MICHAEL A. SIRAGUSA
ERIE COUNTY ATTORNEY

COUNTY OF ERIE

MARK C. POLONCARZ
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MICHELLE M. PARKER
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH
SECOND ASSISTANT COUNTY ATTORNEY

December 10, 2014

Ms. Karen McCarthy, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. McCarthy:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	*Erie County Medical Center Corporation v. County of Erie and John Greenan*
Document Received:	Verified Petition
Name of Claimant:	Erie County Medical Center Corp. 462 Grider Street Buffalo, New York 14215
Claimant's attorney:	Anthony J. Colucci, III, Esq. Colucci & Gallaher, P.C. 2000 Liberty Building 424 Main Street Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

Michael A. Siragusa (dld)

MICHAEL A. SIRAGUSA
Erie County Attorney

MAS:dld
Enc.

STATE OF NEW YORK
SUPREME COURT :: COUNTY OF ERIE

ERIE COUNTY MEDICAL CENTER CORPORATION,
462 Grider Street
Buffalo, New York 14215,

Petitioner,

v.

COUNTY OF ERIE
John W. Greenan,
Commissioner of Personnel
95 Franklin Street
Buffalo, New York 14202

Respondent.

VERIFIED PETITION

INDEX NO: 2014-0220

FILED
2014

The Erie County Medical Center Corporation ["ECMCC"], by and through its attorneys, Colucci & Gallaher, P.C., for its verified petition against respondent the County of Erie, New York [the "County"], alleges as follows:

INTRODUCTION

1. This is an action for a declaratory judgment and a permanent injunction against defendant the County, based on the County's failure to perform a duty enjoined upon it by law and a determination that was arbitrary and capricious and/or an abuse of discretion.

2. As detailed more fully below, the County has acted in excess of its authority under the law. The County has improperly and unfairly attempted to implement civil service written competitive examinations for Health Information Systems ["HIS"] positions at ECMCC, ignoring the training and experience component that is a vital aspect of the HIS

positions and the primary factor considered in similar information technology positions in New York and the County itself.

3. The determination to use a written competitive examinations by the County, over the objections of ECMCC, is arbitrary and capricious and/or an abuse of discretion. The County has acted without legitimate purpose and in violation of the law, ignoring the clear statutory power granted to ECMCC that gives it the power to fix and determine its employees' qualifications and duties.

4. In 2010, ECMCC sued the County and the New York State Department of Civil Service ("NYS DCS") for similar actions involving different ECMCC HIS positions. The matter was titled The Erie County Medical Center Corporation v. County of Erie, *et al.*, Supreme Court, County of Erie, Index No. 2010-011442. That matter was resolved prior to trial.

THE PARTIES

5. ECMCC is a public-benefit corporation created by state law to operate a tertiary care hospital, clinics and a residential health care facility in Western New York. ECMCC serves an integral part of the education and research mission of the School of Medicine and Biomedical Sciences of the State University of New York at Buffalo, and fulfills an important public purpose in providing health care to the citizens of Western New York.

6. The County is a municipal corporation that, among other things, is the statutory agent for ECMCC in Taylor Law and collective bargaining matters. N.Y. Public Authorities Law § 3629(2) provides in pertinent part that: "The county office of labor relations shall, for all purposes of article fourteen of the civil service law, act as agent for

the corporation and shall, with respect to the corporation, have all the powers and duties provided under article twenty-four of the executive law." David A. Palmer is the current Commissioner of Personnel for the County.

7. Upon information and belief, the County utilizes the New York State Department of Civil Service, under Civil Services Law 23(2) to provide services relative to the announcement, review of applications, preparations, construction and rating of examinations, and establishment and certification of eligible lists for positions in the classified service under the jurisdiction of such municipal commission. The final decisions regarding the testing "fall within the exclusive jurisdiction and [are] made solely by the Commissioner of Personnel of respondent Erie County, the local civil service agency with merit system oversight for ECMCC." See November 22, 2010 affidavit of Jeffrey M. Braude, associate attorney for NYS DCS, at ¶3. A true and accurate copy of the affidavit is attached as Exhibit A.

