

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

Appeal No. 55-04

DECISION AND ORDER

IN THE MATTER OF THE APPEAL OF:

JAMES GARCIA, Appellant,

Agency: Department of Aviation, Denver International Airport, and the City and
County of Denver, a municipal corporation.

The hearing in this appeal was commenced on September 13, 2004 before Hearing Officer Valerie McNaughton, and concluded on September 14, 2004. Appellant was present throughout the hearing and was represented by Cheryl Hutchison, of the Association of Federal, State, County and Municipal Employees (AFSCME). The Agency was represented by Assistant City Attorney Christopher M.A. Lujan. Having considered the evidence and arguments of the parties, the Hearing Office makes the following findings of fact, conclusions of law and enters the following decision:

FINDINGS AND ANALYSIS

This is an appeal of a ten-day suspension of Appellant James Garcia, a Supervisor of Administrative Support I in charge of the Call Center for Guest Services at the Denver International Airport. The suspension on April 16, 2004 was administered for violations of Career Service Rules (CSR), Department of Aviation rules and Executive Order 112. The timely appeal asserts that his suspension was in violation of the Career Service Authority (CSA) disciplinary rules.

I. **NATURE OF DISCIPLINE**

Appellant was suspended for ten days based upon the appointing authority's conclusion that he was guilty of a pattern of inappropriate behavior and inadequate performance of his supervisory duties since he signed a Zero Tolerance Memorandum on October 2, 2002. The discipline letter cited several incidents of negative interactions with co-workers, other airport employees and passengers, as well as a failure to clearly communicate directions or to apply rules fairly. In addition to the suspension, Appellant was ordered to complete three training courses in interpersonal skills, and develop an action plan to put those skills into practice.

The following conduct was deemed by the Agency to support the discipline imposed:

1. On February 17, 2004, Appellant was abrupt, stern and bad-tempered during an exchange with Transportation Security Agency (TSA) supervisor John Martinez on the subject of moving passengers from one security checkpoint to another,

2. On January 14, 2004, Appellant screamed at an employee during a discussion regarding Appellant's placement of a Note to File in the employee's personnel file on Nov. 10th,

3. On November 10, 2003, Appellant placed the Note to File in a personnel file without notifying the employee or Charles Maldonado, Manager of Guest Services, in violation of Mr. Maldonado's policy,

4. On December 8, 2003, during a quarterly review, Appellant was informed by a subordinate that he placed a Note to File in the subordinate's file without furnishing a copy to the subordinate or Mr. Maldonado, in violation of policy,

5. On December 2, 2003, a group of employees communicated their complaints of unfair and abrasive behavior by Appellant to Mr. Maldonado and Human Resources personnel,

6. On September 17, 2003, Travelers Assistance Program supervisor Petie Horton reported that Appellant displayed intimidating behavior during a conversation regarding a traveling family in need of comfort zone supplies,

7. On June 16, 2003, Appellant was discourteous to a Premier passenger who attempted to use the frequent flyer gate at a security checkpoint,

8. On June 18, 2003, Appellant had a negative encounter with a 1K passenger,

9. On June 9, 2003, Appellant was rude and abrupt with Aviation Passenger Service Representative Vicky Ronstadt, and

10. Appellant failed to clearly articulate priorities and directions to his staff in applying the 2003 furlough rollout, family sick leave and other policies and procedures, resulting in confusion and the need to re-issue two quarterly performance evaluations.

The Agency charged Appellant with violations of the following subsections of CSR § 16-50 A., Discipline and Termination: (1) Gross negligence or willful neglect of duty, (7) Refusal to obey the orders of a supervisor, (8) Threatening or intimidating employees, (18) Violation of Executive Order #112, Violence in the Workplace, and (20) Other unspecified conduct.

Appellant was also charged with violations of the following subsections of CSR § 16-51 A., Causes of Progressive Discipline: (2) Failure to meet established standards of performance; specifically, Department of Aviation Violence in the Workplace Policy and Procedure No. 2016 and CSR § 15-10 requiring employees to fulfill their duties

conscientiously; (4) Failure to maintain satisfactory work relationships; (5) Failure to observe departmental regulations; (6) Carelessness in the performance of duties; (10) Failure to comply with supervisory instructions, and (11) Other unspecified misconduct.

