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U. S. DEPARTMENT OF LABOR

OFFICE OF WORKERS' COMPENSATION PROGRAMS
DIVISION OF ENERGY EMPLOYEES OCCUPATIONAL
ILLNESS COMPENSATION
FINAL ADJUDICATION BRANCH



July 9, 2012

Gary Vander Boegh, Vice President
Commonwealth Environmental Services, LLC
4645 Village Square Drive, St. F.
Paducah, KY 42001

Dear Mr. Vander Boegh:

Enclosed please find a Final Decision and Remand Order on the claim of Herbert A. Travis for compensation under the Energy Employees Occupational Illness Compensation Program Act, 42 U.S.C. § 7384 *et seq.* His claim for benefits based on renal cancer with nephroureterectomy is denied under Parts B and E of the Act. I regret that I could not provide a favorable decision on his claim. His claim based on carcinoma of the ureter and non-Hodgkin's lymphoma under Parts B and E of the Act is remanded to the Jacksonville district office for further consideration and the issuance of a new decision consistent with this remand order. I have enclosed a copy of his cover letter along with the final decision and remand order.

Please note that the representative is limited to a fee of 2% of the amount of lump-sum compensation awarded for the filing of an initial claim and an additional 10% of the difference between the amount of potential lump-sum compensation listed in the recommended decision and the amount actually awarded in any final decision with respect to any objections to a recommended decision. 20 C.F.R. § 30.603(b) (2012).

If you would like to complete an anonymous customer service survey, please visit our web site at www.dol.gov/owcp/energy.

Please note that the remand order is directed to the Jacksonville district office. Unless you are contacted by that office for additional information, you are not required to take any action at this time. I regret any inconvenience caused to you by this remand. Except as provided above, all future correspondence, inquiries or telephone calls should be directed to the Jacksonville district office. Thank you for your cooperation.

Sincerely,

Handwritten signature of Carolina R. Betts in cursive.

Carolina R. Betts
Hearing Representative

U. S. DEPARTMENT OF LABOR

OFFICE OF WORKERS' COMPENSATION PROGRAMS
DIVISION OF ENERGY EMPLOYEES OCCUPATIONAL
ILLNESS COMPENSATION
FINAL ADJUDICATION BRANCH



July 9, 2012

Herbert A. Travis
[REDACTED]

Dear Mr. Travis:

Enclosed please find a Final Decision and Remand Order on your claim for compensation under the Energy Employees Occupational Illness Compensation Program Act, 42 U.S.C. § 7384 *et seq.* Your claim for benefits based on renal cancer with nephroureterectomy is denied under Parts B and E of the Act. I regret that I could not provide a favorable decision on your claim. Your claim based on carcinoma of the ureter and non-Hodgkin's lymphoma under Parts B and E of the Act is remanded to the Jacksonville district office for further consideration and the issuance of a new decision consistent with this remand order. A copy of your final decision has been sent to your authorized representative.

If you disagree with this decision, you may request **reconsideration**. Such a request must be in writing and must be made within **30 days** of the date of issuance of this decision. It must clearly state the grounds upon which reconsideration is being requested. The request for reconsideration should be sent to:

U.S. Department of Labor/DEEOIC
Final Adjudication Branch
Attn: Hearing Unit
P.O. Box 77918
Washington, DC 20013-7918

In order to ensure that you receive an independent evaluation of the evidence, the request for reconsideration will be reviewed by a Final Adjudication Branch hearing representative other than the undersigned.

If the claim was denied because you have not established covered employment under the EEOICPA and you have **new evidence** of either covered employment or exposure to a toxic substance, you may request a **reopening** of the claim. If the claim was denied because your cancer was not causally related to work-related exposure to radiation and you can identify either a **change** in the probability of causation guidelines, a **change** in the dose reconstruction methods

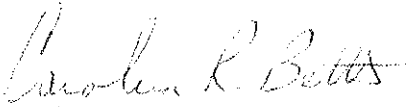
or an **addition of a class** of employees to the Special Exposure Cohort, you may also request a **reopening** of the claim.

These requests to reopen the claim must be in writing and be sent, along with your supporting information, to the following address:

U.S. Department of Labor, EEOICP
Attn: District Director – REOPENING
400 West Bay Street, Suite 722
Jacksonville, FL 32202

Please be advised that the final decision on your claim may be posted on the agency's website if it contains significant findings of fact or conclusions of law that might be of interest to the public. If it is posted, your final decision will not contain your file number, nor will it identify you by name.