8. The NYS DCS "cannot compel a local civil service agency to adopt the NYS DCS' proposed examination plans or utilize its examinations. A local civil service agency such as [the County] retains ultimate responsibility for administration of its examination program, even where it requests and obtains NYS DCS assistance and uses examinations prepared by NYS DCS." Exhibit A at ¶18.

CREATION AND OPERATION OF ECMCC

9. In 2003, the County and the State of New York determined through Home Rule legislation that the public health needs of the residents of the County and the State of New York would best be served by creating ECMCC as a public benefit corporation, giving it the legal, financial, and managerial flexibility to take full advantage of the opportunities and

challenges of an evolving health care environment. See N.Y. Public Authorities Law §§ 3626-3647.

10. ECMCC operates the Erie County Medical Center, a comprehensive acute-care hospital licensed under Article 28 of the New York Public Health Law to operate 550 acute care and 136 skilled nursing beds, and includes a 390 bed long-term care facility on its Grider Street campus. The Erie County Medical Center, as part of its statutory mission, provides tens of millions of dollars annually in charity care, and over 30% of its inpatients and outpatients are Medicaid recipients.

11. The Erie County Medical Center is the only major public hospital in Western New York. It provides numerous unique, specialized services not available at other area hospitals. It is the regional center for the eight counties of Western New York for trauma, burn care, transplantation and rehabilitation. Its specialized services include a designated spinal cord injury unit and head trauma unit. It is the designated AIDS treatment center for the eight counties of Western New York, the designated Emergency Preparedness Response Center for the eight counties of Western New York, the central point of admission into the local mental health community, and the largest acute care mental health hospital program in Western New York.

12. As set forth below, both the County has acted in a manner which both violates the law and interferes with the operations and management of ECMCC.

ECMCC HAS THE POWER TO APPOINT ITS OWN EMPLOYEES AND TO FIX THEIR QUALIFICATIONS

13. Employees of ECMCC are deemed public employees for all purposes. Currently, ECMCC employs over 2,800 public employees. See N.Y. Public Authorities Law § 3629(1).

14. Employees of ECMCC, for purposes of article fourteen of the civil service law, are deemed employees of the County and shall be employed within the current County bargaining unit designation. See N.Y. Public Authorities Law § 3629(2).

15. ECMCC has certain general powers regarding its employees. See N.Y. Public Authorities Law § 3630.

16. Importantly, § 3630(21) of the N.Y. Public Authorities Law provides that ECMCC has the power:

> to appoint such officers, employees, and agents as the corporation may require for the performance of its duties and to fix and determine their qualifications, duties, and compensation, subject to the provisions of the civil service law and any applicable collective bargaining agreement, and to retain or employ counsel, auditors, engineers, and private consultants on a contract basis or otherwise for rendering professional, management, or technical services and advice.

(Emphasis supplied).

THE COUNTY'S EXAMINATIONS SHALL BE PRACTICAL AND RELATE TO MATTERS WHICH FAIRLY TEST AN APPLICANT'S CAPACITY TO FULFILL THE POSITION'S DUTIES

17. Positions are classified jurisdictionally as competitive, non-competitive, exempt or labor. See N.Y. Civil Service Law § 2(10).

18. Positions in the exempt class are those, other than unskilled labor positions, for which competitive or non-competitive examinations or other qualifications requirements are not practicable. See 4 NYCRR § 2.1(a).

19. Positions in the non-competitive class may be filled by the appointment of a person who meets the minimum qualifications established for such position. See 4 NYCRR § 2.2(a).

20. The merit and fitness of applicants for positions which are classified in the competitive class are ascertained by examinations that are prescribed by the County. See N.Y. Civil Service Law § 50(1).

21. An examination may be written, oral, other test or a combination of tests. See generally 4 NYCRR § 67.1.

22. The County issues announcements for each competitive examination, setting forth the minimum qualifications required and the subjects of the examination. See N.Y. Civil Service Law § 50(2).

23. Upon information and belief, the County utilizes the services of the NYS DCS to establish the scope and type of exam, be it either a written exam, evaluation based on training and experience, or a combination of the above.

24. Importantly, N.Y. Civil Service Law § 50(6) provides the following scope for examinations:

> Examinations shall be practical in their character and shall relate to those matters which will fairly test the relative capacity and fitness of the persons examined to discharge the duties of that service into which they seek to be appointed.

