

COMMONWEALTH OF PENNSYLVANIA

Luis G. Marengo : State Civil Service Commission
: :
v. : :
: :
Lackawanna County Assistance Office, :
Department of Human Services : Appeal No. 30949

Luis G. Marengo : Peter J. Garcia
Pro Se : Attorney for Appointing Authority

Jareth E. Rickaby
Jessica Kiwak
Indispensable Parties¹

ADJUDICATION

This is an appeal by Luis G. Marengo challenging his non-selection for promotion to Income Maintenance Casework Supervisor (hereinafter, “IMCW Supervisor”) with the Lackawanna County Assistance Office, Department of Human Services (hereinafter, “appointing authority”). A hearing was held on November 17, 2022, via video, before Commissioner Gregory M. Lane.

The Commissioners have reviewed the Notes of Testimony, the exhibits introduced at the hearing, and the closing statements of the parties. The issue before the Commission is whether the appointing authority’s non-selection for promotion of appellant was based upon any discriminatory factor.

¹ In recognition of the due process requirements outlined in *Jefferson County Assistance Office, Department of Public Welfare v. Wolfe*, 136 Pa. Commw. 115, 582 A.2d 425 (1990), the individuals currently occupying the challenged position were given the opportunity to participate in the proceedings, which they accepted. N.T. pp. 11-13; Comm. Exs. C, C-1, D, D-1.

FINDINGS OF FACT

1. On April 11, 2022, Indispensable Party Jessica Kiwak interviewed for a IMCW Supervisor position with the appointing authority. Ap. Exs. 2, 5, 9.
2. On April 12, 2022, Indispensable Party Jareth E. Rickaby and appellant interviewed for a IMCW Supervisor position with the appointing authority. Ap. Exs. 3, 7, 11.
3. By email dated April 28, 2022, appellant was informed Rickaby was promoted to IMCW Supervisor. Comm. Ex. B.
4. By email dated May 4, 2022, appellant was informed Kiwak was promoted to IMCW Supervisor. Comm. Ex. B.
5. The appeal was properly raised before the Commission and was heard under Section 3003(7)(ii) of Act 71 of 2018.
6. Appellant is not challenging Rickaby's promotion to IMCW Supervisor. N.T. pp. 38-39.

7. The IMCW Supervisor position was not posted as a bilingual position. N.T. pp 76-77.
8. Kiwak, Rickaby, and appellant all interviewed with the same three-person interview panel that consisted of Income Maintenance Administrator 3 Joseph Tomaselli, Income Maintenance Administrator 3 Christina Donnini, and Income Maintenance Administrator 1 Frank Muraca, Jr. N.T. pp. 32, 36-39, 84, 88-89, 106-110; Ap. Exs. 2, 3, 5, 7, 9, 11.
9. Kiwak, Rickaby, appellant, and all the other candidates who interviewed for the IMCW Supervisor positions were Income Maintenance Caseworkers and met the Minimum Experience and Training (hereinafter, "METs") for the IMCW Supervisor positions. N.T. pp. 114-115.
10. The competitive interview process² for each candidate was the same and was the same type of competitive interview process the panelists had used in the past. N.T. pp. 60, 73-75, 102, 113-114, 116.

² The competitive interview process is the method used by the appointing authority to identify which candidate, from a list of eligible equally qualified candidates, is the best for a given vacancy. N.T. pp. 72-73, 114-115.

11. Fifteen minutes before the interview, each candidate was provided the interview questions and blank papers. N.T. pp. 28-29.

12. All the candidates were asked the same following interview questions in the order below:
 1. Cite specific examples from your educational background and job experience that make you the best candidate for the position of IM Supervisor?
 2. As a Supervisor, your team may be comprised of in office and teleworking staff. The work expectations are the same regardless of the work location. Please describe what you believe your philosophy and approach would be to ensure your team achieves the Department's timeliness and accuracy performance expectations?
 3. If you are the selected candidate, your team assignment may include programs that you may not have extensive program knowledge. Please describe what you believe your transition plan would be to ensure you can effectively provide guidance to your team and feed back to management?
 4. As a supervisor, one of your new responsibilities will be performance management. Providing performance reviews and regular feedback to your team members and management is an

important aspect of your duties. Please describe why these performance tools are important and how you would use performance management to encourage your team members?

