

INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE

FAYETTE AUGILLARD,

Complainant,

vs.

DEPARTMENT OF HIGHER EDUCATION, COLORADO STUDENT LOAN PROGRAM,

Respondent.

Administrative Law Judge Kristin F. Rozansky held the hearing in this matter on August 18, 2003 and October 29, 2003 at the State Personnel Board, 1120 Lincoln, Suite 1420, Denver, Colorado. The parties submitted written closing arguments and the record was closed on January 12, 2004. Assistant Attorney General Andrew Katarikawe represented Respondent. Respondent's advisory witness was Mark Putman. Complainant appeared and was represented by Lee Judd.

MATTER APPEALED

Complainant, Fayette Augillard ("Complainant" or "Augillard") appeals the abolishment of her position and her subsequent layoff by Respondent, Department of Higher Education, Colorado Student Loan Program ("Respondent," "DHE" or "CSLP"). Complainant seeks reinstatement to her former classification and back pay. Respondent requests affirmance of its actions and attorney fees and costs.

In their written closing arguments, the parties were asked to address various state employee tenure cases and their interplay with §23-3.1-103, C.R.S.

For the reasons set forth below, Respondent's action is **affirmed**.

ISSUES

1. Whether Respondent's action was arbitrary, capricious or contrary to rule or law;
2. Whether attorney fees are warranted.

FINDINGS OF FACT

General Background

1. Complainant is a certified state employee who has been employed by CSLP since May 1996. Initially, when she was hired, she was classified as an Administrative Assistant II (“AAII”). In December 1997, she became an Administrative Assistant III (“AAIII”). In March 2001, she became an Office Manager I (“OMI”). She held this classification until July 2003, the effective date of her layoff, when she was demoted to a Program Assistant I position – the classification immediately below her OMI classification.
2. Mark Putman is the Director of Loan Servicing, a division within CSLP. Putman directly supervised Carol Danford who, in turn, directly supervised two OMIs, Complainant and Geri Mizak.
3. There were seven units within the Loan Servicing division. Two of those units were Loan Origination/Loan Accounting (“LOLA”) and System Adjustments Unit (“SAU”). Complainant oversaw and supervised the LOLA staff and Mizak oversaw and supervised the SAU staff. Both of them reported directly to Danford.
4. The LOLA and SAU staffs were each comprised of a group of Administrative Assistant IIs who reported to Administrative Assistant IIIs, who in turn reported to Complainant and Mizak.
5. All of the AAIIIs performed supervisory duties, tracked timesheets for AAIs; and were lead workers for the various areas in LOLA and SAU. The two OMIs (Complainant and Mizak) both had supervisory and technical duties. At least 35% of Complainant’s OMI duties were related to her supervisory duties. The remaining 65% of her duties involved customer service, insuring federal and state regulatory compliance, suggesting and implementing system efficiencies and conversion of new lenders into CSLP’s system
6. In November 2002, CSLP went through a system conversion to a new computer system. During the four to six month period following the conversion, Complainant worked in excess of forty hours a week to resolve many of the technical problems which arose from the conversion.
7. After the conversion, CSLP had a 15% reduction in its needed staffing levels, despite a 28% increase in the number of loans processed, due to the new system’s increased efficiencies. In anticipation of the 15% reduction in staffing needs, CSLP had not, prior to the system conversion, been filling any positions. In addition, there has been a \$1 million increase in CSLP’s annual revenues, a portion of which is attributable to the substantial increase in the number of students enrolling at Colorado universities.

