

STATE OF CONNECTICUT  
APPELLATE COURT

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AC 42276

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ALEXANDER M. PHILLIPS

Plaintiff-Appellant

V.

TOWN OF HEBRON, ET AL

Defendants – Appellees

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REPLY BRIEF OF THE PLAINTIFF

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TO BE ARGUED BY:

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## ARGUMENT

### **I. The standard and scope of review applicable to this appeal.**

This Court has *De novo* (or plenary) review over this appeal because it presents questions of law involving the interpretation and application of a statute. “The application of a statute to a particular set of facts is a question of law, over which we exercise plenary review. *Maturo v. Maturo*, 296 Conn. 80, 88, 995 A.2d 1 (2010).” *Follacchio v. Follacchio, et al.*, 124 Conn.App. 371, 4 A.3d 1251, 1254 (2010).

### **II. The defendants concede the plaintiff’s appellate arguments.**

In the plaintiff’s Brief, he advanced arguments based upon the plain language of the IDEA’s exhaustion statute, the differences between statutory and common law exhaustion requirements, types of remedies available under the IDEA, an analytical flowchart for decision-making and that state law claims pursuant to the Connecticut anti-discrimination statutes and common law negligence per se are beyond the scope of the IDEA exhaustion statute. The defendants’ offered no substantive response to these arguments.

Instead, the defendants offer a Connecticut common law exhaustion requirement of the IDEA and, in essence, simply reiterate the trial court’s Memorandum of Decision complete with the same references to state statutes and case law. The defendants offer no authority or justification for their approach when our Supreme Court has stated:

“The act is a federal act, and, as such, ‘we look to the federal courts for guidance in resolving issues of federal law.’” *Unified School District No. 1 v. Conn. Dept. of Ed.*, 64 Conn. App. 273, 284 (2001) citing *Turner v. Frowein*, 253 Conn. 312, 340, 752 A.2d 955 (2000). If, as the Trial Court opined in its Memorandum of Decision, that “The primary purpose of the state statute is to implement the substantive and procedural requirements of the IDEA” then Connecticut implementing statutes adopt and use the explicit, statutory exhaustion requirement of the IDEA. However, the defendants advocate imposing the common law jurisprudential doctrine of administrative exhaustion (see Defs. Brief at page 14) citing *Stepney, LLC v Town of Fairfield*, 263 Conn. 558, 564, 921 A.2d 725 (2003) despite ample federal precedent to the contrary in the plaintiff’s Brief. The defendants’ Brief implies that the plaintiff Alexander Phillips failed to exhaust administrative remedies without identifying what those remedies are and in disregard of the factual background to the contrary.

The defendants’ brief contains abstractions without analysis and implications without factual support. For example, on page 14 the defendants assert “In this case, General Statutes §10-76h and Conn. Agencies Regs. 10-76h-16, afforded the plaintiff an adequate administrative procedure to address his state law claims.”...“Whereas an adequate administrative *procedure* existed, and whereas the plaintiff did not exhaust these administrative *remedies* before filing the subject civil action, the trial court properly dismissed Counts One through Twenty of the plaintiff’s complaint for lack of subject

matter jurisdiction” (emphasis added). The defendants fail, refuse or neglect to explain how the Connecticut Education statutes provide an administrative process or remedy (which are not the same thing) for disability discrimination claims pursuant to Connecticut General Statutes §46-60 et seq. and “negligence” is not one of the bases enumerated for the complaint process pursuant to §10-76h.

On page 16 of the defendants' brief they argue that the plaintiff seeks relief for a denial of FAPE because of allegations that the defendants violated the least restrictive environment policy (LRE) and “The plaintiff is challenging the provision of educational services to the minor plaintiff, Alex, in regards to his IEP, and specifically in regards to the IDEA's requirements that students with disabilities be education in the least restrictive environment, and that parents be notified of any progress and/or changes to their child's IEP.” The defendants fail to identify, with any specificity, any paragraphs in the plaintiff's complaint that allege “educational services<sup>1</sup>” are being challenged; nor do the defendants identify any declaratory and/or injunctive relief, which are the remedies for a denial of FAPE<sup>2</sup>, in the plaintiff's prayer for relief.

