AMERICAN ARBITRATION ASSOCIATION

In the Matter of Arbitration between		
Fraternal Order of Police, Lodge 5	:	Case Number: 01-18-0003-5717
and	:	(Lt. Jonah T. Conway, 10 Day Suspension)
City of Philadelphia	:	

OPINION AND AWARD

Hearing Date: November 26, 2019

Arbitrator: Thomas P. Leonard, Esquire

Appearances:

Fraternal Order of Police, Lodge 5	City of Philadelphia
James R. Glowacki, Esquire Willig, Williams &Davidson	Tiffany R. Allen, Esquire City of Philadelphia Law Department

Procedural History

The Fraternal Order of Police, Lodge 5 (FOP) and the City of Philadelphia (City) are parties to a collective bargaining agreement covering the wages, hours and terms and conditions of employment of the police officers employed by the City. The CBA contains a grievance procedure for disciplinary suspensions. The procedure involves several steps, culminating in arbitration pursuant to the rules of the American Arbitration Association.

On June 6, 2018, the FOP filed a grievance alleging that the City's ten (10) day suspension of Lieutenant Jonah Conway was without just cause. The grievance proceeded through the steps of the procedure. On September 21, 2018, the FOP made a demand for arbitration with the American Arbitration Association. On October 12, 2018, the American Arbitration Association notified the undersigned that the parties had selected him as the arbitrator to hear this grievance.

The parties agreed to hold the arbitration on November 26, 2019 at the offices of the American Arbitration Association, 230 South Broad Street, Philadelphia, Pennsylvania. The hearing was held as scheduled, at which time the parties presented evidence, cross-examined witnesses and introduced documentary evidence. Following the hearing, the parties made closing arguments and the arbitrator closed the record.

Issue

The parties stipulated that the issues to be decided are as follows:

1. Whether the ten (10) day suspension of Lieutenant Jonah Conway was for just cause?
2. If not, what shall be the remedy?

Facts

Lieutenant Jonah Conway has been a member of the Philadelphia Police Department since 1997. He was promoted to the rank of lieutenant in February, 2015.

On [redacted] at approximately 9:17 PM. while off duty, Lt. Conway was heading to [redacted] to drop off his girlfriend (now wife), J[redacted] R[redacted], who was temporarily staying at the home of her ex-sister in law while she was in the process of moving to a new home. Ms. R[redacted] is a corporal with the Department. Lt. Conway and Cpl. R[redacted] have children together.

They had just had dinner together and had gone to a CVS to get [redacted] for Ms. R[redacted]'s daughter. On the way Cpl. R[redacted]'s daughter [redacted] called her mother to say that there was a disturbance at the house. Lt. Conway and Cpl. R[redacted] pulled up to the house. Mr. Conway waited outside while Ms. R[redacted] entered the house. While he was waiting outside the house, he saw three males walking around the house and then observed Ms. R[redacted]'s nephew, [redacted], come out of the house and have a confrontation with one of the males arguing about money. The male walked away. [redacted] then yelled to Lt. Conway to get in the house because all the males had guns on them. They walked by Lt. Conway, got in a car and drove away. Lt.

Conway got in his pickup truck and followed them. Lt. Conway called 911. At the 300 block of Deveraux Street, the male on the passenger side rolled down the window and fired two gunshots at Lt. Conway.

Lieutenant J[redacted] C[redacted] arrived at the scene at the 300 block of Deveraux a few minutes after Lt. Conway was shot at. Lt. C[redacted] is assigned to the Northeast Detectives Division (NEDD), Second District. He asked Lt. Conway if he was okay and asked what happened. Lt. Conway stated that it began at [redacted] when he was helping "J[redacted]" move. He did not mention J[redacted]'s last name or that she was an officer in the Philadelphia Police Department. Ms. R[redacted] was in the same District as Lt. C[redacted], but on a different platoon. He did not know that she was involved in the [redacted] incident. Lt. Conway did not mention that Ms. R[redacted]'s nephew was involved in the incident. Between seven to ten other officers were at the scene. Lt. C[redacted] did not know that Lt. Conway and Cpl. R[redacted] were involved in a personal relationship or had children together.

After Lt. C[redacted] talked with Lt. Conway, he called the Northeast Detective Division to do a follow-up investigation. He also called his captain and the police radio front desk to make sure the scene was protected and that normal investigatory procedures would be followed.

