

DIRECTOR OF THE DEPARTMENT OF LABOR & INDUSTRIES
STATE OF WASHINGTON

In re: James Gutschmidt,

Determination of Compliance No. 230-16

OAH Docket No. 10-2016-LI-00274

No. 2017-017-WPA

DIRECTOR'S ORDER

RCW 49.48.084(4); RCW 34.05

Joel Sacks, Director of the Washington State Department of Labor & Industries, having considered the Initial Order served on March 17, 2017, having considered the petition for review filed by James Gutschmidt (the Appellant), briefing submitted to the Director's Office, and having reviewed the record created at hearing and the records and files herein, issues this Director's Order. This Order intends to resolve the contested issue of whether Okanogan County Transportation & Nutrition (OCTN) violated the wage payment and minimum wage laws with regard to the Appellant for the time period of December 15, 2015, to January 15, 2016. **The Determination of Compliance No. 230-16, issued by the Department on June 29, 2016, is AFFIRMED.**

The parties in this matter are the Department, OCTN, and the Appellant.

The Director makes the following Findings of Fact, Conclusions of Law, and Final Decision and Order.

I. FINDINGS OF FACT

1. The Office of Administrative Hearings issued and served the Initial Order on March 17, 2017, following a hearing that was held on March 15 and 16, 2017. The Initial Order affirmed the Department's Determination of Compliance No. 230-16.

2. On April 14, 2017, the Appellant timely filed a petition for review with the Director. The Appellant filed additional briefing on July 24, 2017.

3. On June 29, 2017, the Department filed a response to the Appellant's petition for review.

4. The Appellant's petition for review references evidence that was not part of the administrative record below. For instance, he claims to have emailed OCTN about owed wages prior to the end of his term. This claim is not substantiated by any documentary evidence within the record and is, in effect, new testimony that was not presented at the time of the hearing.

5. The Appellant contends that OCTN should not have been allowed to intervene in the administrative hearing. Because the Appellant claimed OCTN owed him \$255,528 in unpaid wages, OCTN had an interest relating to the property or the transaction that was the subject of the appeal.

6. The Appellant also contends that he should have been provided with a copy of his personnel file from OCTN. The record does not establish that OCTN was ever served with this request. Further, OCTN stated on the record that it does not maintain such files for nonemployees, as it considered the Appellant to be. The Department likewise confirmed that it never received a personnel file from OCTN and it therefore formed no part of the basis for the Determination of Compliance.

7. The Director adopts and incorporates all the Initial Order's findings of facts.

8. The Director adopts and incorporates the Initial Order's "Issues Presented," the "Order Summary," and the "Hearing" summary.

II. CONCLUSIONS OF LAW

1. Based on the Appellant's timely filed petition for review, there is authority to review and decide this matter under RCW 49.48.084 and RCW 34.05.

2. The additional evidence submitted by the Appellant, and arguments related thereto, were not part of the administrative hearing record and may not be considered here on appeal to the Director. RCW 34.05.464; *see Towle v. Dep't of Fish & Wildlife*, 94 Wn. App. 196, 205-06, 971 P.2d 591 (1999). Appellant had a full opportunity to present such evidence at the administrative hearing on March 15 and 16, 2017.

3. The APA allows intervention so long as it "is in the interest of justice and will not impair the orderly and prompt conduct of the hearings." RCW 34.05.443(1). Civil Rule 24 further provides an automatic right to intervene if a statute confers the authority or if the intervenor has an interest relating to property or the transaction which is the subject of the action. OCTN was properly allowed to intervene under RCW 34.05.443 and Civil Rule 24.

4. The ALJ properly denied the Appellant's request for a copy of his personnel file which was, effectively, a motion to compel. The request did not comply with the prehearing conference order or with Civil Rule 26, and in any event there is no evidence that the requested personnel file actually existed.

5. The Director adopts and incorporates all the Initial Order's conclusions of law.

III. DECISION AND ORDER

Consistent with the above Findings of Fact and Conclusion of Law, the Determination of Compliance No. 230-16 is AFFIRMED and the Initial Order of March 17, 2017, is incorporated by reference herein.