8. After the conversion, Putman, along with management staff and some third party observers, reviewed the functions of the Loan Servicing's divisions seven units, looking for functions between the units that required similar skill sets and provided opportunities to cross train employees. As a result of that analysis, it was recommended, in part, that, within the Loan Servicing division, that LOLA and SAU be combined into one unit.
9. On April 18, 2003, Putman informed his staff that there would be reorganization and that, under that reorganization, LOLA and SAU would be merging into a single unit that would be called the Processing Unit (the "Reorganization").
10. One of the stated bases for the Reorganization was to allow for better support during LOLA's and SAU's peak times.
11. LOLA, which handled the initial processing of student loans at the beginning of school semesters, had peak times from January to February and July to September. SAU, which handled deferments, had peak times approximately sixty to ninety days after LOLA.
12. Prior to the Reorganization, during LOLA's and SAU's peak times, the two units would pay overtime and, during the conversion to the new system, also hired temporaries in order to handle the workload while the CSLP employees learned the new system. In addition, during managers meetings, the managers of the various units would ask for, and receive, voluntary assistance from the other units. After the Reorganization and during the current fiscal year, the Processing Unit has only incurred forty-five hours in overtime pay.
13. During 2002, in part as a result of the overtime and temporary labor expenses, the Loan Servicing Division had losses totaling \$900,000.
14. Under the Reorganization, the new Processing Unit cross-trains the employees from the former LOLA and SAU units, thereby eliminating the need for overtime and temporaries to handle the workload during the peak times.
15. Under the Reorganization, the Processing Unit has two groups or teams, both performing the same functions and having identical structures. Each group is comprised of Processing Analysts (formerly AAlls) and Senior Processing Analysts (formerly AAlls), all of who report to a Team Leader (also formerly an AAll). Both of the Team Leaders report to a Supervisor. The Supervisor and a Process Administrator position both report directly to Carol Danford.
16. The Senior Processing Analysts do more complex transactions than the Processing Analysts. The Team Leaders are responsible for the old AAll duties of supervision and tracking of timesheets for all of the analysts and have the additional new duties of preparing statistical reports and working on the analysts' annual performance

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evaluations.

17. As a part of the Reorganization, the former supervisory and technical duties of the two OMI positions were divided between the Supervisor position and a newly created Process Administrator position. The Supervisor position was initially a classified position (OMI) and then became a non-classified position. It now handles all of the supervisory duties that had been previously divided between the two OMI positions, including establishing performance plans, evaluating employee performance, delegating work assignments and making recommendations on promotions, transfers and discipline. The positions oversee all of the Processing Analysts; Senior Processing Analysts and Team Leaders.
18. The Process Administrator position has no supervisory authority, is a non-classified position, and is responsible for training personnel on the new system and handling technical issues regarding the new system, including proposing system efficiencies and monitoring the system for state and federal regulatory compliance and contractual compliance. It handles all of the technical duties previously divided between the two OMI positions and has no supervisory duties at all. The upper monthly pay range of the Process Administrator is approximately \$600 lower than the OMI upper monthly pay range.
19. After receiving input from his management team and the Processing Analysts and reviewing past performance evaluations, Putman determined that Mizak should be transferred to the Supervisor position, an OMI position. The former LOLA and SAU AAll and AAlll employees were all retained and were mixed between the two new teams within the new Processing Unit.
20. On April 18, 2003, Putman informed Complainant of the Process Administrator position and told her that it had been "slated" for her, as she possessed strong technical skills, one of the two skill areas required for the position.
21. On April 25, 2003, Complainant informed Putman that she wished to remain in a classified position with the same duties and responsibilities. He replied that he would try to find her such a position.
22. On April 29, 2003, Complainant again met with Putman who told her that he had been unable to find the type of position for which she wished. She also, at this time, received a copy of the job description for the Process Administrator.
23. CSLP's Human Resources group told Putman that he could not offer the job to Complainant as it was a new position and that she would have to compete for the position. He was formally reprimanded for telling her that she was "slated" for the position.
24. On May 12, 2003, when Complainant asked Putman for an update, he told her that

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her position was being eliminated and that, because CSLP was becoming an enterprise on July 2003, no new classified positions could be created and Complainant would have to compete for the non-classified Process Administrator position.

25. The May 14, 2003 Business Plan of Reorganization (the "Plan") outlines the merging of LOLA and SAU, the dissolution of another unit and the centralization of other services. The Plan contained an explanation of the reasons for the change, the anticipated benefits and results, a description of the changes and the impact of those changes on the employees. The pertinent part of the explanation for the Reorganization was to reduce use of overtime and temporaries during peak periods, provide for cross-training and to take advantage of the efficiencies offered by the system conversion.

