IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT

No. 9 MAP 2023

THE BOROUGH OF WEST CHESTER,

Appellant,

vs.

PENNSYLVANIA STATE

SYSTEM OF HIGHER EDUCATION AND WEST CHESTER UNIVERSITY OF PENNSYLVANIA OF THE STATE SYSTEM OF HIGHER EDUCATION,

Appellees

AMICUS CURIAE BRIEF OF LOWER SWATARA TOWNSHIP and LOWER SWATARA TOWNSHIP MUNICIPAL AUTHORITY IN SUPPORT OF BOROUGH OF WEST CHESTER

Counsel for Lower Swatara Township and Lower Swatara Township Municipal Authority

Kevin L. Hall, Pa. I.D. No. 311826
Brian J. Murren, Pa. I.D. No. 324567
J. Andrew Salemme, Pa. I.D. No. 208257
TUCKER ARENSBERG, P.C.
300 Corporate Center Drive, Suite 200
Camp Hill, PA 17011
khall@tuckerlaw.com
bmurren@tuckerlaw.com
asalemme@tuckerlaw.com
717-221-7951

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STATEMENT OF INTEREST OF LOWER SWATARA TOWNSHIP AND THE LOWER SWATARA TOWNSHIP MUNICIPAL AUTHORITY

Lower Swatara Township (the "Township") is a township of the first class, with administrative offices located at 1499 Spring Garden Drive, Middletown, PA 17057. The Lower Swatara Municipal Authority ("LSMA" or "Township Authority") is a Pennsylvania Municipal Authority created pursuant to the Municipality Authorities Act, 53 Pa.C. S. § 5601 et seq., with offices at 1499 Spring Garden Drive, Middletown, PA 17057. The Township and Township Authority are paying in whole for the preparation of this *Amicus Curiae* Brief which is prepared in whole by its counsel Tucker Arensberg, P.C.

STATEMENT OF ISSUE

WHETHER A STORMWATER CHARGE IMPOSED BY A MUNICIPALITY IS A USER FEE OR A TAX?

ARGUMENT

Municipalities across this Commonwealth have enacted Stormwater Management Fees as part of comprehensive efforts to comply with federal and State regulatory requirements related to stormwater runoff. Such fees have been instituted in order to offset the costs to municipalities of operating stormwater management infrastructure and facilities. In this case, owners of "Developed Property" in the Borough of West Chester are assessed a fee for usage of the Borough's Stormwater Collection and Conveyance System. This approach is substantially similar to that adopted by other local governments in both Pennsylvania and other States, including *Amicus*.

Whether Commonwealth entities, or other entities subject to fees but not normally subject to taxes, will be required to contribute to the costs of stormwater management by paying Stormwater Management Fees turns principally on the question of whether imposition of the fee is construed as a tax. For municipalities with Commonwealth property owners, the implications of this decision will be profound. State courts in Arizona, Arkansas, Georgia, Illinois, Florida, Maine, Ohio, Washington and West Virginia have addressed the issue pending before this Court and concluded that analogous stormwater fees were fees and not taxes. Similarly, federal

courts in Virginia and Georgia have reached a similar conclusion--and the Commonwealth Court has reached a differing result than that was reached below in *Appeal of Best Homes, DDJ, LLC*, 2021 Pa. Commw. Unpubl LEXIS 667 (Dec. 23, 2021).

The Commonwealth Court, relying almost exclusively on a single case: *DeKalb County, Georgia v. United States*, 108 Fed. Cl. 681 (Fed. CL. 2013), concluded that Stormwater Management Fees constitute a tax and not a fee for services. Because Commonwealth entities are immune from local taxation, that determination results in West Chester University (and potentially more broadly any other entity not subject to local taxation) not having to pay Stormwater Management Fees. But the *DeKalb* case is a minority view and for good reason. The majority of courts which have analyzed this precise question have concluded that stormwater management fees are just that: fees. This Court should join those jurisdictions and reverse.

The Stormwater Fees Charged by the Borough of West Chester are Permissible Impact Fees Designed to Contain the Development of Impervious Surface Area.

