

This is a redacted version of the original decision. Select details have been removed from the decision to preserve the anonymity of the student. The redactions do not affect the substance of the document.

**Pennsylvania Special Education Due Process Hearing Officer
Final Decision and Order**

CLOSED HEARING

ODR No. 29143-23-24

Child's Name:

D.S.

Date of Birth:

[redacted]

Parent:

[redacted]

Counsel for Parent:

Drew Christian, Esq.

P.O. Box 166,

Waverly, PA 18471

Local Education Agency:

Blue Ridge School District

5150 School Road,

New Milford, PA 18834-9503

Counsel for the LEA:

Christopher Bambach, Esq.

Sweet Stevens Katz Williams,

331 E. Butler Avenue,

New Britain, PA 18901

Decision Date:

March 5, 2023

Hearing Officer:

Charles W. Jelley Esq.

OVERVIEW OF THE DISPUTE AND PROCEDURAL HISTORY

On December 6, 2023, the hearing officer entered an Order in favor of the District denying the Parents' first expedited discipline claim, child find, and denial of free appropriate public education at ODR FILE # 28756-23-24 .¹ This hearing officer concluded that the Parents failed to prove that the Student was a person with a disability and otherwise eligible to receive the discipline protections found in the Individuals with Disabilities Education Act (IDEA) and Section 504. I also concluded that the Parents failed to prove that the Student was a "thought to be eligible" person with a disability within the IDEA discipline protections. Next, I refused to set aside a May 2023 one-year expulsion. Finally, I found the District's October 2023 "expedited evaluation" was inadequate and directed the District to fund an independent educational evaluation (IEE). The remaining non-expedited claims were scheduled for a hearing in January 2024.

THE PARENTS FILED AN AMENDED COMPLAINT

On January 27, 2024, the Parent Amended the earlier filed November 2023 IDEA and Section 504 due process Complaint. They now assert that the District erred when, after reviewing the IEE, it refused to complete a manifestation determination review. The Parents assert that had the District completed the manifestation review and offered a free appropriate public education (FAPE), the team would have determined that the Student misconduct was a direct manifestation of a disability. Finally, they contend

¹ Except for the cover page, identifying information is omitted to the extent practicable. The Parents' claims arise under 20 USC §§ 1400-1482 and Section 504, 29 USC §794. The federal regulations implementing the IDEA are codified in 34 CFR §§ 300.1-300.818; while the Section 504 regulations are found at 34 CFR § 104. *et seq.* The applicable Pennsylvania regulations, implementing the IDEA are set forth in 22 Pa. Code §§ 14.101-14.163 (Chapter 14). References to the record throughout this decision will be to the Notes of Testimony (NT p.#), Parent Exhibits (P-) followed by the exhibit number, School District Exhibits (S-) followed by the exhibit number, and Hearing Officer Exhibits (HO-) followed by the exhibit number. Except for the cover page, identifying information is omitted to the extent practicable.

that after concluding that the misconduct was a manifestation, the team would have returned the Student to the high school, which, if true, is a substantive violation.

The Parents now concede that the time for completing the manifestation determination has long since passed; however, they now ask me to substitute the testimony of the independent educational evaluator as a proxy for the statutory required manifestation determination review team's decision. Finally, relying on the examiner's opinion, they seek an Order to return the Student to the high school.

As the Parties were preparing for this hearing, the Parents, on January 31, 2024, appealed the first expedited discipline Decision at ODR FILE # 28756-23-24 to the United States District Court for the Middle District of Pennsylvania.

THE DISTRICT'S ANSWER AND MOTION TO DISMISS

On February 6, 2024, the District filed a timely Answer denying any procedural or substantive violations of the IDEA or Section 504. On February 18, 2024, the District filed a multi-count Omnibus Motion to Dismiss. The District now asks me to stay this hearing and Decision pending resolution of the federal action. The District first asserts that the doctrines of claim and issue preclusion bars the action. They next assert that it would be absurd to have the District complete a manifestation determination now as the rules provide that a manifestation determination must be made within 10 days of the disciplinary when the Student was expelled in May 2023.

The Parent filed a timely Response to the Motion on the eve of the February 20, 2024 session. I denied the stay as neither the hearing officer nor the Parties can extend the decision due date. The Parties participated in a one-day expedited evidentiary hearing on February 20, 2024.

