THE DISTRICT OF COLUMBIA

BEFORE

THE OFFICE OF EMPLOYEE APPEALS

In the Matter of:	)	
	)	OEA Matter No.: 2401-0123-10
TRACEY NORRIS,	)	
Employee	)	
	)	Date of Issuance: May 25, 2012
v.	)	
	)	
DISTRICT OF COLUMBIA	)	
PUBLIC SCHOOLS,	)	
Agency	)	STEPHANIE N. HARRIS, Esq.
	)	Administrative Judge

Tracey Norris, Employee *Pro-Se*
W. Iris Barber, Esq., Agency Representative

INITIAL DECISION

INTRODUCTION AND PROCEDURAL HISTORY

On November 2, 2009, Tracey Norris ("Employee") filed a Petition for Appeal with the Office of Employee Appeals ("OEA" or "Office") contesting the District of Columbia Public Schools' ("Agency" or "DCPS") action of terminating his employment through a Reduction-in-Force ("RIF"). The effective date of the RIF was November 2, 2009. Employee's position of record at the time his position was abolished was an Elementary Teacher at Moten Elementary School ("Moten"). Employee was serving in Educational Service status at the time he was terminated.

I was assigned this matter on February 7, 2012. On February 14, 2012, I ordered the parties to submit briefs on the issue of whether Agency conducted the instant RIF in accordance with applicable District laws, statues, and regulations ("February 14th Order"). Agency complied, but Employee did not respond to the February 14th Order. Accordingly, on March 29, 2012, I issued an Order for Statement of Good Cause ("March 29th Order") wherein Employee was required to submit a statement explaining his failure to adhere to the deadline as was previously prescribed. Moreover, Employee was also directed to submit his legal brief. Employee's response was due on or before April 9, 2012. As of the date of this decision, OEA has not received a response from Employee regarding the aforementioned Orders. After reviewing the record, I have determined that there are no material facts in dispute and therefore a hearing is not warranted. The record is now closed.

JURISDICTION

This Office has jurisdiction in this matter pursuant to D.C. Official Code §1-606.03 (2001).

ISSUE

Whether Agency's action of separating Employee from service pursuant to a RIF was done in accordance with all applicable laws, rules, or regulations.

BURDEN OF PROOF

OEA Rule 628.1, 59 DCR 2129 (March 16, 2012) states:

> The burden of proof with regard to material issues of fact shall be by a preponderance of the evidence. "Preponderance of the evidence" shall mean:
>
> > That degree of relevant evidence which a reasonable mind, considering the record as a whole, would accept as sufficient to find a contested fact more probably true than untrue.

OEA Rule 628.2 *id.* states:

> The employee shall have the burden of proof as to issues of jurisdiction, including timeliness of filing. The agency shall have the burden of proof as to all other issues.

FINDINGS OF FACTS, ANALYSIS, AND CONCLUSIONS OF LAW

On September 10, 2009, former D.C. School Chancellor Michelle Rhee authorized a Reduction-in-Force ("RIF") pursuant to D.C. Code § 1-624.02, 5 DCMR Chapter 15, and Mayor's Order 2007-186. Chancellor Rhee stated that the RIF was necessitated for budgetary reasons, explaining that the 2010 DCPS fiscal year budget was not sufficient to support the current number of positions in the schools.[1]

Although the instant RIF was authorized pursuant to D.C. Code § 1-624.02,[2] which encompasses more extensive procedures, for the reasons explained below, I find that D.C. Official Code § 1-624.08 ("Abolishment Act") is the more applicable statute to govern this RIF.

Specifically, section § 1-624.08 states in pertinent part that:

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[1] *See* Agency's Answer, Tab 1 (December 9, 2009).

[2] D.C. Code § 1-624.02 states in relevant part that:

> (a) Reduction-in-force procedures shall apply to the Career and Educational Services… and shall include:
> (1) A prescribed order of separation based on tenure of appointment, length of service including creditable federal and military service, District residency, veterans preference, and relative work performance;
> (2) One round of lateral competition limited to positions within the employee's competitive level;
> (3) Priority reemployment consideration for employees separated;
> (4) Consideration of job sharing and reduced hours; and
> (5) Employee appeal rights.