The Stream Protection Ordinance at issue is assessed on only owners of real property within the Borough "where man made changes[s] have been made which would add impervious surfaces to the property." West Chester

Code § 94A-5. These fees are charged for the purpose of mitigating the impacts caused by unrestricted stormwater runoff and complying with an entire federal and state regulatory schema focused on accomplishing the same. *See* 40 C.F.R. § 122.30(c); 25 Pa. Code 92a.32(a). Rather than accomplish this task by creation of a separate authority for that purpose as would be permitted pursuant to 56 P.S. § 5607(a)(18), the Borough has chosen to do so pursuant to its authority to protect the health, safety and welfare of its citizens. *Southwest Delaware County. Mun. Auth. v. Aston* 198 A.2d 867, 872 (Pa. 1964). Regardless of the mechanism by which the fee is charged, the fees serve the sole purpose of reducing and mitigating stormwater runoff, such runoff which only results from the construction of impervious surface area on a particular property. Impervious surface area, because it has the largest impact on stormwater runoff, has been determined to be a net-negative. By linking the fee to the amount of impervious surface area, the fee allows a property to receive the "discrete benefit" of a certain amount of impervious surface area on the property.

In other contexts, municipalities are permitted to charge similar impact fees, such as for land development or offsite public transportation capital improvements. *See generally,* 53 Pa.C.S. § 10503-A, *et seq.* Such statutes allow

a municipality to accept payments in lieu of on-site improvements. *Id.* Similarly, the ordinance at issue allows a property owner to choose whether to make improvements to the stormwater facilities or reduce impervious surface area on the property, or pay a fee in lieu of such improvements.

Rather than view the impervious surface area as a discrete benefit equally attributable to each property, the Commonwealth Court focused on the reduction in stormwater, which was described as a general benefit, or one which was not ascertainable for purposes of determining the proper fee to be charged.[1] By linking the fee to the amount of impervious surface area permitted on a particular property, the distinction between a benefit to the general public and the discrete benefit afforded to each landowner becomes clear.

[1] It is notable that the main case cited for distinguishing between a tax and a fee in the Commonwealth Court opinion below, *City of Philadelphia v. Pennsylvania PUC*, 676 A.2d 1298, 1307 (Pa. Cmwlth. 1996), involves neither a tax nor a fee. It is suggested that *White v. Commonwealth,* 571 A.2d 9 (Pa. Cmwlth. 1990), and its progeny provides the proper framework in which the analysis is to be performed. *See, e,g, Robison v. Fish & Boat Comm'n*, 646 A.2d 43 (Pa. Cmwlth. 1994)(implementation of fees in the context of overall regulatory scheme).

The Majority of State Court Decisions on the Issue Support the Conclusion that Stormwater Management Fees are not a Tax.

Twenty years ago, the Florida Supreme Court addressed the issue pending before this Court in *City of Gainesville v. State of Florida*, 863 So.2d 138 (Fla. 2003), and concluded that stormwater management fees were fees and not a tax. The *Gainesville* Court noted that stormwater runoff can cause flooding and threaten water quality. *Id*. at 141. It added that Florida law required local governments to establish stormwater management plans and that the City therein established a stormwater utility fee based on impervious areas of land--and that "[t]he vast majority of stormwater utilities across the country establish their rate structures by measuring impervious area." *Id*. at 142. The City did not charge a fee to those properties that retained all stormwater on-site or undeveloped properties nor did it charge the University of Florida a fee because the University provided its own stormwater management service *in its entirety* and drained stormwater into a lake. *Id*. The Florida Department of Transportation refused to pay the stormwater fee, contending, as here, that the fee constituted a tax or special assessment.

Florida law defined "user fees" as:

> charges based upon the proprietary right of the governing body permitting the use of the instrumentality involved. Such fees share common traits that distinguish them from taxes: they are charged in exchange for a particular governmental service which benefits the party paying the fee in a manner not shared by other members of society, and they are paid by choice, in that the party paying the fee has the option of not utilizing the governmental service and thereby avoiding the charge.

Id. at 144.

The Court reasoned that the stormwater fee constituted a user fee because it applied only to developed properties on impervious areas of land. According to the *Gainesville* Court, the fee was also sufficiently voluntary because property owners could avoid the fee if they did not develop their property. *See also City of Key West v. Key West Golf Club Homeowners'*, 228 So. 3d 1150 (Fla. App. 2017).