5. Do you have any additional information about your knowledge, experience, ability, and training relevant to this position that you were not able to present through your answers to our questions?
6. Are you able to perform the essential functions of this position with or without accommodations? Yes or No?
7. Do you have any questions about this position?
8. Knowing what you do about the job, are you still interested?

N.T. pp. 60, 116; Ap. Exs. 2, 3, 5, 7, 9, 11.

13. The candidates were instructed to use the blank papers to write their answers to the above outlined interview questions, and they could then use those answers as a guide during the actual interview. N.T. pp. 28-29.
14. At the conclusion of the interview, the candidates' pre-interview notes were collected by Human Resources Analyst 2 Mary Ann Greco and were destroyed. N.T. p. 61.

15. The panelists neither reviewed nor saw the candidates' pre-interview notes. N.T. pp. 60-61, 101, 115.
16. At the start of the interview, the panelists told each candidate that when responding to questions the candidate should assume the panelists know nothing about their background, experience, training, and the interview is each candidate's opportunity to explain why they are the best candidate. N.T. pp. 39, 110-111.
17. All the candidates were given the same amount of time for the interview and were told what the maximum amount of time was for the interview. N.T. p. 60.
18. During the interview, the panelists did not prevent appellant from answering the questions. N.T. p. 138.
19. Appellant did not provide the interview panel any information about his educational background. N.T. p. 136.

20. Appellant did not tell the interview panel he had prior supervisory experience when he was employed as a paramedic supervising an EMT because he did not think this information was relevant to the IMCW Supervisor position. N.T. pp. 131-132, 136-137.
21. The panelists used a “Candidate Rating Form” to take notes during the interview. Ap. Exs. 2, 3, 5, 7, 9, 11.
22. After the interview, the panelists used the “Candidate Rating Form” to score each candidate in the following five categories: Communication; Interpersonal Skills/Customer Service; Experience; Problem Solving/Decision Making, and Organizational Skills. Ap. Exs. 2, 3, 5, 7, 9, 11.
23. In each of the five categories the panelists had the option to score the candidates as Excellent, Above Average, Average, Below Average, or Undesirable. Ap. Exs. 2, 3, 5, 7, 9, 11.
24. Appellant’s scores in each category ranged from “Above Average” to “Below Average.” Ap. Exs. 3, 7, 11.

25. Kiwak's scores in each category ranged from "Excellent" to "Above Average." Ap. Exs. 2, 5, 9.

DISCUSSION

The present appeal is challenging appellant's non-selection for promotion to Income Maintenance Casework Supervisor (hereinafter, "IMCW Supervisor") with the Lackawanna County Assistance Office, Department of Human Services (hereinafter, "appointing authority"). Comm. Ex. A. Appellant alleges his non-selection for promotion was the result of discrimination on the grounds of race and national origin because the appointing authority did not promote the most qualified candidates by selecting White Non-Hispanic candidates over Hispanic candidates. Comm. Ex. B; N.T. pp. 20-21. Specifically, appellant alleges this is evidenced by the interview panelists not taking detailed written notes of the things he said during the interview, and all the Hispanic candidates being ranked in the bottom third. N.T. pp. 128, 173-177. Appellant is Hispanic.³ Based on appellant's allegations and the testimony elicited during the hearing, we find appellant has raised claims of both traditional and procedural discrimination.

³ At the hearing, appellant did not testify he was Hispanic, however, the Commission will note in his appeal request form appellant stated he is "[b]eing passed for promotion by less qualified candidates due to being Hispanic." Comm. Ex.B.

In an appeal alleging discrimination, appellant bears the burden of establishing that the personnel action was due to discrimination. *Henderson v. Office of the Budget*, 126 Pa. Commw. 607, 560 A.2d 859 (1989) *petition for allowance of appeal denied*, 524 Pa. 633, 574 A.2d 73 (1990). Section 2704 of Act 71 of 2018 (hereinafter “Act 71”) provides:

An officer or employee of the Commonwealth may not discriminate against an individual in recruitment, examination, appointment, training, promotion, retention, or any other personnel action with respect to the classified service because of race, gender, religion, disability or political, partisan or labor union affiliation or other non-merit factors.

