70923-2 70923-2

No. 70923-2-I

IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION I

CYNTHIA DILLON,

Appellant,

v.

DEPARTMENT OF LABOR AND INDUSTRIES OF THE STATE OF WASHINGTON and BARDAHL MANUFACTURING, A WASHINGTON CORPORATION,

Respondents,

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APPELLANT'S OPENING BRIEF

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I. INTRODUCTION

Appellant Cynthia Dillon, the plaintiff below, by and through her attorney of record, Tara Jayne Reck of Foster | Staton, P.C., offers this Brief in support of her appeal.

This case originates from an Administrative Law Review (ALR) appeal from a Decision and Order of the Board of Industrial Insurance Appeals (Board) dated March 9, 2012, wherein the Board concluded that the Department of Labor and Industries (Department) properly rejected Ms. Dillon's application for benefits because her injury occurred in a "parking area". She appealed the Board decision to superior court because she was "acting during the course of employment"[1] with Bardhal Manufacturing when her injury occurred, her injury did not occur in a "parking area", and therefore the "parking lot exception" to the Industrial Insurance Act (Act) does not apply.

The Department moved for summary judgment, which the trial court denied. (Clerks papers, hereinafter CP, at pp. 7-19 and 48-49) However, after briefing and argument, the trial court affirmed the Board's decision to affirm the Department order rejecting Ms. Dillon's claim. (CP at pp.102-104) The trial court's

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[1] RCW 51.08.013

decision should not stand. The Board and trial court erroneously applied the "parking lot exception" to exclude coverage of Ms. Dillon's injury under the Act. As an exception to the Act, which must be liberally construed in order to protect and provide benefits to injured workers and their beneficiaries, the "parking lot exception" must be discriminatingly applied to avoid undermining the protective purpose of the Act. Here, the "parking lot exception" was erroneously applied and the decision must be reversed in order to carry out the intent and purpose of the Act.

II. ASSIGNMENTS OF ERROR

A. SUPERIOR COURT AND THE BOARD ERRED IN FINDING AND CONCLUDING THAT CYNTHIA DILLON'S INJURY OCCURRED IN A "PARKING AREA".

B. SUPERIOR COURT AND THE BOARD ERRED IN FINDING AND CONCLUDING THAT THE "PARKING LOT EXCEPTION" TO THE INDUSTRIAL INSURANCE ACT APPLIES AND EXCLUDES CYNTHIA DILLON FROM COVERAGE UNDER THE ACT.

III. ISSUE

A. Whether Superior Court and the Board of Industrial Insurance Appeals correctly decided that Cynthia Dillon's injury should not be allowed under the Act because her injury occurred in a parking area and that as a result the parking lot exception applies to exclude coverage.

IV. STATEMENT OF THE CASE

A. FACTUAL AND PROCEDURAL HISTORY

1. Jurisdictional Background

On December 10, 2010, the Department received an application for benefits from Cynthia M. Dillon for a November 24, 2010 injury she sustained in the course of her employment with Bardahl Manufacturing Corporation. (CABR at p. 69) The Department assigned claim number AP-51612 and issued an order on December 16, 2010 paying provisional time loss compensation from December 7, 2010 through December 15, 2010. (CABR at p. 69) The Department issued another order on December 30, 2010, paying provisional time loss benefits from December 16, 2010 through December 29, 2010. (CABR at p. 69) On January 6, 2011, the Department issued an order assessing a time loss compensation overpayment of $1,463.95 and rejecting Ms. Dillon's application for benefits on the basis that she was not in the course of employment since her injury reportedly occurred in a parking lot, thus excluding her from coverage under the Act. (CABR at p. 69) On January 18, 2011, Ms. Dillon requested reconsideration of the Department's January 6, 2011 order. After reconsideration, on March 2, 2011, the Department affirmed its January 6, 2011 order.