The Georgia Supreme Court followed suit a year later in *McLeod v. Columbia County*, 599 S.E. 2d 152 (S.C. Ga. 2004). In *McLeod*, the county assessed owners of developed property "a monthly stormwater utility charge based on the amount of impervious surface area located on their property." *Id*. at 153. The property owners therein contended that the utility charge was a tax. The *McLeod* Court noted the distinction between taxes and fees, stating:

> First, taxes are a means for the government to raise general revenue and usually [are] based on ability to pay (such as property or income) without regard to direct benefits which may inure to the payor or to the property taxed. Fees, on the other hand, "are intended to be and should be clearly described as a charge for a particular service provided." Second, fees should apply based on the contribution to the problem. Third, fee payers, unlike tax payers, should receive some benefit from the service for which they are paying, although the benefits may be indirect or immeasurable.

Id. at 155. The Georgia Court relied on an earlier Florida Supreme Court case, *Sarasota County v. Sarasota Church of Christ*, 667 S2d 180 (Fla. 1995), in finding a stormwater fee was not a tax. In discussing the *Sarasota* Court decision, the *McLeod* Court noted,

> the fee applies to residential and non-residential developed property, but not to undeveloped property, which actually contributes to the absorption of stormwater runoff; the properties charged receive a special benefit from the funded stormwater services, which are designed to implement federal and state policies through the control and treatment of polluted stormwater contributed by those properties; and, the cost of those services was properly apportioned based primarily on horizontal impervious surface area.

Id. The Court, in finding that the stormwater fee was not a tax, also found it significant that "property owners can reduce the amount of the charge by creating and maintaining private stormwater management systems." *Id*.

The Georgia Supreme Court upheld *McLeod* in *Unified Gov't of Athens-Clarke County v. Homewood Vill.*, 739 S.E.2d 316 (Ga. 2013). In the *Athens-Clarke County* case, the ordinance imposed a stormwater management service fee to developed property and was apportioned based on impervious surface area. Property owners could reduce the amount charged by creating or maintaining their own stormwater management system. Finding that the ordinance was substantially similar to that at issue in *McLeod*, the High Court found the stormwater fee was not a tax.

Illinois' appellate courts reached a similar result in *Church of Peace v. City of Rock Island*, 828 N.E. 2d 1282 (Ill. App. 2005). There, a group of churches challenged a stormwater service fee and alleged that the fee was a tax from which they were exempt. The fee applied to developed property and was based on impervious area. The Court in *Church of Peace* reasoned,

> a tax may be distinguished from a fee by observing that a tax is a charge having no relation to the service rendered and is assessed to provide general revenue rather than compensation. A fee, on the other hand, is proportional to a benefit or service rendered. Under this analysis, the storm water service charge is clearly a fee.

Id. at 1285. The Court added that even if it would be cost prohibitive for a property owner to construct its own storm water run-off system, that the fee

was still voluntary because "[v]oluntary participation involves nothing more than weighing the competing costs of participation." *Id*. at 1286.

That decision was recently followed by the Illinois Court of Appeals in *Green v. Vill. of Winnetka*, 2019 IL App (1st) 182153. In *Green*, a property owner contested imposition of a stormwater fee on the basis that the fee was a tax. The stormwater ordinance was analogous to that of the Borough here. The *Green* Court found it significant that the stormwater fees were assessed based on the impervious area of a parcel and that property owners who do not use the stormwater system could obtain a 100% credit and the revenue was dedicated to a fund used exclusively to support the stormwater system. Accordingly, it upheld summary judgment in favor of the municipality and determined that the fee was not a tax.

The Superior Court of Arizona (the equivalent of the Court of Common Pleas in Pennsylvania) reached the same result in *Fred Nackard Land Co. v. City of Flagstaff*, 2005 Ariz. Super. LEXIS 1105. Among other challenges, the plaintiff therein asserted that the stormwater fee constituted an unlawful tax. The city charged a fee to owners of developed land.

The Arizona Court began by highlighting "that the 'weight of decided law from other jurisdictions favor a finding' that a stormwater service charge

is a user fee rather than a tax." *Id*. at *4. It rejected the plaintiffs' argument that the fee was "not voluntary because the owner of developed land cannot avoid paying the fee and '... money has been demanded despite the fact that no service was ever requested.'" *Id*. at *5. Citing *Gainesville*, *supra*, *Church of Peace*, *supra*, and *McLeod*, *supra*, the Court found that the fee was voluntary--and not a tax. It highlighted that the fees were "used exclusively for stormwater management service operations, systems and facilities. The fees are not deposited in the City's general fund. The rate structure is based on a tiered system in which the rate is tied to the amount of impervious surface area on the developed property." *Id*. at *6. The same is true in the underlying case.