(Emphasis supplied).

25. Upon information and belief, the NYS DCS determines the scope of the position and either write the exam for the position or recommends use of the decentralized Information Technology exam that has been developed. The test can be either written, an

evaluation of training and experience, an oral test or any number of items. The end result has to be that the people appointed must be from an eligible list that was established as a result of the examination.

26. Furthermore, as part of the examination process, the County may investigate the qualifications of candidates which may include training, experience and character qualifications or any area pertinent to the suitability of the candidate for employment. See 4 NYCRR § 66.4(a).

27. The County ignored the job specifications for each of the positions when determining the subjects of examination for two high level HIS positions at ECMCC.

28. On or about October 9, 2014, the County announced that written competitive examinations would be held on December 6, 2014 for the following positions:

a. Clinical Informatics Educator (No. 62-733); and

b. Healthcare Information Reporting Manager (No. 74-011).

True and accurate copies of the notices are attached as Exhibits B & C respectively.

29. The County's use of written exams for these HIS positions was over ECMCC's objections. The County refused to incorporate a training and experience component to the examination, choosing instead relying solely on a written test. Upon information and belief, the County has choose to use training and experience exams for upcoming HIS positions at ECMCC such as the Senior Technical Assistant-Information Systems (ECMC) (No. 17-428) and HIS position at the County, such as Applications Systems Specialist (No. 17-425), Senior Technical Support Services Specialist (No. 17-432) and Technical Support Services Specialist (No. 17-422). True and accurate copies of the notices for the foregoing positions are attached as Exhibit D.

30. Upon information and belief, despite the objection by ECMCC, the County was directed by the NYS DCS to use the written test for the Clinical Informatics Educator (No. 62-733) and Healthcare Information Reporting Manager (No. 74-011) titles. No reason was provided for why ECMCC's request to use a training and experience exam was disregarded.

31. The County's determination to proceed with the written examinations for the Clinical Informatics Educator (No. 62-733) and Healthcare Information Reporting Manager (No. 74-011) titles as scoped in the original subjects of examination was arbitrary and capricious, ignoring the clear mandate under law that ECMCC has the power to "fix and determine" the qualifications and duties of its employees. See N.Y. Public Authorities Law § 3630(21).

32. In addition to additional HIS titles identified in paragraph 29 above, numerous similar HIS titles from around the state are tested on a training & experience basis rather than a written exam.

33. For example, New York State has announced continuous recruitment examinations for HIS position which are based on training and experience and are not written competitive. For example, there are no written tests for the positions of Information Technology Specialist 1 (Exam No. 20-786), Information Technology Specialist 1 (Programming) (Exam No. 20-787), Information Technology Specialist 2 (Exam No. 20-788) or Information Technology Specialist 1 (Exam No. 20-789) with the New York State Civil Service. The subjects of examination for these positions are based on an evaluation of training and experience in health information management.

34. Other counties use training & experience tests for their equivalent HIS positions, including Westchester County (Assistant Systems Analyst Programmer, Coordinator of Computer Services, Information Systems Security Analyst, and Manager of Software Architecture) and Albany County (Programming Technology Specialist II).

THE WRITTEN COMPETITIVE EXAMINATIONS ARE ARBITRARY AND CAPRICIOUS AND MATERIALLY CHANGE THE QUALIFICATIONS OF EMPLOYEES IN ECMCC'S HIS DEPARTMENT.

35. As shown above, pursuant to the N.Y. Public Authorities Law, ECMCC has the power to fix and determine the qualifications and duties of its employees. See N.Y. Public Authorities Law § 3630(21).

36. Since 2003, senior HIS positions at ECMCC (such as those being tested) have been evaluated by an in-depth training and experience questionnaire, combined with an information technology computerized test qualifier. The questionnaires allowed for thorough evaluation of all aspects of the qualifications for a position. In addition to the competitive examination, the candidates had to pass an interview and on-the-job probation, including evaluations by supervisors and managers, to achieve permanent posting. This method of examination properly tested the qualifications fixed and determined by ECMCC.