The follow-up investigation at NEDD began with Detective S[redacted] E[redacted] interviewing Lt. Conway. Det. E[redacted] has been a detective since January, 2015. In 2016, she was at the Northeast Detectives unit headquarters, covering the 15th and 2nd Districts. She was not the "assigned" investigator to the incident, who would be at the scene collecting the information, so that investigator asked Det. E[redacted] to do the interview.

On [redacted], she interviewed Lt. Conway about the events that night. She had never met Lt. Conway before that night. She typed the interview questions and answers. In her words, she did not ask him too many questions because he was visibly upset and evasive. He was not paying attention to her. He kept getting up from the chair, walking into the other room in the headquarters, talking with other supervisors about the incident. The interview totals one page, with four questions and answers, lasting 17 minutes (10:45 pm to 11:02 pm). City Exhibit 1. Much of that 17 minutes, he was not there but was talking to other supervisors.

Detective E[redacted] is a lower rank than Lt. Conway. Det. E[redacted] saw his behavior as not normal behavior of the subject of an interview, so she called her superior, Lieutenant M[redacted]R[redacted] to ask him what she should do. Lt. R[redacted] told her to stop the interview. She showed him that he only answered four questions and asked him if she should ask more. R[redacted] replied that she should just let him go. She admitted in this arbitration hearing that she did not try to get Lt. Conway to focus because he was a higher rank than her and she did not want to interfere with his discussions. Det. E[redacted] testified that she has interviewed other victims who have been upset but she was able to eventually get them to stay seated and answer her questions, unlike Lt. Conway's behavior.

Of the four questions that Det. E[redacted] was able to ask Lt. Conway, the first question was, "Officer in your own words can you tell me any information you may have in reference to this assignment." He answered that he was dropping off his girlfriend J[redacted]R[redacted] at [redacted] and then described what happened with the three males and how one shot a gun at him. He did not mention that Ms. R[redacted] was a police officer. Det. E[redacted] did not know Ms. R[redacted] or that she was in the Department. Lt. Conway did not volunteer Ms. R[redacted]'s contact information.

The three other questions were: "Did you get a tag on the vehicle?" ("No, I couldn't get the tag.") "Can you describe the males?" ("I think there were 3 males but I can only describe the one that went up to [redacted] and was talking to '[redacted].' He was a black wearing all grey, about 5'7", about 200 lbs.") "Can you describe the gun?" ("It was a black handgun.")

Det. E[redacted] asked Lt. Conway to read and sign her document of the interview questions and answers. He did so. That concluded her involvement in the investigation.

Later that night, Det. E[redacted] learned that Ms. R[redacted] was a corporal in the department.

Lieutenant Detective D[redacted] R[redacted] is head of the Northeast Detective Division, special investigations unit. This unit investigates pattern crimes as well as shootings. He has been there since 2007. He got involved with this incident on the night of the shooting when his line detectives notified him. Detective E[redacted] is in his unit. The next day he went to [redacted] discovered that there was a video of the incident at [redacted] and obtained it by a getting a search warrant.

Lt. R[redacted] reviewed and compared Det. E[redacted]'s interview to the events on the video. To him, it seemed like a short interview in light of all of the activity in the video. The interview contained few details about Lt. Conway's interaction with the males coming out of [redacted].

Lt. R[redacted] was concerned about the lack of details in the interview, the possibility that Lt. Conway was being deceptive and the possibility that Lt. Conway and Cpl. R[redacted] were involved in a crime, so he asked Captain S[redacted] T[redacted], Commanding Officer of the NEDD, to bring in Internal Affairs Department (IAD) to investigate. Lt. R[redacted] testified that it is department policy to bring in IAD in this kind of case because for a criminal prosecution to hold up in court, it is essential that an off duty police officer who involved in chasing a suspect must be a credible witness and Lt. R[redacted] needed to be sure of Lt. Conway's credibility. Lt.

R[redacted] also talked with Detective E[redacted] about the brevity of the interview and she said it was due to Lt. Conway being evasive.

Because of the brevity of Lt. Conway's interview the night of the incident, it took the Department longer to gather the necessary information about the crime than it would have if the investigation revealed more information on the night of the crime. One deficiency was that Lt. Conway did not tell Sgt. E[redacted] where on Deveraux Street the shots were fired, so it took officers longer to find the spent shell casings.