Sincerely,



Carolina R. Betts
Hearing Representative

cc:

Gary Vander Boegh, Vice President
Commonwealth Environmental Services, LLC
4645 Village Square Drive, St. F.
Paducah, KY 42001

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2012, a copy of the Notice of Final Decision and Remand Order was sent to the following:

Herbert A. Travis



Gary Vander Boegh, Vice President
Commonwealth Environmental Services, LLC
4645 Village Square Drive, St. F.
Paducah, KY 42001

A handwritten signature in cursive script that reads "Carolina R. Betts".

Carolina R. Betts
Hearing Representative

U.S. DEPARTMENT OF LABOR

OFFICE OF WORKERS' COMPENSATION PROGRAMS
DIVISION OF ENERGY EMPLOYEES OCCUPATIONAL
ILLNESS COMPENSATION
FINAL ADJUDICATION BRANCH



EMPLOYEE: Herbert A. Travis
CLAIMANT: Herbert A. Travis
FILE NUMBER: XXX-XX-2107
DOCKET NUMBERS: 94333-2009
10073746-2009
DECISION DATE:

NOTICE OF FINAL DECISION AND REMAND ORDER
FOLLOWING A HEARING

This decision and remand order of the Final Adjudication Branch (FAB) concerns your claim for compensation under the Energy Employees Occupational Illness Compensation Program Act of 2000, as amended, 42 U.S.C. § 7384 *et seq.* (EEOICPA or the Act). For the reasons set forth below, your claim based on renal cancer with nephroureterectomy is denied under Parts B and E of the Act. Your claim based on carcinoma of the ureter and non-Hodgkin's lymphoma under Parts B and E of the Act is remanded to the Jacksonville district office for further consideration and the issuance of a new decision consistent with this remand order.

STATEMENT OF THE CASE

On March 25, 2008, you filed a form EE-1, Claim for Benefits under the Act, based on renal cancer with nephroureterectomy, carcinoma of the ureter, and non-Hodgkin's lymphoma.

A pathology report dated February 26, 2008; from Carolyn S. Watson, M.D., establishes a diagnosis of urothelial transitional cell carcinoma of the right ureter. A pathology report dated February 27, 2008, from Robert M. Haugh establishes a diagnosis of small cleaved cell follicular malignant lymphoma (non-Hodgkin's lymphoma). A pathology report dated March 3, 2008, from Gerald T. Weir, M.D., establishes a diagnosis of non-invasive papillary transitional cell carcinoma of the ureter and moderate to severe arteriolonephrosclerosis and chronic pyelonephritis of the kidney. The report from Dr. Weir states that no mass lesions of the kidney are identified. A medical letter, dated March 4, 2008, from William L. Skinner, M.D., states that your diagnoses were transitional cell carcinoma of the right ureter on February 26, 2008 and small cleaved cell follicular malignant lymphoma (non-Hodgkin's lymphoma) on February 27, 2008. The medical evidence is insufficient to establish that you were diagnosed with renal cancer necessitating nephroureterectomy.

On the form EE-3, Employment History, you stated you were employed as a heavy equipment operator by API Contractors (Asphalt Paving Incorporated) at the Paducah Gaseous Diffusion Plant, in Paducah, Kentucky, from 1990 to 2005. The Department of Energy (DOE) was unable to verify the claimed employment. You indicated that you did not wear a dosimetry badge.

You completed an Occupational History Questionnaire (OHQ) on March 21, 2008. In the section for non-DOE work history you listed that you were employed by Local 181 Operating Engineers Union in Paducah, Kentucky, at different contracting jobs throughout the Southeast from 1986 to present. In the section for DOE facility you listed that you were employed by API Contractors periodically from 1990 to 2005 at the Paducah GDP.

Your Social Security Earnings Statements show that you were employed by Asphalt Paving, Inc., from 1985 to 2006.