DATED at Tumwater this 26 day of September, 2017.



JOEL SACKS
Director

SERVICE

This Order was served on you the day it was deposited in the United States mail. RCW 34.05.010(19).

APPEAL RIGHTS

Reconsideration. Any party may file a petition for reconsideration. RCW 34.05.470. Any petition for reconsideration must be filed within 10 days of service of this Order and must state the specific grounds on which relief is requested. No matter will be reconsidered unless it clearly appears from the petition for reconsideration that (a) there is material clerical error in the order **or** (b) there is specific material error of fact or law. A petition for reconsideration, together with any argument in support thereof, should be filed by mailing, or by emailing to DirectorAppeal@LNI.WA.GOV, or delivering it directly to Joel Sacks, Director of the Department of Labor and Industries, P. O. Box 44001 Olympia, Washington 98504-4001, with a copy to all other parties of record and their representatives. Filing means actual receipt of the document at the Director's Office. RCW 34.05.010(6).

NOTE: A petition for reconsideration is not required before seeking judicial review. If a petition for reconsideration is filed, however, the 30-day period will begin to run upon the resolution of that petition. A timely filed petition for reconsideration is deemed to be denied if, within twenty (20) days from the date the petition is filed, the Director does not (a) dispose of the petition **or** (b) serve the parties with a written notice specifying the date by which it will act on the petition. RCW 34.05.470(3).

Judicial Review. Any petition for judicial review must be filed with the appropriate court and served within 30 days after service of this Order. RCW 34.05.542. RCW 49.48.084(5) provides, "Orders that are not appealed within the time period specified in this section and Chapter 34.05 RCW are final and binding, and not subject to further appeal." Proceedings for judicial review may be instituted by filing a petition in superior court according to the procedures specified in chapter 34.05 RCW, Part V, Judicial Review and Civil Enforcement.

DECLARATION OF MAILING

I, Lisa Rodriguez, hereby declare under penalty of perjury under the laws of the State of Washington, that the DIRECTOR'S ORDER was mailed on the 26 day of September 2017, via U.S. Mail, postage prepaid to the following:

James Gutschmidt
1255 Chesaw Road
Oroville, WA 98844

Heather Leibowitz, Assistant Attorney General
Attorney General's Office
800 Fifth Ave., Ste. 2000
Seattle, WA 98104

Jennifer Fitzhum
Okanogan County Transportation & Nutrition
P.O. Box 711
Omak, WA 98841

Jerry Moberg
Jerry Moberg & Associates
P.O. Box 130
Ephrata, WA 98823

DATED this 26 day of September, 2017, at Tumwater, Washington.



Lisa Rodriguez

**WASHINGTON STATE
OFFICE OF ADMINISTRATIVE HEARINGS**

In the matter of:

James Gutschmidt,,

Appellant / Wage Claimant.

Docket No. 10-2016-LI-00274

INITIAL ORDER

Agency: Department of Labor and Industries
Program: Wage Claims
Agency No. DOC-230-16

1. ISSUES PRESENTED

- 1.1 Whether the Department of Labor and Industries' June 29, 2016, Determination of Compliance concluding that the Okanogan County Transportation & Nutrition dba Okanogan Transportation & Nutrition does not owe James Gutschmidt \$255,528.00 in wages for work performed between January 15, 2015 through January 15, 2016, should be affirmed or reversed.

2. ORDER SUMMARY

- 2.1 The Department of Labor and Industries' June 29, 2016, Determination of Compliance concluding that the Okanogan County Transportation & Nutrition dba Okanogan Transportation & Nutrition does not owe James Gutschmidt \$255,528.00 in wages for work performed between January 15, 2015 through January 15, 2016, is AFFIRMED.

3. HEARING

Hearing Date	March 15 and 16, 2017
Administrative Law Judge	Courtney E. Beebe
Appellant / Wage Claimant	James Gutschmidt
Appellant's Witnesses	None Presented
Appellant's Exhibits	Exhibits A pp.7,8,13,14,15, 54, Exhibi C pp. 2, 3, 4, are Excluded; The remainin pages of Exhibits A and C, as well as Exhibits B, D, and F are admitted.
Agency	Department of Labor and Industries
Agency Representative	Heather Lebowitz, Asst. Atty. General
Agency Witnesses	Yesenia Sebedra, Industrial Relations Agent; Jennifer Fitzthume, Robert McDaniel, Pam Cole, Penny Dumas, Lillian Murrah.
Agency Exhibits	Department's Exhibits 1 through 41 were admitted.

