appreciably more serious than that for ordinary civil negligence" (*Boutin*, 75 NY2d at 695).

Under VTL 125 bicycles with electric assist are not considered motor vehicles; however, under VTL 1281, operators of e-bikes are granted all the rights and privileges and subject to all duties applicable to motor vehicle drivers. Under VTL 1231, traffic laws apply to operators of bicycles and e-bikes. Under VTL Section 1234(a) any bicycle must in general be driven in a bicycle lane or, if in the absence of such a lane, near the right-hand edge of the roadway or on a usable right-hand shoulder.

In the case of Officer Cramer, OSI would need to prove that his "seriously blameworthy" conduct created a substantial and unjustifiable risk that people would die because of it, that he failed to perceive that risk, and that the failure to perceive it was "a gross deviation from the standard of care that a reasonable person would observe in the situation." Based on all the facts and circumstances of this case, including but not limited to the video collected and the Collision Reconstruction Report, OSI would be unable to prove that Officer Cramer engaged in

blameworthy conduct at that level.

The evidence shows that, prior to the collision, he was about to make a left hand turn and was traveling at an appropriate speed for the conditions. Though he did not appear to brake for the left turn, or make the turn in the proper path, which the reconstructionist deemed the primary cause of the collision, his turn was not so deviant from a proper turn as to be "seriously blameworthy" under the case law. Though no alcohol screen or sobriety test was administered, the SPD members who interacted with Officer Cramer at the scene, immediately following the collision, did not report any sign that he was impaired or intoxicated, and there is no indication in Officer Cramer's BWC video that he was impaired or intoxicated. There is no evidence that he was distracted. As shown in the reconstruction diagram, Mr. Adams was operating the e-bike toward the middle of the road, far from the curb, and was dressed in black clothing at night, in an area that was not well lighted. And the angle of the intersection likely caused the "A" pillar of the SUV to obstruct Officer Cramer's view.

Therefore, OSI concludes that a prosecutor would not be able to prove beyond a reasonable doubt that Officer Cramer committed Criminally Negligent Homicide.

Manslaughter in the Second Degree, Penal Law Section (PL) 125.15(1)

Since Officer Cramer could not be proved guilty of committing Criminally Negligent Homicide, he could not be proved guilty of committing Manslaughter in the Second Degree, which requires proof of a higher degree of culpability.

Manslaughter in the Second Degree is defined this way:

> "A person is guilty of manslaughter in the second degree when he recklessly causes the death of another person."

PL 15.05(3) defines "recklessly" this way:

> A person acts recklessly with respect to a result [e.g., death] … when he is aware of and consciously disregards a substantial and unjustifiable risk that such result will occur…. The risk must be of such nature and degree that disregard thereof constitutes a gross deviation from the standard of conduct that a reasonable person would observe in the situation…." [emphasis added]

As set forth above, there is no evidence that Officer Cramer "consciously disregarded" the risk of death.

VTL 1104

OSI's research did not find any case in which a police officer driver has been criminally prosecuted in New York for injuring or killing a person while responding to an emergency. This may be due to the protection afforded to police officers by VTL 1104, which reads in part that "the driver of an authorized emergency vehicle, when involved in an emergency operation" may "proceed past a steady red signal…but only after slowing down as may be necessary for safe operation" and may "exceed the maximum speed limits so long as he does not endanger life or property." VTL 1104(e) states that "the foregoing provisions shall not relieve the driver of an authorized emergency vehicle from the duty to drive with due regard for the safety of all persons, nor shall such provisions protect the driver from the consequences of his reckless disregard for the safety of others." See *Anderson v Commack Fire Dist.*, 39 NY3d 495, 498 (2023) (police officers responding to an emergency may disregard specific traffic laws "as long as specified safety precautions are observed, and they do not act recklessly").

Whether VTL Section 1104 Applies to Criminal Cases

VTL 1104 by its terms is not stated to be a defense to crimes under the Penal Law, but the VTL itself has criminal provisions, and we assume VTL 1104 would be a defense to those crimes. Also, as mentioned, there are no reported cases in New York of police officers charged with crimes for killing or injuring persons as a result of driving in response to an emergency call, and therefore no caselaw applying (or not applying) VTL 1104 to charges under the Penal Law. However, for purposes of this memo, OSI assumes that courts would apply VTL 1104 to criminal cases, and, if there were a grand jury proceeding in this case, OSI would instruct the grand jurors in VTL 1104.