71 Pa.C.S. § 2704. As expressly provided for in this section, the Commission has jurisdiction over claims of discrimination involving numerous actions that occur in the merit system, including “recruitment” and “examination.” 71 Pa.C.S. § 2704. Under Section 3003(7)(ii) of Act 71, the Commission has authority to convene hearings when an individual aggrieved by an alleged violation of Section 2704 files a timely appeal. 71 Pa.C.S. § 3003(7)(ii).

The provisions of Section 2704 are substantially the same as the provisions in Section 905.1 of Act 286 (71 P.S. § 741.905a), and both sections of the respective acts use virtually the same language.⁴ In applying this language, the

⁴ Section 905.1 provides:

905.1 Prohibition of Discrimination—No officer or employe[e] of the Commonwealth shall discriminate against any person in recruitment, examination, appointment, training, promotion, retention, or any other personnel action with respect to the classified service because of political or religious opinions or affiliations because of labor union affiliations or because of race, national origin, or other non-merit factors.

71 P.S. § 741.905a.

courts have held these provisions address both “traditional” and “procedural” discrimination. *Pronko v. Department of Revenue*, 114 Pa. Commw. 428, 439, 539 A.2d 456, 462 (Pa. Commw. Ct. 1988). “Traditional discrimination” encompasses claims of discrimination based on race, sex, national origin, or other non-merit factors. *See State Correctional Institution at Albion v. Bechtold*, 670 A.2d 224 (Pa. Commw. Ct. 1996).

Act 71 of 2018 also addresses “procedural” discrimination. “Procedural discrimination” involves a violation of procedures required pursuant to the Act or related Rules. *Price v. Luzerne/Wyoming Counties Area Agency on Aging*, 672 A.2d 409, 411 n. 4 (Pa. Commw. Ct. 1996); *Pronko v. Department of Revenue*, 114 Pa. Commw. 428, 539 A.3d 462 (1988) 71 Pa.C.S.A. § 2704. Where a procedural violation of the Act constitutes the alleged discrimination, no showing of intent is required. *Price, supra*. However, to obtain relief, the employee must show she was harmed because of the procedural noncompliance with the Act, or that because of the peculiar nature of the procedural impropriety, she could have been harmed, but there is no way to prove that for certain. *Price, supra*.

In support of his appeal, appellant presented the testimony of Human Resources Analyst 2 Mary Ann Greco, Income Maintenance Administrator 3 Joseph Tomaselli, Income Maintenance Administrator 3 Christina Donnini, and Income Maintenance Administrator 1 Frank Muraca, Jr. Additionally, appellant testified on his own behalf. The appointing authority did not present any witnesses or evidence at the hearing. Before we begin our summarization of the testimony and evidence,

we will note appellant is not challenging the promotion of Indispensable Party Jareth E. Rickaby.⁵ N.T. pp. 38-39. We will now summarize the testimony and evidence.

On April 11, 2022, Indispensable Party Jessica Kiwak interviewed for an IMCW Supervisor position at the appointing authority. Ap. Exs. 2, 5, 9. On April 12, 2022, Indispensable Party Jareth E. Rickaby and appellant interviewed for an IMCW Supervisor position at the appointing authority. Ap. Exs. 3, 7, 11. By email dated April 28, 2022, appellant was informed Rickaby was promoted to IMCW Supervisor. Comm. Ex. B. By email dated May 4, 2022, appellant was informed Kiwak was promoted to IMCW Supervisor. Comm. Ex. B.

The IMCW Supervisor positions were not posted as bilingual positions. N.T. pp 76-77. Kiwak, Rickaby, and appellant all interviewed for the same open IMCW Supervisor positions and interviewed before the same three-person interview panel that consisted of Tomaselli, Donnini, and Muraca. N.T. pp. 32, 36-39, 84, 88-89, 106-110; Ap. Exs. 2, 3, 5, 7, 9, 11. Kiwak, Rickaby, appellant, and all the other candidates who interviewed for the IMCW Supervisor positions were Income Maintenance Caseworkers and met the Minimum Experience and Training (hereinafter, “METs”) for IMCW Supervisor. N.T. pp. 114-115. The competitive interview process for each candidate was the same and was the same type of competitive interview process the panelists had used in the past. N.T. pp. 60, 73-75, 102, 113-114, 116.