37. The County's decision to limit the current examination to only written competitive examinations, ignoring the methods of testing and their ability to evaluate the merit and fitness of the candidates for each of these HIS positions, is arbitrary and capricious.

38. The training and experience component of the examination is necessary because the HIS positions require a working knowledge in vendor specific technologies and standards. These positions work directly with Clinical Leadership and Hospital Administration at the Erie County Medical Center to use clinical information software

efficiently and effectively in support of the regulatory, quality of care and outcome objective of the Hospital, a process that directly impact patient safety, improve ECMCC's quality of care, and ensure ECMCC's ability to meet the aggressive standards of healthcare regulatory bodies and insurance companies, including but not limited to, Centers for Medicare and Medicaid Services ["CMS"], the Health Insurance Portability and Accountability Act ["HIPAA"], the American Recovery and Reinvestment Act ["AARA"] and the requirements of the State of New York.

39. The HIS positions also lead the effort to procure, install, configure and maintain the systems and processes that meet the requirements of the AARA which requires ECMCC to replace existing paper records with electronic documentation by 2015.

40. The HIS positions must have the ability to understand the foregoing regulations and requirements and the ability to develop and maintain highly specialized clinical informatics systems, including but not limited to Healthcare Information Systems ["HCIS"], Picture Archive and Communication Systems ["PACS"], Cardiovascular Information Systems ["CVIS"], ambulatory care records, inpatient electronic health records and the various systems that interconnect them.

41. In addition, the HIS positions must demonstrate specialized work experience within the healthcare environment.

42. The written competitive examinations that have been announced for these HIS positions do not test the above qualifications, qualifications that ECMCC requires an applicant to possess. A written competitive examination will not evaluate a candidate's working knowledge of vendor specific technologies and standards.

Clinical Informatics Educator

43. The subjects of examination for the Clinical Informatics Educator position at ECMCC states that it will be a written competitive examination which will test in the areas of preparing written materials, the principles of providing user support, supervision systems analysis and design, and training users of computers. The subjects of examination are very general and do not test the specific qualifications of the Clinical Informatics Educator position at ECMCC. See Exhibit B. A true and correct copy of the job description, including distinguishing features, typical work activities, required knowledge, skills, abilities & personal characteristics, and minimum qualifications for the Clinical Informatics Educator position is attached as Exhibit E.

44. The subjects of the written examination for the Clinical Informatics Educator position do not meet or coincide with the ECMCC's requirements for qualifications for this position, despite the County having full knowledge of ECMCC's requirements for the position.

45. ECMCC requires, among other things, that the Healthcare Information Reporting Manager meet the following performance knowledge, skills, abilities and personal characteristics:

a. A thorough knowledge of current electronic medical record technology and systems, equipment, policies, procedures and terminology;

b. A good knowledge of operating systems file structure and design;

c. A working knowledge of medical clinical processes and procedures in the application of information system technology to clinical outcomes;

d. A working knowledge contemporary instructional design and graphics software applications;

e. An ability to research course development, delivery concepts and technical issues;

f. An ability to communicate effectively, both orally and in writing;

g. An ability to establish and maintain effectively working relationships;

h. An ability to train others;

i. An ability to prioritize and execute tasks in a high-pressure environment;

j. Have analytical and problem solving skills;

k. Have excellent instructional, presentation and interpersonal skills;

l. Be self motivated, change oriented and have a strong customer service orientation; and

m. Be physically capable of performing the essential functions of the position with or without reasonable accommodation.

See Exhibit E.

46. The subjects of examination determined by the County plainly ignore the typical work activities; the subjects of the written exam include (1) preparing written material, (2) principles of providing user support, (3) supervision, (4) systems analysis and design, and (5) training uses on computers. The only supervisory duties identified in the job specification are over "lower level technical and clerical staff;" there are no supervisory typical work activities. Other written test subjects are likewise not part of the position, such as Preparing Written Materials and Systems Analysis and Design. The distinguishing features and typical work activities do not mention the preparation of written materials or systems design. The job specification (Exhibit E) is specific regarding typical work activities, knowledge, skills and abilities, while the general, nondescript subjects of the

examination prepared by the County ignore these specific items required for the operation of the hospital.