4. FINDINGS OF FACT

Based on the evidence presented, the Administrative Law Judge makes the following findings of fact:

Investigation of Licensee

- 4.1 James Gischmidt ("Wage Claimant") was elected as President to the Board of Directors of the Okanogan County Transportation & Nutrition non-profit corporation ("OCTN") on January 15, 2015. The other members of the OCTN Board elected the Wage Claimant to the OCTN Board on the understanding that he would volunteer his time as an OCTN Board member.
- 4.2 OCTN is a non-profit corporation that works with other non-profit or public entities to provide services to seniors in Okanogan County. OCTN's Board of Directors consists of a President, Vice-President, Treasurer, Secretary and other Board Members. OCTN Board Members perform various functions including approving contracts, signing checks, and managing funds. The day to day operations of OCTN are administered by the Executive Director of OCTN, Jennifer Fitzthume. Each of the OCTN Board members and the Executive Director of OCTN understood that they were volunteers who donated their time to OCTN. No OCTN Board member expected or received wages for any work performed.
- 4.3 Between January 15, 2015, the Wage Claimant signed contracts and checks, and appeared at OCTN Board meetings. The Wage Claimant appeared at meetings for other non-profits and public entities as well. The Wage Claimant drove to and from his home to OCTN's place of business and he was reimbursed by OCTN for travel expenses for these trips.
- 4.4 The Wage Claimant and OCTN did not have any agreement to pay the Wage Claimant wages. The Wage Claimant did not keep track of the time he spent performing his duties for the OCTN Board, and OCTN did not require its volunteer OCTN Board members to account for their donated time. The Wage Claimant was not supervised and no person at OCTN directed the Wage Claimant's daily activities. The Wage Claimant's position as President could only be terminated by a vote of the other OCTN Board members. The Wage Claimant did not have an agreement to share in any profits or losses in the business based on his managerial skills. The Wage Claimant did not invest in any materials or equipment to perform his duties, and his duties did not require any special skills. The tasks the Wage Claimant performed were integral to OCTN's business, but could be performed by the other OCTN Board members in his absence.
- 4.5 At no time between January 15, 2015 and January 15, 2016, did the Wage Claimant seek wages from OCTN. The Wage Claimant and OCTN never agreed on a rate of pay or the number of hours that the Wage Claimant would work. The Wage Claimant and OCTN never agreed that he was hired as an employee.

- 4.6 The OCTN Board voted the Wage Claimant out of his position on January 15, 2016. The OCTN Executive Director had no authority to terminate the Wage Claimant's position.

Jurisdiction

- 4.7 The Wage Claimant filed a Worker's Rights Complaint on March 17, 2016, asserting that OCTN owed the Wage Claimant \$255,528.00 in wages for work performed from January 15, 2015 through January 15, 2016. The Wage Claimant provided no basis for the rate of pay in his complaint.
- 4.8 The Department issued Determination of Compliance concluding that OCTN does not owe Wage Claimant \$255,528.00 in wages for work performed between January 15, 2015 through January 15, 2016.
- 4.9 The Wage Claimant filed a letter of appeal and request for hearing on July 14, 2016.
- 4.10 The matter was referred to the Office of Administrative Hearings on October 12, 2016.

Credibility

- 4.11 The testimony of the parties conflicted on material points, particularly the job duties actually performed by the Wage Claimant, the hours worked by the Wage Claimant, and whether the Wage Claimant was an employee. Based upon the evidence presented, and having carefully considered and weighed all the evidence, including the demeanor and motivations of the parties, the reasonableness of the testimony and the totality of the circumstances presented, the Administrative Law Judge finds that the Wage Claimant's testimony regarding the hours worked and his status as an employee amounts to self-serving testimony that is not credible and not corroborated by either the documentary evidence presented or the testimony of the other witnesses. In contrast, the Department and OCTN's witnesses presented credible testimony that the Wage Claimant was an uncompensated volunteer member of the OCTN Board.