(CABR at p. 70) With the assistance of counsel, on March 16, 2011, Ms. Dillon requested reconsideration of all adverse orders issued within the preceding sixty days. (CABR at p. 70) Thereafter, on April 20, 2011, Ms. Dillon supplemented her request for reconsideration of the March 2, 2011 order. (CABR at p. 70) This was forwarded to the Board as a direct appeal on May 4, 2011. (CABR at p. 70) On May 10, 2011, the Board issued an order granting Ms. Dillon's appeal and assigned it docket number 11 14830. (CABR at p. 69) As noted above, the Board affirmed the Department's May 2, 2011 order rejecting Ms. Dillon's claim based upon application of the "parking lot exception". (CABR at pp. 1-16)

Ms. Dillon filed a timely appeal in King County Superior Court. (CP at pp. 1-2) The Department subsequently moved for summary judgment, which motion was denied on March 1, 2013. (CP at pp. 7-19 and 48-49) The matter was converted to a bench trial; both parties provided trial briefs and presented oral argument. (CP at pp. 97-98, 50-96) On August 26, 2013, the Court entered a judgment and order affirming the Board's decision to affirm the rejection of Ms. Dillon's claim based upon application of the "parking lot exception." (CP at pp. 102-104) As a result, Cynthia Dillon

appealed to the Washington State Court of Appeals, Division One. (CP at pp. 105-109)

2. Factual Background

Ms. Dillon began working for the Bardahl Corporation in September of 2009 as a lab-tech assistant. (CABR, testimony of Cynthia Dillon at p. 19) Ms. Dillon customarily used the Employee Only door located near the bay door to enter the Bardahl work facility because she was initially told to use this door. (CABR, testimony of Ms. Dillon at pp. 23-24; testimony of Dennis Fisk at pp. 136-137) Management never required her to use another entrance, and, as the testimony of other witnesses confirmed, many of the employees also used the same Employee Only door Ms. Dillon customarily used to enter and exit the building. (CABR, testimony of Ms. Dillon at pp. 24-25) The door was located next to a bay door that was occasionally used for ventilation purposes but not for loading or unloading freight. As the admitted exhibits show, the bay door was located next to a fire hose connection for the fire department. (CABR, exhibit nos. 4, 5) In front of this area, the employees set out an ashtray and the area became known as the "smoking area". (CABR, testimony of Eric Nicolaysen at p. 111)

The location where Ms. Dillon fell was near the door where she went to and from work. In that location, there are no lines or other markings denoting particular parking spaces. Similarly, the location has no signs identifying it as a parking area, and no employees were assigned to park there. (CABR, testimony of Dennis Fisk at p. 135) Perpendicular to the location where Ms. Dillon was injured is a separate and distinct designated parking area containing approximately eight parking spaces clearly identified with parking lines and signs on the building directly in front of the parking spaces reading "Reserved Parking". (CABR, testimony of Eric Nicolaysen at p. 115; exhibit nos. 4, 12, 13, 14, and 15)

The parties to this matter stipulated that the employer owned, controlled, and maintained the location where Ms. Dillon fell. Ms. Dillon testified that, at times, Bardahl employees would remove buckets of water from the facility through a nearby bay door and dump the buckets of water in the drain near the location where she was injured. During their testimony, other Bardahl employees confirmed this practice. (CABR, testimony of Ms. Dillon at pp. 40-41; testimony of Dennis Fisk at p. 139) Ms. Dillon further testified that water sometimes sat in the vicinity of where she fell.

November 24, 2010, the day before Thanksgiving, was a cold day in Seattle, and snow and ice covered the ground. In fact, the weather was so inclement that Bardhal employees were given permission to leave work early due to the icy conditions and the upcoming holiday. That day, Ms. Dillon left work around 3:15 or 3:30 p.m. (CABR, testimony of Ms. Dillon at pp. 20-22) As she left the building, she walked out the Employee Only door she regularly used to enter and exit the facility. She took approximately ten to fifteen steps before slipping on some black ice, landing on her buttocks and hands. There was no car parked where she fell. She felt immediate pain in her low back, and she sat on the ground for a minute to regain her senses. (CABR, testimony of Ms. Dillon at p. 26) She called her supervisor Dennis Fisk who told her to walk into the office and inform Eric Nicolaysen of her injury. (CABR, testimony of Dennis Fisk at p.134) After a couple of minutes, Ms. Dillon got up and walked to Mr. Nicolaysen's office. (CABR, testimony of Ms. Dillon at p. 27-28) He could not recall much of his conversation with Ms. Dillon that day but did remember her telling him that she had fallen on ice just outside the building and she seemed quite upset. (CABR, testimony of Eric Nicolaysen at pp. 103-104 and 124-125)