47. Thus, the refusal by the County to have a competitive examination based on training and experience, and instead have only the written competitive examination that has been announced for this position, is arbitrary, capricious, abuse of discretion and violation of law.

Healthcare Information Reporting Manager

48. The subjects of examination for the Healthcare Information Reporting Manager position at ECMCC states that it will be a written competitive examination which will test in the areas of data processing concepts and terminology, principles and practices of database administration, programming techniques and concepts, project management, supervision and systems analysis and design. The subjects of examination are very general and do not test the specific qualifications of the Healthcare Information Reporting Manager position at ECMCC. See Exhibit C. A true and correct copy of the job description, including distinguishing features, typical work activities, required knowledge, skills, abilities & personal characteristics, and minimum qualifications for the Healthcare Information Reporting Manager position is attached as Exhibit F.

49. The subjects of examination for the Healthcare Information Reporting Manager position do not meet or coincide with the ECMCC's requirements for qualifications for this position, despite the County having full knowledge of ECMCC's requirements for the position.

50. ECMCC requires, among other things, that the Healthcare Information Reporting Manager meet the following performance knowledge, skills, abilities and personal characteristics:

a. A thorough knowledge of the principles and practices associated with the design, development, implementation and operation of healthcare information reporting systems;

b. A thorough knowledge of hospital information reporting systems;

c. A thorough knowledge of report development methodologies, standards and procedures;

d. A good knowledge of standard database reporting tools;

e. A good knowledge of concepts related to data mining;

f. A good knowledge of report design and layout;

g. A working knowledge of current versions of MS Office and Windows OS;

h. A working knowledge of the organization and current reporting tools and database structure;

i. To be skilled in the creation of and extraction of data from customer defined screens;

j. An ability to format data for use in other industry standard software;

k. An ability to communicate effectively, both orally and in writing;

l. Resourcefulness;

m. Good judgment;

n. Initiative; and physically capable of performing the essential functions of the position with or without reasonable accommodation.

See Exhibit F.

51. The subjects of written examination determined by the County plainly ignore the performance knowledge, skills, abilities and personal characteristics required by ECMCC. The written test subjects include "supervision," while the only supervisory duties identified in the job specification are over "lower level technical and clerical staff." The County does not include any specifics regarding health care information systems and software, data security, or business inter-operability standards, instead requiring only a written exam on general computer systems. The job specification (Exhibit F) is specific regarding typical work activities, knowledge, skills and abilities, while the general, nondescript subjects of the examination prepared by the County ignore the knowledge, skills and abilities required for the operation of the hospital.

52. Thus, the refusal by the County to have a competitive examination based on training and experience, and instead have only the written competitive examination that has been announced for this position, is arbitrary, capricious, abuse of discretion and violation of law.

FIRST CAUSE OF ACTION
DECLARATORY JUDGMENT – VIOLATION OF THE PUBLIC AUTHORITIES LAW

53. ECMCC repeats and re-alleges each and every allegation contained in paragraphs 1 through 52 as if fully set forth herein.

54. The County's violation of the N.Y. Public Authorities Law has created a justiciable controversy regarding the rights of ECMCC under the Public Authorities Law.

55. By the terms and provisions of the N.Y. Public Authorities Law § 3630(21), ECMCC has the power to appoint its employees and to fix and determine the qualifications, duties and compensation of its employees.

56. The County has affirmatively interfered with ECMCC's operations and powers through the implementation of the written competitive examinations for the HIS positions at ECMCC.

57. The County has failed to abide by the requirements of N.Y. Public Authorities Law will continue until a Court has declared ECMCC's rights under the N.Y. Public Authorities Law.

58. ECMCC does not have an adequate remedy at law.

59. By reason of the premises, the County has violated N.Y. Public Authorities Law § 3630(21) by impairing the rights vested in ECMCC to appoint its employees and to fix and determine the qualifications, duties and compensation of its employees.

60. By reason of the premises, ECMCC is entitled to a declaratory judgment determining that the County and NYS DCS have violated Public Authorities Law § 3630(21) by not allowing ECMCC to fix and determine the qualifications of its employees in a competitive manner.

61. By reason of the premises, ECMCC respectfully requests this court declare its rights under the N.Y. Public Authorities Law.