> (a) ***Notwithstanding*** *any other provision of law, regulation, or collective bargaining agreement either in effect or to be negotiated while this legislation is in effect* for the fiscal year ending September 30, 2000, and *each subsequent fiscal year*, each agency head is authorized, within the agency head's discretion, to identify positions for abolishment (emphasis added).
>
> (b) Prior to February 1 of each fiscal year, each personnel authority (other than a personnel authority of an agency which is subject to a management reform plan under subtitle B of title XI of the Balanced Budget Act of 1997) shall make a final determination that a position within the personnel authority is to be abolished.
>
> (c) ***Notwithstanding*** *any rights or procedures established by any other provision of this subchapter*, any District government employee, regardless of date of hire, who encumbers a position identified for abolishment shall be separated without competition or assignment rights, except as provided in this section (emphasis added).
>
> (d) An employee affected by the abolishment of a position pursuant to this section who, but for this section would be entitled to compete for retention, shall be entitled to one round of lateral competition pursuant to Chapter 24 of the District of Columbia Personnel Manual, which shall be limited to positions in the employee's competitive level.
>
> (e) Each employee selected for separation pursuant to this section shall be given written notice of at least 30 days before the effective date of his or her separation.

In *Mezile v. D.C. Department on Disability Services*,[3] the D.C. Superior Court found that "the language of § 1-624.08 is unclear as to whether it replaced § 1-624.02 entirely, or if the government can only use it during times of fiscal emergency." The Court also found that both laws were current and that the government triggers the use of the applicable statute by using "specific language and procedures."[4]

However, the Court of Appeals took a different position. In *Washington Teachers' Union, Local #6 v. District of Columbia Public Schools*, [5] DCPS conducted a 2004 RIF "to ensure balanced budgets, rather than deficits in Fiscal Years 2004 and 2005." The Court of Appeals found that the 2004 RIF conducted for budgetary reasons, triggered the Abolishment Act ("the Act") instead of "the regular RIF procedures found in D.C. Code § 1-624.02."[6] The Court stated that the "ordinary and plain meaning of the words used in § 1-624.08(c) appears to leave no doubt about the inapplicability of § 1-624.02 to the 2004 RIF."[7]

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[3] No. 2010 CA 004111 (D.C. Super. Ct. February 2, 2012).
[4] *Id.* at p. 5.
[5] 960 A.2d 1123, 1125 (D.C. 2008).
[6] *Id.*
[7] *Id.*

The Abolishment Act applies to *positions abolished for fiscal year 2000 and subsequent fiscal years* (emphasis added). The legislation pertaining to the Act was enacted specifically for the purpose of addressing budgetary issues resulting in a RIF.[8] The Act provides that, "notwithstanding any rights or procedures established by any other provision of this subchapter," which indicates that it supersedes any other RIF regulations. The use of the term 'notwithstanding' carries special significance in statutes and is used to "override conflicting provisions of any other section."[9] Further, "it is well established that the use of such a 'notwithstanding clause' clearly signals the drafter's intention that the provisions of the 'notwithstanding' section override conflicting provisions of any other sections."[10]

The Abolishment Act was enacted after § 1-624.02, and thus, is a more streamlined statute for use during times of fiscal emergency.[11] Moreover, the persuasive language of § 1-624.08, including the term 'notwithstanding,' suggests that this is the more applicable statutory provision to conduct RIFs resulting from budgetary constraints. Accordingly, I am primarily guided by § 1-624.08 for RIFs authorized due to budgetary restrictions. Under this section, an employee whose position was terminated may only contest before this Office:

1. That he did not receive written notice thirty (30) days prior to the effective date of his separation from service; and/or

2. That he was not afforded one round of lateral competition within his competitive level.

Employee's Position

In his Petition for Appeal, Employee states that he is unsure whether "the circumstances that initiated the RIF were unexpected or not contrived."[12] Employee asserts that he is challenging the RIF on the grounds that DCPS failed to follow appropriate procedures as required by D.C. Code § 1-624.08. Employee also questions how DCPS defined the competitive levels used for the RIF, noting that "[i]f the competitive level was not clearly defined, how can one fairly be compared and how can the comparison be evaluated."[13] Additionally, Employee claims that Agency refused to provide him with a copy of the competitive level document.[14] He also states that he was not observed formally or informally, and questions how anyone could have effectively determined his performance.[15] Employee further alleges that there were two new teachers at his former school, who were not separated in the instant RIF, and he questions how they were judged given the short time to complete necessary paperwork.[16] Employee has requested that he be reinstated with back pay, benefits, and all previous attachments to his position.[17]