At a pre-disciplinary meeting held on April 5, 2004, Appellant read a written rebuttal statement. [Exh. 4.] The statement asserted that he did not remember the incidents alleged to have occurred on June 9th, 11th and 18th, and stated that the remaining actions were undertaken in performance of his job duties. After the meeting, Appellant sent an email explaining that he was merely encouraging staff to take furlough hours before earned leave in order to avoid holiday staff shortages. [Exh. 16.]

In making its determination of discipline, the Agency considered Appellant's September 2000 five-day suspension for harassment and willful neglect of duty. [Exh. 17.] It also considered that Appellant had signed a Zero Tolerance Memorandum on October 2, 2002, warning him to "immediately cease the practice of harsh, angry and intimidating personal interaction." [Exh. 6.] The Agency noted that the cited incidents indicated that Appellant had failed to heed the directions given in previous performance evaluations, action plans and supervisors' orders, and had failed to apply the lessons taught in numerous training classes related to communication and proper supervisory skills. The Agency imposed a ten-day suspension, ordered completion of three specified courses in interpersonal skills by July 21, 2004, ordered Appellant to submit a report of how he intends to apply the skills learned from the courses, and ordered Appellant to develop an action plan in conjunction with his manager, Charles Maldonado. [Exh. 3.]

II. ISSUES

1. Whether the Agency proved that Appellant committed violations of the Career Service Rules by a preponderance of the evidence, and

2. If so, whether the ten-day suspension imposed was reasonably related to the seriousness of the offenses in question in conformity with CSR § 16-10.

III. EVIDENCE

The City Charter requires that the facts at issue in a Career Service appeal must be determined *de novo*. C5.25(4). Such a determination requires an independent fact-finding hearing and the resolution of factual disputes. Turner v. Rossmiller, 532 P.2d 751 (Colo. App. 1975.)

Appellant was disciplined under five general areas covered by the nine specifically cited rules violations, as outlined below.

A. Performance of Duties

Appellant is alleged to have violated three separate sections of the disciplinary rules related to the performance of duties: CSR § 16-50 A. (1), Gross negligence, CSR

§ 16-51 A. (2), Failure to meet established standards of performance, and CSR § 16-51 A. (6), Carelessness in the performance of duties.

In support of its argument that Appellant's behavior was in violation of his performance standards, the Agency presented the evidence of its policies, training, Appellant's Performance Enhancement Plan (PEP), management orders and informal mentoring. The relevant policies are CSR § 15-10, which requires employees' performance to reflect credit on the Career Service and the City and County of Denver, Executive Order 112, prohibiting violence in the workplace, and its Department of Aviation counterpart, Policy and Procedure No. 2016. The Agency asserts that Appellant had notice of the performances standards, that his behavior established a pattern of intimidating conduct from June 2003 to February 2004, and that this behavior was in violation of those performance standards.

Appellant, Guest Services Manager Charles Maldonado, and Aviation Human Resources Director James Thomas all testified that Guest Services is the front-line customer services unit for the Department of Aviation whose mission is to exemplify good customer service goals. The unit defines the word "customer" as including everyone: passengers, co-employees, tenants, airline personnel, and personnel from other agencies at the Denver International Airport. The Agency personally reinforced its philosophy of customer service to Appellant by several means: his PEP standards and ratings [Exh. 5, pp. 4 – 7], continuous mentoring by his manager Charles Maldonado, the Sept. 2000 imposition of a five-day suspension for similar behavior [Exh. 17], training classes on conflict resolution and communication skills [Exh. 18], and his signature on a zero tolerance memorandum on Oct. 2, 2002 based upon previous cited violations of those standards and policies. The Agency established thereby that Appellant had sufficient notice of the performance standards expected of him.

Appellant's representative argued that Appellant was deprived of notice of the incidents upon which the discipline was based, and thereby was not given an adequate opportunity to rebut the charges at his pre-disciplinary meeting. The evidence demonstrates that Mr. Maldonado did apprise Appellant of the details of the incidents as complaints surfaced from various sources. Since the nature of the offense is that of a pattern of conduct, it is found that Appellant did have notice of the charges and an adequate opportunity to rebut them in keeping with the requirements of procedural due process.