Abolishment of Complainant's Position

26. On May 23, 2003, Complainant received written notice that effective July 7, 2003, her position would be abolished due to the Reorganization.
27. On May 23, 2003, Complainant was informed by Delores Martinez of Human Resources that the Process Administrator position could not be classified as an OMI position because it had no supervisory duties and OMIs had to have supervisory duties. Complainant was also told that the Process Administrator position would be posted on May 23rd, the application process would be closed on May 28th, and interviews would be held and a decision made on May 29th, so that Complainant would still have time to exercise her retention rights, if necessary.
28. After he arranged for the posting of the position, Putman was not involved in the recruiting process for the Process Administrator position. He removed himself from the process because of the possible perception that he had offered the position to Complainant.
29. Complainant submitted her application for the Process Administrator, along with three other people. After the initial round of interviews, two finalists, one of whom was Complainant, were selected. The other finalist withdrew her application before the second interview.
30. The first panel of interviewers recommended that the second interview panel contain someone with a training background, because of the training component of the Process Administrator position. The second panel, which included CSLP's Manager of Training, prepared their own set of questions for the second interview, based upon their review of the job's duties. After interviewing Complainant, they approached Putman, told him that they had grave concerns about Complainant's ability to fulfill the training duties involved in the job and recommended that, given the pool of candidates, no one be hired at that time.
31. On June 9, 2003, Complainant was informed that she had not gotten the Process

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Administrator position.

32. The Process Administrator position has remained vacant since June 2003. Other managers have performed the technical duties of that position and the training component has been handled by the Team Leaders within each unit.
33. Apart from Complainant, only one other employee, also classified as an OMI, was laid off. That employee exercised her retention rights to another OMI position within CSLP.

Complainant's Retention Rights

34. The Department of Personnel and Administration calculated Complainant's retention rights within the retention area of DHE's central staff, CSLP, the Colorado Historical Society and the Council on the Arts (the "Retention Area").
35. Within the Retention Area, there were no positions within Complainant's current class or in any class to which she had been previously certified. There was, however, a Program Assistant I position, the highest-level demotion in Complainant's current or previously certified class series.
36. On June 2, 2003, Complainant received written notice of her retention rights to an encumbered (i.e. occupied) Program Assistant I position at CSLP.
37. On June 5, 2003, Complainant accepted the Program Assistant I position, in lieu of being laid off. As a Program Assistant I, she is paid \$3547 monthly, which is at the top of the position's pay range, but is also a \$290 reduction from her monthly OMI pay, with no opportunity for a pay increase.
38. In July 2003, Complainant was placed in the Program Assistant I position.

DISCUSSION

I. GENERAL

A. Burden of Proof

In this proceeding regarding an administrative action, the Complainant has the burden to prove by preponderant evidence that the Respondent's acts or omissions were arbitrary, capricious or contrary to rule or law. *Department of Institutions v. Kinchen*, 886 P.2d 700 (Colo. 1994) and. Section 24-50-103(6), C.R.S.

B. Applicable Authority Regarding Layoffs and CSLP Employees' Participation in the State Personnel System

Under Colorado's state personnel system, certified state employees have a property right in their positions during efficient service. Colo. Const., art. XII, Section 13(8). Therefore, by statute and Board rule, if there is a reduction in workforce due to a lack of work, a lack of funds or a reorganization (the three statutorily allowable bases for layoffs), consideration must be given to both performance and seniority to determine which employees should be retained. § 24-50-124(1), C.R.S. and R-7-7 and R-7-8, 4 CCR 801. These principles allow for a balancing of state agencies' needs in managing state services and resources against certified state employees' constitutionally protected property rights.

1. General Layoff Procedures

No matter which of the three allowable bases is used for a layoff, there are two general steps in the process that the State Personnel Board has mandated. Those steps are: (1) giving written notice of the layoff; and (2) allowing employees to exercise retention rights to current or previously certified classifications and positions. R-7-12, 7-13 and 7-18, 4 CCR 801.

In determining retention rights, employees have retention rights only within their retention areas. §24-50-124, C.R.S. and R-7-13, 4 CCR 801. Within those retention areas, employees have retention rights first to positions within the employee's current class certification, then to the employee's previous class certifications, and finally to the highest level demotion in the employee's current or previously certified class series. Board Rule R-7-18, 4 CCR 801.

