

UNITED STATES OF AMERICA
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF ADMINISTRATIVE LAW JUDGES

The Secretary, United States)	
Department of Housing and Urban)	
Development, on behalf of John Trasviña,)	
Assistant Secretary of Fair Housing)	FHEO No. 03-11-0195-8
and Equal Opportunity,)	
)	
Charging Party,)	
)	
)	
v.)	
)	
The Philadelphian Owners' Association,)	
)	
Respondent)	
)	
The Secretary, United States)	
Department of Housing and Urban)	
Development, on behalf of XXXX,)	FHEO No. 03-11-0128-8
)	
)	
Charging Party,)	HUDALJ No.
)	
)	
v.)	
)	
The Philadelphian Owners')	
Association,)	
)	
Respondent)	
)	

CHARGE OF DISCRIMINATION

I. JURISDICTION

On or about January 13, 2011, XXXX("Complainant XXXX") filed a verified complaint with the United States Department of Housing and Urban Development ("HUD"), alleging that The Philadelphian Owners' Association ("Respondent POA") committed discriminatory housing practices against her, on the basis of disability, in violation of the Fair Housing Act ("Act"), 42 U.S.C. §§ 3601-19. Complainant XXXX's case was dual-filed with the Pennsylvania Human Relations Commission. On or about

February 1, 2011, HUD reactivated the case. The complaint was amended on or about August 1, 2011 to include violations of the Fair Housing Act at 42 U.S.C. §§ 3604(c), 3604(f)(1)(A) and 3604(f)(2)(A) and to remove Mark Blasky, President of the POA's Board of Directors, as a Respondent. Respondent POA is alleged to have violated the following provisions of the Act: 42 U.S.C. §§ 3604(c), 3604(f)(1)(A), 3604(f)(2)(A), 3604(f)(3)(B) and 3617. Complainant XXXX alleges that Respondent POA was responsible for denying her request to have an assistance animal as a reasonable accommodation for her disability, making areas of The Philadelphian complex unavailable to her, limiting her access to amenities and facilities of The Philadelphian complex with her assistance animal, creating and allowing a hostile and intimidating environment at The Philadelphian to persist against her because of her assistance animal and publishing and enforcing pet policies that discriminate based on disability in violation of the Fair Housing Act ("Act").

On March 15, 2011, John Trasviña, Assistant Secretary for the Office of Fair Housing and Equal Opportunity ("Assistant Secretary") of HUD, filed a complaint alleging that Respondent POA, Joseph Lawrence, and Francis McKibbin discriminated on the basis of disability. The Secretary's complaint was amended on or about August 11, 2011 to include violations of the Fair Housing Act at 42 U.S.C. §§ 3604(c), 3604(f)(1)(A) and 3604(f)(2)(A) and to remove Joseph Lawrence and Francis McKibbin as Respondents. Respondent POA is alleged to have violated the following provisions of the Act: 42 U.S.C. §§ 3604(c), 3604(f)(1)(A), 3604(f)(2)(A), 3604(f)(3)(B) and 3617. The Secretary's complaint alleges that Respondent POA was responsible for denying requests by residents of The Philadelphian, including Complainant XXXX, to have an assistance animal as a reasonable accommodation because of disability, making areas of The Philadelphian complex unavailable to individuals with disabilities who use an assistance animal, limiting the access of individuals with disabilities with an assistance animal to amenities and facilities of The Philadelphian complex, creating and allowing a hostile and intimidating environment at The Philadelphian to persist against persons with disabilities who need an assistance animal and publishing and enforcing pet policies that discriminate based upon disability in violation of the Act.

The Act authorizes the Secretary of HUD to issue a Charge of Discrimination on behalf of aggrieved persons following an investigation and determination that reasonable cause exists to believe that a discriminatory housing practice has occurred. 42 U.S.C. § 3610(g)(1) and (2). The Secretary has delegated that authority to the General Counsel (76 Fed. Reg. 42462 (July 18, 2011)), who has redelegated the authority to the Regional Counsel. 76 Fed. Reg. 42463, 42465 (July 18, 2011).

As the Fair Housing and Equal Opportunity Director for Region III, the Assistant Secretary's designee, has determined that reasonable cause exists to believe that discriminatory housing practices have occurred, she has issued Determinations of Reasonable Cause in connection with the foregoing cases and, therefore, has authorized the issuance of this Charge of Discrimination.