Appellant also claimed that he was prejudiced by not being invited to the December 2nd meeting with several employees who reported their complaints about Appellant to Mr. Maldonado and Agency Human Resources personnel. On the contrary, Mr. Maldonado testified that he discussed the same issues raised by those employees in his one-on-one meetings with Appellant. Appellant also claims he was disadvantaged by the exclusion of other members of his staff from that meeting, who may have given a different report of Appellant's communication skills. Since the purpose of the meeting was to allow a forum for complaints about Appellant, it is found that Appellant was not entitled to have other members of his staff present.

The Agency presented the testimony of Appellant's managers, employees supervised by Appellant, and outside airport personnel. That testimony established that the pattern of conduct in question demonstrated poor customer service skills, in violation of Guest Services performance standards.

TSA Checkpoint Supervisor John Martinez testified that Appellant confronted him in an aggressive manner on Feb. 17, 2004 while Mr. Martinez was communicating line wait times to passengers at Baggage Area 7. Appellant squared his shoulders, came within eight inches of Mr. Martinez, and asked him in a loud voice who had authorized him to divert traffic. Appellant then asked him for his badge number, according to Mr. Martinez. Surrounding passengers reacted to the encounter by asking Mr. Martinez why Appellant was treating him this way. Appellant admitted he was "stressed" during the encounter and asked Mr. Martinez, "[i]s it clear that you're diverting [passengers to a different security checkpoint]?" Appellant told his supervisors that Mr. Martinez "misinterpreted my intentions [and] ignored my attempts to communicate waiting times at the other checkpoints". [Exh. 4, p. 4.]

Doneva Watts, a Guest Services Representative supervised by Appellant, testified that Appellant displayed a heavy-handed, abrasive style of management that at times caused staff members Vickie Ronstadt and Theresa Durham to leave his office in tears. Appellant snapped at Ms. Watts loudly if she corrected his erroneous directions to a customer, and sometimes turned his anger at an employee onto the next passenger who approached the Call Center with a question. Ms. Watts complained to Appellant's supervisor three times between June and December 2003 about Appellant's negative behavior and his use of her sick leave to support an unfavorable performance review.

Teresa Durham, Airport Passenger Service Representative, has been supervised by Appellant for the past three years. She testified that Appellant was negative and aggressive toward her, despite her performance awards. Ms. Durham filed a grievance against Appellant for misapplication of the sick leave policy, unsupported negative comments in her performance evaluation, and placement of a Note to File in her personnel file in violation of the policy requiring him to give a copy to her and Mr. Maldonado. [Exh. 13.] As a result of that grievance, management changed the wording of the evaluation and removed the Note to File. [Testimony of Charles Maldonado.]

Director of DIA Human Resources James Thomas testified that his unit conducted a thorough two-month investigation of Appellant's conduct. Based largely on Appellant's previous five-day suspension for similar conduct and the zero tolerance memorandum of October 2002, Mr. Thomas concluded that the Agency had given Appellant a clear message not to demonstrate those behaviors from that point on. [Exhs. 6, 17.] Mr. Thomas reviewed the investigation and concluded that Appellant had displayed a pattern of inappropriate behavior perceived as intimidating, hostile or threatening from June 2003 to early 2004, despite the previous discipline, zero

tolerance memorandum, and the Agency's extensive investment in training Appellant in the area of interpersonal skills. Mr. Thomas testified that the discipline complied with CSA rules and was appropriate under the rules governing progressive discipline.

Charles Maldonado, the Manager of Guest Services, testified that he received a complaint from Traveler's Assistance supervisor Petie Horton after an unpleasant encounter with Appellant in September 2003. Ms. Horton told Mr. Maldonado that Appellant inserted himself in the middle of a passenger situation that she had already handled. She described that Appellant "puffed up and began to berate me" after she informed him that she had a situation under control. [Exh. 26.] Mr. Maldonado interviewed another employee, Dale Howard, at Appellant's suggestion, and determined that Mr. Howard was not a witness to the incident. He then concluded that the incident occurred as described by Ms. Horton based upon his past observations of similar conduct and body posture by Appellant.

Mr. Maldonado, a former educator, testified that he did not read Appellant's personnel file when he started in February 2003 as Manager of Guest Services because he wanted to form his own opinion about his staff. Based on his observations of Appellant's communication style, Mr. Maldonado began to continually discuss with Appellant that he was expected to cease the use of an authoritarian or angry manner, and substitute a cooperative approach with all customers, as that word is used within Guest Services. He included those expectations in Appellant's PEPR dated August 15, 2003. [Exh. 5, pp. 4 - 7, 17.]