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[8] *Id*.
[9] *Burton v. Office of Employee Appeals*, 30 A.3d 789 (D.C. 2011).
[10] *Id.*
[11] *Mezile v. D.C. Department on Disability Services*, No. 2010 CA 004111 (D.C. Super. Ct. February 2, 2012).
[12] Petition for Appeal (November 2, 2009).
[13] *Id.*
[14] *Id.*
[15] *Id.*
[16] *Id.*
[17] *Id.*

Agency's Position

Agency submits that it conducted the RIF in accordance with the District of Columbia Municipal Regulations and the D.C. Official Code by affording Employee one round of lateral competition and thirty (30) days written notice prior to the effective date of his termination.[18] Agency further maintains that it utilized the proper competitive factors in implementing the RIF and, Employee, who was one of the lowest ranked Elementary Teachers, was terminated as a result of the round of lateral competition.[19]

RIF Procedures

Employee questions how Agency defined the competitive levels used for the RIF. Under Title 5 DCMR § 1501.1, the Superintendent of DCPS is authorized to establish the competitive areas when conducting a RIF so long as those areas are based "upon all or a clearly identifiable segment of the mission, a division or a major subdivision of the Board of Education, including discrete organizational levels such as an individual school or office." For the 2009/2010 academic school year, former DCPS Chancellor Rhee determined that each school would constitute a separate competitive area.[20] In accordance with Title 5, DCMR § 1502.1, competitive levels in which employees subject to the RIF competed were based on the following criterion:

1. The pay plan and pay grade for each employee;

2. The job title for each employee; and

3. In the case of specialty elementary teachers, secondary teachers, middle school teachers and teachers who teach other specialty subjects, the subject taught by the employee.[21]

Here, Moten was identified as a competitive area, and Elementary Teacher was determined to be the competitive level in which Employee competed. According to the Retention Register provided by Agency, there were nineteen (19) elementary teacher positions subject to the RIF.[22] Of the nineteen positions, five (5) positions were identified to be abolished. Because Employee was not the only Elementary Teacher within his competitive level, he was required to compete with other employees in one round of lateral competition. Employee has not provided any documentation showing that he was not employed as an Elementary Teacher at Moten. Accordingly, I find that Agency properly placed Employee in the Elementary Teacher competitive level.

According to Title 5, DCMR § 1503.2 *et al.*:

> If a decision must be made between employees in the same competitive area and competitive level, the following factors,

[18] Agency Brief at pp. 3-7 (March 6, 2012).
[19] *Id*. at pp. 4-5. School-based personnel constituted a separate competitive area from nonschool-based personnel and are precluded from competing with school-based personnel for retention purposes.
[20] Agency Answer, Tab 1, RIF Authorization (December 9, 2009).
[21] *Id*.
[22] Agency Brief, Exhibit A, Retention Register (March 6, 2012).

> in support of the purposes, programs, and needs of the organizational unit comprising the competitive area, with respect to each employee, shall be considered in determining which position shall be abolished:
>
> (a) Significant relevant contributions, accomplishments, or performance;
>
> (b) Relevant supplemental professional experiences as demonstrated on the job;
>
> (c) Office or school needs, including: curriculum, specialized education, degrees, licenses or areas of expertise; and
>
> (d) Length of service.

Based on § 1503.1, Agency gave the following weights to each of the aforementioned factors when implementing the RIF:

> (a) Office or school needs, including: curriculum, specialized education, degrees, licenses or areas of expertise - (75%)
>
> (b) Significant relevant contributions, accomplishments, or performance – (10%)
>
> (c) Relevant supplemental professional experiences as demonstrated on the job – (10%)
>
> (d) Length of service – (5%)[23]

Agency argues that nothing within the DCMR, applicable case law, or D.C. Official Code prevents it from exercising its discretion to weigh the aforementioned factors as it sees fit.[24] Agency cites *to American Federation of Government Employees, AFL-CIO v. OPM*,[25] wherein the Office of Personnel Management was given "broad authority to issue regulations governing the release of employees under a RIF…including the authority to reconsider and alter its prior balance of factors to diminish the relative importance of seniority."[26] I agree with this position and find that Agency had the discretion to weigh the factors enumerated in 5 DCMR 1503.2, in a consistent manner throughout the instant RIF.