II. SUMMARY OF THE ALLEGATIONS IN SUPPORT OF THIS CHARGE

Based on HUD's investigation of the allegations contained in the aforementioned complaints, as set forth in the aforementioned Determinations of Reasonable Cause, Respondent POA is charged with discriminating against Complainant XXXX and other Philadelphian residents based upon their disability in violation of 42 U.S.C §§ 3604(c), 3604(f)(1)(A), 3604(f)(2)(A), 3604(f)(3)(B) and 3617.

A. Statutory and Regulatory Provisions

1. It is unlawful to make, print, or publish or cause to be made, printed or published any notice, statement or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation or discrimination based on disability, or an intention to make any such preference, limitation or discrimination. 42 U.S.C. § 3604(c); 24 C.F.R. § 100.75(c)(1) (2011).
2. It is unlawful to refuse to rent or sell or negotiate for rental or sale or otherwise make unavailable or deny a dwelling to any person because of disability. 42 U.S.C. § 3604(f)(1); 24 C.F.R. § 100.202(a)(1) (2011).
3. It is unlawful to discriminate against a person in the terms, conditions, or privileges of a sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of disability. 42 U.S.C. § 3604(f)(2); 24 C.F.R. § 100.202(b)(1) (2011).
4. Discrimination under 42 U.S.C. § 3604(f)(1) and (f)(2) includes denying a person with a disability a reasonable accommodation when such accommodation may be necessary to afford such person equal opportunity to enjoy a dwelling. 42 U.S.C. § 3604(f)(3)(B); 24 C.F.R. § 100.204(a) (2011).
5. A reasonable accommodation is a change in a rule, policy, practice or service when such accommodation may be necessary to afford a person with a disability the equal opportunity to enjoy a dwelling. 42 U.S.C. § 3604(f)(3)(B); 24 C.F.R. § 100.204(a) (2011).
6. It is unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his having exercised or enjoyed, or on account of his having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by section 3604 of the Act. 42 U.S.C. § 3617; 24 C.F.R. § 100.400(b) (2011).
7. The Act defines "handicap" as a physical or mental impairment which substantially limits a person's major life activities, a record of having such an impairment, or being regarded as having such an impairment. 42 U.S.C. § 3602(h); 24 C.F.R. § 100.201 (2011). Although the term "handicap" appears in the Fair Housing Act and its implementing

regulations, the Charge and Determinations of Reasonable Cause use the terms “disability” and “handicap” interchangeably.

B. Parties and Properties

1. The Philadelphian is a 21-story condominium complex, located at 2401 Pennsylvania Avenue, Philadelphia, Pennsylvania. The complex has a total of 776 condominium units.
2. Respondent POA manages The Philadelphian and consists of a Board of ten members who are elected by the condominium owners.
3. Complainant XXXX is a person with a disability as defined in the Act at 42 U.S.C. § 3602(h) and 24 C.F.R. § 100.201. Complainant XXXX’s disability limits her major life activities, including her ability to work and a conduct a social life. Complainant XXXX has been a condominium unit owner at The Philadelphian since 1989, and resides in Unit 36A. Complainant XXXX filed a HUD complaint that gives rise to this Charge alleging disability discrimination.
4. John Trasviña, Assistant Secretary for HUD, on behalf of the Secretary of HUD, filed a HUD complaint that gives rise to this Charge alleging disability discrimination.
5. All persons with a disability who need an assistance animal at The Philadelphian complex are aggrieved persons as defined by the Act. 42 U.S.C. § 3602(i) and 24 C.F.R. § 100.20.