2. Reorganization Layoff Procedures

A reorganization is "a change in the fundamental structure, positions, and/or functions accountable to one or more appointing authorities." R-7-7(A), 4 CCR 801. If a layoff is due to a reorganization, there are procedures in addition to the layoff procedures set forth above. Prior to a reorganization layoff and the issuing of layoff notices, a business plan must be posted. R-7-7(A), 4 CCR 801. That business plan must contain five key elements: (1) an organizational chart; (2) the reasons for the change; (3) the anticipated benefits and results; (4) a general description of the expected changes; and (5) their effects on employees. R-7-7, 4 CCR 801.

In a case that factually resembles the circumstances in this matter, the Colorado Court of Appeals overturned a purported reorganization. *Bardsley v. Colorado Dept. of Public Safety*, 870 P.2d 641 (Colo. App. 1994). In the *Bardsley* case, the Governor, in response to a budget shortfall, issued two executive orders that eliminated a division in the Department of Public Safety ("DPS") and created an office under the Department of Local Affairs ("DOLA"). The principal functions of the eliminated division and the created office

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included preparation of a state disaster plan and coordination of the local, state and federal activities regarding disasters. Thirty-one DPS employees were laid off as a result of the elimination of the division. The new DOLA office hired twenty employees, several of whom were former DPS employees in the eliminated division. The qualifications and responsibilities for the new positions were substantially similar. All of the former DPS employees who were hired by DOLA were treated as new employees, with regards to annual and sick leave accruals (having been paid for accrued benefits when they were laid off by DPS), and had to serve a probationary period.

The *Bardsley* court, based upon over seventy years of case law, held that neither the legislative nor the executive branch of the government could abrogate certified state employees' tenure rights under Colorado's Constitution, art. XII, Section 13 (the "Civil Service Amendment"). Prior case law had established that certified employees' positions could not be eliminated and new non-classified positions created in their place with substantially similar duties. See *People ex rel Kelly v. Milliken*, 223 P. 40 (Colo. 1924) and *Colorado Civil Rights Commission ex rel Ramos v. Regents of the University of Colorado*, 759 P.2d 726 (Colo. 1988). The *Bardsley* court reiterated this principal, stating, "a certified position may not be abolished and the incumbent employee terminated if a new position is created with substantially the same duties and responsibilities as the old position, but filled by another employee." *Bardsley*, 870 P.2d at 647. The *Bardsley* court, in remanding the matter back for further proceedings, held that a key factor in determining whether the complainant employees' tenure rights had been violated was a determination of whether the new and old positions were substantially similar. *Id.* at 648. If there was substantial similarity then the complainant employees' tenure rights were violated. *Id.* at 648.

3. CSLP Employee's Participation in the State Personnel System

CSLP employees who were within the state personnel system prior to July 1, 2002 may remain in the system until their employment is terminated. §23-3.1-103(3), C.R.S. All CSLP employees hired on or after July 1, 2002 are considered exempt from the state personnel system. §23-3.1-103(3), C.R.S. Therefore, any newly created CSLP positions are not considered part of the state personnel system.

II. HEARING ISSUES

A. The Appointing Authority's action was not arbitrary, capricious, or contrary to rule or law.

Arbitrary or capricious exercise of discretion can arise in only three ways, namely: (a) by neglecting or refusing to use reasonable diligence and care to procure such evidence as it is by law authorized to consider in exercising the discretion vested in it; (b) by failing to give candid and honest consideration of the evidence before it on which it is authorized to act in exercising its discretion; (c) by exercising its discretion in such manner after a consideration of evidence before it as clearly to indicate that its action is based on conclusions from the evidence such that reasonable men fairly and honestly considering the evidence must reach

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contrary conclusions. *Lawley v. Dep't of Higher Educ.*, 36 P.3d 1239 (Colo. 2001).

Complainant failed to meet her burden of proof in demonstrating that Respondent acted in any of the three ways outlined in the *Lawley* case. The credible evidence established that the system conversion resulted in a 15% reduction in the necessary staffing levels despite a 28% increase in the workload. Complainant argued that the peak times for the two units coincided. Respondent argues that this is not true and that, during the current fiscal year, there has been little or no need for temporary or overtime assistance. The issue of when the peak times occurred for the two units is immaterial in light of the fact that Respondent, during the current fiscal year, has needed to hire little or no temporary help and has paid much less overtime than last year. This supports Respondent's contentions that the Reorganization, with the assistance of the system conversion, created efficiencies in functions of the two merged units through the use of cross training of the Processing Units employees.

