**HEARING OFFICER, CAREER SERVICE BOARD**
**CITY AND COUNTY OF DENVER, COLORADO**

Appeal Nos. 122-03

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FINDINGS AND ORDER

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IN THE MATTER OF THE APPEAL OF:

**JOYCE MONTABON, Appellant,**

v.

Agency: Department of Revenue, Treasury Division, and the City and County of Denver, a municipal corporation.

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## INTRODUCTION

For purposes of these Findings and Order, Joyce Montabon shall be referred to as "Appellant." Department of Revenue, Treasury Division shall be referred to as "Department" or "Treasury Division." The City and County of Denver shall be referred to as "City." Collectively they shall be referred to as "Agency." The Rules of the Career Service Authority shall be abbreviated as "CSR" with a corresponding numerical citation.

A hearing on this appeal was held December 2-4, 2003, before Robin R. Rossenfeld, Hearing Officer for the Career Service Board. Appellant was present and represented by Jeffrey Menter, Esq. The Agency was represented by Linda Davison and Jack Wesoky, Assistant City Attorneys, with Susann Stubbs serving as the advisory witness.

The Hearing Officer has considered the following evidence in this decision:

The following witnesses were called by and testified on behalf of the Agency:

Appellant, Dr. Edwin Healey (hostile witness), Susann Stubbs, Rita Murphey, Steve Hutt

The following witnesses were called by and testified on behalf of the Appellant:

Tammy Montabon Deitz, Bob Dent, Susann Stubbs, Appellant

The following exhibits were offered and admitted into evidence on behalf of the Agency:

1-6, 10-12, 16

The following exhibits were offered and admitted into evidence on behalf of the Appellant:

A, C, E, I, J, K, L, M, N, Q, R, U, EE, FF, GG, HH, II

The following exhibits were admitted into evidence by stipulation:

1- 4, 6, 11, 12, 16, C, J, K, M

The following exhibits were offered but not admitted into evidence and therefore not considered in this decision:

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## NATURE OF APPEAL

Appellant is appealing her disqualification, claiming disability discrimination. Appellant is requesting she be reinstated and provided with back pay and benefits.

## ISSUES ON APPEAL

Whether Appellant was properly disqualified from her employment with Treasury Division?

Whether the Rules concerning the interactive process were properly applied, and, if they were not, what relief is Appellant entitled to?

Whether Appellant's disqualification was based upon a discriminatory (disability) bias?

## PRELIMINARY MATTERS

Appellant filed her Notice of Appeal for her disqualification on July 24, 2003. Appellant filed a Motion for Summary Judgment November 13, 2003. The Agency responded on November 19, 2003. On November 22, the Hearing Officer denied the Motion because there was a factual dispute as whether Rita Murphey acted in good faith in the handling of the interactive process or whether her actions were *per se* violations of CSR §5-84.

On November 26, the Agency filed a Motion *in Limine* and a Motion to Quash a Subpoena to Produce regarding evidence concerning Appellant's vacation and sick leave payment. The basis of the two Motions was that the vacation and sick leave payment issue was improperly and untimely raised before the Hearing Officer in Appellant's Motion for Summary Judgment and that, in any case, the Hearing Officer did not have subject matter jurisdiction to consider the Agency's withholding of certain payments upon Appellant's termination. Appellant responded to the Motions on December 1. The Hearing Officer ruled on the Motions at the commencement of the hearing on December 2. The Motions were granted. The vacation and sick leave issue was improperly and untimely raised in Appellant's Motion for Summary Judgment. In any case, the issue was outside the jurisdiction of the Hearing Officer and could be properly raised only in a court of general jurisdiction. The subpoena to produce the records relating to vacation and sick leave was quashed as the evidence was irrelevant to the issues properly in front of the Hearing Officer.

## FINDINGS OF FACT

1. Appellant was employed by the Department as an Administrative Support Assistant IV.

2. The CSA Classification description for ASA IV provides, in relevant part:

GENERL STATEMENT OF CLASS DUTIES

Performs specialized and/or technical office support work that requires detailed knowledge of the specialized/technical area.

* * *

ESSENTITAL DUTIES

Performs specialized and/or technical office support functions such as assisting with collections; recording financial data into standardized formats; researching and examining chain of title and legal descriptions; processing motor vehicle title applications; providing specialized human resource support in benefits, medical claims, and other human resource area; and performing intake procedures and monitoring progress.