Mr. Maldonado testified that he received numerous complaints and grievances from Guest Services staff and other airport personnel based upon Appellant's confrontational demeanor and unfair application of policies. [Exhs. 10, 11, 13, 21, 22, 30.] He learned that Appellant violated his Note to File policy announced in March 2003 by failing to provide Mr. Maldonado or employees Dolores Proffitt and Vicki Ronstadt a copy of Notes to File before placing them in the employee's personnel file. [Exhs. 11, 13.]

Appellant did not deny that his performance standards required him to adhere to the Agency's customer service policy, or that the actions cited in the disciplinary letter violated that policy. He admitted that Mr. Maldonado had frequently instructed him to stop his aggressive communication style. Appellant countered only that he wanted to discuss the reasons for his behavior with Mr. Maldonado, and that his actions were taken in the performance of his duties. It is concluded that Appellant intentionally chose to continue his own communication style with knowledge that it violated Agency policy.

The evidence regarding items 1 - 2 and 6 - 9 established that Appellant was guilty of a pattern of angry and intimidating communication with customers, as that term is defined by the Agency. The evidence related to items 3, 4 and 10 proved that Appellant violated management performance standards with regard to the Notes to File system and performance evaluations. Item 5 is a report of complaints rather than conduct by Appellant, and therefore does not itself support disciplinary action. The

Agency has established by a preponderance of the evidence that the standards of performance were objective and reasonable, and that Appellant committed the acts alleged in the referenced items. Therefore, it is found that Appellant committed gross negligence in the performance of his duties in violation of CSR § 16-50 A. (1), as well as failure to meet established standards of performance in violation of CSR § 16-51 A. (2), and carelessness in the performance of duties in violation of CSR § 16-51 A. (6).

B. Disobedience to Supervisory Orders

The Agency claims that the Appellant failed to comply with Mr. Maldonado's instructions to avoid anger and confrontation in his on-the-job communications with others, and also disobeyed his order to provide copies of all Notes to File to both the employee and Mr. Maldonado prior to placing them in a personnel file. The Agency supported those assertions by the facts contained in items 1 – 10 of the disciplinary letter.

As recited above, the Agency has proven that Appellant committed the behavior described in items 1 – 4 and 6 -10 of the disciplinary letter. It remains to be determined whether that conduct constituted disobedience to supervisory orders in violation of CSR § 16-50 A. (7), refusing to comply with the orders of an authorized supervisor, and CSR § 16-51 A. (10), failure to comply with the instructions of an authorized supervisor.

Mr. Maldonado provided personal instruction and directions to Appellant over a number of months on the subject of compliance with the policy governing customer service. At the March 2003 supervisory meeting attended by Appellant, Mr. Maldonado ordered his supervisors to give him and the affected employee a copy of all Notes to File before any such notes were placed in an employee's personnel file.

As stated above, Appellant admitted that he was repeatedly ordered by Mr. Maldonado to comply with the Agency's customer service policy. He also admitted that he had knowledge of the order controlling distribution of a Note to File since March 2003.

Contemporaneous memos demonstrate that Appellant admitted placing such notes in two personnel files after that order without copying the employee or Mr. Maldonado. [Exhs. 11, pp. 2, 4; Exh. 14.] His statement to Mr. Maldonado that one of the notes was intended as a reminder to himself is not credible. The note was placed in a personnel file rather than in Appellant's desk or other personal storage area. The Agency was reasonable in disregarding that statement as mitigation of intentional disobedience. The Agency also reasonably concluded that Appellant was the person who placed a Note to File in Teresa Durham's file, based upon Mr. Garcia's email admission that he had done so in Exh. 14.

The evidence supports a finding that Appellant failed to comply with his supervisor's instructions with regard to both compliance with the customer service policy prohibiting angry and intimidating conduct and the Note to File policy, as described in

items 1 – 4 and 6 – 9 of the disciplinary letter. The Agency has established by a preponderance of the evidence that Appellant disobeyed the orders of his supervisor, in violation of CSR § 16-50 A. (7), refusing to comply with the orders of an authorized supervisor, and CSR § 16-51 A. (10), failure to comply with the instructions of an authorized supervisor.