Complainant also argues that the differences between the former OMI positions and the newly created Supervisor and Process Administrator positions are distinctions without meaning. However, a careful comparison of the job duties of the Process Administrator and Supervisor positions to each other and to Complainant's former OMI position does not support this argument.

The Reorganization placed all of the supervisory duties under the Supervisor position and left the Process Administrator with none. Without supervisory duties a position cannot be classified as an OMI position. Even if the position had remained within the classified system, the transfer of the position's supervisory duties would have had a direct impact on the classification of the position. The crux of the *Bardsley* analysis is that the newly created positions were substantially similar with almost all of the same duties. Yet, in this case, while there are some similarities between the old and new positions, there were also substantive differences. The redistribution of the duties is a distinction with meaning.

Under §23-3.1-103(3), C.R.S., CSLP employees hired before July 1, 2002 are included within the state personnel system until the termination of their employment with CSLP, unless they accept a promotion, a voluntary demotion or a transfer for purposes of a change of duties performed for the benefit of CSLP. In such instances, those employees would become exempt from the state personnel system. §23-3.1-103(3), C.R.S. CSLP employees hired on or after July 1, 2002 are also considered exempt from the state personnel system. §23-3.1-103(2), C.R.S.

One constraint on this statute is the clearly established case law governing state employees tenure rights, case law most recently enunciated by *Bardsley*. Under that case law, certified employees are constitutionally protected from being laid off from their classified positions and having substantially similar, non-classified, positions created in their place. However, given the difference in the former OMI and the new Process Administrator positions, the Process Administrator position is a new position, falls within the purview of §23-3.1-103(2), C.R.S. and does not fall within the prohibited conduct outlined in *Bardsley*.

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There was no demonstration that the rearrangement of the OMI duties was an arbitrary or capricious exercise of the Respondent's discretion. Rather, it was demonstrated that the merging of the two units necessitated the merging of the supervisory functions. Prior to the Reorganization, there were three lines of supervision under Putman – Danford, Complainant and Mizak, and the AAlls. Given that the former structure had a greater number of units, there were a greater number of supervisors – three levels within each unit. After the Reorganization, there are still three lines of supervision under Putman but there are fewer units, therefore, it was reasonable for Respondent to determine that it needed fewer people in the supervisory positions.

There was a reduction in the number of supervisors at the first two levels of the Processing Unit. Instead of needing a number of AAlls to perform minimal supervisory duties there are now two Team Leaders who have also taken on additional duties, including input into employee evaluations. In turn, instead of needing two positions (the former OMI positions) to oversee a number of AAlls, there is now only one position overseeing the two Team Leaders. It was reasonable for Respondent to decide to consolidate the supervisory duties and have one person (the Supervisor position), rather than two (the Supervisor and Process Administrator positions), supervising the two Team Leaders.

It was also not established that the Respondent failed to comply with the requirements for a reorganization layoff. Respondent had a business plan that contained the five key elements mandated by Board rule. There was no showing that Respondent and its managers, in creating that plan of reorganization and eliminating Complainant's OMI position and creating the Supervisor and Process Administrator positions, was acting out of punitive motives towards Complainant or a desire to move Complainant from a management position. Rather, it was established that Putman, in an effort to retain Complainant's technical skills, tried to find a comparable position for Complainant but was unable to do so. The interviewing process, from which Putman appropriately excused himself given his previous conversations with Complainant, was not shown to be wrongfully biased against Complainant in any fashion. Rather, the second interview panel made an effort to formulate questions that addressed the duties of the position. There was no demonstration that their conclusion that Complainant lacked the appropriate training background was an arbitrary or capricious decision.

Finally, Complainant presented no evidence disputing that Complainant's retention rights were not calculated appropriately.

Respondent acted reasonably in formulating the Reorganization, redistributing the OMI duties, characterizing the Process Administrator position as different and calculating Complainant's retention rights.

B. Attorney fees are not warranted in this action.

Attorney fees are warranted if an action was instituted frivolously, in bad faith,

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maliciously, or as a means of harassment or was otherwise groundless. § 24-50-125.5, C.R.S. and Board Rule R-8-38, 4 CCR 801. The party seeking an award of attorney fees and costs shall bear the burden of proof as to whether the personnel action is frivolous, in bad faith, malicious, harassing, or otherwise groundless. Board Rule R-8-38(B), 4 CCR 801. There was no evidence that would lead to the conclusion that Complainant pursued her constitutional right to a hearing in order to annoy, harass, abuse, be stubbornly litigious or disrespectful of the truth.