VTL 1104 and Manslaughter in the Second Degree

In *Saarinen v. Kerr*, 84 NY2d 494 (1994), a police officer observed a van drive through a stop sign at 30 mph; the van refused to stop after the officer activated his lights and sirens. The officer chased the van at speeds of about 60 mph where the posted speed limit was 35 mph. During the chase, the van drove into oncoming traffic, through a red light, and eventually crashed into the plaintiff's car, seriously injuring her. The plaintiff sued the officer and the municipality. The Court of Appeals held that the officer could not be held liable if he were merely negligent:

> "[A] police officer's conduct in pursuing a suspected lawbreaker may not form the basis of civil liability to an injured bystander unless the officer acted in reckless disregard for the safety of others. This standard demands more than a showing of a lack of 'due care under the circumstances' – the showing typically associated with

> ordinary negligence claims. It requires evidence that 'the actor has intentionally done an act of an unreasonable character in disregard of a known or obvious risk that was so great as to make it highly probable that harm would follow' and has done so with conscious indifference to the outcome." *Saarinen* at 501, quoting Prosser and Keeton, Torts § 34, at 213 (5th ed) (emphasis added).

The court pointed to the "grim calculus" of VTL 1104, permitting officers to go through red lights and to exceed speed limits, stating that these actions "will inevitably increase the risk of harm to innocent motorists and pedestrians." The court said limiting liability to cases of recklessness would be consistent with the legislative intent, as it would reduce "judicial second-guessing of the many split-second decisions that are made in the field under highly pressured conditions" and would reduce the risk that the threat of liability could "deter emergency personnel from acting decisively and taking calculated risks in order to save life or property." *Saarinen*, at 502.

However, in *Campbell v City of Elmira,* 84 NY2d 505 (1994), a companion case decided the same day as *Saarinen*, the Court said that the potential for liability is a "protection for the general public against disproportionate, overreactive conduct." In that case, the Court confirmed a finding of liability, based on recklessness, in a civil case where a fire truck had proceeded through a red light at a speed of 10 to 15 mph. The court highlighted that the driver of the firetruck "acknowledged that he had a statutory duty to check the color of the light prior to proceeding into and through the intersection because that would affect the level of care he was obligated to satisfy in going forward, even with an emergency right of way." 84 NY2d at 513.

Based on *Saarinen*, charging a police officer with criminally negligent homicide, Penal Law Section (PL) 125.10, based on speeding or going through a red light is probably barred. Even though the Penal Law standard of negligence is stricter than the kind of negligence on which the lawsuit in *Saarinen* was based, the Court's language seems to require that recklessness be pleaded and proved.

Indeed, both *Saarinen* and VTL 1104 seem to envision that a police officer, under the right circumstances, could be charged with reckless homicide, which is the essence of Manslaughter in the Second Degree, Penal Law Section (PL) 125.15(1).

The Court in *Saarinen* said that a police officer driver, responding to an emergency, could not be held liable for causing injury unless the officer "acted in reckless disregard for the safety of others," and had "intentionally done an act of an unreasonable character in disregard of a known or obvious risk that was so great as to make it highly probable that harm would follow" and had "done so with conscious indifference to the outcome [emphasis added]." These phrases are similar to the Penal Law definition of recklessness. If anything,

the Penal Law definition is stricter, because of the requirement of "gross deviation," thereby making it more likely that a prosecution for a reckless homicide would be permitted under *Saarinen*.

Proving Recklessness

Determining recklessness is a "fact-specific inquiry," including weighing "the precautionary measures taken by [the officer] to avoid causing harm to the general public" against the officer's "duty to respond to an urgent emergency situation" *Frezzell v City of New York*, 24 NY3d 213, 219 (2014).