⁵ During appellant’s direct examination of Tomaselli, appellant stated, “I will not be referencing Mr. Rickaby’s form, Exhibit AP-1, as he had prior experience in a similar line of work in Labor & Industry, plus supervisory experience as a LIHEAP supervisor. Therefore, I am not challenging his appointment.” N.T. pp. 38-39.

Greco testified fifteen minutes prior to the interview, each candidate was provided with blank papers and copies of the interview questions. N.T. pp. 28-29. All the candidates were instructed to use the blank papers to write out their answers to the provided interview questions, and they could then use those answers as a guide during the actual interview. N.T. pp. 28-29. At the conclusion of the interview, the candidates' pre-interview notes were collected by Greco and were destroyed. N.T. p. 61. The panelists neither reviewed nor saw the candidates' pre-interview notes. N.T. pp. 60-61, 101, 115.

Having summarized the facts leading up to the interviews, we will now turn to the facts presented as to the actual interviews. All three interview panelists were questioned about their decision to promote Kiwak to the IMCW Supervisor position over appellant.

All the panelists testified to the following general facts. At the start of the interview, the panelists told each candidate when responding to questions the candidate should assume the panelists know nothing about their background, experience, training, and the interview is each candidate's opportunity to explain why they are the best candidate. N.T. pp. 39, 110-111. All the candidates were asked the same interview questions in the same order. N.T. pp. 60, 116; Ap. Exs. 2, 3, 5, 7, 9, 11; *See* Finding of Fact #12. All the candidates were given the same amount of time for the interview and were told the maximum amount of time for the interview. N.T. pp. 60. During the interview, the panelists did not prevent appellant from answering any questions. N.T. p. 138.

Tomaselli was the first panelist called to testify. Tomaselli testified during the interview appellant provided very limited responses to all the questions. N.T. p. 40. Tomaselli recalled appellant stated he helped others in the office, he had eight years of experience as an IMCW, and he had some technical knowledge. N.T. pp. 46, 49. Tomaselli further testified appellant provided no information regarding his educational background and no information as to any prior job-related supervisory experience. N.T. pp. 70-71. Comparatively, Tomaselli testified Kiwak provided in-depth answers to the interview questions, and detailed information about her background. N.T. pp. 45, 49; Ap. Ex. 2. Kiwak described her customer service experience when she worked at County Children and Youth Services, and how she had to make decisions without supervisory guidance and treated everybody with respect. N.T. pp. 67-68. Tomaselli testified customer service is an integral part of the IMCW Supervisor position because IMCW Supervisors interact with clients when the clients voice concerns about their benefits. N.T. p. 68.

Interview panelist Donnini testified next. Donnini did not know appellant prior to the interview. N.T. pp. 95-96. Donnini testified appellant mentioned he had eight years of experience, did not provide detailed answers, and did not mention anything about his education. N.T. pp. 94-95. Donnini noted the following in her "Candidate Rating Form" regarding appellant's interview: appellant was well spoken, lacks details; interprets and applies policy, but did not give examples to demonstrate decision making or problem solving; No mention of organization or ability to multitask other than using Workload Dashboard to

prioritize. N.T. pp. 97-99; Ap. Ex. 7. Additionally, Doninni noted appellant's technical ability on her "Candidate Rating Form," but did not correlate it with problem solving as a supervisor. N.T. p. 90. Donnini explained, "what I look for is how you work as a caseworker . . . and how you turn that around into decision making and problem solving as a supervisor." N.T. p. 90.

Comparatively, Donnini testified Kiwak went into great detail regarding her education, experience, and problem-solving abilities. N.T. p. 94. Kiwak stated she worked at Head Start and met with families to determine their needs for schooling, jobs, and housing. N.T. pp. 103-104. Kiwak further explained while working at Children and Youth Services she assessed families for waiver programs. N.T. p. 104. Kiwak also gave a detailed example about de-escalating a client who was found ineligible for a medical payment, and she was specifically sought out by a supervisor due to her good de-escalation skills. N.T. p. 104.

Muraca was the last interview panelist to testify. Muraca testified he rated Kiwak higher than appellant because Kiwak "provided great detail about her background, experience, and training and [appellant] did not." N.T. pp. 110-111. Muraca further testified appellant "listed items but didn't elaborate on them at all and how they related, more importantly, to the position of Income Maintenance Casework Supervisor." N.T. pp. 110-111. Muraca characterized appellant's answers as brief, and specifically lacking detail as to how his background, experience or training would relate to a supervisor position. N.T. pp. 112, 118.