Interprets and explains regulations, policies, standards, and/or procedures to internal/external customers based on extensive knowledge of a specialized area within a defined scope.

Reviews and evaluates forms, applications, computations, documents, and/or other information to determine accuracy, completeness, acceptability, or compliance based on extensive knowledge of a specialized area or legal requirements.

Prepares and processes documents and other forms in accordance with legal precedents or other specialized/technical procedures.

Recommends improvements or solutions to problems within a range of specified, acceptable, and/or standard alternatives and technical practices.

Provides specialized information, identifies problems within a defined scope and has the authority to resolve discrepancies, and follows up on requests or complaints.

Approves and rejects information and determines appropriate services within a defined scope.

Utilizes a computer to input information/data and to create, edit, compile, manipulate, and retrieve files and/or databases and creates reports.

MINIMUM QUALIFICAITONS
Competencies, Knowledge & Skills

* * *

Knowledge of standard office practices and procedures sufficient to be able to process various types of paper work associated with office support duties.

Skill in utilizing computer software to accomplish a variety of tasks.

Physical Demands:

Sitting: remaining in the normal seated position.
Handling: seizing. Holding, grasping, or otherwise working with hand(s)
Fingering: picking, pinching, or otherwise working with fingers.
Talking, expressing or exchanging ideas by means of spoken words.
Hearing: perceiving the nature of sounds by the ear.
Repetitive motions: making frequent movements with a part of the body.
Eye/hand/foot coordination: performing work through using two or more.
Near Acuity: able to see clearly at 20 inches or less.
Depth Perception: ability to judge distances and space relationships.
Field of Vision: ability to see peripherally.
Accommodation: ability to adjust vision to bring objects into focus.
Color Vision: ability to distinguish and identify different colors.

Working Environment:

Subject to many interruptions.

* * *

(Exhibit 12)

3. Appellant was assigned to provide data entry for the Use Tax project, which, along with the sales tax, brings in 52% of the City's revenues. It is a hardship for the City when the revenues are not collected because the records are not accurate and up-to-date.

4. Appellant was injured at work on November 15, 2000. She was injured while removing a thirty to forty pound box of records from a shelf. A workers compensation case was opened. An ergonomic plan was developed for Appellant. She received medical treatments from a Dr. Kesten. On April 1, 2001, she told him that she had no pain at all and that the "last thirty days went really well." On April 23, 2001, she told Dr. Kesten she felt great, had no pain, was sleeping "really good," had no trouble lifting things at home and that she did not need to use the TheraCane. Dr. Kesten placed Appellant on maximum medical improvement (MMI) with no work restrictions. The workers comp case was closed on June 26, 2001.

5. On August 8, 2001, Appellant received a denial of her Career Service Authority classification claim.

6. Appellant had a severe flare-up of her symptoms on August 9, 2001, which she claimed to leave her in "excruciating pain. She did not go to work from August 9 through19. She visited Dr. Kesten again on August 16

7. Appellant was scheduled for a deposition related to a lawsuit she had filed on August 13 and 16, 2001. She was unable to prepare for the deposition because of her pain and it was postponed until August 22, 2001

8. Despite her claim of being in too much pain to give her deposition on August 13, Appellant tried to file an appeal of the denial of her reclassification that day. Appellant actually filed her appeal with Jim Yearby, Personnel Director, on August 16, the other day she cancelled the deposition because of her pain.

9. On August 24, 2001, Appellant told Dr. Bergeron that she was feeling "so much better" because she had a new ergonomic chair at work that was helping her. (Exhibit 11, p. 103) She confirmed that she was getting better to Dr. Bergeron on August 31, but this time she complained about the new chair not working. (Exhibit 11, p. 104)

10. Suring the month of September 2001, while there was no litigation activity occurring, Appellant was doing fairly well.

11. On October 21, 2001, she received Mr. Yearby's denial of her classification appeal. On October 23, she reported "excruciating pain." She took 53 hours of sick leave between October 23 and 31, 2001. She filed an appeal of the classification denial to the Hearing Officer (October 31). She also was engaged in obtaining a new workers' compensation attorney and making calls to the Office of the Mayor to complain about her workers' comp claim.