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<sup>1</sup> The phrase “inadequate educational services” is language from *Graham v. Friedlander*, discussed below, and does not appear in the plaintiff's Complaint.

<sup>2</sup> “The only relief that an IDEA officer can give--hence the thing a plaintiff must seek in order to trigger § 1415(l)'s exhaustion rule--is relief for the denial of a FAPE.” *Fry, supra*, at 753.

The defendants mistakenly believe that a violation of LRE equates to a denial of FAPE, it does not. Very recently, in *R.F. v. Cecil County Public Schools*, 919 F.3d 237, 246 (4<sup>th</sup> Cir. 2019) the federal Court of Appeals stated “In sum, we hold that CCPS did violate certain procedural requirements of the IDEA, most notably by changing R.F.’s placement without notifying her parents [LRE] or modifying her IEP. However, any procedural violations did not deny R.F. a FAPE.” This position is consistent with the District Court of Connecticut’s reasoning in its Memorandum of Decision to Remand this case back to the Superior Court (**A196-A204**) as well as the Connecticut State Department of Education’s Findings of Fact and Conclusions (**A154-A157**).

On page 18 of the defendants’ brief they submit “The plaintiff subsequently withdrew the request for a Due Process Hearing, *but not because he suddenly believed that the District had fulfilled its FAPE obligation.* (A154)(emphasis added). The defendants offer no facts to support their contention that the plaintiff’s stated reason for his action was improper or untrue.

On page 20 of the defendants’ brief they state “While a parent is required to pursue a Due Process hearing, that process does not foreclose a parent from subsequently obtaining monetary relief in the courts for non-IDEA claims, nor does it obviate the tremendous benefit of having a complete factual record and administrative expertise to facilitate judicial review.” The defendants do not cite any authority for many of their propositions nor do they provide any examples of cases wherein that occurred.

The defendants offer instead an “analogy” of the administrative exhaustion requirements for claims of discrimination to CHRO and lastly, in a most conclusory assertion, “This same should hold true for parents seeking relief for a denial of FAPE” (Defs. Brief at page 21). The plaintiff’s appeal states what the IDEA exhaustion statute actually says and what the relevant case law is – the defendants want to argue what it should be. The defendants’ brief is replete with such abstractions without analysis.

This Court, in *Rosenthal Law Firm, LLC v. Cohen*, 190 Conn. App. 284, 210 A.3d 579 (2019) cited *Estate of Rock v. University of Connecticut*, 323 Conn. 26, 33, 144 A.3d 420 (2016) for the proposition that “Claims are inadequately briefed when they are merely mentioned and not briefed beyond a bare assertion.... Claims are also inadequately briefed when they ... consist of conclusory assertions ... with no mention of relevant authority and minimal or no citations from the record ....” [Internal quotation marks omitted.] *Rosenthal, supra*, at n.1.

Likewise, in *Spears v. Elder*, 156 Conn. App. 778, 115 A.3d 482 (2015), this Court stated “We consistently have held that [a]nalysis, rather than mere abstract assertion, is required in order to avoid abandoning an issue by failure to brief the issue properly.” (Internal quotation marks omitted.) *State v. Mendez*, 154 Conn.App. 271, 275 n.2, 105 A.3d 917 (2014); see *Carabetta v. Carabetta*, 133 Conn.App. 732, 737, 38 A.3d 163 (2012), *Spears, supra*, at 792. More to and on the point, this Court, in *Birchard v. New Britain*, 103 Conn. App. 79, 927 A.2d 985 (2007) stated “According to the law of

pleading, what is not denied is conceded." *Id.* at 84 citing *Casey v. Galli*, 94 U.S. 673, 679, 24 L.Ed. 168 (1877). Also the Wisconsin Appellate Court, in *Shier v. Ziwisky*, 100 Wis.2d 746, 303 N.W.2d 854 (1981) stated "Defendant did not respond to plaintiff's argument. We consider that defendant concedes the point. 'Respondents . . . cannot complain if propositions of appellants are taken as confessed which they do not undertake to refute.' *State ex rel. Blank v. Gramling*, 219 Wis. 196, 199, 262 N.W. 614, 615 (1935)."