Ms. Dillon went home and the following day, Thanksgiving Day, she rested at home. By Friday, her back was so symptomatic that she went to the emergency room at Valley Medical Center. On Monday, she returned to work and completed an application for benefits for her industrial injury. Her back symptoms continued, so she went to the St. Francis Hospital emergency room on November 30, 2010. (CABR, testimony of Ms. Dillon at p. 28) She then sought follow-up medical treatment with Alan Chen, M.D. on December 8, 2010. She told Dr. Chen about her fall at work and her excruciating pain. He restricted her from work and requested a lumbar MRI that showed a new small disc herniation at L5-S1 and marrow edema in the sacrum at S3 and S4. (CABR, deposition of Alan Chen, M.D. at p. 24) Dr. Chen concluded that Ms. Dillon had suffered new and distinct injuries to her lower back proximately caused by the November 24, 2010 fall at work. (CABR, deposition of Alan Chen, M.D. at pp. 30-31)

Robert Thorpe is a land use expert who has worked on hundreds of similar cases for cities, counties, and private businesses to assist entities in interpreting federal, county, and city codes to request appropriate and necessary building and land permits based on the applicable codes. (CABR, testimony of

Robert Thorpe at pp. 59-62) Mr. Thorp is the only land use expert to testify in this matter and his opinions are un-rebutted. Mr. Thorpe visited the Bardahl facility where Ms. Dillon was injured and took pictures of the area where the injury occurred. He also reviewed and analyzed the federal, county, and city codes applicable to the Bardhal facility to identify relevant parking and safety regulations. (CABR, testimony of Robert Thorpe at p. 62) Based upon his investigation and research, Mr. Thorpe determined that while the area where Ms. Dillon fell was customarily used by employees for parking, this use violated city and federal codes because the area should have been cleared from cars to allow: (1) for employees to safely enter and leave the building; (2) for fire trucks to park in the area and access the fire hose connection next to the bay door; (3) for access to and from the building for handicapped individuals pursuant to the Americans with Disabilities Act; and (4) for employees to quickly leave the building and the premises in case of emergency. (CABR, testimony of Robert Thorpe at pp. 62, 66-69 71, 87-90; exhibit nos. 2, 3, 9) Mr. Thorpe further concluded that the area where Ms. Dillon fell should have been cleared of all cars for the safety of the employees and that safety should take precedence over convenience. (CABR,

testimony of Robert Thorpe at pp. 79-83) There were no permits for parking to take place in the area where M.s Dillon was injured.

V. ARGUMENT

The Industrial Insurance Act (Act) is specifically designed to reduce to a minimum the suffering and economic loss arising from injuries occurring in the course of employment. Injured workers are the intended beneficiaries of the Act; its provisions must be liberally construed with ***all*** doubts resolved in favor of the injured worker. RCW 51.12.010; *McIndoe v. Dept. of Labor & Indus.*, 144 Wn.2d.252, 256-57, 26 P.3d 903 (2001); *Wilber v. Dept. of Labor and Indus.*, 61 Wn.2d 439, 446, 378 P.2d 684 (1963).

In the State of Washington, workers injured during the course of their employment are covered by the protective umbrella of the Act. "Acting in the course of employment" means the worker is acting at his or her employer's direction or in the furtherance of his or her employer's business, including time spent going to and from work on the jobsite as defined in RCW 51.32.015 and RCW 51.36.040, insofar as such time is immediate to the actual time that the worker is engaged in the work process in areas controlled by his or her employer, except the designated parking area. At the time an injury is sustained, it is not necessary that the worker be

doing the kind of work that the worker's pay is typically based upon. RCW 51.08.013. Because Ms. Dillon was injured when she slipped and fell as she exited the Bardhal plant immediately after her work shift ended, she was "acting" in the course of employment.