12. During the month of November 2001, Appellant was reevaluated at Red Rock Center for Rehabilitation by Dr. Jeffery Kesten. (Exhibit 11, pp. 126-132) She began to receive trigger point injections, which she found to be helpful. During this month, Appellant prepared an affidavit for Marie Rodriguez, a fellow employee who also had a case pending against the City. Her deposition was taken in Ms. Rodriguez's case on November 15. She also prepared a summary judgment motion, including 74 exhibits, for her federal lawsuit against the City. She was caught by workers' comp surveillance shoveling snow at a time she claimed to be in too much pain to work.

13. Appellant's symptoms were exacerbated again in December 2001. She told Dr. Kesten that the trigger point injections were making her symptoms worse. An MRI was performed on December 11. It came back normal.

14. Appellant told Dr. Kesten about her work stresses tied to the ongoing litigation. Dr. Kesten suggested that the litigation activities had an affect on her physical condition and suggested that she get biofeedback training. She objected to that suggestion because she could "see" visible bumps due to her injuries and she wanted to know what was wrong with her before she went to learn biofeedback. He also provided her with a variety of alternative therapies for her pain.

15. Appellant threatened to file a complaint against Dr. Kesten in December 2001/Janaury 2002.

16. Appellant had a deposition scheduled for December 13, 2001. It had to be rescheduled.

17. Appellant filed a harassment case against Robert Wolfe, Assistant City Attorney, Mary Padilla and Rebecca Stubbs on December 21, 2001. On December 26, she began a letter writing campaign to the Mayor and the City Council. Also during this time, she made changes to her deposition testimony and gave a deposition in the Maria Rodriguez matter.

18. On January 18, 2002, the final pretrial order was due in Appellant's federal lawsuit. She prepared and copied approximately 3,000 documents as exhibits for the trial.

19. Appellant filed a second appeal with the Career Service on January 25, 2002. By the end of January, she had her own case in federal courts, was working on her workers' comp

claim, had two cases before the Career Service, and was assisting Maria Rodriguez in her case.

20. Appellant believes that the pain she was experiencing was due to a lack of medical treatment, not to the number of lawsuits she had pending.

21. On January 15, 2002, Appellant received an independent medical examination (IME) from Dr. Lynn Parry, who found Appellant was not at maximum medical improvement (MMI) and that she was "at tremendous risk for developing increasing problems and cumulative trauma." (Exhibit 11, p. 165) Appellant decided that she now wanted to be treated by Dr. Parry and not Dr. Kesten. Dr. Parry could not provide medical treatment since she was the physician providing the IME for workers' comp.

22. Appellant's litigation activities continued throughout the spring. On March 11, 2002, Appellant filed nine pages of objections to a "Meets Expectations" Performance Enhancement Plan Report. On March 13, 2002, she reported alleged harassment at work to the Denver Police Department. She tried to report harassment to the Golden Police Department for matters happening in her home on March 19, 2002. Neither police department would take her report. She submitted a supplemental affidavit in her federal case on March 20, 2002. A hearing was conducted on the proposed exhibits in federal court on April 3, 2002. There was a hearing on May 20, 2002, in federal court regarding her witnesses.

23. Appellant's next workers' comp doctor was Dr. Jill Castro. She first visited her on September 30, 2002. Dr. Castro put Appellant on temporary work restrictions, limiting her to three to four hours of work each day (which was reduced from the 6-8 hours Dr. Kesten had stated during the summer of 2002), with ten to twenty minutes of data entry with five minute breaks in between. Dr. Castro did not place any lifting restrictions on Appellant at that time.

24. After Dr. Castro put Appellant on work restrictions, she averaged three hours of work per day, while she was getting paid for a full eight hours under her workers' comp benefits. Appellant was able to work through June 19, 2003.

25. On November 4, 2002, Dr. Castro advised Appellant that the delay in her recovery was do to the stress and anxiety she had from the litigation she was involved with.

26. Appellant filed a fourth case with the EEOC in December 2002. She filed an appeal to the Tenth Circuit Court of Appeals on December 12, 2002. She filed another case with the Career Service on December 30, 2002.

27. Data entry is a primary function of Appellant's job. The job requires the ability to do more than twenty minutes of data entry a day.

28. Over the course of time, Appellant was provided with a lower desk, several ergonomic chairs, and headsets to accommodate her restrictions.