C. Factual Allegations

1. Prior to its 1980 conversion to a condominium complex, The Philadelphian was a rental apartment complex that allowed tenants to have pets.
2. In 1980, when The Philadelphian became a condominium complex, the condominium documents prohibited pets except for those already residing in the building.
3. In or around 1991, the Respondent POA issued an Amended and Restated Declaration of Condominium (“1991 policy”) that stated, in relevant part, that “no dogs, cats or other non-domestic mammals... of any kind shall be raised, bred, or kept in any Unit or in the Common Elements.” The 1991 policy prohibited anyone from bringing an animal on The Philadelphian’s passenger elevators. Animals already living at The Philadelphian were “grandfathered” in under this policy and could remain.
4. On or about April 3, 2000, the Respondent POA enacted a Dog Policy Resolution (“2000 policy”) concerning dogs grandfathered under the 1991 policy. The 2000 policy required dog owners to pay monthly pet fees of \$25.00 (“to reimburse the building for the added monitoring”) and use the freight elevators and loading dock

when transporting dogs, prohibited dogs in the main lobby and imposed fines of \$100 per incident for any violations or for any unregistered dogs. The 2000 policy also prohibited any visiting dogs.

5. In or around 2006, the Respondent POA adopted a revised policy that required dogs that had not been grandfathered under previous pet policies issued by the Respondent POA to be removed from The Philadelphian within thirty days and imposed a daily fine of \$100 for owners who did not comply with this policy. In addition, the 2006 policy required that all owners of dogs use the freight elevators and stay out of the main lobby or face the imposition of a fine of \$100.
6. In or around March of 2007, the Respondent POA issued a pet policy (“2007 policy”) that prohibited dogs, cats, or other animals from residing or visiting The Philadelphian complex unless the animal is a “service animal” as defined by the Americans with Disabilities Act, is trained and “provided it does not affect other Residents’ quiet enjoyment or cause damage to Common Elements.” The 2007 policy required owners of grandfathered dogs to use the appropriate freight elevator to transport their dog. The 2007 policy further provided that if the freight elevator is out of service the owner of an assistance animal may use a passenger elevator, but must transfer to an alternate freight elevator on the second floor. The 2007 policy prohibited dogs in the main lobby, subject to a fine of \$100 per incident. In addition, the 2007 policy required:

Medical documentation of such an owner’s disability must be provided to the Management Office together with evidence that the animal is trained accordingly. In some cases, ‘therapy animals’ may be medically recommended. In such cases and on a case-by-case basis, the Board may approve the visitation only of such animals provided that the resident provides medical certification of this need.

7. On or about May 13, 2008, counsel for Respondent POA presented a “Pet Issue Statement” at a condominium association open meeting. The Statement declared that dogs and cats are not permitted in The Philadelphian, unless grandfathered in 1994 or permitted under the Fair Housing Act. The Statement provided that a person must meet the requirements of the Act, which the Statement identified as “very strict and are a major threshold to get by a claiming individual,” in order to qualify as a person with a disability. The Statement stated that “proof of such a disability may require more than just a doctor’s note” and that the animal “may be required to have had individual and possible special training to distinguish the animal from an ordinary pet.” In addition, the 2008 policy states:

...[T]here can be varying degrees of such required impairment, necessity and training, which has resulted in various interpretations of these requirements in different circumstances with different individuals and by different courts. This can make it difficult to predict with any certainty the outcome of any particular legal dispute involving these issues...

8. In a letter dated October 21, 2010, Complainant XXXX advised Respondent POA's General Manager that she is disabled and in need of an assistance animal. The letter further indicated that Complainant XXXX would provide written support from her doctor supporting her need for the assistance animal.
9. In a letter dated October 27, 2010, Complainant XXXX's doctor, XXXX advised Respondent POA that XXXX is a person who has a psychological disability which includes depression, whose major life activities are limited and who needs an emotional assistance animal to ameliorate the effects of her disability.
10. In a letter dated November 4, 2010, Respondent POA denied Complainant XXXX's request for an assistance animal, stating "...[Y]ou do not appear to be qualified for such an accommodation..." The letter advised Complainant XXXX that she must "immediately comply" with Respondent POA's pet policies by removing her dog from the building within thirty days or face sanctions. The letter further indicated that Respondent POA would reconsider her request if Complainant XXXX provided additional information. However, the letter contained no guidance about what additional information might be needed to enable Complainant XXXX to maintain an assistance animal.
11. In a letter dated November 17, 2010, Complainant XXXX asked Respondent POA to identify what type of additional information would be required for reconsideration of her request for a reasonable accommodation to its pet policies. In this letter, Complainant XXXX advised Respondent POA that other residents had harassed her because of her assistance animal and asked the Respondent POA to address this issue by sending a letter to all residents informing them that it is illegal to harass persons with assistance animals.
12. Complainant XXXX did not receive a response to her November 17, 2010 letter from Respondent POA nor did Respondent POA send a letter or notice to residents of The Philadelphian about harassment.
13. On January 13, 2011, the Complainant XXXX filed a fair housing complaint with HUD alleging that Respondent POA discriminated against her on the basis of her disability.
14. In or around April, 2011, Respondent POA enacted a new written pet policy ("2011 policy") that it forwarded to all residents. The 2011 policy incorporated the previous Respondent POA pet policies and further stated:

Any resident requesting an exception to this Policy by a reasonable accommodation under the federal law (the Fair Housing Amendments Act) must first submit such request in writing to the POA Management Office. All such requests will be considered by the POA on a case by case basis; and reasonable accommodations may be granted upon good

cause shown. If permitted by prior POA grandfathering or by a POA reasonable accommodation exception (for an approved assistance animal), only one such animal may be kept in any Unit and it must be licensed and kept in compliance with applicable Philadelphia law. All animals must be registered with the POA ... No visiting animals, except ADA approved and trained service animals, are permitted anywhere in the building.

15. The 2011 policy states that “all residents with a permitted animal are not allowed in the Main Lobby, passenger elevators, ... Main Lobby sitting rooms, Shuttle Bus, Library, Art Room, Social Rooms, Swimming Pool Area, Fitness Rooms, Management Office, Mailroom and Laundry Room.”
16. The 2011 policy requires that residents accompanying a “permitted animal” must only use freight elevators and if the freight elevators are out of service can use a passenger elevator to the second floor “but such residents must then defer to any objecting residents already on a passenger elevator.”
17. The 2011 policy states that a resident with a mobility impairment or with an approved assistance animal “may pass through the Main Lobby and any other Common Areas only for exiting or entering the building, with no stopping, standing or sitting allowed in those areas.” Unless specified by the date of the policy, all of the Respondent POA’s policies with regard pets will be referred to as “Respondent’s pet policies.” Respondent POA issued several pet policies over the years including in 1980, 1991, 2000, 2006, 2007, 2008 and 2011. All of the policies have evolved from the general prohibition of animals residing in or visiting The Philadelphian.
18. In or around April 2011, Respondent POA sent a notice and a letter to residents of The Philadelphian, including Complainant XXXX, entitled “Instructions to Physicians for Documenting Disability Under the Federal Fair Housing Act” (“Instructions”) along with the 2011 policy that stated that exceptions to the pet policy are not automatic and may require medical documentation or additional information. The Instructions require a physician to provide an opinion and documentation supporting a person’s claim of disability as well as the following information: professional credentials, licenses to practice, years of practice, areas of specialization, recommended type of assistance animal, any required special training of such animal, how the animal can help the patient and observations about the animal’s assistance to the patient. In addition, the Instructions state that “it may be necessary for you to testify under oath in federal court about your opinion.”
19. In a letter dated June 10, 2011 from Respondent POA’s counsel, Respondent POA informed Complainant XXXX that because she failed to comply with the Respondent POA’s request for additional information, Complainant XXXX’s pending request for a reasonable accommodation was denied under the Respondent POA’s new pet policy. The letter further advised Complainant XXXX to remove her animal within thirty days or face sanctions.