SECOND CAUSE OF ACTION
DECLARATORY JUDGMENT – VIOLATION OF THE CIVIL SERVICE LAW

62. ECMCC repeats and re-alleges each and every allegation contained in paragraphs 1 through 61 as if fully set forth herein.

63. The County's violation of the N.Y. Civil Service Law has created a justiciable controversy regarding the rights of ECMCC under the N.Y. Civil Service Law.

64. By the terms and provisions of N.Y. Civil Service Law § 50(6), the NYS DCS has the obligation to issue examinations and the County has the obligation to conduct examinations for the HIS positions at ECMCC that were practical in their character and related to those matters which fairly test the relative capacity and fitness of the persons examined to discharge the duties of that service into which they seek to be appointed.

65. The County's failure to abide by the requirements of N.Y. Civil Service Law will continue until a Court has declared the NYS DSC has violated the law.

66. ECMCC does not have an adequate remedy at law.

67. By reason of the premises, the County has violated N.Y. Civil Service Law § 50(6) by issuing written competitive examinations for the HIS positions at ECMCC that are not practical and do not fairly test the relative capacity and fitness of the persons examined to discharge the duties of that service into which they seek to be appointed.

68. By reason of the premises, ECMCC is entitled to a declaratory judgment determining that the County and NYS DCS have violated N.Y. Civil Service Law § 50(6).

THIRD CAUSE OF ACTION
PRELIMINARY AND PERMANENT INJUNCTION

69. ECMCC repeats and re-alleges each and every allegation contained in paragraphs 1 through 68 as if fully set forth herein.

70. The County has and will continue to treat ECMCC unfairly in violation of the N.Y. Public Authorities Law and the N.Y. Civil Service Law.

71. ECMCC will be irreparably harmed if the County proceeds with the written competitive examinations for the HIS positions at ECMCC.

72. By reason of the premises, ECMCC is entitled to a preliminary and permanent injunction prohibiting the foregoing conduct and any other conduct violating the N.Y. Public Authorities Law and the N.Y. Civil Service Law.

WHEREFORE, ECMCC respectfully requests a judgment from this Court:

A) Declaring and decreeing that by implementing the written competitive examinations for the HIS positions at ECMCC, the County has acted in violation of N.Y. Public Authorities Law § 3630(21);

B) Declaring and decreeing that by implementing the written competitive examinations for the HIS positions at ECMCC, the County has acted in violation of N.Y. Civil Service Law § 50(6);

C) Permanently enjoining the County from taking any future action that alters, limits, or impairs the rights vested in ECMCC to appoint its employees and to fix and determine the qualifications, duties and compensation of its employees;

D) Permanently enjoining the County from conducting written competitive examinations for the HIS positions at ECMCC when ECMCC has requested a different type of exam permitted under the Civil Service Law;

E) Permanently enjoining the County from taking any future action that is inconsistent with the N.Y. Public Authorities Law;

F) In the event that the County persists in such improper conduct, preliminarily enjoining the County from taking any future action that is inconsistent with the N.Y. Public Authorities Law;

G) Together with the costs and disbursements of this action and such other and further relief as the Court deems just and proper.

DATED: Buffalo, New York
December 4, 2014

COLUCCI & GALLAHER, P.C.

By: _____

Anthony J. Colucci, III
Paul G. Joyce
Attorneys for Petitioner Erie County Medical Center Corporation
2000 Liberty Building
Buffalo, New York 14202-3695
(716) 853-4080

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE)ss.:

Kathleen O'Hara, being duly sworn, deposes and says that she is the Vice-President of Human Resources of Erie County Medical Center Corporation, the petitioner in the within entitled action; that she has read the foregoing Petition and knows the contents thereof; that same is true to her own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters she believes it to be true.

The grounds of deponent's belief as to all matters in the said Petition not stated upon deponent's own knowledge, are investigations which deponent has caused to be made concerning the subject matter of this action and information acquired by deponent in the course of deponent's duties as an officer of said corporation, and from the books and papers of said corporation.

Kathleen O'Hara

Sworn to before me this 4th
day of December, 2014.

PAUL G. JOYCE
Notary Public, State of New York
Qualified in Erie County
My Commission Expires April 26, 2017

Notary Public