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[23] It should be noted that OEA has consistently held that DCPS is allowed discretion to accord different weights to the factors enumerated in § 1503.2. Thus, Agency is not required to assign equal values to each of the factors. *See White v. DCPS*, OEA Matter No. 2401-0014-10 (December 30, 2001); *Britton v. DCPS*, OEA Matter No. 2401-0179-09 (May 24, 2010).
[24] Agency Brief at pp. 4-5 (March 6, 2012).
[25] 821 F.2d 761 (D.C. Cir. 1987).
[26] *Id*.

Competitive Level Documentation Form

Agency employs the use of a Competitive Level Documentation Form ("CLDF") in cases where employees subject to a RIF must compete against each other in lateral competition. In conducting the instant RIF, the principal of Moten was given discretion to assign numerical values to the first three factors enumerated in Title 5, DCMR § 1503.2, *supra,* as deemed appropriate, while the "length of service" category was completed by the Department of Human Resources ("DHR"). Employee alleges that Agency refused to provide him with a copy of the competitive level document. However, the undersigned notes that Agency included a copy of Employee's CLDF in its Answer at Tab 3.

Employee received a total of eighteen (18) points on his CLDF, and was, therefore, ranked among the lowest five employees in his respective competitive level. Employee's CLDF stated, in pertinent part, the following:

> "Mr. Norris has struggled with managing his second grade classroom. He shows no commitment to learning his class work for students, is not challenging and does not promote critical thinking and learning…He fails to submit lesson plans and there is no class work generated from lessons taught. Mr. Norris does not maintain order in his classroom…[H]e allows students to jump and play in the classroom creating a safety hazard. He also does not work effectively to utilize instructional time. The classroom environment is not friendly and inviting [and] there is no student work displayed. He displays a lack of commitment to his students [and] the school community. Even with support the school has provided Mr. Norris, he has begun this school year…with the same ineffective pedagogy and nonchalant attitude regarding student work. His students' desks are still in rows though the administrative staff has repeatedly asked him to change the structure of his classroom. He does not serve on any committees and shows no desire to get involved with the school community."[27]

Employee received a total of two (2) points out of a possible ten (10) points in the category of Office or School Needs; a score much lower than the other employees within his competitive level who were retained in service.[28] This category is weighted at 75% on the CLDF and includes: curriculum, specialized education, degrees, licenses or areas of expertise. Employee received zero (0) points in the category of Relevant Significant Contributions, Accomplishments, or Performance, which is weighted at 10% on the CLDF. Additionally, Employee received zero (0) points in the category of Relevant Supplemental Professional Experiences as Demonstrated on the Job, which is weighted at 10% on the CLDF.

Employee claims that he was not observed formally or informally and questions how his performance could have been effectively determined. The undersigned notes that the criteria Agency

[27] Agency Answer, Tab 3 (December 9, 2009).
[28] Agency Brief, Exhibit A, Retention Register (March 6, 2012).

instructed the principals to use in ranking employees did not require a formal observation of employees.[29] Specifically, in the Office or School Needs category, principals were instructed to assign scores "reflect[ing] [the] best judgment of the extent to which the person meets the particular needs of [the] school."[30]

Employee further alleges that he was not fairly compared to other Employees because the competitive levels were not clearly defined. However, Employee has not provided any credible evidence that would bolster a score in any of the aforementioned categories completed by the principal of Moten. Further, there is no indication that any supplemental evidence would supplant the higher scores received by the remaining employees in Employee's competitive level who were not separated from service. Moreover, this Office cannot substitute its judgment for that of the principal at Moten, who was given discretion to complete Employee's CLDF and had wide latitude to invoke his managerial discretion. With respect to the aforementioned CLDF categories, I find that I will not substitute my judgment for that of the principal of Moten as it relates to the scores he accorded Employee and his colleagues in the instant matter.