C. Threatening or Abusive Behavior

The Agency asserts that Appellant was guilty of threatening, intimidating or abusing employees in violation of CSR §§ 16-50 A. (8) and (18), Executive Order 112, CSR § 16-51 A. (5) and Department of Aviation Policy 2016. The conduct cited in support of this allegation is that Mr. Maldonado on one occasion witnessed Appellant cornering Vicki Ronstadt in the break room to discuss an attendance issue, using an intimidating tone. Mr. Maldonado's reaction to the scene was that the behavior was uncalled for to discuss a work-related issue, although he added, "I'm sure James thought he was just communicating with her a piece of work information." The witness stated that he believed Appellant had probably also intimidated Doneva Watts, Teresa Durham, and Terry Lee, based upon his recognition of the common thread of the complaints against Appellant.

It does not appear that the break room incident was listed in the disciplinary letters. The evidence indicates that this incident was not the June 9, 2003 event identified in the disciplinary letter as item 9, since Mr. Maldonado testified on cross-examination that Ms. Ronstadt herself reported the latter incident to him, after which Mr. Maldonado instructed Appellant to be fair to all employees.

Mr. Maldonado was the only witness who testified about the break room incident. His testimony was that Appellant cornered or pinned Ms. Ronstadt, and addressed her in an intimidating tone loud enough to bring Mr. Maldonado out of his office. His reaction indicated that he did not then believe that incident was threatening or violent in nature within the meaning of Career Service or Agency rules, since he took no corrective action based on his observations under either Executive Order 112 or the corresponding Department of Aviation rule, Policy 2016. [Exhs. 8, p. 2, and 9, pp. 2 - 3.] The Agency offered no testimony on the issue of whether Appellant's conduct caused any apprehension of harm in anyone present.

The Agency seeks to have the rule interpreted to prohibit workplace communications made in an aggressive manner; here, the use of an angry tone while crowding a subordinate's personal space. Resolution of this issue turns on the meaning of § 16-50 A. (8). The language of the rule is similar to that used in Executive Order 122 and the Aviation Department's Policy 2016, both of which reference acts or perceived threats of physical violence as examples of actions covered by the policies. Previous CSA Hearing Office decisions interpreting these rules support that interpretation. See e.g. In re: Day, #12-03 (incident of "pure rage" frightening co-workers found to violate workplace violence rules); In re: Fresquez, #73-02 (disagreeable behavior distinguished from violence or threats of violence).

Appellant's discussion of a work issue with an employee in his staff does not become an act or threat of violence because it is delivered in an unpleasant or even intimidating manner. Further, the fact that the manager who witnessed the behavior took no action pursuant to the applicable rules to ensure the safety of the employee tends to confirm that the nature of the encounter was that of a harshly-imposed reprimand rather than an act of violence. Thus, the Agency has not established that the conduct violated CSR § 16-50 A. (8), (18), Executive Order 112, CSR § 16-51 A. (5) or Department of Aviation Policy 2016 by a preponderance of the evidence.

D. Failure to Maintain Satisfactory Work Relationships

Based upon the above findings that Appellant committed the behavior described in items 1 – 2 and 6 – 9, it is concluded that Appellant violated CSR § 16-51 (4), Failure to maintain satisfactory work relationships. The testimony of members of his staff, other airport personnel, and Mr. Maldonado amply demonstrated that his intimidating supervisory style resulted in poor staff morale, lack of the communication needed to effectively accomplish the service goals of Guest Services, a strained relationship with some other airport personnel, and several passenger complaints. Appellant's failure to obey policies and instructions for the benefit of his staff resulted in several employee complaints and grievances. Many were sustained by management, which required the correction of performance reviews and the expulsion of Notes to Files from personnel files. Appellant's unpopularity with his staff was illustrated by the unpleasant employee meeting held on December 2, 2003, at which five employees expounded on the reasons for their dislike of Appellant. [Exh. 22.]

It is abundantly clear that Appellant has failed to maintain satisfactory work relationships because of his failure to adapt his supervisory style to that required by his service-oriented department, as well as his failure to comply with the rules and orders of his manager. For that reason, it is found that the Agency has established that Appellant violated CSR § 16-51 (4).

E. Failure to Reflect Credit on City and Career Service

Finally, Appellant was charged with a violation of CSR § 16-51 A. (5) and CSR § 15-10, failure to observe departmental rules requiring an employee's performance to reflect credit on the City and County of Denver and the Career Service Authority.