5. CONCLUSIONS OF LAW

Based on the facts above, the Administrative Law Judge makes the following conclusions:

Jurisdiction

- 5.1 The Office of Administrative Hearings has jurisdiction over the persons and subject matter of this case under RCW 34.05 and 49.48.084.

Burden of Proof

- 5.2 Under the WPA, the wage claimant has the initial burden of showing *prima facie* evidence of a wage payment law violation. See, *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 687-688, S.Ct. 1187, 90 L.Ed. 1515 (1946) (federal minimum wage law under Fair Labor & Standards Act); *MacSuga v. County of Spokane*, 97 Wn.App. 435, 445-446, 983 P.2d 1167 (1999). The *prima facie* showing must be supported by a preponderance of the evidence.
- 5.3 A preponderance of the evidence is that evidence which, when fairly considered, produces the stronger impression, has the greater weight, and is the more convincing as to its truth when weighed against the evidence in opposition thereto. *Yamamoto v. Puget Sound Lbr. Co.*, 84 Wash. 411, 146 Pac. 861 (1915).
- 5.4 Substantial evidence must be presented and must be "sufficient to persuade a fair-minded person of the truth or correctness of the matter." *Ongom v. Dept. of Health*, 124 Wn App. 935, 948-49, 104 P.3d 29 (2005), *reviewed on other grounds*, 155 Wn.2d 1001, 122 P.3d 185 (2005).

Applicable Law

- 5.5 Wage Payment Act, RCW 49.48 (WPA) authorizes administrative enforcement of wage payment requirements. Upon receipt of a wage complaint that alleges a violation of a wage payment requirement, the Department "shall investigate" and, unless otherwise resolved, "shall" issue either a citation (when finding a wage law violation) or a determination of compliance (when finding no violation) within sixty days. RCW 49.48.083. The Department may extend the time period by providing advance written notice to the employee and the employer setting forth good cause for an extension of the time period. (Id.)
- 5.6 Wage payment requirements are those "set forth in RCW 49.46.020, 49.46.130, 49.48.010, 49.52.050, or 49.52.060, and any related rules adopted by the department." RCW 49.48.082(10). These wage payment requirements include, but are not limited to, requirements to pay minimum wages, overtime wages, agreed wages, and wages for final pay periods. RCW 49.48.082(12).
- 5.7 RCW 49.46.020 requires that every employer shall pay to each of his or her employees a rate of minimum wage for hours worked. See also WAC 296-126.
- 5.8 RCW 49.46.010(7) defines "wage" as:
- [C]ompensation due to an employee by reason of employment, payable in legal tender of the United States or checks on banks convertible into cash on demand at full face value, subject to such deductions, charges, or allowances as may be permitted by rules by director.

RCW 49.46.010(7).

- 5.9 Hours worked means all hours which the worker is authorized or required by the business to be on the premises or at a prescribed work place. WAC 296-126-002(8). This could include travel time, training, and meeting time, wait time, on-call time, and time for putting on and taking off uniforms and also may include meal periods. RCW 49.48, 49.46 and 49.52.
- 5.10 The WMWA defines an "employee" as "any individual employed by an employer." RCW 49.46.010. The term "employee" is further defined as "an employee who is employed in the business of his employer whether by way of manual labor or otherwise." WAC 296-126-002.
- 5.11 The WMWA is based on the Fair Labor Standards Act (FLSA). *Innis v. Tandy*, 141 Wn.2d 517, 523-24, 7 P.3d 807 (2000), and court interpretations of the FLSA are persuasive authority. To determine whether an individual is an employee, the courts will apply the economic realities test as set forth in *Goldberg v. Whitaker House Coop.*, 366 U.S. 28, 81 S. Ct. 933 (1961). "An individual who, without promise or expectation of compensation, but solely for his personal purpose or pleasure, worked in activities carried on by other person either for their pleasure or profit is outside the sweep of the [FLSA]." *Tony & Susan Alamo Foundation v. Sec'y of Labor*, 471 U.S. 290, 295, 105 S. Ct. 1953 (1985). An individual can volunteer for a public agency for civic, charitable, or humanitarian reasons, without promise or expectation of receipt of compensation for services rendered. 19 C.F.R. Section 553.106(a).
- 5.12 The economic realities test is used to establish whether a person is an employee of the business or if the person is an independent contractor or volunteer who is not owed compensation in the form of wages. *Anfinson v. FedEx Ground Package System, Inc.*, 174 Wn.2d 851, 281 P.3d 289 (2012) citing *Bartels v. Birmingham*, 332 U.S. 126, 130, 67 S. Ct. 1547, 1550, 91 L.Ed. 1947 (1947). The economic realities test sets forth six factors for consideration:
- 1) The degree of control exerted by the alleged employer over the worker;
 - 2) The worker's opportunity for profit or loss depending upon the worker's managerial skill;
 - 3) The worker's investment in equipment or materials required for the task, or employment of the of the helpers;
 - 4) Whether the service the worker renders requires a special skill;
 - 5) The degree of permanence of the working relationship, and;
 - 6) Whether the service rendered is an integral part of the alleged employer's business.