### **III. The cases cited in the defendants' Brief do not support their position.**

The eight cases (*Polera v. Bd. of Educ. Of Newburgh Enlarged City Sch. Dist.*, 288 F.3d 478, 483 (2d. Cir. 2002); *Hsing v. Glastonbury Board of Education*, Superior Court, judicial district of Hartford, Docket No. CV-01-0809804-S, (Dec. 1, 2003, Hennessey, J.); *DiStiso v. Town of Wolcott*, No. 3:05cv1910(PCD), 2006 WL 3355174, at \*4 (D. Conn. Nov. 17, 2006); *Avoletta v. City of Torrington*, United States District Court, Docket No. 3:07-CV841 (AHN)(D. Conn. March 31, 2008); *Cave v. E. Meadow Union Free Sch. Dist.*, 514 F.3d 240, 247-49 (2d Cir. 2008); *Murphy v. Town of Wallingford*, United States District Court, Docket No. 3:10-CV-278 (CFD)(D. Conn., March 23, 2011); and *M.A. v. NY Dept. of Ed.*, 1 F.Supp.3d 125 (S.D.N.Y. 2014)) cited by the defendants (the same ones cited by the Trial Court in its Memorandum of Decision) fall into two groups: pre-Fry and post-Fry cases. All of the pre-Fry cases (*Polera*, *Cave*, *Avoletta*, *Hsing*, *M.A.*, *Murphy* and *Distiso*) have a common element: they all seek relief that was

available under the IDEA. Three of the seven pre-Fry cases specifically alleged the denial of FAPE in their complaints (*Polera, Avoletta, and Distiso*). Four of the seven pre-Fry cases alleged violations of the Americans with Disabilities Act and the Rehabilitation Act (*Polera, Cave, Avoletta, and M.A.*); four of the seven alleged causes of action under 42 U.S.C. §1983 (*Cave, Avoletta, Murphy and Distiso*); and five of the seven alleged violations of the Federal Constitution (*Polera, Cave, Avoletta, Murphy and Distiso*). The plaintiff submits that these pre-Fry cases from within the Second Circuit Court of Appeals were decided using the “injury centered approach” which, as stated in *Polera, supra*, at 481, required that “potential plaintiffs with grievances *related* to the education of disabled children generally must exhaust their administrative remedies before filing suit in federal court, even if their claims are formulated under a statute other than the IDEA,” (emphasis added) and that very approach was rejected in *Fry v. Napoleon Cmty. Sch.*, 137 S. Ct. 743, 752 (2017).

The one post-Fry case, *Graham v. Friedlander*, Superior Court, judicial district of Stamford-Norwalk, Docket No. FSTCV116008466S (July 10, 2017, Povodator, J.) dismissed the plaintiffs’ claims for a failure to exhaust administrative remedies although the plaintiffs sought only monetary damages for state common law claims. Counsel for the plaintiff has difficulty reconciling the *Graham* court’s use of *Fry* with the court’s decision.

There are two possibilities to resolve this enigmatic result: (1) the *Graham* court incorrectly relied upon the common law doctrine of administrative exhaustion, citing *Neiman v. Yale University*, 270 Conn. 244, 259, 851 A.2d 1165, 1174 (2004) for the proposition that "It is not the plaintiff's preference for a particular remedy that determines whether the remedy . . . is adequate . . . and an administrative remedy, in order to be adequate, need not comport with the plaintiffs' opinion of what a perfect remedy would be." (Internal quotation marks and citations, omitted.) 270 Conn. 260" which runs counter to the reasoning and holding in *Fry* "The statutory language asks whether a lawsuit in fact "seeks" relief available under the IDEA--not, as a stricter exhaustion statute might, whether the suit "could have sought" relief available under the IDEA (or, what is much the same, whether any remedies "are" available under that law), *Fry* at 755; and (2) as the United State Solicitor General, in its *amicus* brief in *Fry* suggested "the court [Sixth Circuit Court of Appeals] appeared to ground its analysis on a perceived need 'to preserve the primacy the IDEA gives to the expertise of state and local agencies' in determining whether a child has been denied a FAPE under the IDEA" (United States *amicus* brief at page 16)(A515). The *Graham* court noted that the plaintiffs specifically alleged the defendants provided "inadequate educational services"<sup>3</sup>