However, in making its decision in this case, the Board and trial court interpreted the Act -- specifically the "parking lot exception" -- broadly in order to exclude coverage rather than to protect and provide benefits to Ms. Dillon. This broad interpretation of the "parking lot exception" is contrary to the well-established mandate that any doubt regarding the meaning of workers' compensation law be resolved in favor of the injured worker and/or his or her beneficiaries. *Clauson v. Dept. of Labor and Indus.,* 130 Wn. 2d 580, 925 P.2d 624 (1996). Combined with this mandate, the applicability of the "parking lot exception" also depends greatly upon the particular facts and circumstances of each individual case. Based on the facts and circumstances in this case, the "parking lot exception" must not be broadly construed to exclude coverage because: (1) the exception does not clearly define "parking lot" leaving that term open for interpretation, and the area where Ms. Dillon fell does not fit within the ordinary meaning of a parking lot

based upon federal, city, and county codes, safety, and practicality; (2) even if considered a "parking lot", the "parking lot exception" does not apply because Ms. Dillon was injured immediately after her work shift, in a location under exclusive control of her employer that is commonly traversed by employees entering and exiting the plant facility through designated employee "man doors", that contained particular hazards (the icy surface near a drain) not shared by the general public, and because she would not have been subjected to those hazards and injury but for her employment at Bardhal; and (3) the increasingly liberal interpretation and application of the "parking lot exception" undermines legislative intent and contradicts the purpose of the Act.

A. STANDARD OF REVIEW

The trial court's jurisdiction to review a decision of the Board is appellate in nature; the trial court can only decide matters previously decided by the Board. *Shufeldt v. Dept. of Labor and Indus.*, 57 Wn.2d 758, 359 P.2d 495 (1961). Relief from a Board order is proper when the Board has erroneously interpreted or applied the law, the order is not supported by substantial evidence, or it is arbitrary or capricious. *Mt. Baker Roofing, Inc. v. Dept. of*

Labor and Indus., 146 Wn. App. 429, 191 P.3d 65 (2008), amended on reconsideration.

The Court of Appeals' review of a trial court decision is limited to an examination of the record to see whether substantial evidence supports the findings made after the trial court's *de novo* review, and whether the court's conclusions of law flow from the findings made. *Rogers v. Dept. of Labor and Indus.*, 151 Wn. App. 174, 210 P.3d 355 (2009). Because the Department is charged with administering the Act, the Court of Appeals affords substantial weight to the Department's interpretation of the Act. However, the Court of Appeals may substitute its judgment for the Department's because its review of the Act is *de novo. McIndoe v. Dept. of Labor and Indus.*, 100 Wn. App. 64, 995 P.2d 616 (2000), review granted 141 Wash.2d 1025, 11 P.3d 826, affirmed 144 Wash.2d 252, 26 P.3d 903 (2001).

B. APPLICATION OF THE "PARKING LOT EXCEPTION" IN THE CONTEXT OF THE INDUSTRIAL INSURANCE ACT

RCW 51.32.015 explains the time and place requirements for an injurious event to be covered under the Act. These time and place requirements are also set forth in RCW 51.36.040 (medical aid rules). RCW 51.08.013 defines the phrase "acting in the course

of employment" and contains the phrase "except parking area", dubbed "the parking lot exception":

> "Acting in the course of employment" means the worker acting at his or her employer's direction or in the furtherance of his or her employer's business which shall include time spent going to and from work on the jobsite, as defined in RCW 51.32.015 and 51.36.040, insofar as such time is immediate to the actual time that the worker is engaged in the work process in areas controlled by his or her employer, except parking area. It is not necessary that at the time an injury is sustained by a worker he or she is doing the work on which his or her compensation is based or that the event is within the time limits on which industrial insurance or medical aid premiums or assessments are paid.

1. <u>Broad Interpretation of the "Parking Lot Exception" to Exclude Coverage for Injured Workers Is Contrary to the Purpose of the Act.</u>

The Board and appellate courts have acknowledged the "parking lot exception" is not absolute. *In re Deborah J, Carey*, BIIA Dec., 03 13166 & 03 15519 (2004); *Bolden v. Department of Transportation, 95 Wn. App. 218, 221, 974 P.2d 909* (1999). The provisions of the Act must be liberally construed and ***all*** doubts must be resolved in favor of the injured worker. RCW 51.12.010; *McIndoe v. Dept. of Labor & Industries*, 144 Wn.2d.252, 256-57, 26 P.3d 903 (2001); *Wilber v. Department of Labor and Industries*, 61 Wn.2d 439, 446, 378 P.2d 684 (1963). However, in the present

case, the Board and trial court failed to apply liberal construction and instead resolved doubts regarding the definition of "parking area" in order to exclude Ms. Dillon from coverage rather than to protect and provide benefits for her under the Act. "The parking lot exception set forth in RCW 51.08.013(1) excludes industrial insurance coverage for Ms. Dillon." (CABR at p. 42)