On cross examination, Lt. R[redacted] admitted that the interview of an officer in a shooting would have ordinarily would have produced a minimum of three pages. He also admitted that it is the duty of the interviewer to ask the questions. However, he also testified that it is unusual for an officer being interviewed to get up in the middle of the interview and walk to another room on the floor to talk with other officers. R[redacted] also testified that an interviewer cannot do much to direct or restrain a victim, such as Lt. Conway, to remain for questions, such as arresting the officer.

On [redacted], a week later, the NEDD called in Lt. Conway for a second interview with Detective A[redacted]. He also began his interview with an open-ended question: "Tell me in your own words what happened on [redacted] at approximately 9"17 PM on the [redacted] that lead you to the 300 Block of Deveraux St that brings you in to the North East Detectives Division inside 2831 Levick St.? Lt. Conway provided an answer of 21 lines, typewritten. Det. Adams then went on to ask him 48 other questions. The entire interview was four and a half (4 ½) pages.

Lieutenant Louis Higginson is assigned as an investigator at the Internal Affairs Bureau, working there over four years. On June 1, 2017, IAD assigned him the investigation into Lt.

Conway's case when Sgt. Joseph Chilutti retired. When a case is assigned to him, he collects the facts of the case, interviews with any witnesses, witness statements and any surveillance video. Captain S[redacted] T[redacted], from Northeast Detectives Division, began the process of investigating Lt. Conway by requesting that Lt. Higginson begin the investigation.

On October 25, 2017, Lt. Higginson produced an 18 page report (City Exhibit 5) . Higginson's report contained an interview conducted by Higginson's predecessor investigator, Sgt. Chilutti, who said that when he talked interviewd Sgt. M[redacted] the night of [redacted] that Lt. Conway told Sgt. M[redacted] that there was a "disturbance of some kind on the block" without mentioning that the disturbance began at [redacted], where Cpl. R[redacted] had been staying. The interview also omitted reference to three (3) males and only referred to a "silver car." Lt. Higginson's report was based on interviews with 16 persons,I ncluding Lt. Conway, Cpl. R[redacted] Det. E[redacted], the first responding officers to the [redacted] and the first responding officers to the scene of the shooting on Deveraux Street.

Lt. Higginson sent his report to his supervisor, Captain Carol Abrams. The report ended with a three page conclusion The report concluded, in relevant part, as follows:

Conclusion:

This investigation SUSTAINED the following Departmental Violations against Lt. Jonah Conway:

Lt. Conway failed to fully cooperate during his initial interview with Det. E[redacted] at Northeast Detective Division (NEDD)

. . . .

Lt. Conway did lie during his Internal Affairs interview

. . . .

Det. E[redacted] stated she typed everything Lt. Conway said into his interview. Lt. Conway was being evasive in his interview. Det. E[redacted] stated that when Lt. Conway was asked to read and sign his statement, he did not read it, he just signed it.

. . . . .

Det. E[redacted] stated that Lt. Conway mentioned his girlfriend "J[redacted]" but never said she was a corporal in the Police Department. Lt. Conway never said that "J[redacted]" was a witness to this incident. Lt. Conway never mentioned "Cpl. R[redacted]" at all. Det E[redacted] did not know Cpl. J[redacted] R[redacted] and did not find out she was a corporal in the 2nd District until sometime after Lt. Conway's interview.

. . . .

(City Exhibit 5, pp. 19-21)

Lt. Higginson's report was reviewed by several levels of the police department above him before it went to a Police Board of Inquiry: a staff inspector in the Internal Affairs Division, Hugh Lynch; the chief Inspector of Internal Affairs; the Deputy Commissioner of Internal Affairs and the Commissioner. It went in a memorandum form

Following the Department procedure, the results of the investigation are sent to a Police Board of Inquiry (PBI) for a "7518" (the disciplinary paperwork) at which time the officer can accept the finding or have a hearing. Lt. Conway chose a hearing.

Inspector Raymond Convery (now retired) testified in this arbitration hearing about how the PBI works and his role as the chair of a three member of the PBI on the charges brought against Lt. Conway for the [redacted] incident. The PBI is composed of an Inspector (Chair), a Captain and a peer officer (a lieutenant in Lt. Conway's case). The PBI functions as a trial,

with the Department presenting evidence to support the charges and the officer having the opportunity to defend against the charges.