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<sup>3</sup> "The plaintiffs' Complaint clearly alleges that the services provided to the minor plaintiffs were inadequate and that the provision of these inadequate services caused plaintiffs *permanent harm*." Povodator, J. in *Graham v. Friedlander*, *supra*.

for the finding that the plaintiffs alleged a denial of FAPE. That 'perceived need to preserve the primacy of the IDEA' may have been present in *Graham*<sup>4</sup>.

Every plaintiff in all eight of the aforementioned cases (pre and post *Fry*) admitted or did not contest the assertion that they failed to exhaust administrative remedies. In contrast, the plaintiff Alex Phillips did file state administrative complaints and later filed suit in Superior Court seeking only monetary damages for state statutory and common law causes of action based upon wrongful segregation. The differences between the defendants' cases and Alex Phillips may not be "vast" but they are simple yet profound.

However, the plaintiff Alexander Phillips hopes this Court does not discard all the aforementioned cases cited by the defendants because some contain decisions and points that the plaintiff would like to use as support for his Appeal.

First, the defendants cite the Second Circuit's approach, as articulated in *Polera*, as "the correct one." (Defs. Brief at page 21) wherein the *Polera* court stated: "The IDEA is intended to remedy precisely the sort of claim made by Polera: that a school district failed to provide her with appropriate educational services. The fact that Polera seeks

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<sup>4</sup> "The concept of exhaustion of administrative remedies is somewhat related to the concept of primary jurisdiction--courts should defer to administrative personnel and entities with expertise in a particular area, and that is especially the case with IDEA." Povodator, J. in *Graham v. Friedlander, supra*.

damages, in addition to relief that is available under the IDEA, does not enable her to sidestep the exhaustion requirements of the IDEA. Where, as here, a full remedy is available at the time of injury, a disabled student claiming deficiencies in his or her education may not ignore the administrative process, then later sue for damages.” The plaintiff submits that the Second Circuit Court of Appeals decided what administrative remedies would be appropriate to address the plaintiff’s claims rather than what remedies were actually sought in the civil lawsuit.

But the United States Supreme Court in *Fry* apparently disagreed with *Polera* and the defendants here when it stated: “That inquiry makes central the plaintiff’s own claims, as §1415(*l*) explicitly requires. The statutory language asks whether a lawsuit in fact “seeks” relief<sup>5</sup> available under the IDEA--not, as a stricter exhaustion statute might, whether the suit “could have sought” relief available under the IDEA (or, what is much the same, whether any remedies “are” available under that law).... In effect, §1415(*l*) treats the plaintiff as “the master of the claim”: She identifies its remedial basis--and is

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<sup>5</sup> To be clear, the United States Supreme Court defined “relief” in “the ordinary meaning of “relief” in the context of a lawsuit is the “redress[ ] or benefit” that attends a favorable judgment. Black’s Law Dictionary 1161 (5th ed. 1979). And such relief is “available,” as we recently explained, when it is “ accessible or may be obtained.” *Ross v. Blake*, 578 U.S. \_\_\_, \_\_\_, 136 S.Ct. 1850, 1858, 195 L.Ed.2d 117, 126 (2016) (quoting Webster’s Third New International Dictionary 150 (1993)). *Fry*, at 743. The *Fry* Court also identified where they would find “relief sought”: “In their prayer for relief, the Frys sought a declaration that the school districts had violated Title II and §504, along with money damages to compensate for E. F.’s injuries.” *Id.* at 752 (emphasis added).

subject to exhaustion or not based on that choice. *Caterpillar Inc. v. Williams*, 482 U.S. 386, 392, 107 S.Ct. 2425, 96 L.Ed.2d 318, and n. 7 (1987). A court deciding whether §1415(l) applies must therefore examine whether a plaintiff's complaint--the principal instrument by which she describes her case--seeks relief for the denial of an appropriate education."