On April 27, 2009, the Center for Construction Research and Training (CPWR) provided documentation from the International Union of Operating Engineers Local Union 181 showing your name, address, date of birth and Social Security number and listing a dispatch for Asphalt Paving, Inc. (API) indicating you were sent out on "5-22-85 (Pad)" as new member. Also there are dates of 5-22-86, 5-22-87, 5-22-88, and 05-22-89 listed on the document. The document stated you were transferred to Parent Body on "1-9-90." This document corresponds with your OHQ statement of working for Local 181 from 1986 to present and for API from 1990 to 2005. Other documents from CPWR include a Participant Basic Data Report showing your union service initiation date of May 22, 1985, and the Central Pension Funds of the International Union of Operating Engineers Employee History Detail listing the beginning date of your work for API as December 31, 1985. This document lists period ending dates and number of hours worked for the employer API.

You submitted two co-worker affidavits on Forms EE-4. In his March 22, 2008 affidavit, Lawrence D. Warran stated that he worked with you as a laborer for API at the Paducah GDP from August 15, 1990 through August of 2006. In his March 24, 2008 affidavit, Van E. Rudolph stated that he owned API and worked with you from May of 1985 through August 8, 2006. Mr. Rudolph asserted that you worked as a heavy equipment operator for API at the PGDP from May of 1987 through September of 2004 on the following four projects: C404 Burial Ground Closure from May 1987 to August 1987, Refrigerated Autosampler from June 1990 to April 1991, C616 Lagoon Modifications from May 1997 to November 1997, and the North South Diversion Ditch Section 1 from March 2004 to September 2004. By letter dated April 10, 2008, Mr. Rudolph stated the only payroll records he had for 1987 are reports API filed with the International Union of Operating Engineers and at least 75% of the hours were at the Paducah GDP. By letter dated March 23, 2009, Mr. Rudolph stated: ". . . the reports to the Operating Engineers are the only payroll documents I have. The reports showed 313 hours and I honestly cannot confirm or deny Mr. Travis' claim 100%. I stated at least 75% of those hours were at the Paducah GDP. This is my memory about something that happened 20 years ago. The work was done for Martin Marietta, under Subcontract SC-8172. Maybe they have the certified payrolls."

In his declaration dated November 6, 2009, Mr. Steve Willett stated that he worked with you for API at the Paducah GDP from May 1987 to August 1987, until the job was completed. He also claimed to have worked with you for approximately 3 to 4 months on another project from approximately late 1988 through early 1989 and on another project with you beginning in June of 1990 through April of 1991.

In his November 12, 2009 declaration, Mr. Don Wagner stated that he worked with you for API on a Martin Marietta project inside the Paducah GDP from May 1987 to August 1987, which involved installing a cap on the hazardous waste (RCRA) landfill. In addition, Mr. Wagner stated that he worked with you from June 1990 to April 1991 on the "Auto Dialer/Flume Installation" project at the Paducah GDP.

On December 28, 2009, the FAB issued a final decision following a hearing, concluding that you are not entitled to benefits for carcinoma of the ureter and non-Hodgkin's lymphoma under Parts B and E of the Act since it was not "at least as likely as not" (a 50% or greater probability) that your cancers were related to radiation exposure and that toxic exposure at the DOE facility was not "at least as likely as not" a significant factor in aggravating, contributing to or causing your cancers. In addition, the final decision denied your claim for kidney (renal) cancer since the evidence of record was insufficient to establish a diagnosis of kidney cancer. This final decision found that you were employed by a DOE subcontractor at the Paducah GDP intermittently from June 1, 1987 through June 24, 2005. The decision determined that the evidence of record does not establish that you worked an aggregate of at least 250 work days at the Paducah GDP. Specifically, the decision indicated that the evidence of record establishes that you worked at the Paducah GDP for 1434.25 hours from June 1, 1987 to February 1, 1992.¹

By letter dated January 27, 2010, your authorized representative requested reconsideration of the December 28, 2009 final decision. On March 10, 2010, the FAB issued an order denying the request for reconsideration.

On June 21, 2010, the Director of DEEOIC issued an order vacating the December 28, 2009 final decision and March 10, 2010 reconsideration denial. The Director's Order states that further development was necessary to determine whether you qualified as a member of the Special Exposure Cohort (SEC) by working at least 250 cumulative work days at the Paducah Gaseous Diffusion Plant within the SEC time frame prior to February 1, 1992.