Arkansas joined the majority of jurisdictions rejecting stormwater management fees as a tax in *Morningstar v. Bush*, 383 S.W.3d 840 (Ark. 2011). The *Morningstar* Court noted that the city therein had initially funded its stormwater utility system through its general fund--but that in order to comply with newer mandates from the Environment Protection Agency that it would not have sufficient funds. Accordingly, the city established a stormwater fee. Owners of undeveloped property were not required to pay the fee. The fees collected were deposited into a fund for the exclusive use

in operating and maintaining a stormwater utility and storm-related services. The Court found that the fee was not a tax.

West Virginia's Supreme Court held similarly in *Shannon v. City of Hurricane*, 2012 W. Va. LEXIS 17. There, the court concluded that because the fee was used for the cost of maintaining the stormwater system it was not a tax.

Maine's Supreme Court reached the same result in *City of Lewiston v. Gladu*, 40 A.3d 964 (Me. 2012). In *Gladu*, the city sued the property owner for failure to pay stormwater fees between 2007 and 2010. The city had promulgated an ordinance in 2006 that authorized assessment and collection of stormwater management fees based on the impervious surface area of the property. The city ordinance mandated that the fees be kept separate from other municipal funds and used only to pay stormwater expenses. It also provided credits for properties that maintained their own collection and discharge system. Gladu owned a property containing a small shopping mall and parking lot that collected water in private storm drains that emptied into a stream that was part of the city's stormwater system. The Court considered four factors in deciding whether the fee was a tax:

1) whether the primary purpose is to raise revenue; (2) whether the assessment is "paid in exchange for exclusive benefits not received by the general public"; (3) whether the assessment is voluntary; and (4) whether the assessment is "a fair approximation of the cost to the government and the benefit to the individual of the services provided."

Id. at 967. The *Gladu* Court examined each factor and held that "the stormwater assessment is a fee and not a tax." *Id*. at 971. Citing a Washington Court of Appeals decision, *Tukwila School District No. 406 v. City of Tukwila*, 167 P.3d 1167 (Wash. Ct. App. 2007), the Court first concluded that the primary purpose of the fee was not to raise revenue but was for a regulatory purpose. It reasoned that providing funds to construct, replace, improve, repair and maintain stormwater facilities and relieve runoff and pollution problems created by impervious surfaces was a regulatory activity. *Id*. at 968.

As to the second factor, whether the fee confers a benefit beyond that provided to the public at large, the *Gladu* Court, relying on *McLeod*, *supra*, and *Sarasota*, *supra*, again determined that the factor weighed in favor of the fee not being a tax because it applied to developed properties and those properties received a special benefit of having stormwater managed in compliance with state and federal laws.

Regarding the voluntariness factor, the Court found *Church of Peace*, *supra*, persuasive and rejected the argument that the high costs of avoiding the assessment fee did not render it involuntary. It reasoned that the availability of credits was sufficient to make the fee voluntary. As to the last factor, whether the fee was a fair approximation of the cost to government, the court found that the financial records therein established that the "City's impervious surface-based fee system makes a 'fair approximation' of the benefit Gladu receives by having his stormwater managed and water quality protected." *Gladu*, *supra* at 971.

More recently, the Ohio Court of Appeals joined the majority of jurisdictions in finding that stormwater management fees are not taxes. *Steeplechase Vill., Ltd. v. City of Columbus*, 2020 Ohio App. LEXIS 4848. The *Steeplechase* Court set forth two tests for determining if a fee is a tax. It first outlined a four-factor test:

> (1) the assessment is "imposed in furtherance of regulatory measures to address a specified issue"; (2) the assessment is not placed in the general fund, but is used only to fund the specified purpose; (3) the assessment is "'imposed by a government in return for a service it provides'"; and (4) the assessment involves "a specific charge in return for a service * * *.