After eliciting the above testimony of the interview panelists, appellant testified on his own behalf. Appellant asserted “there were a lot of things that I stated during that interview that were not recorded [by the panelists].” N.T. p. 124. Appellant testified he mentioned relying on Microsoft Access and Outlook for prioritization in addition to Workload Dashboard, but this was not reflected in the panelists’ notes. N.T. pp. 124-125. Additionally, appellant testified he gave examples of caseworkers and supervisors contacting him with questions about policy, systems, and how to do their work. N.T. pp. 126-127. Appellant explained “[w]here I did not provide the specific examples during the interview because there are like - - some of them more recent, but this happens on a daily basis.” N.T. pp. 125-126. Appellant concluded his direct testimony stating, “[a]nd looking at Exhibit AP-8, we’ll see that most of the caseworkers have an average experience of 3.5 years, all non-Hispanic whites. All the Hispanic caseworkers with an average experience of 8.1 years, they’re ranked in the bottom third.”⁶ N.T. p. 128.

The appointing authority elicited the following testimony from appellant on cross examination about his interview. Appellant testified he did not make any reference to his educational background. N.T. p. 136. Appellant did not tell the panelists about his past experience as a paramedic supervising an EMT because he did not think it was relevant to the IMCW Supervisor position. N.T.

⁶ The appointing authority did not object to this testimony by appellant, however, the appointing authority did object to the admission of Ap. Ex. 8, the document upon which appellant’s testimony was based. Specifically, the appointing authority asserted Ap. Ex. 8 was not a reliable source of information because appellant had altered the exhibit by adding the candidate’s ethnicities and years of experience. N.T. p. 160. The Commission sustained the appointing authority’s objection, and Ap. Ex. 8 was not entered into evidence and is not part of the record of this adjudication. N.T. pp. 161-162.

pp. 131-132, 136-137. Appellant acknowledged Donnini noted on her “Candidate Rating Form” appellant assisted co-workers with technical issues, and appellant has a familiarity with teleworking. N.T. pp. 138-141. Appellant agreed the panelists did not prevent him from answering the questions, and he had all the time he needed to answer the questions. N.T. pp. 137-138.

At the conclusion of the appellant’s case-in-chief the appointing authority made an oral Motion to Dismiss appellant’s appeal stating the appellant failed to present sufficient evidence to make out a *prima facie* case of discrimination. N.T. pp. 164-167. Commissioner Lane deferred ruling on the appointing authority’s Motion to Dismiss pending review by the whole Commission. N.T. pp. 166-167. The Commission is now ready to address the appointing authority’s Motion to Dismiss.

Appellant asserts his non-selection was because he is Hispanic, which he claims is evidenced by all the Hispanic candidates being ranked in the bottom third, and the panelists not recording in their notes statements appellant made during the interview. N.T. pp. 128, 173-177. Initially, appellant’s assertion all Hispanic candidates were ranked in the bottom third is, at the most, uncorroborated hearsay.⁷ Hearsay admitted without objection may support a finding in an administrative proceeding only if corroborated by competent evidence in the record. *Burks v. Commonwealth, Department of Public Welfare*, 48 Pa. Commw. 6, 10, 408 A.2d

⁷ Hearsay is a statement made by an out-of-court declarant that is offered to prove the truth of the matter asserted. Pa.R.E. 801 (225 Pa. Code Rule 801 (2019)).

912, 914 (1979). Appellant did not present any testimony or evidence regarding his race or national origin, the race or national origin of Kiwak and Rickaby, or the race or national origin of the other non-selected candidates. Appellant did testify, without objection by the appointing authority, all the Hispanic IMCW candidates were ranked in the bottom third. N.T. pp. 128-129. This is the only testimony appellant presented referencing the race or national origin of the candidates. The burden of proof is on the appellant, and he did not tell the Commission how he obtained this information. Consequently, appellant is offering the evidence to prove all the Hispanic candidates were ranked in the bottom third, however, he did not provide direct evidence as to how he reached this conclusion. Accordingly, the Commission neither finds as a fact all Hispanic candidates were ranked in the bottom third, nor finds appellant's statement credible because it is not supported by *any* other evidence in the record.