(Id.)

- 5.13 The existence and degree of each factor is a question of fact, while the conclusion to be drawn from these factors is a question of law. *Brock v. Superior Care, Inc.*, 840 F.2d 1054, 1059 (2nd Cir. 1988).

Analysis

- 5.14 The issue in this case is whether the Wage Claimant was a volunteer OCTN Board member or an employee of OCTN. The Department has asserted that the Wage Claimant was an unpaid volunteer and the Wage Claimant argues that he was an employee of OCTN and is entitled to wages.
- 5.15 The facts of this case favor the Department and OCTN. OCTN and its Executive Director did not direct the Wage Claimant's daily activities and the Wage Claimant was not supervised by any member of the OCTN. The Wage Claimant was not hired, but instead was elected to the position of President of the OCTN volunteer board by the other volunteer OCTN Board members. The Executive Director of OCTN did not have any authority to terminate the Wage Claimant's involvement with OCTN, only the other OCTN Board members could terminate the Wage Claimant's position.
- 5.16 The Wage Claimant and OCTN did not have any agreement to pay wages or commissions, and there is no evidence that the Wage Claimant's compensation and activities were not dependent on the Wage Claimant's managerial skills. The Wage Claimant did not invest in any equipment or materials to perform his position as President of OCTN's board. The tasks the Wage Claimant performed did not require any special skills, the relationship between the Wage Claimant and OCTN was less than permanent, as it was subject to the vote of the other members of the OCTN Board on at least an annual basis.
- 5.17 Certainly, the tasks performed by the Wage Claimant were integral to the business of OCTN, but they are tasks that were also performed by a number of the other OCTN Board members. The facts as presented show that the Wage Claimant does not meet the economic realities test and is therefore not an employee of OCTN.
- 5.18 Beyond the economics realities test, there must be given due consideration to the most important fact of this case: that the other members of the OCTN Board that the Wage Claimant worked with knew and understood that they were generously donating their time to assist the functions of a non-profit corporation and did not expect or demand any compensation for their activities on behalf of OCTN. Additionally, at no time during his employment did the Wage Claimant seek payment of wages; it was only after he had been removed from the OCTN Board that the Wage Claimant determined that he was owed wages. These facts weigh heavily against the Wage Claimant's claim that he was an employee and support

a conclusion that he was a volunteer for OCTN as a member of a volunteer board who only sought wages after he was voted off the OCTN Board.