As it is empowered to do, the Agency and Guest Services has defined its own mission as requiring each employee to provide excellent customer service to anyone encountered by the employee. By that measure, Appellant must be judged by whether the people who encounter Appellant in the course of the performance of his duties form a positive impression of the City and Career Service.

The totality of the evidence indicates that Appellant had an unacceptable amount of negative encounters with passengers, airport personnel and Agency staff. This was

established at hearing by the testimony of his staff's anger at him for his harsh supervisory style, numerous reports of confrontations between Appellant and others at the airport, and witness testimony of others' reaction to Appellant. One telling example was related by Terry Lee, who reported that Appellant became angry with a passenger for failing to understand his directions. The passenger returned to the Call Center to ask Mr. Lee if there was something he had done to set Appellant off.

It is therefore concluded that Appellant's commission of the conduct described in items 1 – 2 and 6 – 9 violated CSR § 16-51 A. (5) and CSR § 15-10.

IV. PENALTY

The sole remaining issue is whether a ten-day suspension, additional training and an action plan were reasonably related to the seriousness of the offence, taking into consideration Appellant's past disciplinary record, in compliance with CSR § 16-10.

Discipline is reasonably related to the seriousness of an offense if it is within the range of reasonable alternatives available to a reasonable, prudent agency administrator. GUSTERN, 128-02, at 20 (decision dated 12-28-02.), *citing Adkins v. Div. of Youth Services*, 720 P.2d 626 (Colo.App. 1986.) Discipline is not excessive if it is substantially based on considerations that are supported by a preponderance of the evidence. GUSTERN, *id.*

Appellant's past record included a five-day suspension for a similar incident in 2000, in which he was found to be guilty of harassment and willful neglect of duty for an angry exchange perceived to be intimidating by a fellow employee. [Exh. 17, p. 5.] Mr. Maldonado testified that the Agency's policy encourages progressive discipline, and requires that suspensions be imposed in increments of five days, or one work week. He considered the fact that Appellant had not corrected his behavior despite the five-day suspension, the 2002 Zero Tolerance Memorandum, and frequent counseling to avoid negative interaction. Mr. Maldonado determined that the next step of progressive discipline, which was a ten-day suspension, was appropriate in this instance, when coupled with additional training and a specific action plan. The penalty was based upon the determination that it was the minimum that would be needed to achieve a reasonable hope that Appellant would learn from the discipline and achieve the desired behavior and performance, given his failure to correct the situation after less severe discipline.

Appellant argues that the penalty is too severe because some of the incidents occurred in June 2003. The Agency counters that the behavior at issue is a pattern of conduct over a period of nine months that did not abate despite contemporaneous notice that the behavior was inappropriate. Under the circumstances, reliance upon incidents over nine months old is not an abuse of discretion.

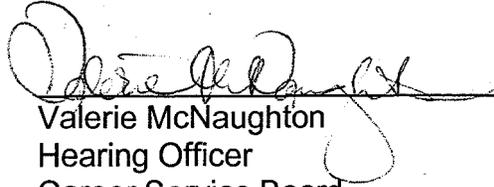
It is found that the penalty imposed was consistent with the purposes of progressive discipline to correct inappropriate behavior and performance under CSR §

16-10. The Agency proved that Appellant committed nine instances of inappropriate conduct. Each of those nine incidents violated more than one Career Service rule, as stated above. The appropriateness of the penalty is not diminished by the fact that not all of the violations alleged are sustained.

ORDER

The Agency's discipline of Appellant dated April 16, 2004 is AFFIRMED.

Dated this 23rd day of
November, 2004.


Valerie McNaughton
Hearing Officer
Career Service Board

CERTIFICATE OF MAILING

I hereby certify that I have forwarded a true and correct copy of the foregoing **DECISION** by depositing same in the U.S. mail, postage prepaid, this 23rd day of November, 2004, addressed to:

James Garcia
8555 E. Chenado
Denver, CO 80237

Cheryl Hutchison
AFSCME Council 76
3401 Quebec Street, #7500
Denver, CO 80207

I further certify that I have forwarded a true and correct copy of the foregoing **DECISION** by depositing same in the interoffice mail, this 23rd day of November, 2004, addressed to:

Christopher M. A. Lujan
Assistant City Attorney
Litigation Section

Jim Thomas
Department of Aviation