On May 27, 2011, the Jacksonville district office issued a recommended decision, recommending that you are not entitled to benefits for carcinoma of the ureter and non-Hodgkin's lymphoma under Parts B and E of the Act since it was not "at least as likely as not" (a 50% or greater probability) that your cancers were related to radiation exposure and that toxic exposure at the DOE facility was not "at least as likely as not" a significant factor in aggravating, contributing to or causing your cancers. In addition, the recommended decision recommended that you are not entitled to benefits for the claimed condition of renal cancer with

¹ The decision noted that according to the Federal (EEOICPA) Procedure Manual, Chapter 2-600.6d(2)(a) (January 2010), the 250 work day requirement is equivalent to 2000 hours. However, this conversion is only to be used when the number of days is not apparent in the employee's primary work record since it results in a rough estimate of the number of days worked.

nephroureterectomy under Parts B and E of the Act since the medical evidence was insufficient to establish a diagnosis of renal cancer. The recommended decision fully explained the district office's determination that you worked less than 250 work days at the Paducah GDP prior to February 1992.

Attached to the recommended decision was a notice of claimant rights, which stated that you had 60 days in which to file an objection to the recommended decision and/or request a hearing. On July 29, 2011, the FAB received your authorized representative's letter of objection and request for a hearing dated July 25, 2011. The hearing was held on October 18, 2011, in Paducah, Kentucky.

A claimant is allowed thirty days after the hearing is held to submit additional evidence or argument, and twenty days after a copy of the transcript is sent to them to submit any changes or corrections to that record. By letter dated February 22, 2011, the transcript was forwarded to you. No response was received.

OBJECTIONS

In your authorized representative's letter of objection, he stated that the Department of Labor (DOL) incorrectly determined that you do not qualify as a member of the Paducah GDP SEC class, that you worked intermittently at the Paducah GDP even though the Paducah GDP access log reports provided to the DOL by the DOE did not reflect these work days ("or were not to be considered"), that the DOL failed to consider employment information provided to them by the DOE, and that the DOL failed to recognize your employment affidavits at the Paducah GDP in 1986.

During the hearing, your employment and medical history were discussed. You, your authorized representative, and your co-worker Mr. Donald Wagner presented testimony regarding the objections to the recommended decision. In addition, your authorized representative submitted the Paducah GDP Daily Visitor Register Information which lists your name on March 19, 1986, March 31, 1986, June 13, 1990, September 13, 1990, September 14, 1990, September 17, 1990, September 27, 1990 and October 2, 1991. In addition, he submitted an Engineering Service Order (ESO) document showing five project orders from March 7, 1986 through April 9, 1990. You indicated that you worked on these projects for API.

During the hearing Mr. Wagner stated that you worked on the ESO 16721 project from September 1989 to April of 1990 and that you had security clearance, but he did not. (Hearing Transcript (HT), page 19, lines 18 through page 20 line 1).

You stated that the septic tank was back by the water plant and Mr. Wagner stated, "Best I remember it was." Your authorized representative stated that the septic tank system improvement project ran from September 10, 1987 to March 10, 1988. (HT, page 20, lines 12 through line 22).

On the Paducah GDP Daily Visitor Register Information submitted at the hearing, Mr. Wagner stated that his name is listed along with your name for the dates September 14, 1990 and September 17, 1990. (HT page 32, lines 11 through line 24). In addition, Mr. Wagner stated "The one on the plumbs was

started worked four ten-hours days. Then it went to 5 to 6 to 7, and sometimes 12-hours days. We worked a lot of overtime.” (HT page 36, lines 2 through 5).

Your authorized representative stated that there is enough evidence to place you on site at the Paducah plant for over 250 work days based on co-workers affidavits stating that you worked 10 hour days and some Saturdays and Sundays. He stated that the DOL must depend on fellow co-workers testimonies/declarations as allowed by the EEOICPA regulations since a due diligence search was performed by Mr. Van Rudolph President of API and he indicated that his company’s records were, in fact, incomplete or were no longer in the company’s possession due to the early date of the API contract..

After the hearing, On October 19, 2011, the FAB received a fax from the Paducah Resource Center of contracts with API, including projects from March 7, 1986 through March 13, 1992.

On June 6, 2012, your authorized representative submitted a copy of an e-mail from Amy L. Rothrock from the DOE that stated if someone had a clearance, he would not be in the visitor log for March 1986 forward unless he was listed as an escort because he would not have had to sign in and get a visitor badge or be escorted.