After carefully reviewing the entire record, including the transcript, the Motion, the Response, the Reply, the closing statements, and the exhibits, I now find against the Parent and in favor of the District.

ISSUE

Did the District's refusal to complete a manifestation determination and return the Student to the high school deny the Student a free appropriate public education?

FINDINGS OF FACT

All evidence was carefully and thoughtfully considered; I will now make Findings of Fact and Conclusions of Law as necessary to resolve the "expedited" disciplinary issue presented. The evidence - testimony and documents substantiated and contextualized the Findings of Fact. Finally, I decline to catalog or make Findings of Facts or Conclusions of Law on any evidence related to the "non-expedited" issue.

THE STUDENT'S MAY 2023 EXPULSION

1. In May 2023, the Student was expelled for one (1) school year for making a threat to assault a staff member. (ODR FILE #28746-23-24).
2. As a consequence of the expulsion, the District offered and the Family agreed to enroll the Student at Blue Ridge School District's asynchronous [redacted] Grade Virtual Learning Network (VLN). The Student's regular education homeroom teacher is the contact for the English Language Arts (ELA) class. (P-3)
3. Once per week, students are invited to meet with the teacher 1-to-1 in a video breakout room to ask questions and get clarification on assignments. (P-3).
4. The Student's coursework and instruction are delivered via VLN's self-developed video platform for asynchronous learning using other integrated websites. Each Student has a homepage with a link for each

class's video lessons, assigned readings, and work to complete. The system tracks log-in times, time spent viewing videos, and work turned in. For each class, viewing at least two videos per week is required to complete the weekly quiz. The Student tends to turn in all assignments over the weekend all at once; the Student's work is usually of good quality, and the Student earns good grades, primarily As and Bs. However, in early January 2024, the record reflects that the Student failed to complete work for two classes, bringing down the English Language Arts (ELA) and Science grades. The Student's schedule combines academically rigorous and less rigorous foundation classes. (P-3).

5. For Math and ELA, the Student has "core" teachers who have office hours and answer questions as needed. The Student's other teachers are "adjuncts" who grade assignments and are accessible only by email. (P-3).

THE INDEPENDENT EVALUATION

6. On December 20, 2023, the Student was evaluated by a private evaluator. The private evaluator is a school psychologist, a clinical psychologist, and a licensed psychologist. (P-3). An independent educational evaluation (IEE) report was completed and provided to the Parties on or about January 11, 2024. *Id.*
7. The IEE report includes one measure of intelligence and achievement. As the Student is not receiving instruction in a classroom, the staff did not complete any behavioral, social, emotional, or measures of executive functioning. The report does not include a summary of the Student's classroom grades. (P-3).
8. The examiner did not observe the Student in the virtual environment. (P-3).

9. The IEE report includes an interview with the online homeroom teacher and another teacher who instructed the Student during [earlier] grades. (P-3).
10. The evaluator administered the Woodcock-Johnson Tests of Achievement-IV (WJ-IV), Gray Silent Reading Tests (GSRT), and the Test of Written Language-4 (TOWL-4), which were used to evaluate achievement. (P-3).
11. Overall math performance was in the average range but varied across measures. The Student received a low average score on an untimed test of math computation skills. The Student's basic math fact fluency skills are in the average range. The Student's output was accurate, and completion was age-appropriate. (P-3).
12. The Student's spelling skills were in the average range compared to same-aged peers. The Student displayed encoding skills, though occasionally made orthographic retrieval errors with less frequent rules and patterns (i.e., "vacaiton" for vacation; "calender" for calendar). (P-3).
13. The Student scored within the average range when asked to develop and write sentences to match verbal and visual cues on a structured writing task. The Student showed inconsistent/weak writing mechanics. The Student made numerous inattention/spelling and visual/orthographic retrieval errors when asked to write an essay. The Student did better on the simple, structured spelling assessment. The Student produced incomplete, partial phrases and run-on sentences, omitted letters/words, and did not carefully check over [the Student's] output. (P-3).
14. On the BASC-3 Behavior Assessment System for Children 3rd Edition (BASC-3), the Mother reported concerns in the home setting, including challenging conduct/ behavior, depressed/negative mood, low

frustration tolerance/aggression, and impulsivity/hyperactivity. The Father's BASC-3 was unremarkable across subscales. Because the Student is not in a brick-and-mortar school, the homeroom teacher did not complete a BASC-3. (P-3).