C. CYNTHIA DILLON'S INJURY DID NOT OCCUR IN A PARKING AREA.

As already noted, RCW 51.08.013 defines the phrase "acting in the course of employment" and contains the phrase "except parking area", but the statute fails to define the term "parking area", leaving it open to legal interpretation. It is clear from the Board and trial court decisions, they applied case law that uses a common dictionary definition to attempt to clarify the meaning of the phrase: "The term 'parking' is defined as 'the leaving of a vehicle in an accessible location' or 'an area in which vehicles may be left.' Webster's Third New International Dictionary *1642 (3rd ed. 1993)*; *Madera v. J.R. Simplot Co.*, 104 Wn. App. 93, 15 P.3d 649 (2001)." (Board Proposed Decision and Order at p. 14). According to the un-rebutted testimony of land use expert Mr. Thorpe, the area where Ms. Dillon was injured is neither an "accessible location" nor

"an area in which vehicles may be left". The parking of any vehicles in this location is improper because: (a) there are no permits that designate and allow for the location to be used as a parking area; (b) parking in this area impedes emergency access to the Bardhal facility and emergency evacuation from the facility; (c) parking in this location leaves insufficient safe vehicle maneuver lanes; (d) and parking in this location encroaches on American with Disabilities Act-required pedestrian routes as well as the customary route used by Bardhal employees to enter and exit the facility for work shifts.

Bardhal has only four permitted parking spaces that are near to, but not in the same location as, where Ms. Dillon was injured. Any vehicle parked in a location outside the four permitted parking spaces is not parked in a space that is accessible or in a location where vehicles may be left. Therefore, applying liberal construction to any doubt as to the definition of "parking area", under the dictionary definition analysis, the location where Ms. Dillon fell was not a "parking area".

1. The "Parking Lot Exception" Does Not Apply When Injury Occurs in Areas Where Motor Vehicles Are Not Parked or Which Do Not Constitute Parking Areas.

If the location in which injury occurs is not a "parking area," the "parking lot exception" does not apply. According to the Board in the case of *In re Robert Marengo*, Dckt. No. 01 14972 (July 17, 2002), RCW 51.08.013 does not exclude a worker from coverage when going to and from work immediate to work periods, on the employer's premises, in an area adjacent to the actual parking area. Because the injured worker in *Marengo* was injured in a stairwell adjacent to the parking garage and used by employees to enter and exit the parking garage, the Board concluded the injury did not occur in a "parking area" and the "parking lot exception" did not apply. This analysis is supported by other cases as well. *In re Robert Marengo,* Dckt. No. 01 14972 (July 17, 2002); *Boeing Co. v. Rooney,* 102 Wn. App. 414, 10 P.3d 423 (2000); *In re James J. Rooney,* Dckt. No. 97 6827 (February 2, 1999).

Under a similar but slightly different set of facts, in the case of *In re Michael Burnett*, BIIA Dec., 49 588 (1978), the Board concluded that the worker's injury was properly covered under the Act because he was not injured in a "parking area". Even though the claimant had been parking his own car in a location surrounded by a fence and designated as a parking area, the Board concluded the location was not a "parking area" because much of the area

was being used for other purposes. In arriving at this decision, the Board explained:

> [T]he only issue here is whether the claimant was injured in a "parking area." The employer is obviously contending that the whole area inside the fence was a "parking area" because it had originally been designed and used as such. We disagree with this contention. There is nothing magic about a fence that would forever stamp the whole area inside of it as a "parking area".

In re Michael P. Burnett, BIIA Dec., 49 588 (1978).

In both *Marengo* and *Burnett*, the Board considered the facts and circumstances particular to those individual cases to determine whether the exception applies. Similar to *Burnett*, in this case there is nothing magical about employees taking it upon themselves to park in an unsafe and unpermitted location that converts it into a "parking area" despite the obvious logistical difficulties and safety hazards it presents. Like *Marengo,* Ms. Dillion was not injured in a parking area. She was injured in a location adjacent to the four permitted employee parking spots in a location that should not be used for parking.