Second, also in *Polera* was a discussion of *Covington v. Knox County School System*, 205 F.3d 912 (6th Cir. 2000). In *Covington*, the mother of a disabled student sued the school district under 42 U.S.C. § 1983, alleging in her complaint, that school officials had locked the student inside a small, dark, unheated, unventilated cell for long periods of time as a disciplinary measure. In considering the applicability of the IDEA exhaustion requirement, the court held "that in the unique circumstances of this case--in which the injured child has already graduated from the special education school, his injuries are wholly in the past, and therefore money damages are the only remedy that can make him whole--proceeding through the state's administrative process would be futile and is not required before the plaintiff can file suit in federal court." *Id.* at 917. ... damages would have been the only adequate remedy even had he sought immediate relief at the time of the wrongdoing. Nothing could "undo" the harm that he had suffered." *Polera, supra*, at 489-490 (emphasis added).

In his Memorandum in Opposition to the Defendants' Motion to Dismiss, the plaintiff Alexander Phillips argued "The IDEA cannot provide any equitable remedy for the minor

plaintiff Alexander Phillips, it cannot give him back all the hours he spent in a courtroom during the school day” (A94). The plaintiff submits that his case is more like the situation in *Covington* than any case cited by the defendants.

Lastly, with respect to the issue of whether the IDEA exhaustion requirement applies to state law claims, the case of *M.A. v. NY Dept. of Ed.*, *supra*, (upon which the defendants and the trial court rely) based upon its adoption of a Report and Recommendation by a Magistrate, stated “The Report also recommended that the exhaustion requirement did not apply to Plaintiff’s state law claims. (Report 29 n.11.)” and on page 29 of the Report at footnote 11, the Magistrate simply stated: “The IDEA’s exhaustion requirement does not apply to plaintiffs’ state-law claims. See 20 U.S.C. §1415(l).”

“Congress enacted Section 1415(l) with the specific goal of preserving the viability of non-IDEA causes of action as “separate vehicles” for protecting the rights of children with disabilities. House Report 4. It did not require IDEA procedures to be exhausted in circumstances where the plaintiff seeks only relief that cannot be awarded under the IDEA.” Brief for United States as *Amicus Curiae* 16. (A515) The defendants, in their Brief, advocate a return to the exclusivity of the IDEA which the United States Congress expressly rejected when it legislatively overturned *Smith v. Robinson*, 468 U.S. 992 (1984).

#### IV. Conclusion

The minor plaintiff Alexander Phillips, for the foregoing arguments and reasons, was not required to exhaust his common law and Connecticut statutory claims through the administrative process provided by the IDEA, and even if he was required to exhaust his administrative remedies through the IDEA, the plaintiff Alexander Phillips did. The judgment of the trial court in dismissing those claims, and the indemnification claims associated with them, should be reversed and this case should proceed to trial.

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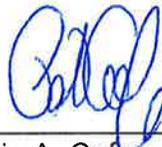
## CERTIFICATION

In accordance with Practice Book Section 67-2(g) the undersigned hereby certifies that this Brief was electronically delivered to the Appellate Court of the State of Connecticut and has been electronically delivered to the last known e-mail address of all counsel of record this day, October 8, 2019. It is further certified that this Brief does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order or case law.

The undersigned also hereby certifies that this document complies with all applicable Rules of Appellate Procedure under sections 67-2, 67-3 and 62-7. It is further certified that on this day, October 8, 2019 the original and 10 copies of this Brief, which are true and accurate copies of the electronically submitted Brief, were filed with the Appellate Court of the State of Connecticut and one copy was mailed, postage prepaid, to the following pro se parties, counsel of record and trial court judge:

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