The PBI recommended that Lt. Conway be found guilty of violating Section 1-008-10 of the Disciplinary Code (Failure to cooperate in any Departmental investigation) and not guilty of violating Section 1-009-10 of the Disciplinary Code (Lying or attempting to deceive regarding a material fact during the course of any Departmental Investigation).

The PBI's chair, Inspector Convery, The PBI's chair Convery testified in this arbitration hearing that it appeared to PBI panel, after all of the evidence that was presented to it, that Lt. Conway was not cooperating with Sgt. E[redacted] on [redacted] was to protect Corporal R[redacted] from investigation. The PBI panel wanted to recommend more than ten days discipline but eventually agreed to ten (10) days.

The PBI sent its recommendations to the Commissioner, who then issued Lt. Conway a notice of a ten (10) day suspension for violating Section 1-008-10.

The charge against Lt. Conway is:

Article I Conduct Unbecoming

Section 1-008-10 Failure to cooperate in any Departmental investigation.

> Internal Affairs investigation #16-1047 determined that you failed to fully cooperate during your initial interview with Detective S[redacted] E[redacted] #[redacted] at Northeast Division on Wednesday, [redacted]

Discussion

The City, as the employer, bears the burden of proving that its discipline of Lt. Jonah Conway was for just cause. The City contends that the facts of the case demonstrate that Lt. Conway violated the Department Disciplinary Code at Article 1-008-10 by failing to fully cooperate with Department investigators with regard to an incident that happened on [redacted]

[redacted]

City's Position

The City has proven all of the tests of the traditional just cause analysis for employee discipline cases. Lt. Conway had notice that he could be disciplined for acting improperly while on off-duty status. In Directive 10.10 the City put all employees on notice of what is expected from off duty officers who are involved in a police action. The City conducted a fair and impartial investigation of Lt. Conway's actions. The investigation went through Internal Affairs Division (IAD) review, several command levels above that and eventually to a Police Board of Inquiry. The PBI established a violation of the Code of Conduct through a PBI review. The PBI, after hearing all of the evidence from the charging officers and from Lt. Conway, recommended dismissal of the charge of lying (Section 1- 009-10) but recommended a ten (10) day suspension for failure to cooperate (Section 1-008-10) The PBI was satisfied that Lt. Conway violated the Code. Finally, in this arbitration, the City proved by substantial evidence that Lt. Conway violated the Disciplinary Code.

The City demonstrated that Lt. Conway was evasive. In the important, initial investigation with Det. E[redacted], when memories were freshest, he was walking around and going in and out of the operations room. Det. E[redacted] testified credibly to that point. Her contemporaneously made report, signed by Lt. Conway, confirmed that she was only able to ask him four questions.

Det. E[redacted] had to seek guidance from a superior, Lt. R[redacted], who directed her to end the interview. When Lt. R[redacted] a long tenured investigator, looked at her report, he knew that something was wrong when Det. E[redacted] was only able to ask four questions. He had known Detective E[redacted] in her brief time with the Department to be a good investigator.

Lt. Conway's answers to the open ended question left out key details, particularly that his girlfriend, Ms. R[redacted], was a corporal with the Philadelphia Police Department. Lt. Conway's answers to an investigatory interview done on[redacted] were more responsive. The interviewer was able to ask 49 substantive questions covering four and a half pages. Lt. Conway's answers to the first open ended question about what happened on [redacted] was much more detailed.

The City responds to Lt. Conway's contention that his state of mind after being shot at made him unable to tell Det. E[redacted] everything. The City admits that Lt. Conway was probably traumatized, but points out that this trauma did not prevent him from telling much more to fellow officers at the scene of the shooting on Deveraux and in the operations room on the same night. He told them Cpl R[redacted]'s relation to the incident. The City contends that Lt. Conway's failure

to tell similar details to the officer who mattered, investigating Detective E[redacted] is inexcusable and deserves discipline.

As for the FOP's argument that this arbitrator should take note of the arbitration of the grievance of Cpl. R[redacted] who also faced discipline for the [redacted] incident. The City argues that the arbitration of Cpl. R[redacted], decided on November 12, 2019 by David Reilly, is distinguishable in that the charges against her are completely different than Lt. Conway's. Furthermore, the range of discipline was different, from reprimand up, whereas here the minimum discipline was ten (10) days.