15. The Student often feels attacked every time there is a disagreement. The Student has trouble sleeping at night and feels irritable. The Student uses very harmful words towards peers and adults when upset. (P-3).
16. On the self-report Brown Executive Function and Attention Scales, the Student's Total Composite fell in the moderately elevated. The Student endorsed personal struggles with organizing, prioritizing, and activating to work; focusing, sustaining, and shifting attention to tasks; regulating alertness, sustaining effort and processing speed; managing frustration and modulating emotions; utilizing working memory and activating recall; and monitoring and self-regulating action. (P-3).
17. The Student reported significantly elevated symptoms on the Beck Youth Inventories Combination Booklet-2 regarding depression as well as mildly to moderately elevated symptoms associated with low self-concept, anxiety, anger control/ irritability, and behavioral regulation. (P-3).

THE INDEPENDENT EVALUATION AND THE DEVELOPMENT OF THE IEP

18. On January 18, 2024, the Parties met, reviewed the IEE report, and reached a consensus that the Student was a person with multiple IDEA disabilities. The examiner concluded, and the team agreed that the Student was IDEA eligible under the categories of Emotional Disturbance and Other Health Impairment. The team then determined that because of each IDEA disability, the Student now required specially designed instruction. (P-4).

19. The Parties also met on January 18, 2024, to develop an individual education program (IEP). The IEP includes one goal statement to address behavior, one math goal statement, four forms of specially designed instruction, and social work as the related service. (P-4).
20. While social worker services were scheduled to occur once a week, the IEP does not state the duration of each session. (P-4 p.15).
21. The IEP does not include a standalone positive behavior support plan or specially designed instruction to address any behaviors that impede learning. (P-4).
22. Rather than return to the high school, the IEP team decided that the Student should continue instruction at the Virtual Learning Network until the expulsion ends in May 2024. (P-4).
23. The Parents requested, and the District refused to consider if the Student's threatening statement in May 2023 was a manifestation of the Student's now-identified IDEA disabilities. (P-4).
24. Although the District issued a Notice of Recommended Educational Placement (NOREP) on January 18, 2024, offering VLA-Network, the NOREP did not mention the refusal to complete a manifestation or why the VLA-Network is the least restrictive educational placement. Rather than accept or reject the IEP and NOREP the Parent's filed an Amended Expedited Due process complaint on January 27, 2024. (P-4).

THE AMENDED COMPLAINT

25. On January 27, 2024, the Parents Amended the November 2023 Complaint to include another expedited discipline-related due process claim. The Parent now seeks three forms of relief. First, the Parents appeal the District's refusal to conduct a manifestation determination review. Second, the Parents ask for an Order overturning the School District's board decision to expel the Student. Third, they seek an Order

directing the District to return the Student to the high school. (See Amended Complaint).

26. In another twist, on January 31, 2024, the Parent filed a Complaint in the Middle District of Pennsylvania, seeking reversal of the first Expedited Decision and Order issued on December 6, 2023. (HO Exhibit #3 attachment to District's Omnibus Motion to Dismiss).
27. The relief demanded in the federal action includes "[a]n order overturning the Hearing Officer's ruling that the Student was not eligible for IDEA services on the date of the ODR Decision" and "[a]n order for the School District's expulsion to be overturned based on disciplinary protections of the IDEA." Id. at 12.

THE OMNIBUS MOTION TO DISMISS OR STAY THIS ACTION

28. On February 6, 2024, the District filed an Answer to the second expedited due process Complaint denying all allegations. (HO Exhibit # 4).
29. On or about February 17, 2024, the District filed an Omnibus Motion to Dismiss the Expedited Complaint. The District now contends that the doctrines of claim and issue preclusion bar the instant due process hearing. (HO Exhibit #5).
30. On February 19, 2024, the Parent filed a Response to the Motion to Dismiss, arguing that while the Parties are the same, the issues and claims in this action are not based on a common core of operating facts. They also assert that the December 2023 Decision is not a final order. (HO#6).
31. Understanding that neither the hearing officer nor the Parties can extend the Decision Due Date in an expedited dispute, the hearing officer refused to grant a stay and directed the Parties to go on the record and present evidence. The District asked, and the hearing officer

agreed to allow the District to file a Reply Brief as part of their closing brief. (HO #7).