20. During the time she has had her assistance animal, Complainant XXXX has been told by other residents that dogs don't belong at The Philadelphian. Complainant XXXX was once falsely accused of being responsible for leaving her assistance animal's fecal waste in the hallway. A resident at The Philadelphian yelled at Complainant XXXX for bringing her assistance animal into the mailroom and lobby and threatened to complain to management. Complainant XXXX reported the incident to XXXX, President of the Respondent POA, and he told Complainant that the woman was correct. In a letter dated November 17, 2010, Complainant XXXX advised Respondent POA that she was experiencing harassment by other residents because of her assistance animal and asked the Respondent POA to take action to stop the harassment. Respondent POA did nothing to stop the harassment.
21. Because of the threat of fines or other sanctions, Complainant XXXX has decreased her use of the common areas, which she cannot comfortably use without her assistance animal. Complainant XXXX has not been able to fully enjoy her dwelling unit as well as the common areas and facilities of The Philadelphian complex without restriction.
22. Because of the threat of fines or other sanctions, Philadelphian residents with a disability who need an assistance animal cannot fully enjoy their dwelling units as well as the common areas and facilities of The Philadelphian complex without restriction.
23. There are other residents of The Philadelphian, in addition to Complainant XXXX, who seek or currently use an assistance animal, who are intimidated about seeking or using an assistance animal because of the invasive, onerous and overly restrictive pet policies of Respondent POA.
24. Philadelphian residents have experienced intimidation and harassment by other Philadelphian residents because of their disability and use of an assistance animal. One Philadelphian resident with a disability was confronted in the lobby by another resident who shouted at her and identified her disability, while other residents looked on. The resident with a disability notified Respondent POA about this intimidation and harassment, however, Respondent POA failed to address the incident.
25. Respondent POA circulated a memorandum to all residents regarding the specific reasonable accommodation request for an assistance animal by a disabled couple living at The Philadelphian.
26. Respondent POA's pet policies have created a hostile environment for persons with disabilities who reside at or visit The Philadelphian complex and need an assistance animal.
27. Respondent POA has received several requests from residents of The Philadelphian complex seeking an assistance animal as a reasonable accommodation to its pet policies

and has not approved any of the requests.

28. Complainant XXXX continues to need an assistance animal to live with her and move about The Philadelphian complex in order to ameliorate the effects of her disability.
29. Respondent POA's pet policies contain onerous requirements that discourage persons with disabilities in need of an assistance animal from seeking and using one. These include requirements to: have an ADA approved and trained animal; limit to one assistance animal; use the freight elevator when with an animal; enter and exit with assistance animal through the loading dock unless the person has a physical disability; enter and exit through the lobby and common area, if physically disabled, but not stand or stop in such areas if accompanied by an assistance animal. Respondent POA's pet policies prohibit persons with disabilities who use an assistance animal from using passenger elevators, lobby, lobby sitting rooms, library, art room, social rooms, swimming pool areas, fitness rooms, library, mailroom, common areas, management office or laundry room. Respondent POA's pet policies require persons with a disability using an assistance animal to remove their animal from an elevator if another resident requests it. Respondent POA's pet policies seek burdensome and invasive documentation of a disability from the doctor of a resident requesting an accommodation. Respondent POA's pet policies impose fines for violation of its pet policies.
30. Respondent POA's pet policies discriminate against persons with disabilities in need of an assistance animal in many ways. For example, persons with disabilities who use an assistance animal may not enter the following areas when accompanied by their assistance animal: passenger elevators, lobby, lobby sitting rooms, library, art room, social rooms, swimming pool areas, fitness rooms, library, mailroom, common areas, management office or laundry room. In addition to its denials of valid reasonable accommodation requests, Respondent POA's pet policies seek private medical information from a resident requesting an accommodation, to which it is not entitled. Philadelphian residents who need an assistance animal, including Complainant XXXX, limit their use of The Philadelphian complex due to Respondent POA's pet policies.
31. Respondent POA's restrictive pet policies may discourage persons with disabilities in need of an assistance animal from purchasing or renting at The Philadelphian.

D. Fair Housing Act Violations

1. By publishing and circulating pet policies to Philadelphian residents and making statements that indicate a preference, limitation or discrimination based on disability, Respondent POA violated the Act, as described in paragraphs 3-7, 10, 14-20 and 29-31, above. 42 U.S.C. § 3604(c); 24 C.F.R. § 100.75(c)(1) (2011).
2. By enforcing discriminatory pet policies, Respondent POA made the units of residents with a disability in need of an assistance animal, including The Philadelphian's common areas and other amenities,

unavailable in violation of the Act, as described in paragraphs 3-7, 10-11, 14-23, and 25- 31, above. 42 U.S.C. § 3604(f)(1)(A); 24 C.F.R. § 100.202(a)(1) (2011).