Below are examples of factors courts have considered when balancing these competing interests:

> Nature of the emergency. *Allen v Town of Amherst*, 8 AD3d 996, 997 (4th Dept 2004): "Although all police officers in patrol vehicles responding to police calls are involved in an emergency operation within the meaning of Vehicle and Traffic Law…the nature of the call nevertheless is relevant in determining whether a responding officer's conduct was in reckless disregard for the safety of others."
>
> Whether the officer's emergency lights on and the siren activated. *Regdos v City of Buffalo*, 132 AD3d 1343, 1343 (4th Dept 2015): "We conclude that the jury could have rationally determined that the combination of, inter alia, Officer Fera's excessive speed, her failure to activate the emergency lights and siren and slow down or brake as she approached plaintiff's vehicle from behind, plaintiff's timely and appropriate engagement of her left turn signal, and Officer Fera's attempt to pass plaintiff's vehicle on the left on the wrong side of the street at a city intersection constituted 'reckless disregard for the safety of others.'"
>
> Officer's speed and knowledge of prior incidents; the weather, traffic, and road conditions. *Flack v State*, 57 AD3d 1199, 1200-01 (3d Dept 2008): "Here, it is undisputed that it was raining heavily at the time of the accident, other cars on the road were traveling well under the speed limit, the road contained S-curves and knolls, and Kijowski knew that there recently had been other serious accidents caused by inappropriate speed in the area where this collision occurred. Additionally, while Kijowski testified that the reason he was chasing the speeding vehicle—which was traveling at 73 miles per hour—was that it posed a risk to the public based on the above conditions, he nevertheless pursued that car at a speed of over 80 miles per hour, a speed at which he had never driven on that road even under ideal conditions and a speed which he admitted posed a significant risk to the public.
> Under these circumstances, we find that Kijowski's conduct was reckless."

Officer's failure to slow down before intersection. *Connelly v City of Syracuse*, 103 AD3d 1242, 1242 (4th Dept 2013): "…issue of fact whether defendant officer acted with reckless disregard for the safety of others by entering a limited-visibility intersection controlled by a four-way stop sign shortly before midnight without slowing, stopping."

Officer's obstructed view. *Destino v State*, 203 AD3d 1598 (4th Dept 2022): "We conclude that the evidence at trial established that the trooper passed a stop sign and entered an intersection at a high rate of speed and directly into oncoming traffic without a siren or horn in a situation where there was 'almost no visibility' due to 'extreme' and '[v]ery dense' fog. Contrary to the State's contention, such circumstances support a determination that the trooper acted with reckless disregard for the safety of others."

Officer's violation of department policy. *Saarinen*, 84 NY2d 494, 503: "The characterization of the conduct McGown had observed is significant because the Village's own policy specifically provides that '[a] traffic infraction alone does not justify the risks of a high-speed pursuit.' A violation of this policy, if in fact it occurred, would be an important, although not dispositive, factor in determining whether McGown had acted recklessly."

Here, the evidence establishes that Officer Cramer was not driving recklessly as he turned left onto Liberty Street:

- His estimated speed was within a range of 29 to 35 mph in a 40 mph zone
- There is no evidence of distracted or impaired driving
- Video evidence does not show other vehicles in the vicinity at the time of the collision
- The roadway was wet, but weather conditions were not severe
- Mr. Adams was wearing all black and traveling near the middle of the roadway
- It was after midnight in early December making it less likely that one would encounter someone riding an e-scooter

Under the case law described above, such conduct would not have been a "gross deviation from the standard of conduct of a reasonable person" as to give rise to criminal culpability. OAG therefore concludes that criminal charges are not warranted in this case.

## RECOMMENDATION

OSI recommends that all police agencies hold police officers to the same standards as civilians and ask them to submit to a preliminary breath-test (PBT) at the scene as quickly as practicable after a motor vehicle collision, as authorized by Section 1194(1)(b) of the Vehicle and Traffic Law. If the PBT is positive for the presence of alcohol, the agency should have the involved officer perform field sobriety tests to assess their physical and mental abilities, promptly followed by a chemical test of their blood or breath, if there is an arrest.

Additionally, when the collision results in serious physical injury or the death of another person, police agencies should ask the involved officer to voluntarily consent to toxicology testing. If the officer consents, the agency should take all necessary steps to secure the blood sample in a timely fashion, as close in time to the collision as possible.

OSI therefore recommends that all patrol officers and supervisors be trained in the administration of the PBT and field sobriety tests so that they can test any on-duty or off-duty police officer (or any civilian) involved in a motor vehicle collision on scene as soon as practicable to determine whether they were operating a vehicle while impaired by alcohol.

If the involved police officer (or civilian) does not voluntarily consent to toxicology testing, the agency should seek a court order to compel a chemical test pursuant to Vehicle and Traffic Law Section 1194(3), provided there is a sufficient legal basis to do so.

Dated: March 6, 2025