FOP's Position

The FOP contends that the City has not met its burden of proof that Lt. Conway violated Department Disciplinary Code by failing to cooperate with the investigator. Lt. Conway testified that he told Detective E[redacted] all of the circumstances of how he went from [redacted] to Deveraux Street, including the fact that "J[redacted]" was Cpl. R[redacted] and that she worked for the Department. Yet none of these details made it into Det. E[redacted]' report. The Department has not proven that Lt. Conway failed to mention Ms. R[redacted] was a corporal.

The interview conducted by Detective E[redacted] was extremely short. Her own paperwork shows that the interview only had four questions in about 17 minutes. While being interviewed by Detective E[redacted], Lt. Conway did not hide Cpl. R[redacted]'s involvement in the incident or downplay her involvement. He did mention her involvement and he assumed Detective E[redacted] was typing everything he was telling her. The FOP also noted that before the interview, Lt.

Conway had called 911 during the chase. Later that evening, he told the responding officers.about Ms. R[redacted]. When back at the Northeast operations room, he had openly told two other officers of Ms. R[redacted]'s involvement in the incident. It strains credulity to think that Lt. Conway would not cooperate with Det. E[redacted] on the specific issue of Ms. R[redacted] being a corporal in the department.

The FOP also argues that the City should be looking at Detective E[redacted]' failure to ask the questions to get all relevant information. Als, when Lt. R[redacted] heard from Det. E[redacted] that Lt. Conway was not answering the questions, Lt R[redacted] should have come down to talk with Lt. Conway to ask him to calm down. Lt. R[redacted] had been Lt. Conway's supervisor and knew him and should have done more than just tell Det. E[redacted] to end the interview. It is unfair for the Department to suspend an officer who was a victim of a shooting who was visibly upset.

The reason Lt. Conway signed the four question form given to him by Det. E[redacted] is that he was upset at being shot at, the first time that happened to him in his career. He testified that he signed whatever was placed in front of him.

Also, the FOP points out that Lt. A[redacted]' interview of Lt. Conway a week later, on [redacted], was longer, at least an hour in length, because it was done by a competent investigator.

Finally, in the arbitration of Cpl. R[redacted], who also faced discipline for the [redacted] incident, the arbitrator determined the City did not have just cause to issue her a five (5) day suspension and reduced the penalty to two (2) days. Even though it is a different officer and a different disciplinary code at issue, it is illustrative in showing the deficiencies in the City's investigation of Lt. Conway.

Analysis

Arbitrators have commonly utilized a seven-factor test for determining whether an employer had just cause to discipline employees, and this test has been approved by Pennsylvania Courts in their review of arbitrator's awards. The test considers the following factors:

> (1) Did the employer give the employee forewarning of the possible disciplinary consequences of his or her conduct?;
>
> (2) Was the employer's rule or orders reasonably related to the orderly, efficient and safe operation of its business and the performance that the employer might properly expect of the employee?;
>
> (3) Did the employer make an effort to determine whether the employee in fact violated its rule or order?;
>
> (4) Was the employer's investigation conducted fairly and objectively?;
>
> (5) Did the employer obtain substantial evidence of the employee's violation?;
>
> (6) Has the employer applied its rules and penalties even-handedly to all employees?; and
>
> (7) Was the degree of imposed discipline reasonably related to the seriousness of the offense and the employee's work record?

Int'l Bhd. of Fireman & Oilers v. Township of Falls, 688 A.2d at 269, 271 (Pa. Commw. Ct. 1997,) (citing Am. Fed'n of State, County & Mun. Employees, Dist. Council 88 v. City of Reading, 568 A.2d 1352 (Pa. Commw. Ct. 1990)). Using this analysis, just cause for discipline does not exist where any one of the above factors is not satisfied. Id.

In this just cause analysis, the factor that is at issue is whether the City positively answered question five (5), i.e. whether the employer obtained substantial evidence of Lt. Conway's violation? Specifically, did the City prove that Lt. Conway violated 1-008-10 by not cooperating with Sgt. E[redacted]? The focus of this inquiry is on Lt. Conway's actions, not on the actions of others, as the FOP argues.