29. Appellant was asked to keep a log of her activities beginning in September 2002. (Exhibit EE) The purpose was to help Appellant monitor her time and be sure not to work outside her restrictions. These logs show that usually she spent no more than fifteen minutes an hour doing data entry. They also show that, on occasion, she would be asked to cover the phone for Sylvia Martinez, Ms. Stubbs' secretary. While Appellant was told not do any data entry at Ms. Martinez's desk because it was not ergonomically correct for her, Appellant did some data entry there. She did not tell Ms. Stubbs that she was performing outside her

restrictions.

30. On December 4, 2002, Appellant told her supervisor that she did not feel that she could keep up with the data entry that needed to be performed. She suggested that the system be automated, or reassigned to someone else to perform. She also asked that she be given until the end of the month, when she expected to receive permanent work restrictions (PWR), before a decision was made whether to disqualify her. Ms. Stubbs agreed to give her another month. It was seven more months before the Department took any action.

31. At first, Appellant told Dr. Castro that good things were happening at work and that the amount of data entry had been reduced. She also told Dr. Castro that she could not work more than three hours a day and that if she did data entry for more than ten minutes, her symptoms would flare up.

32. On March 11, 2003, Rita Murphey, ADA Coordinator for the CSA, contacted Appellant to see if the PWR had been issued.

33. In May 2003, Appellant filed an ADA lawsuit against the City claiming she had a permanent disability.

34. Finally, on June 19, 2003, Appellant's interactive meeting was held with Ms. Murphey. Appellant's daughter, Tammy Montabon Dietz and Ms. Stubbs were also at the meeting. Appellant said she could work three hours a day because of the pain issues (even though her doctor said she could work up to four hours), with ten to twenty minutes of data entry. She also told Ms. Murphey that she would eventually be able to work an eight-hour day. They talked about job restrictions. She again suggested automation of the data entry, a new headset, and (unbiased) medical treatment (which Appellant claimed she was being denied).

35. Ms. Murphey testified that Appellant required more medical treatment and that is not considered a reasonable accommodation under the interactive process. Appellant asked for "more time" to feel better, which also is not a reasonable accommodation, particularly as Appellant could not give an end date for her recovery. Ms. Murphey told Appellant that it would be difficult to find Appellant any job given her limited ability to work under her work restrictions. She noted that there was a significant reduction in part-time jobs and that she was not aware of any available at the time.

36. Ms. Murphey researched the positions for which Appellant might be qualified. She had to place Appellant into a position either at her level (612) or in a demotion. She also looked at Appellant's skills and abilities, her education and experience, and the physical restrictions she was under. She searched through the weekly bulletin listing open jobs, put out feelers to recruiters looking for part-time employees performing light duties, looked at the e-listing interface with the City Agencies, and contacted the on-call coordinator to see if there were any on-call positions for which Appellant might qualify.

37. The biggest obstacle in finding a position for Appellant was the number of hours Appellant could work and her physical restriction to doing data entry.

38. Ms. Murphey did not make the determination that Appellant was disabled under the ADA because it was not clear from the information she had that Appellant was "disabled." Ms. Murphey said that it was not clear that Appellant could not engage in the major life activity "working." She could still perform a broad range of jobs. The problem was the unavailability of

jobs within the City due to a hiring freeze and lay-offs during the summer of 2003.

39. Ms. Murphey gave Appellant through June 30, 2003, to come up with any new suggestions on how to accommodate her. Appellant was unable to come up with any new suggestions.

40. Appellant met with Dr. Castro on June 20. Dr. Castro told Appellant she would have to have adoptive/compensatory strategies in place.

41. Ms. Murphey looked for possible jobs for Appellant from June 19 thought June 30. While she generally looks for ninety days, she did not do so in this case. Ms. Murphey stated this rule is in place to provide an opportunity for job reassignment, not to give an employee more time to heal and get better. Ms. Murphey determined there was little likelihood Appellant would able to perform the essential duties of any position within ninety days. Therefore, she closed the interactive process early.

42. Despite having closed the interactive process on June 30, Ms. Murphey continued to look for jobs for Appellant through September 19, the ninetieth day. No jobs opened during the time that met Appellant's education, experience and permanent restrictions.

43. Ms. Murphey testified that as of the date of the hearing, there were still not jobs available for Appellant that met with her continuing work restrictions.