- 5.18 Given the evidence presented, it must be concluded that the Wage Claimant has not carried its burden and was not an "employee" of OCTN as defined by RCW 49.46.010. Therefore he was not entitled to wages under RCW 49.46.010(7) or any other provision of Washington law.
- 5.19 Even if the Wage Claimant met the definition of an employee of OCTN, the Wage Claimant has demanded an exorbitant amount of money from OCTN, \$255,528.00 in wages. The Wage Claimant admitted repeatedly that there was only an "implied agreement" for his employment at most and that there was no agreed upon rate of pay with OCTN. Additionally, the Wage Claimant presented no evidence of an hourly rate or reasonable salary by which the Department or this Tribunal could base his rate of pay upon. Therefore, even if the Wage Claimant was an employee of OCTN, which as concluded above he was not, the Wage Claimant has frivolously asserted he is owed a six figure salary for no reason. Therefore, at most the Wage Claimant if he was an employee, would be entitled to hourly wages at a rate of the applicable minimum wage.
- 5.20 Further, the Wage Claimant did not provide sufficient evidence of the hours he worked. The Wage Claimant submitted documentation regarding the hours he worked to the Department, but throughout the proceedings the Wage Claimant admitted that the hours he claimed were incorrect or incomplete. Notably, the Wage Claimant was not able to show that the hours he spent reading and researching contractual provisions and associate law was actually a duty he was required to perform or that he performed the tasks during the periods of time he claimed to perform the tasks given his other activities for other entities. Additionally, the credible testimony of the Department's witnesses shows that the Wage Claimant did not work the hours he claimed. Each witness disputed the amount of time the Wage Claimant claimed it took him to perform tasks and the witnesses also credibly testified that other OCTN Board members would perform the tasks for the Wage Claimant when he was not available. The other OCTN Board members also could not verify that the Wage Claimant worked all the hours he claimed he worked. As a result, even if the Wage Claimant was an employee and entitled to the applicable rate of pay of minimum wage, the hours the Wage Claimant claimed he worked are not supported by sufficient evidence.
- 5.21 In sum, the Wage Claimant has not carried his burden and shown by a preponderance of the evidence that he was either an employee of OCTN, or that he is entitled to the salary he claims or that he worked the hours he claimed. As a result, Department's June 29, 2016, Determination of Compliance must be affirmed.

6. INITIAL ORDER

6.1 The Department of Labor and Industries' June 29, 2016, Determination of Compliance is AFFIRMED.

Order issued from Tacoma, Washington on the date of mailing.



Courtney Beebe
Administrative Law Judge
Office of Administrative Hearings

PETITION FOR REVIEW

Any party that disputes this Initial Order may file a Petition for Administrative Review with the Director of the Department of Labor and Industries.¹ You may e-mail your Petition for Administrative Review to the Director at directorappeal@lni.wa.gov. You may also mail or deliver your Petition for Administrative Review to the Director at the Department's physical address listed below.

Mailing Address:

Director
Department of Labor and Industries
PO Box 44001
Olympia, WA 98504-4001

Physical Address:

7273 Linderson Way SW
Tumwater, WA 98501

If you e-mail your Petition for Administrative Review, please do not mail or deliver a paper copy to the Director.

Whether you e-mail, mail or deliver the Petition for Administrative Review, the Director *must actually receive* the Petition for Administrative Review during office hours at the Director's office within 30 days of the date this Initial Order was mailed to the parties. You must also provide a copy of your Petition for Administrative Review to the other parties at the same time.

If the Director does not receive a Petition for Administrative Review within 30 days from the date of the Initial Order, the Initial Order shall become final with no further right to appeal.²

If you timely file a Petition for Administrative Review, the Director will conduct an administrative review under chapter 34.05 RCW.

¹ RCW 49.48.084 and RCW 34.05.464.

² RCW 49.48.084 and Chapter 34.05 RCW.

CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 10-2016-LI-00274

I certify that true copies of this document were served from Tacoma, Washington via Consolidated Mail Services upon the following as indicated:

James Gutschmidt 1255 Chesaw Rd Oroville, WA 98844 Appellant 91 7199 9991 7036 8798 8370	<input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Heather Leibowitz 800 fifth Avenue, Ste. 2000 MS: TB-14 Seattle, WA 98104 Agency Representative	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Okanogan County Transportation & Nutrition ATTN: Jennifer Fitzhum, Executive Director P.O. Box 711 Omak, WA 98841 Employer	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Jerry J. Moberg Jerry Moberg & Associates PS P.O. Box 130 Ephrata, WA 98823 Employer Representative	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail

Date: Friday, March 17, 2017

OFFICE OF ADMINISTRATIVE HEARINGS



Melanie Barnhill
Legal Assistant