THE DUE PROCESS HEARING

32. At the due process hearing, the Parent presented two witnesses, the IEE evaluator and the District's Director of special education. (NT pp
33. The IEE examiner is a school psychologist, a neuropsychologist, and a clinical psychologist. (NT pp.61-70, P-2).
34. The IEE examiner cogently explained the Student's test scores. (P-3, NT pp.60-172).
35. Although not mentioned in her report, the IEE examiner, relying on her training as a "clinical psychologist," also expressed an opinion that the Student's May 2023 misconduct was a manifestation of the Student's disabilities, diagnosed in January 2024. (NT pp.132-139). Finally, relying on the Mother's statements about getting the Student on the bus in [redacted], the IEE examiner, again relying on her "clinical" background and training, expressed a second opinion that the Student's now-identified disabilities were evident as far back as Kindergarten. (NT pp.132-139).
36. The Director of Special Education explained how the District reviewed and accepted the IEE report and the development of the proposed IEP. (NT pp.142-172).
37. The Director explained that because the Student's behaviors interfered with learning, the District completed a functional behavioral assessment, and the IEP should include a positive behavioral support plan.² (P-5, NT pp.142-172). The IEP in the record does not include the purported functional behavioral assessment, and the IEP does not include a positive behavior support plan. (P-4)

² While the Director stated that the functional behavioral assessment was attached to the IEP the standalone assessment was not included in the record.

38. The Notice of Recommended Educational Placement (NOREP) proposed Itinerant Emotional Support at the VLA Academy. The NOREP did not state why the District refused to complete a manifestation determination or why they refused to return the Student to the high school. (P-5).

GENERAL LEGAL PRINCIPLES

BURDEN OF PROOF AND CREDIBILITY

Generally, the burden of proof consists of two elements: the burden of production and the burden of persuasion. In special education due process hearings, the burden of persuasion lies with the party seeking relief. In this case, the Parents are the party seeking relief and must bear the burden of persuasion.³ The party seeking relief must prove entitlement for relief by preponderant evidence and may not prevail if the evidence rests in equipoise. *Id.*

During a due process hearing, the hearing officer makes express, qualitative determinations regarding the relative credibility and persuasiveness of the witnesses."⁴ Explicit credibility determinations give courts the information that they need in the event of a judicial review. While no one-factor controls, a combination of factors causes me to pause and comment on the particular testimony of several witnesses.⁵

³ *Schaffer v. Weast*, 546 U.S. 49, 62 (2005); *L.E. v. Ramsey Board of Education*, 435 F.3d 384, 392 (3d Cir. 2006).

⁴ *Blount v. Lancaster-Lebanon Intermediate Unit*, 2003 LEXIS 21639 at *28 (2003).

⁵ The fact finder's determination of witness credibility is based on many factors. Clearly, the substance of the testimony, including the detailed description of the relevant events, consistency /corroboration with others recollection, the accuracy of recall of past events when contrasted with written documents, played some part in my credibility determination. Furthermore, when the witness contradicts him or herself or is contradicted by the testimony of other witnesses can play a part in the credibility determination. Finally, non-verbal observable actions like constantly adjusting body movement, eye contact, feigned confusion, and whether the responses are direct or appear to be either evasive, unresponsive or incomplete are otherwise important in determining persuasiveness.

The Parent called two witnesses, the independent evaluator and the District's Director of Special Education. The District did not call any witnesses.

On the Parents' side, I found the independent evaluator's testimony fact testimony about the evaluation was clear and helpful. At the same time, I found her opinion testimony about the manifestation determination and the Student's disability status in the [redacted] school year borders on partisan advocacy. Contrary to the cogent testimony about the IEE results, the manifestation determination remarks were overly broad and grounded on her "clinical psychologist" experience instead of her school psychologist training.

The testimony of the District's Special Education Director was choppy. The witness appeared uncomfortable with the IDEA eligibility decision and was unclear why the District refused to complete the manifestation review. At other times, she appeared somewhat evasive about the refusal to return the Student to the high school.