44. Appellant was sent a letter of Contemplation of Disqualification on July 1, 2003. (Exhibit 3)

45. On July 3, Appellant told Ms. Stubbs that she was in so much pain that she could not understand the contents of the letter. Two days later she sent Steve Hutt, Treasurer of the City and County of Denver, and her appointing authority, a letter in which she had already noticed substantial improvement under her new massage therapy plan. On July 8, during the disqualification meeting, she reiterated that a return to full-time work was still her goal. She could not explain to Mr. Hutt why she thought she had a permanent disability in May 2003, but no longer believed it to be permanent in July.

46. Appellant was sent notice of her disqualification on July 15, 2003. (Exhibit 2)

47. The appeal was filed with the Career Service Hearing Officer in a timely manner.

48. Appellant has difficulty doing her housekeeping, cooking, driving, and typing. She is slow in getting her hair done. She can't sit in booths in restaurants and needs to be careful in which chairs she sits in. She needs an orthopedic cushion when she sits.

49. Dr. Edwin Healey saw Appellant for an IME as part of her workers' comp claim on July 31, 2003. He spent an hour with her and approximately two hours reviewing three to four inches of medical records and writing his report. He stated that he never questioned Appellant about her truthfulness in providing the information she did. He initially concluded that Appellant would get better if she were provided with appropriate ergonomic changes to her office. During his testimony he admitted that he was unaware that those changes had been provided to Appellant. He disagreed with another report that Appellant was malingering. He also believed that Appellant would benefit from the ministrations of Frank Telamantes, a chiropractor. He stated that Appellant's neurological tests were normal. However, pain is

subjective and difficult to quantify and that persistent pain lead to changes in the brain's biochemistry so that pain is actually "felt" differently.

50. Dr. Healey stated that he could not say, within a reasonable degree of medical certainty, Appellant could return to work full time even on the date of the hearing. He agreed that she was able to work only three to four hours a day. He opined that the time might increase to four to six hours after more therapy. He was unable to state whether Appellant could do more than ten to twenty minutes of data entry at a time.

## DISCUSSION AND CONCLUSIONS OF LAW

The City Charter C5.25 (4) requires the Hearing Officer to determine the facts in this matter "de novo." This has been determined to mean an independent fact-finding hearing considering evidence submitted at the de novo hearing and resolution of factual disputes. *Turner v. Rossmiller*, 35 Co. App. 329, 532 P.2d 751 (Colo. Ct. of App., 1975)

This is an appeal of a disqualification under CSR §14-20. Therefore, the Agency has the burden of proof.

### A. Disqualification

CSR §14-21 permits an employee be separated from employment without fault if the employee has a physical impairment that prevents satisfactory performance of the essential functions of the position. Prior to disqualification for a physical impairment or incapacity, if it is determined that the employee is disabled within the meaning of the Americans with Disabilities Act, the agency must make an effort to make a reasonable accommodation. If a reasonable accommodation cannot be provided or if the employee rejects the reasonable accommodation, disqualification is permitted. If an employee is not disabled within the meaning of the ADA, the agency need not attempt to make a reasonable accommodation before initiating the disqualification. CSR §14-22 provides that an employee may be disqualified when the employee becomes unable to perform the essential functions of the position because of mental or physical impairment or incapacity.

The Agency has shown through its evidence that Appellant was unable to perform the essential job functions (particularly data entry) of an Administrative Assistant IV due to her work restrictions.

The Agency has also shown that Appellant is not disabled within the meaning of the ADA. While Appellant has limitations on her ability to perform data entry, such limitations are not a substantial impairment of a life activity necessary for the ADA to apply. *Doebele v. Sprint/United Mgmt. Co.*, 342 F.3d 117 (10th Cir 2003). Appellant did not present any evidence, either prior to the disqualification or during the hearing, that she is unable to perform tasks central to daily life, such as household chores, bathing or brushing one's teeth. *Toyota Motor Mfg., Inc. v. Williams*, 534 U.S. 184, 197 (2002). The fact that she performs these functions either slowly or with some difficulty is not sufficient. Therefore, Rita Murphey was correct in determining that there was no need to make further "reasonable accommodations" prior to disqualifying Appellant.

In any case, Ms. Murphey still looked at alternative job assignments and asked Appellant to suggest other reasonable accommodations. Ms Murphey was unable to find any jobs within the City for which Appellant qualified by experience, education, knowledge, training and within her

restrictions.