D. THE "PARKING LOT EXCEPTION" IS NOT APPLICABLE.

Both the Board and courts have held that the "parking lot exception" does not apply when the injury location is classified as part of the jobsite in an area controlled by the employer and/or the

injury location occurred along a customary employee ingress/egress route containing a specific hazard not shared by the general public.

Here, the Board and trial court concluded that the snowy and icy conditions on the day Ms. Dillon fell were a hazard shared by the general public. This decision is erroneous and inconsistent with other decisions in which the Board has found the opposite to be true. For example, in the case of *In re: Brian Thur,* Dckt. No. 99 12526 (May 16, 2000), the injured worker slipped and fell on a sidewalk while walking to work after having parked his car in a covered parking lot. In that case, the Board found that the employer, as the abutting land owner, had a legal duty to maintain the sidewalk and remove snow and ice from the sidewalk. Although a public sidewalk, it was primarily used by employees or by persons needing to come and go from the employer's place of business. While the sidewalk was not being used by the employer for any business or work process, it was the only practical and customary route by which an employee parking in the employer maintained parking lot could access the employer's jobsite. In so deciding, the Board properly applied liberal construction of the Act to provide benefits even though the claimant could have used a

different parking lot, even though the general public could use the sidewalk upon which the claimant fell, and even though the claimant could have used another route to get to work. *In re: Brian C. Thur*, Dckt. No. 99 12526 (May 16, 2000).

Here, Ms. Dillon slipped and fell immediate to the time she completed her work shift, her fall occurred in an area owned and maintained by the employer, and she slipped and fell on the customary route used by plant employees to enter and exit the facility for work shifts. The day she was injured, the area was icy but she was following a route customarily used by her and other plant employees for entering and exiting the facility. Furthermore, both Mr. Fisk and Ms. Dillon confirmed that the plant uses the area where she fell for work business because employees empty buckets of water from the plant facility into the drain near the location where she fell. The icy surface presented a fall hazard not commonly shared by the general public, Ms. Dillon would not have been exposed to this hazard but for her work for the employer, and the area was used for the furtherance of the employers business when employees used the drain to empty buckets of water from the Bardhal facility. As was the case in *Thur* and *Hamilton*, these

specific facts dictate that Ms. Dillon's injury must be covered under the Act.

VI. ATTORNEY FEES ON APPEAL

Ms. Dillon is entitled to an award of attorney fees and expenses on appeal pursuant to RCW 51.52.130. See also RAP 18.1. This statute provides that "a reasonable fee for the services of the worker's or beneficiary's attorney" shall be awarded, if a decision order is "reversed or modified and additional relief is granted to a worker or beneficiary." RCW 51.52.130. Here, Ms. Dillon seeks to reverse the Superior Court and Board Decisions resulting in allowance of her claim. Thus, Ms. Dillon should be entitled to an award of attorney fees and expenses for her attorney's work on the matter before this Court and the Superior Court or the opportunity to file a supplemental motion for attorney fees and costs in the event she is successful in reversing the Department order denying her claim, thereby securing additional relief as a direct consequence of her success before this Court. See *Brand v. Dept. of Labor and Indus.*, 139 Wn.2d 659, 674, 989 P.2d 1111 (1999).

VII. CONCLUSION

In conclusion, the trial court and the Board erroneously applied the "parking lot exception" to exclude Ms. Dillon from coverage under the Act. The term "parking area" is not defined by statute, leaving doubt as to its meaning. In resolving this doubt, the term "parking area" must be liberally construed in order to protect and provide benefits, not exclude benefits. Application of the "parking lot exception" requires discriminating use. This was not done and as a result, the trial court and Board entered findings and conclusions based upon an erroneous, overbroad application of the "parking lot exception". As a result, the decision must be reversed and this matter must be remanded to the Department with direction to issue an order allowing Ms. Dillon's claim because the "parking lot exception" is inapplicable and Ms. Dillon was injured during the course of her employment. A remand to either the Board or trial court would serve no useful purpose and would only further delay benefits under the Act.

CERTIFICATE OF MAILING

SIGNED at Seattle, Washington.

The undersigned, under penalty of perjury pursuant to the laws of the State of Washington, hereby certifies that on the 6th day of March, 2014, the documents to which this certificate is attached, Appellant's Opening Brief, were served upon the following parties in the manner stated:

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DATED this 6 day of March, 2014.

FOSTER | STATON, P.C.

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