APPLICABLE LEGAL RULES AND PRINCIPLES

IDEA DISCIPLINE PROTECTIONS

First, the IDEA's discipline rules protect already identified students with an IEP from long-term suspensions and expulsion if the student's actions are a manifestation of the student's disability. 34 CFR 300.530(e). Second, the IDEA protects students who, in IDEA jargon, are "thought to be eligible." Provided that the Parent of a "thought to be eligible" child can establish that the district had "knowledge" of the student's disability before the misconduct, the IDEA discipline rules may offer support. 34 CFR § 300.534(a)-(b). Third, parents can request an "expedited evaluation" if, during the disciplinary placement, they come to believe that the child may be eligible for IDEA. 34 CFR 300.534 (d)(2)(i). The regulations at 34 CFR §300.534(d)(1) through (d)(2) describe the "expedited evaluation" protections at issue here as follows:

(d) Conditions that apply if no basis of knowledge.

(1) If a public agency does not have knowledge that a child is a child with a disability (in accordance with paragraphs (b) and (c) of this section) prior to taking disciplinary measures against the child, the child may be subjected to the disciplinary measures applied to children without disabilities who engage in comparable behaviors consistent with paragraph (d)(2) of this section.

(2)(i) If a request is made for an evaluation of a child during the time period in which the child is subjected to disciplinary measures under § 300.530, the evaluation must be conducted in an expedited manner.

(ii) Until the evaluation is completed, the child remains in the educational placement determined by school authorities, which can include suspension or expulsion without educational services.

(iii) If the child is determined to be a child with a disability, taking into consideration information from the evaluation conducted by the agency and information provided by the parents, the agency must provide special education and related services in accordance with this part, including the requirements of §§ 300.530 through 300.536 and section 612(a)(1)(A) of the Act. 34 C.F.R. §300.534.

SECTION 504 DISCIPLINE PROTECTONS

Section 504 does not contain any requirement for a manifestation determination review; however, it does include provisions in its implementing regulations relating to significant changes in placement and procedural safeguards. 34 CFR §§ 104.35, 104.36. The federal Office for Civil Rights has long concluded that even under Section 504, children with disabilities must be afforded a manifestation determination for a significant change in placement. See, e.g., *Duval County Public Schools*, 118 LRP 24691 (OCR 2017); *Dunkin R.-V. School District*, 52 IDELR 138 (OCR 2009). Application of the IDEA discipline protections is one means of meeting this obligation. 34 C.F.R. § 104.36.

ANALYSIS AND CONCLUSIONS OF LAW

The disagreement here centers on if and how, in accordance with 34 CFR 300.530(e), the District "must" complete a manifestation determination "Within 10 school days of any decision to change the placement of a child with a disability because of a violation of a code of student conduct" when the Student becomes IDEA eligible some seven months after the change in placement. The Parents using the independent evaluator as a proxy for a manifestation determination team meeting asked, and the independent evaluator opined that the Student's May 2023 misconduct was a manifestation of the Student's current disability status. They now argue that but for the District's earlier procedural violations, the Student would have been identified as IDEA eligible in May 2023 and otherwise avoided the expulsion. Therefore, they seek an immediate return to the high school.

The District argues that even if I deny the Motion to Dismiss, the Parents' reading of the discipline regulation is absurd. For all the following reasons, I agree with the District that the Parents reading of the regulations is misplaced; therefore, I need not address the merits of the Motion to Dismiss.

First, I agree with the District that the Parents' reading of the regulations would lead to an absurd result. The manifestation determination rules require districts to complete the review within 10 days of the decision to change the Student's placement. The regulations do not require the District to complete a manifestation determination review meeting some seven months (7) months after the change in placement. The Parents' argument, if accepted, would require me to ignore the plain language and structure of 34 CFR. §300.530(e). Therefore, the Parents' first argument is rejected.⁶

⁶ *Spring Branch Indep. Sch. Dist. v. O.W.*, 961 F.3d 781 (5th Cir. 2020) cert. denied, 141 S. Ct. 1389 (2021) (rejecting an interpretation of the IDEA discipline rules that would require an expedited hearing where a student was not being disciplined concluding that the proposed

Second, even assuming that the District is required to complete a manifestation review, the Parents' cure to have one person, the independent evaluator, make the determination is contrary to the plain language in the regulations requiring that a "team" complete the review. 34 CFR 300.530(e).

Third, the evaluator's review did not include a review of "all relevant information in the file, including the child's IEP, any teacher observations, and any relevant information provided by the parents." 34 CFR 300.530(e) Instead, the evaluator relied on her "clinical judgment" and "clinical interview" skills, absent input from the teachers, to reach her conclusions.