On June 7, 2012, your authorized representative submitted Visitor Register logs dated March 19, 1986 and March 31, 1996, from Martin Marietta Energy Systems, Inc, in Paducah, Kentucky, with your name on them. In addition, a Paducah GDP Project Worker History Report lists your name for projects for the periods of January 23, 1990 to December 28, 1990 and March 6, 1991 to March 13, 1992

The International Union of Operating Engineers Local Union 181 document showed that you were dispatched for API on May 22, 1985 at (Pad) as a new member. The document stated you were transferred to Parent Body on January 9, 1990. As stated above, this document corresponds with your OHQ statement of working for Local 181 from 1986 to present and for API from 1990 to 2005. In addition, Mr. Rudolph from API stated the only payroll records he had for 1987 are reports they filed with the International Union of Operating Engineers. Mr. Rudolph confirmed that you worked on Projects at the Paducah GDP from May 1987 to August 1987 and June 1990 to April 1991. You indicated at the hearing that you worked on the API Project ID: ESO-16732 at the Paducah GDP beginning on March 7, 1986. The declaration/disclosure statement and hearing testimony of Mr. Wagner places you on site at the Paducah GDP from May 1987 to August 1987; September 10, 1987 to March 10, 1988; September 1989 to April 1990; and June 1990 to April 1991. Furthermore, the Paducah GDP Project Worker History Report lists your name for projects for the periods of January 23, 1990 to December 28, 1990 and March 6, 1991 to March 13, 1992.

The Central Pension Funds of the International Union of Operating Engineers Employee History Detail sheet indicates the employer as Asphalt (API) and the ending period and number of hours as follows:

<u>Period(s) ending</u>	<u>Hours</u>
April 30, 1986	152.50
May 31, 1987 to August 31, 1987	509.00
September 30, 1987 to March 31, 1988	639.00
September 30, 1989 to April 30, 1990	995.50
June 30, 1990 to April 30, 1991	<u>1,927.50</u>
Total hours	4,223.50

<u>Period(s) ending</u>	<u>Hours</u>
March 31, 1991 to January 31, 1992	1,699.00

Based on the affidavits of Mr. Rudolph and Mr. Wagner you worked on projects from May 1987 to August 1987 and June 1990 to April 1991 with API at the Paducah GDP. According to the Central Pension Funds of the International Union of Operating Engineers Employee History Detail sheet that lists the number of hours you worked, during these time periods the total number of hours worked for API through the union was 2436.5 hours (509.0 hours + 1,927.5 hours). The district office calculated 313 work hours for the first period and 1199.50 hours for the second period, based on Mr. Rudolph's April 10, 2008 letter. However, the case file also contains the Central Pension Funds information, which shows that you worked additional hours during this time period. Furthermore, based on Mr. Rudolph's April 10, 2008 letter indicating that you would have worked at least 75% of the hours at the Paducah GDP, the district office considered only 75% of the hours. During a telephone call with the district office, Mr. Rudolph clarified that he was not contesting that 100% of the hours were worked at the Paducah GDP. In summary, FAB determines that the preponderance of evidence establishes that 1927.5 hours were worked during the above two time periods, not 1512.5 hours, and that 100% of the hours should be considered worked at the Paducah GDP.

In addition, the district office did not use any hours worked from March 31, 1991 to January 31, 1992. As stated above, the Paducah GDP Project Worker History Report lists your name for projects for the period of March 6, 1991 to March 13, 1992, and according to Central Pension Funds of the International Union of Operating Engineers Employee History Detail sheet the total number of hours worked through January 31, 1992 (the ending date of the Paducah SEC period) is 1699 hours.

In addition to this, the district office's calculations include no hours worked prior to June 1987. The FAB received new evidence that showed the employee's name on visitors registers at the Paducah GDP beginning March 19, 1986, along with your Paducah GDP Project Worker History Report.

FINDINGS OF FACT

1. On March 25, 2008, you filed a claim for benefits under the Act based on renal cancer with nephroureterectomy, carcinoma of the ureter, and non-Hodgkin's lymphoma.
2. You were employed by a DOE subcontractor at the Paducah GDP intermittently from March 19, 1986 to June 24, 2005.
3. The medical evidence is insufficient to establish a diagnosis of renal cancer.