Id. at *22. In addition, it noted a three-factor analysis which looked to: "(1) the entity that imposes the assessment; (2) the parties upon whom the assessment is imposed; and (3) whether the assessment is expended for general public purposes, or used for the regulation or benefit of the parties upon whom the assessment is imposed." (internal quotations omitted). *Id*. at *23. It added,

> The classic "tax" is imposed by a legislature upon many, or all, citizens. It raises money, contributed to a general fund, and spent for the benefit of the entire community. * * * The classic "regulatory fee" is imposed by an agency upon those subject to its regulation. * * * It may serve regulatory purposes directly by, for example, deliberately discouraging particular conduct by making it more expensive. * * * Or, it may serve such purposes indirectly by, for example, raising money placed in a special fund to help defray the agency's regulation-related expenses.

Id.

The *Steeplechase* Court opined that under either the four-prong or three-prong tests that the fees imposed were not taxes. It first reasoned that the assessment was directed to the specific issue of maintaining and operating a stormwater system. Further, the fees were kept in a special stormwater fund and not a general fund and were used for operating the stormwater system only. Next, the court noted that the fees were imposed

by the government in return for a service it provided. Thus, it held that the stormwater fee was not a tax.

The Commonwealth Court below did not address or attempt to distinguish any of these cases. Instead, it chose to rely on a single outlier federal decision. However, more recent federal decisions have reached a contrary result: *Norfolk Southern Ry. v. City of Roanoke*, 916 F.3d 315 (4th Cir. 2019); *Homewood Vill., LLC v. Unified Gov't of Athens-Clarke Cnty.*, 132 F. Supp. 3d 1376 (M.D. Ga. 2015).

Recent Federal Decisions Have Also Determined that Stormwater Management Fees are not Taxes.

In addition to the weight of State court authority in support of the Borough's (and *Amicus*') position, the Fourth Circuit's decision in *City of Roanoke*, *supra*, provides persuasive authority in support of reversing the Commonwealth Court decision. There, the city in order to comply with state and federal stormwater regulations enacted an ordinance to manage stormwater. The city imposed a fee on property owners based on a parcel's impervious surface cover, which applied to "improved parcels." Owners could apply for and receive a credit based on installation of rain gardens or pervious asphalt. The revenue generated from the fee was placed into a

stormwater fund that could only be used for specifically delineated stormwater management purposes. *See id*. at 317-18.

The Fourth Circuit considered the *DeKalb* County decision, and found it unpersuasive. It reasoned that the "charge's purpose is more consistent with that of a fee than a tax, because the charge forms part of a comprehensive regulatory scheme." *Id*. at 321. It found that "the Clean Water Act's regulatory scheme now requires the City to take myriad concrete actions to reduce discharges and pollutant concentrations[.]" *Id*.; *see also Homewood Vill., LLC*, 132 F. Supp. 3d 1376.

Likewise, post-*DeKalb*, the Middle District Court of Georgia, also joined the majority of courts in finding that a stormwater management fee did not equate to a tax. There, the property owners alleged that the stormwater program did "not provide them with any benefit that is not shared by the general population." *Id*. at 1379. The local government had promulgated a stormwater management fee in order to fund its stormwater management program to prevent rainfall runoff from collecting pollutants and depositing them. The Court rejected the property owners' argument and found that "the Athens-Clarke stormwater ordinance imposes a user fee, not a tax[.]" *Id*. at 1381.

DeKalb, therefore, stands as a minority outlier among those jurisdictions to have examined this issue.

The Commonwealth Court Decision in Appeal of Best Homes DDJ, LLC.

The Commonwealth Court also reached a different conclusion than did the panel herein in a more recent decision. In *Appeal of Best Homes DDJ, LLC*, 2021 Pa. Cmmw. Unpub. LEXIS 667, the Commonwealth Court, despite citing the underlying case herein, still concluded that a stormwater fee was not a tax. That Court opined:

> there is no record evidence that the Authority's collected fees, which are based to a large extent upon the costs of providing the service, are unrelated to stormwater. Nor did Appellants establish that the Authority does not provide a discrete benefit to Appellants or that the value of the Authority to Appellants is not reasonably proportional to the amount of the fees. Accordingly, Appellants have failed to meet their burden of proving that the Authority's fees are, in actuality, revenue-raising taxes rather than valid fees. Thus, this Court concludes that the trial court did not err by determining that the Authority's assessed fee was not an impermissible tax.