3. By refusing to allow residents with disabilities to have an assistance animal and by enforcing discriminatory and onerous pet policies that restrict assistance animals, Respondent POA discriminated on the basis of disability in the terms, conditions or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with such dwelling, as described in paragraphs 3-7, 10-11, 14-23, and 25-31, above. 42 U.S.C. § 3604(f)(2)(A); 24 C.F.R. § 100.202(b)(1) (2011).
4. Respondent POA violated the Act by creating a hostile environment for persons with disabilities in need of an assistance animal who seek to use their assistance animal without restriction within The Philadelphian complex, as described in paragraphs 3-7, 10-12, and 14-31, above. 42 U.S.C. § 3604(f)(2); 24 C.F.R. § 100.202(b) (2011).
5. By refusing the requests for reasonable accommodation submitted by Complainant XXXX and other residents with disabilities seeking to be accompanied by or to use an assistance animal, Respondent POA discriminated on the basis of disability, as described in paragraphs 8-12, 19, 28 and 31, above. 42 U.S.C. §§ 3604(f)(2) and 3604(f)(3)(B); 24 C.F.R. § 100.204(a) (2011).
6. Respondent POA violated the Act by issuing pet policies that intimidate and discourage residents of The Philadelphian who need an assistance animal from seeking or maintaining such animal, as described in paragraphs 3-7 and 14-31, above. 42 U.S.C. § 3617; 24 C.F.R. § 100.400(b) (2011).
7. Respondent POA violated the Act by creating a hostile environment for persons with disabilities in need of an assistance animal and by failing to stop the intimidation and interference experienced by residents at The Philadelphian who have or need an assistance animal due to their disability, as described in paragraphs 3-7 and 11-12, and 20-26, above. 42 U.S.C. § 3617; 24 C.F.R. § 100.400(b) (2011).

III. CONCLUSION

WHEREFORE, the Secretary of HUD, through the Office of Regional Counsel for the Philadelphia Regional Office, and pursuant to 42 U.S.C. § 3610(g)(2)(A), hereby charges Respondent POA with engaging in discriminatory housing practices in violation of 42 U.S.C §§ 3604(c), 3604(f)(1)(A), 3604(f)(2)(A), 3604(f)(3)(B) and 3617 and prays that an order be issued that:

1. Declares that Respondent POA's discriminatory housing practices, as set forth above, violate the Fair Housing Act, 42 U.S.C. §§ 3601-19 and its implementing regulations;
2. Pursuant to 42 U.S.C. § 3612(g)(3), enjoins Respondent POA and all other persons in active concert or in participation, from discriminating against any person based on disability in any aspect of the sale or occupancy of a dwelling;
3. Pursuant to 42 U.S.C. § 3612(g)(3) and 24 C.F.R. § 180.671(a)(1)(2011), assesses a civil penalty of \$16,000 against the Respondent POA for each violation of the Act;
4. Awards such damages pursuant to 42 U.S.C. § 3612(g)(3) as will fully compensate Complainant XXXX and other residents living at The Philadelphian who have a disability and are in need of an assistance animal for actual damages including emotional distress, embarrassment, humiliation, loss of housing opportunity and inconvenience, caused by Respondent POA's discriminatory conduct;
5. Enjoins Respondent POA and all other persons in active concert or participation with it, from enforcing its discriminatory pet policy;
6. Requires Respondent POA to establish a non-discriminatory reasonable accommodation policy and practice that allows Complainant XXXX and all residents with a disability in need of an assistance animal to maintain an assistance animal in their unit at The Philadelphian and move freely within and about The Philadelphian complex, common areas, and facilities;
7. Requires Respondent POA to allow all visitors with a disability in need of an assistance animal to bring their assistance animal into The Philadelphian complex and move freely within and about The Philadelphian complex, common areas, and facilities;
8. Requires Respondent POA to stop any intimidation or interference experienced by Complainant XXXX and any other persons with a disability living at or visiting The Philadelphian complex because of disability or the presence of their assistance animal.
9. Awards such additional relief as may be appropriate.

The Secretary further prays for such additional relief as may be appropriate.

Respectfully submitted,

_____/s/_____
PATRICIA McGARVEY KNEBELS
Trial Attorney

_____/s/_____
RICHARD A. MARCHESE
Associate Regional Counsel for Civil Rights
and Procurement

_____/s/_____
SHERYL L. JOHNSON
Regional Counsel

U.S. Department of Housing
and Urban Development
Office of the Regional Counsel
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380
Telephone: (215) 430-6664
Fax: (215) 656-3446
TTY: (215) 656-3450

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