The Length of Service category, which was completed by DHR, includes credit for years of service, District residency, veterans' preference, and prior outstanding or exceeds expectation performance rating within the past year. The length of service calculation, in addition to the other factors, were weighted and added together, resulting in a ranking for each competing employee. Employee received a total of three (3) points in this category and has not contested that additional points should have been awarded. Additionally, Agency has provided an affidavit from Peter Weber, who served as the Interim Director of Human Resources during the time of the instant RIF.[31] Mr. Weber states that he was responsible for computing employees' length of service for the instant RIF and used the DHR official Peoplesoft system to obtain data for the calculations, which appear in Employee's CLDF. Further, a review of Employee's personnel file, submitted by Agency, does not reveal any evidence that would necessitate a recalculation of the points awarded in this category.[32] Therefore, based on the evidence of record, I find that Agency properly calculated this number.

Moreover, in reviewing the documents of record, Employee does not offer any statutes, case law, or other regulations to refute Agency's position regarding the principal's authority to utilize discretion in completing an employee's CLDF during the course of the instant RIF. In *Washington Teachers' Union Local No. 6, Am. Fed'n of Teachers, AFL-CIO v. Bd. of Educ. of the Dist. of Columbia*,[33] the D.C. Court of Appeals, in evaluating several union arguments concerning a RIF, stated that "school principals have total discretion to rank their teachers" and noted that performance evaluations are "subjective and individualized in nature."[34] According to the CLDF, Employee received a total score of eighteen (18) points after all of the factors outlined above were tallied and scored. The lowest scoring elementary teacher in Employee's competitive level who was retained in

[29] Agency Answer, Tab 2, Attachment B (December 9, 2009).
[30] *Id.*
[31] Agency Brief, Exhibit B (March 6, 2012).
[32] *Id.*, Employee Personnel File.
[33] 109 F.3d 774 (D.C. Cir. 1997).
[34] *See also American Fed'n of Gov't Employees, AFL-CIO v. Office of Pers. Mgmt.*, 821 F.2d 761, 765 (D.C. Cir. 1987) (noting that the federal government has long employed the use of subjective performance evaluations to help make RIF decisions).

service, received a total score of fifty (50) points.[35] Employee has not proffered any evidence to suggest that a re-evaluation of his CLDF scores would result in a different outcome in this case.[36]

The primary responsibility for managing and disciplining Agency's work force is a matter entrusted to the Agency, not to OEA.[37] This Office will not substitute its judgment for that of an agency; rather, this Office limits its review to determining if "managerial discretion has been legitimately invoked and properly exercised."[38] Accordingly, I find that the principal of Moten had discretion in completing Employee's CLDF, as he was in the best position to observe and evaluate the criteria enumerated in DCMR §1503.2, *supra*, when implementing the instant RIF. Therefore, I find that Agency did not abuse its discretion in completing the CLDF, and Employee was properly afforded one round of lateral competition as required by D.C. Official Code § 1-624.08.

Thirty (30) Days Written Notice

Title 5, §1506 of the DCMR provides the notice requirements that must be given to an employee affected by a RIF. Section 1506.1 states that "an employee selected for separation shall be given specific written notice at least thirty (30) days prior to the effective date of the separation. The notice shall state specifically what action is taken, the effective date of the action, and other necessary information regarding the employee's status and appeal rights." Additionally, D.C. Official Code § 1-624.08(e), which governs RIFs, provides that an Agency *shall* give an employee thirty (30) days notice *after* such employee has been *selected* for separation pursuant to a RIF (emphasis added).

Here, the record shows that Employee received his RIF notice on October 2, 2009, and the RIF effective date was November 2, 2009.[39] The RIF notice states that Employee's position was eliminated as part of a RIF. The RIF notice also provided Employee with information about his appeal rights. Further, Employee has not alleged that he did not receive thirty (30) days notice prior to the effective date of the RIF. Accordingly, I find that Employee was given the required thirty (30) days written notice prior to the effective date of the RIF.

Lack of Budget Crisis and Grievances

Employee alleges that the circumstances initiating the RIF were unexpected and contrived. Employee further alleges that there are two new teachers at his former school who were not separated in the instant RIF. This Office has previously held that it lacks jurisdiction to entertain any post-RIF activity that may have occurred at an agency.[40] Further, in *Anjuwan v. D.C. Department of Public Works*,[41] the D.C. Court of Appeals ruled that OEA lacked authority to determine whether an Agency's RIF was bona fide. The Court of Appeals explained that as long as a RIF is "justified by a shortage of funds at the agency level, the agency has discretion to