First, the FOP argues that Detective E[redacted] should have been more persistent in interviewing Conway on [redacted]. But it is clear from the testimony and all of the circumstances of this case, that Det. E[redacted] acted reasonably and appropriately in the manner and time she gave to the interview. It was Lt. Conway who made the interview an unproductive one. Lt. Conway got up and walked away from the interview to talk to other officers in the NEDD headquarters. Detective E[redacted] then had to ask a superior officer, Lieutenant R[redacted], for guidance and it was this lieutenant's directive to her to end the interview.

The Union argues that if Det. E[redacted] was a qualified interviewer, then she should have asked Lt. Conway more questions. That there is no reason for her to just end the intervirew. She testified credibly that she deferred to Lt. Conway's rank and sought guidance from Lt. R[redacted]. As for the FOP's argument that Lt. R[redacted] should have come down to calm down Lt. Conway, this incorrectly puts the burden on the City to justify the manner in which the investigation was done and begs the question of why Lt. Conway could not have just sat down and remained in the room with Det. E[redacted].

As an aside, I need to mention the dispute about whether Lt. Conway did not cooperate with Sgt W[redacted] when he questioned Lt. Conway at the shooting scene. Lt. Conway denied that he lied to Sgt. W[redacted]. But that dispute is not relevant to the precise charge against Lt. Conway, i.e. that he did not cooperate with Detective E[redacted].

The central factual issue in this case is whether Lt. Conway told Detective E[redacted] that Ms. R[redacted] was a corporal in the department. He testified that he did tell her that. She testified that he did not. In addition, she typed the questions and answers of her [redacted] interview with him. He signed the typed document. In resolving this disputed testimony, I find Detective E[redacted] to be a credible witness. Another reason to find her credible is that her testimony is supported by her typewritten summary of the questions and answers, a contemporaneously composed document.

Another key dispute is whether Lt. Conway got up and walked away from the interview. He denied doing that. Detective E[redacted] testified that he did. On this as well, I find Detective E[redacted] credible.

Another key dispute is Lt. Conway's claim that Det. E[redacted]' four questions report leaves out his description to her of what he was doing before he arrived at [redacted] and how he could reach Cpl. R[redacted] to verify that and where Cpl R[redacted] worked. Det. E[redacted] testified that what was in her report was all that Lt. Conway had told her. Again, I find Detective E[redacted] to be credible. Lt. Conway is essentially questioning the accuracy of a report he signed, claiming that he only signed it because he was upset. However, a police officer, if anyone, should know the impact and consequences of signing a document.

Conclusion

The City proved that Lt. Conway violated Section 1-008-10 of the Disciplinary Code, during his initial interview with Detective S[redacted] E[redacted] at Northeast Detectives Division on [redacted] by failing to fully cooperate with her. The City's five witnesses presented clear and convincing evidence that Lt. Conway's actions on [redacted] were one of a sworn police officer who did not cooperate with Detective E[redacted]. This failure to cooperate took place at a time when the suspect in the shooting of Lt. Conway was still at large.

The City developed its case against Lt. Conway by extensive investigation done a week after the [redacted] interview. Only then did the City bring charges against Lt. Conway. The Charges were then subject to review by multiple layers of superiors in Internal Affairs. Then, the charges were subject to further review by a Police Board of Inquiry, which dismissed the charge of lying.

In this arbitration hearing, the FOP did not present persuasive evidence to give me reason to disregard the conclusions of the PBI.

As for the level of discipline, the PBI recommended a ten (10) day suspension, which is the minimum allowed in the Disciplinary Code. The Code requires for a first offense that the discipline be ten (10) days to dismissal. While deliberating the charges, the PBI panel wanted to give more penalty because the members of the panel believed that a lieutenant should know that he should have cooperated to the fullest extent.

The FOP has made it clear that this is Lt. Conway's first discipline. However, the disciplinary matrix in the Code requires that once the City proves just cause for finding a violation, the discipline, at a minimum, be ten (10) days suspension and prevents an arbitrator from arriving at his own level of discipline.

Having considered all of the evidence and the parties' arguments, I must conclude that the City has met its burden of proving that Lt. Jonah Conway violated Section 1-008-10 of the Disciplinary Code and that the ten (10) day suspension for that violation was proper.

Award

The grievance is denied.

January 8, 2020
Harrisburg, Pennsylvania

Thomas P. Leonard

Thomas P. Leonard, Esquire