Fourth, one person's "clinical" conclusions cannot control the review process or a team's decision-making. In *Bristol Twp. Sch. Dist. v. Z.B.*, 67 IDELR 9 (E.D. Pa. 2016), the court held that the team violated the IDEA when it took a "global" approach to deciding whether a [student's] ADHD played any role in his alleged physical assault of a teacher. Therefore, it is axiomatic that if a "global" viewpoint is an error, so too is the "clinical opinion" of one witness. In *Jay F. v. William S. Hart Union High Sch. Dist.*, 70 IDELR 156 (C.D. Cal. 2017), *aff'd*, 74 IDELR 188 (9th Cir. 2019, unpublished), the court concluded that the team relied too heavily on a school psychologist's opinion when it determined that a high school student's threat to retaliate against two classmates was unrelated to his emotional disturbance. Therefore, applying *Bristol* and *Jay F.*, I now conclude that the examiner's single-minded decision-making contradicts the IDEA-favored team decision-making requirement.

reading of the statute would have produced an absurd result); *Taylor v. Vt. Dep't of Educ.*, 313 F.3d 768 (2d Cir. 2002) (rejecting a construction of the IDEA that would lead to the absurd result *Albuquerque Pub. Schs v. Sledge*, 2019 U.S. Dist. LEXIS 133502 (D.C.N.M. 8/8/2019) (rejecting an interpretation of the IDEA that would produce the absurd result 9 of requiring an APS to accommodate a student in a way which would violate federal law regarding the illegality of marijuana); Cf. *Griffin v. Oceanic Contractors, Inc.*, 458 U.S. 564 (1982) (interpretations of a statute which would produce absurd results are to be avoided if alternative interpretations consistent with the legislative purpose are available).

Fifth, allowing the independent evaluator to go beyond the four (4) corners of the IEE is either a form of trial by surprise or a failure to comply with the 5-day disclosure of recommendations, evaluations, and evidence. Either way, the Parents' trial tactic of not disclosing the evaluator's recommendation is disfavored. 34 CFR §300(a)(3) and (b)(1).

Sixth, the Parent's argument that the independent evaluator was free to opine as an "expert" is not found in the record. (NT pp.60-66). The record, however, is that while the counsel did go through the witness's education, background, and training, counsel did not formally move to qualify the evaluator as an expert. Therefore, opinion testimony beyond the report is insufficient. Finally, even assuming the witness is an expert, the record does not support a basis in school psychology, the relevant standard that would otherwise support blanket assertions relating her 2024 findings back in time to the Student's Kindergarten experience, some nine years ago.

Seventh, even assuming the witness is an expert, the witness erred when she relied on her "clinical" psychologist skills, not her school psychologist skills, to reach her conclusions. The record lacks a description of how or if she applied the IDEA's manifestation determination criteria, not some DSM-V "clinical" theory, to determine if the Student's past behavior was related to the Student's current disabilities.

Eighth, and finally, the record on the manifestation determination topics feels and reads like the independent evaluator crossed the line from "independent evaluator" to advocate. At times, I felt like she went out of her way to advance opinions, recommendations, and conclusions not grounded in the report. Stated another way, the IDEA frowns on conclusions based on a single criterion instead of opinions based on a variety of assessments reviewed by a team of knowledgeable people.

Accordingly, I find that the Parents' reading of the statute does not align with the plain language of the discipline rules. The Parents' suggested interpretation would create an absurd counter-textual result. Therefore, the Parents claim that the District's refusal to complete a manifestation determination caused a denial of a FAPE is rejected.

An **ORDER** consistent with the above Findings of Fact and Conclusions of Law follows.

FINAL ORDER

And now, on this March 5, 2024, it is hereby **ORDERED** as follows:

1. The Parent's IDEA claim that the District must complete a manifestation is Denied.
2. The Parent's Section 504 claim that the District must complete a manifestation is Denied.
3. The Parent's request to return the Student to the high school is Denied.
4. All other claims, demands, and affirmative defenses relating to this expedited hearing are exhausted and otherwise dismissed with prejudice.

March 5, 2024

s/ Charles W. Jelley, Esq. LL.M.

HEARING OFFICER
ODR FILE #29143-23-24