CONCLUSIONS OF LAW

The implementing regulations provide that within 60 days from the date the recommended decision is issued, the claimant must state, in writing, whether he or she objects to any of the findings of fact and/or conclusions of law contained in such decision and whether a hearing is desired. 20 C.F.R. § 30.310(a) (2012). You objected to the recommended decision issued by the district office on May 27, 2011, and requested a hearing to address your objections. During the hearing, you provided oral testimony in response to the recommended decision issued by the district office. Subsequent to the hearing, you were provided with a copy of the transcript, and afforded the opportunity to comment on the accuracy of the transcript. You were also given the opportunity to submit additional evidence in support of your claim. 20 C.F.R. § 30.310(a), 30.314, 30.316(b).

The "... claimant bears the burden of proving by a preponderance of the evidence the existence of each and every criterion necessary to establish eligibility under any compensable claim category ..." and providing "all written medical documentation, contemporaneous records, or other records and documents necessary to establish any and all criteria for benefits set forth in these regulations." 20 C.F.R. § 30.111. Any claim that "does not meet all the criteria for at least one of the categories, set forth in the regulations, must be denied." 20 C.F.R. § 30.110(b)-(c).

In order to be entitled to compensation under Part B of the Act as a "covered employee," an employee must have been diagnosed with one of the following occupational illnesses: cancer, beryllium sensitivity, chronic beryllium disease, or chronic silicosis. *See* 42 U.S.C. §§ 7384l(1), 7384l(15). In order to be entitled to compensation under Part E the Act, the evidence must establish that you are "covered DOE contractor employee"; this is defined as any DOE contractor employee determined to have contracted a covered illness through exposure at a DOE facility. 42 U.S.C. § 7385s(1). The regulations discuss the type of medical evidence required to establish a compensable medical condition, such as a physician's report, laboratory reports, hospital records, and other medical records. The medical evidence submitted will be used to establish the diagnosis and the date of diagnosis of the condition. 20 C.F.R. § 30.114. An employee establishes that he or she contracted cancer with medical evidence that sets forth an explicit diagnosis of cancer and the date on which that diagnosis was first made. 20 C.F.R. § 30.211.

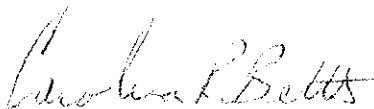
You were provided the opportunity to submit such medical evidence to support your claim; however, you did not submit medical evidence to show that you have been diagnosed with renal cancer. Therefore, the medical evidence is insufficient to establish that you were diagnosed with the claimed condition of renal cancer with nephroureterectomy. Accordingly, your claim based on renal cancer with nephroureterectomy under Part B and Part E of the Act is denied. 42 U.S.C. §§ 7384s, 7385s.

Written affidavits or declarations, subject to penalty for perjury, by the employee, survivor or any other person, will be accepted as evidence of employment history and survivor relationship for purposes of establishing eligibility and may be relied on in determining whether a claim meets the requirements of the Act for benefits if, and only if, such person attests that due diligence was used to obtain records in support of the claim, but that no records exist. A claimant will not be entitled to any presumption otherwise provided for in these regulations if substantial evidence exists that rebuts the existence of the fact that is the subject of the presumption. Substantial evidence means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. When such evidence exists, the claimant shall be notified and afforded the opportunity to submit additional written medical documentation or records. 20 C.F.R. § 30.111(c)(d).

According to the Federal (EEOICPA) Procedure Manual, Chapter 2-0600.6d(2)(a) (January 2010), the 250 work-day requirement is equivalent to 2,000 hours for purposes of determining whether an employee qualifies for inclusion in the SEC. Your authorized representative's objections were reviewed along with the evidence in the case file and additional evidence submitted at the hearing and after the hearing. The totality of the employment evidence suggests that you worked well above the required 2,000 hours.

The regulations provide that at any time before the issuance of its decision, the FAB may remand the claim to the district office for further development without issuing a decision. *See* 20 C.F.R. § 30.317. Therefore, in light of the evidence already in the case file and the additional employment evidence, the FAB is not issuing a final decision and the case is remanded to the district office. Upon remand, the district office should review the employment evidence. After obtaining the appropriate information and reviewing the facts in accordance with the Act, the implementing regulations, and the Federal (EEOICPA) Procedure Manual, the district office should issue a new recommended decision.

Jacksonville, FL



Carolina R. Betts
Hearing Representative