We will now turn appellant's allegation that the panelists' failure to record certain statements appellant made during the interview was evidence of discrimination. All the panelists credibly testified⁸ they did enter notes of appellant's interview answers into their individual "Candidate Rating Form," but noted appellant's answers were very limited and lacked detail. We find this testimony credible because all the panelists' "Candidate Rating Forms" included notes of appellant's answers and all three panelists noted appellant's answers lacked detail.

⁸ The Commission has the inherent power to determine the credibility of witnesses and the value of their testimony. *McAndrew v. State Civil Service Commission (Department of Community and Economic Development)*, 736 A.2d 26 (Pa. Commw. 1999).

More importantly, appellant himself testified he did not provide information about his education, past supervisory history, and he admitted there were areas during the interview where he did not provide specific examples. Further, the panelists testimony did not demonstrate any discriminatory motive. None of the panelists testified they considered race or national origin when making their decision. None of the panelists testified they were aware of the candidates' race or national origin. None of the questions the panelists asked made any reference to race or national origin or sought answers regarding race or national origin. Accordingly, the appellant failed to establish any discriminatory motive by the panelists. Further, any lack of notes taken by the panelists during appellant's interview was likely due to appellant's lack of detailed answers. We find the appellant failed to present sufficient evidence to establish a *prima facie* case of discrimination based on race or national origin.⁹

Before ending our discussion, we are compelled to briefly address an underdeveloped procedural discrimination claim centered on appellant's questioning of the pre-interview candidate notes. First, appellant failed to cite any violation of

⁹ Moreover, had the burden of proof shifted, the appointing authority through cross examination of appellant's witnesses presented legitimate, non-discriminatory rationale for appellant's non-selection for promotion to IMCW Supervisor. Tomaselli credibly testified how Kiwak described her customer service experience when she worked at County Children and Youth Services, and how she had to make decisions without supervisory guidance and treated everybody with respect. N.T. pp. 67-68. Tomaselli explained customer service is an integral part of the IMCW Supervisor position because IMCW Supervisors interact with clients when the clients voice concerns about their benefits. N.T. p. 68. Donnini credibly testified Kiwak went into great detail and provided specific examples regarding her education, experience, and problem-solving abilities. N.T. p. 94. Muraca credibly testified he rated Kiwak higher than appellant because Kiwak "provided great detail about her background, experience, and training and [appellant] did not." N.T. pp. 110-111. Simply stated, the interview panelists found Kiwak a better candidate because she presented more detailed answers, and better communicated to the panelists how her background and experience would make her a good IMCW Supervisor.

procedures required pursuant to Act 71 of 2018 or the related rules as to the use of the pre-interview candidate notes. Second, the interview procedures were the same for all the candidates to include the questions, the panelists, the length of the interview, and the use and handling of the candidate pre-interview notes. Finally, Greco and the panelists credibly testified the panelists did not see the notes. At the end of each candidate's interview, Greco collected the notes and destroyed them. To the extent appellant attempted to raise a procedural discrimination claim related to the pre-interview notes, we find it fails. The pre-interview notes were intended as a tool to assist each candidate to organize their thoughts to better answer the interview questions and were destroyed after the interview. Accordingly, there was no harm to the appellant because the interview panelists never saw the notes, and, consequently, the notes did not factor into the decision not to select appellant for the IMCW Supervisor position.

In conclusion, upon review of the record, the Commission finds appellant has failed to present sufficient evidence to establish a *prima facie* case of discrimination based on race or national origin. Further, we find the appellant failed to prove sufficient evidence to support a procedural violation of the Act. Accordingly, we will grant the appointing authority's Motion to Dismiss, and enter the following:

CONCLUSION OF LAW

Appellant has not presented evidence establishing discrimination violative of Section 2704 of Act 71 of 2018.

ORDER

AND NOW, the State Civil Service Commission, by agreement of its members, dismisses the appeal of Luis G. Marengo challenging his non-selection for promotion to Income Maintenance Casework Supervisor employment with the Lackawanna County Assistance Office, Department of Human Services, and sustains the action of the Lackawanna County Assistance Office, Department of Human Services, in the non-selection for promotion of Luis G. Marengo to Income Maintenance Casework Supervisor employment.

State Civil Service Commission

Maria P. Donatucci
Chairwoman

Gregory M. Lane
Commissioner

Pamela M. Iovino
Commissioner

Mailed: May 24, 2023