Id. at *22. Thus, the Commonwealth Court has reached inconsistent results.

The underlying decision herein took a myopic view of "general benefits" and "specific benefits"--a view rejected by most courts. According to the court below, the stormwater system provided only a general benefit to the entire community and not any specific benefit to those responsible for

payment of the fee. However, other courts have reasoned that developed property owners do receive the specific benefit of having stormwater managed in compliance with federal and state regulations and laws--which they would otherwise have to do themselves at significant expense.

But even if the stormwater fee does not provide a specific benefit to the University, this is but one factor in determining whether a fee is more appropriately considered a tax. Instantly, the fee is not placed in a general fund and is used exclusively for the stormwater management program. The fee is not a general revenue source or measure. The fee instead defrays costs pertaining to regulatory compliance and is addressed to a specific regulatory purpose--and can only be used for specific purposes outlined in the Borough's Ordinance. The Commonwealth Court has historically determined that charges clearly aligned with a regulatory purpose were fees even if they did not fit completely within the analytical test currently used in Pennsylvania to distinguish a tax from a fee. *See, e.g. White v. Commonwealth Medical Professional Liability Catastophe Loss Fund,* 571 A.2d 9 (Pa. Cmwlth. 1990). These, as outlined below, are classic examples of a charge being considered a "fee".

Application of San Juan Cellular[2] Supports the Stormwater Management Fee Being Construed as a Fee.

The First Circuit Court of Appeals in *San Juan Cellular*, cited by the panel below, set forth principles that are consistent with and/or identical to the tests utilized by the various state and federal decisions discussed *supra*, in determining whether a fee is more properly characterized as a tax. That Court noted: "The classic "regulatory fee" is imposed by an agency upon those subject to its regulation." *San Juan Cellular Tel. Co. v. PSC*, 967 F.2d at 685. It added that such fee "may serve regulatory purposes directly by, for example, deliberately discouraging particular conduct by making it more expensive. Or, it may serve such purposes indirectly by, for example, raising money placed in a special fund to help defray the agency's regulation-related expenses." *Id*. The *San Juan Cellular* Court collected cases and noted that, "Courts facing cases that lie near the middle of this spectrum have tended (sometimes with minor differences reflecting the different statutes at issue) to emphasize the revenue's ultimate use, asking whether it provides a general benefit to the public, of a sort often financed by a general tax, or whether it provides more narrow benefits to regulated companies or defrays

[2] *San Juan Cellular Tel. Co. v. PSC*, 967 F.2d 683 (1st Cir. 1992).

the agency's costs of regulation." *Id*. In that case, a regulatory agency imposed the fee, placed the money into a special fund, and used it to defray specialized expenses and not for a general purpose. The *San Juan Cellular* Court therefore concluded that the fee was not a tax.

Instantly, while a regulatory agency does not impose the fee, it is placed in a special fund and is for the express purpose of defraying regulatory costs associated with a comprehensive regulatory scheme employed to comply with State and federal laws and regulations. *Cf. Head Money Cases*, 112 U.S. 580, 590 (1884). Thus, it bears the classic hallmarks of a fee--and not a tax.

CONCLUSION

Stormwater management fees like the one at issue are not taxes designed to raise general revenue. Instead, they are intended to defray costs associated with local governments efforts to comply with State and federal regulations and laws. The majority of State Courts that have addressed this issue have determined that stormwater management fees are not taxes and more recent federal law has joined in that consensus. The Commonwealth Court's reliance on a single outlier decision was misplaced. This Court should join with the majority of States and hold that stormwater

management fees like that imposed here are impact or user fees and not taxes.

Respectfully submitted,

TUCKER ARENSBERG, P.C.

s/J. Andrew Salemme
Kevin L. Hall, Esquire
PA ID No. 311826

Brian J. Murren, Esquire
PA ID No. 324567

J. Andrew Salemme, Esquire
PA ID No. 208257

Counsel for *Amicus*

CERTIFICATE OF WORD COMPLIANCE

I certify that, consistent with PA. R. APP. P. 531(b)(3), this brief consists of less than 7000 words.

TUCKER ARENSBERG, P.C.

/s/J. Andrew Salemme
J. Andrew Salemme
PA ID No. 208257