CONCLUSIONS OF LAW

1. Respondent's action was not arbitrary, capricious, or contrary to rule or law.
2. Attorney's fees are not warranted.

ORDER

Respondent's action is **affirmed**. Complainant's appeal is dismissed with prejudice. Attorney fees and costs are not awarded.

Dated this 5th day of February, 2004.

Kristin F. Rozansky
Administrative Law Judge
1120 Lincoln Street, Suite 1420
Denver, CO 80203
303-764-1472

NOTICE OF APPEAL RIGHTS

EACH PARTY HAS THE FOLLOWING RIGHTS

1. To abide by the decision of the Administrative Law Judge ("ALJ").
2. To appeal the decision of the ALJ to the State Personnel Board ("Board"). To appeal the decision of the ALJ, a party must file a designation of record with the Board within twenty (20) calendar days of the date the decision of the ALJ is mailed to the parties. Section 24-4-105(15), C.R.S. Additionally, a written notice of appeal must be filed with the State Personnel Board within thirty (30) calendar days after the decision of the ALJ is mailed to the parties. Both the designation of record and the notice of appeal must be received by the Board no later than the applicable twenty (20) or thirty (30) calendar day deadline. Vendetti v. University of Southern Colorado, 793 P.2d 657 (Colo. App. 1990); Sections 24-4-105(14) and (15), C.R.S.; Rule R-8-58, 4 Code of Colo. Reg. 801. If the Board does not receive a written notice of appeal within thirty calendar days of the mailing date of the decision of the ALJ, then the decision of the ALJ automatically becomes final. Vendetti v. University of Southern Colorado, 793 P.2d 657 (Colo. App. 1990).

PETITION FOR RECONSIDERATION

A petition for reconsideration of the decision of the ALJ may be filed within 5 calendar days after receipt of the decision of the ALJ. The petition for reconsideration must allege an oversight or misapprehension by the ALJ. The filing of a petition for reconsideration does not extend the thirty-calendar day deadline, described above, for filing a notice of appeal of the decision of the ALJ.

RECORD ON APPEAL

The party appealing the decision of the ALJ must pay the cost to prepare the record on appeal. The fee to prepare the record on appeal is \$50.00 (exclusive of any transcription cost). Payment of the preparation fee may be made either by check or, in the case of a governmental entity, documentary proof that actual payment already has been made to the Board through COFRS.

Any party wishing to have a transcript made part of the record is responsible for having the transcript prepared. To be certified as part of the record, an original transcript must be prepared by a disinterested, recognized transcriber and filed with the Board within 45 days of the date of the designation of record. For additional information contact the State Personnel Board office at (303) 894-2136.

BRIEFS ON APPEAL

The opening brief of the appellant must be filed with the Board and mailed to the appellee within twenty calendar days after the date the Certificate of Record of Hearing Proceedings is mailed to the parties by the Board. The answer brief of the appellee must be filed with the Board and mailed to the appellant within 10 calendar days after the appellee receives the appellant's opening brief. An original and 7 copies of each brief must be filed with the Board. A brief cannot exceed 10 pages in length unless the Board orders otherwise. Briefs must be double-spaced and on 8 1/4 inch by 11-inch paper only. Rule R-8-64, 4 CCR 801.

ORAL ARGUMENT ON APPEAL

A request for oral argument must be filed with the Board on or before the date a party's brief is due. Rule R-8-66, 4 CCR 801. Requests for oral argument are seldom granted.

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CERTIFICATE OF SERVICE

This is to certify that on the _____ day of February, 2004, I placed true copies of the foregoing **INITIAL DECISION OF ADMINISTRATIVE LAW JUDGE and NOTICE OF APPEAL RIGHTS** in the United States mail, postage prepaid, addressed as follows:

Lee T. Judd
Andrew T. Brake, P.C.
777 E. Girard Ave., #200
Englewood, Colorado 80110-2767

and in the interagency mail, to:

Andrew Katarikawe
Assistant Attorney General
Employment Law Section
1525 Sherman Street, 5th Floor
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Andrea C. Woods