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[35] Agency Brief, Exhibit A, Retention Register (March 6, 2012).
[36] See *Anderson v. Liberty Lobby, Inc*., 477 U.S. 242, 248 (1986) (stating that a material fact is one which might affect the outcome of the case under governing law).
[37] *See Huntley v. Metropolitan Police Dep't*, OEA Matter No. 1601-0111-91, *Opinion and Order on Petition for Review* (March 18, 1994); and *Hutchinson v. District of Columbia Fire Dep't*, OEA Matter No. 1601-0119-90, *Opinion and Order on Petition for Review* (July 2, 1994).
[38] *See Stokes v. District of Columbia*, 502 A.2d 1006, 1009 (D.C. 1985).
[39] Agency Answer, Tab 4 (December 9, 2009).
[40] *Williamson v. DCPS*, OEA Matter No. 2401-0089-04 (January 5, 2005); *Cabaniss v. Department of Consumer and Regulatory Affairs*, OEA Matter No. 2401-0156-99 (January 30, 2003).
[41] 729 A.2d 883 (December 11, 1998).

implement the RIF…"[42] The Court also noted that OEA does not have the "authority to second guess the mayor's decision about the shortage of funds…[or] management decisions about which position should be abolished in implementing the RIF."[43]

OEA has interpreted the ruling in *Anjuwan* to include that this Office has no jurisdiction over the issue of an agency's claim of budgetary shortfall, nor can OEA entertain an employees' claim regarding how an agency elects to use its monetary resources for personnel services. In this case, how Agency elected to spend its funds on personnel services or how Agency elected to reorganize internally was a management decision, over which neither OEA nor this Administrative Judge ("AJ") has any control.[44]

Additionally, it is an established matter of public law that as of October 21, 1998, pursuant to the Omnibus Personnel Reform Amendment Act of 1998 (OPRAA), D.C. Law 12-124, OEA no longer has jurisdiction over grievance appeals. Based on the above discussion, Employee has failed to proffer any credible evidence that would indicate that the RIF was improperly conducted and implemented. Employee's other ancillary arguments are best characterized as grievances and outside of OEA's jurisdiction to adjudicate. That is not to say that Employee may not press his claims elsewhere, but rather that OEA currently lacks the jurisdiction hear Employee's other claims.

Failure to Prosecute

Employee's failure to respond to the February 14th and March 29th Orders provides a basis to dismiss this petition. OEA Rule 621.3 grants an AJ the authority to impose sanctions upon the parties as necessary to serve the ends of justice.[45] The AJ may, in the exercise of sound discretion, dismiss the action if a party fails to take reasonable steps to prosecute or defend his appeal.[46] Moreover, this Office has held that failure to prosecute an appeal includes a failure to submit required documents after being provided with a deadline for such submission.[47] Both the February 14th and March 29th Orders advised Employee of the consequences of not responding, including sanctions resulting in the dismissal of the matter. Employee's responses to these Orders were required for a proper resolution of this matter on the merits. Accordingly, the undersigned finds that Employee has not exercised the diligence expected of an appellant pursuing an appeal before this Office and this serves as an alternate ground for the dismissal of this matter.

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[42] *Id*. at 885.
[43] *Id*.
[44] *Gatson v. DCPS*, OEA Matter No. 2401-0166-09 (June 23, 2010).
[45] 59 DCR 2129 (March 16, 2012).
[46] OEA Rule 621.2, 59 DCR 2129 (March 16, 2012).
[47] *See* OEA Rule 621.3(b)-(c); *Employee v. Agency*, OEA Matter No. 1602-0078-83, 32 D.C. Reg. 1244 (1985); *Williams v. D.C. Public Schools*, OEA Matter No. 2401-0244-09 (December 13, 2010); *Brady v. Office of Public Education Facilities Modernization*, OEA Matter No. 2401-0219-09 (November 1, 2010).

CONCLUSION

Based on the foregoing, I find that Employee's position was abolished after he properly received one round of lateral competition and was given thirty (30) days written notice prior to the effective date of the RIF. I therefore conclude that Agency's action of abolishing Employee's position was done in accordance with D.C. Official Code § 1-624.08.

ORDER

It is hereby **ORDERED** that Agency's action of abolishing Employee's position through a Reduction-In-Force is **UPHELD**

FOR THE OFFICE:

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STEPHANIE N. HARRIS, Esq.
Administrative Judge