Based upon the foregoing actions and reasons presented by the Agency, disqualification was appropriate.

**B. The Interactive Process**

There is a second issue. That is whether the interactive process terminated prematurely under the Rules and, if so, what the effect of this is on the relief to which Appellant is entitled.

CSR §5-84 F. 2. provides that, if the employee expresses an interest in continued employment within the City, the CSA:

> shall look for vacant positions for a period of three (3) months. If no vacant position becomes available during the three-month period, disqualifications may be initiated. The responsibility to engage in the interactive process may terminate earlier of the employee withdraws his or her request for a reasonable accommodation. (Emphasis added)

In the instant case, Ms. Murphey terminated the interactive process after eleven days, not ninety. The fact that Appellant was unable to offer any more suggestions for accommodation to Ms. Murphey by June 30 is not the equivalent of a withdrawal of her request. The closure of the interactive process was premature. Ms. Murphey's continuing efforts to locate a job for Appellant does not alter this fact.

Because the interactive process was closed prematurely, the disqualification was also premature. The question now becomes what is the effect of this error under the circumstances of this case.

The Hearing Officer concludes that Appellant's disqualification should not have taken place until September 19, 2003. While the Hearing Officer could send the matter back to the Department to perform another disqualification meeting, such action is not necessary. It is clear that, had the disqualification hearing occurred at any time after September 19, the results would have been the same. Appellant was not able to perform her essential job functions in October, November or even in December when the hearing on the merits occurred. Additionally, even her own witness, Dr. Healey, could not state within a degree of medical certainty when Appellant would be able to work more than three to four hours a day and perform more than ten minutes of data entry at a time. Given Appellant's continuing inability to perform her essential job functions, it is unnecessary to remand this matter back to the Department to perform another disqualification.

However, as the disqualification was premature, the Department is ordered to restore Appellant to the payroll for the period she was prematurely disqualified (July 16 through September 19, 2003), along with any benefits attached.

**C. Disability Discrimination Claim**

Appellant bears the burden to establish discrimination. The requirements for establishing an employment discrimination case were originally set out by the United States Supreme Court in *McDonnell Douglas Corp. v. Green*, 411 U.S. 792 (1972). Appellant bears the burden to prove that she was discriminated against on the basis of her being member of a suspect or protected class. The burden would then shift to the Agency to show that there was a *bona fide* business reason for

its actions. If the Agency shows a *bona fide* business purpose, then Appellant has to show that the *bona fide* business purpose is pretextural. *See also Texas Dept. of Comm. Affairs v. Burdine*, 450 U.S. 248 (1981); *St. Mary's Honor Center et al. v. Hicks*, 509 U.S. 502 (1993).

Mere assertions of discrimination are not sufficient to meet the burden. As stated above, Appellant presented no evidence of disability discrimination because she was unable to show that she is disabled under the Americans with Disabilities Act. There is also no credible evidence that the Agency did not make efforts to accommodate Appellant's work restrictions, make the necessary ergonomic changes to her work area, provide her with sufficient time to heal, or otherwise attempt to assist Appellant in the performance of her duties. The discrimination claim is dismissed.

**ORDER**

Therefore, for the foregoing reasons, the Hearing Officer GRANTS the appeal in part and ORDERS the Agency to restore appellant to the payroll for the period of July 16 through September 19, 2003, along with any benefits thereto. The disqualification is otherwise AFFIRMED. The discrimination claim is DISMISSED.

Dated this 31st day of March 2004.

Robin R. Rossenfeld
Hearing Officer for the
Career Service Board

**CERTIFICATE OF MAILING**

I hereby certify that I have forwarded a true and correct copy of the foregoing FINDINGS AND ORDER by depositing the same in the U.S. mail, this 1st day of April 2004, addressed to:

Joyce Montabon
15748 W. 2nd Ave.
Golden, CO 80401

Jeffrey Menter
26 W. Dry Creek Circle, Ste. 470
Littleton, CO 80120

I further certify that I have forwarded a true and correct copy of the foregoing FINDINGS AND ORDER by depositing the same in interoffice mail, this 1st day of April 2004, addressed to:

Linda Davison, Esq.
Office of the City Attorney
Employment Law Section

Susann Stubbs
Department of Revenue, Treasury Division

Charlotte A. Smith