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School Law Review



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OCR Takes Issue with School Websites

Over the past year, the U.S. Department of Education’s Office for Civil Rights (OCR) has shown an increased focus on public school district websites. Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act (ADA) require that public school districts make their websites accessible to individuals with disabilities. After investigating a number of complaints, OCR ultimately concluded that school website content is often inaccessible to individuals with disabilities, particularly blind and visually impaired users, deaf or hard-of-hearing users, and users with disabilities that affect motor control and their ability to use a mouse.

In February and March of 2016, OCR reviewed complaints filed against 11 different educational organizations in the United States and in one U.S. territory, raising website accessibility issues under Section 504 and the ADA. Section 504 and the ADA require public school districts to provide individuals who have qualified disabilities with equal access to programs, services, and activities unless doing so would fundamentally alter the nature of the programs. OCR has indicated on numerous occasions that accommodations must be made to district websites and other online resources in accordance with Section 504 and the ADA.

The most common problems OCR identified with websites are as follows:

- Images with no accompanying text descriptions, or “alt tags”
- Navigation that requires the use of a mouse
- Videos that lack accompanying audio, transcript, or closed captioning
- Color combinations that make text difficult to read

On June 29, 2016, OCR announced that it had reached voluntary agreements with all 11 organizations, which now have 18 months to resolve the issues under the terms of the agreements. The agreements contained

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mandates such as development of corrective action plans, completion of a thorough audit to ensure access and functionality, adoption of policies and procedures to ensure accessibility to all content added in the future, and posting notices to disabled individuals that contain information on how an individual can request access to online information or inaccessible content, among other things.

“As schools, school districts, states, and territories turn to the Internet as a way to provide relevant and up-to-date information to their audiences in a cost-effective manner, they must make sure they are not inadvertently excluding people with disabilities from their online programs, services, and activities.”

Interestingly, the University of Montana conducted a student survey after receiving an OCR complaint in 2012 about web accessibility from students enrolled in online coursework. The survey results indicated that many of the complaints were caused by a misunderstanding or lack of awareness about available accessibility options. So, along with other ameliorative measures, the university invested resources to educate its student body about web accessibility. The university reached a formal resolution with OCR in 2014.

Catherine E. Lhamon, OCR’s Assistant Secretary for Civil Rights, weighed in on the matter when she stated, “As schools, school districts, states, and territories turn to the Internet as a way to provide relevant and up-to-date information to their audiences in a cost-effective manner, they must make sure they are not inadvertently excluding people with disabilities from their online programs, services, and activities.”

What This Means for Your District

OCR’s recent action on this important accommodations issue highlights the need for public school districts to conduct a formal review of their websites and social media programs to determine whether content is indeed accessible to individuals who suffer from disabilities. Along the same line, districts should regularly assess all types of technology use during school and extracurricular activities to further consider whether the chosen technologies interfere in any way with a disabled individual’s ability to access programs or participate in school activities. Likewise, board policies should be reviewed as part of this process. School districts are encouraged to consult with legal counsel to discuss the implications of this important topic and obtain resources that may further assist with compliance under Section 504 and the ADA.

ECOT in Hot Water over Attendance Practices

Ohio’s school districts and charter schools have been closely following the high-profile litigation matter between the Electronic Classroom of Tomorrow (ECOT) and the Ohio Department of Education (ODE). Millions of funding dollars are at stake – funding that is critical on both sides of the table. Below is a basic timeline of events surrounding this case.

- March: Legislators call on ODE to conduct ECOT attendance review in connection with state funding.
- June: ODE requests student log-in data from ECOT to determine attendance and corresponding funding.
- July: ECOT files suit against ODE in the Franklin County Court of Common Pleas, arguing that using log-in times to calculate attendance violates a 2003 funding agreement. Judge orders ECOT to comply with review.

- August: Court orders ECOT to provide ODE-requested records. ECOT parents join in lawsuit against ODE. ECOT argues that records of time spent offline learning are routinely destroyed so ODE must rely on teacher certifications. Judge denies ODE's request to dismiss case. Concurrent with the litigation, the General Assembly acts on legislation to ensure more accountability for online charter schools.
- September: ODE audit finds that ECOT overreported attendance numbers. Court holds preliminary injunction hearing. ECOT requests an immediate ruling to prohibit ODE from using log-in data to determine attendance. Judge denies request and says that ECOT is unlikely to succeed because it appears that the funding agreement only applied to the 2003–2004 school year.
- October: ECOT appeals the judge's decision but later withdraws the appeal. Both parties agree to allow the September hearing to be the final hearing and trial but reserve the right to appeal. The court decision is expected soon. Meanwhile, ODE recently released community school sponsor evaluations.

Teacher Fails to Report Abuse, Now Faces Civil Suit

J.T. was a student enrolled in a landscaping course in the Buckeye Joint Vocational School District. J.T.'s parents met with the landscaping class instructor, John Davis, because J.T. was being harassed, tormented, and threatened by another student. The parents expressed their concerns, and Davis assured them he would monitor the situation and ensure J.T.'s safety. After this, however, Davis took no further action.

Sometime after this meeting, Davis transported his landscaping students to his own residence, where they worked to landscape his yard. Among the students were both J.T. and the student who was allegedly tormenting him. While the students were working in Davis's yard, Davis left them unattended for a significant period of time. During this time, the aggressor attacked, battered, and physically assaulted J.T. J.T.'s skull was fractured, and he continues to suffer from permanent injuries.

J.T.'s parents sued the Buckeye Joint Vocational School District, the Buckeye Career Center, both boards of education, the teacher, and the attacker. Among other claims, they alleged a violation of R.C. 2151.421. The Complaint specifically stated that Davis, the districts, and the boards of education owed a statutory duty to report suspected child abuse and neglect, and that Davis had breached his duty by failing to timely and appropriately report child abuse. Davis, the districts, and the boards of education requested that the court immediately rule on the pleadings that they had statutory immunity from liability. The trial court rejected their request, and then the school defendants appealed.

On appeal, the boards of education claimed as a defense that the districts and board members were immune from liability under the law. Likewise, the board also argued that the teacher was being sued only in his official capacity and therefore should also be granted statutory immunity.

The appellate court agreed in part and granted immunity to the districts and boards of education. However, the court concluded that the teacher was being sued in his individual capacity and was therefore *not immune* from liability.

In reaching this conclusion, the court looked to R.C. 2744.03, which provides three exceptions to immunity for an employee of a political subdivision (in this case, the teacher, Davis):

1. The employee's actions are outside the scope of employment
2. The employee's actions are malicious, in bad faith, or wanton and reckless
3. Civil liability is "expressly imposed" by a section of the Ohio Revised Code

The court held that both the second and third of these exceptions clearly applied to Davis. The court determined that the Thompson's Complaint alleged sufficient facts that, if proven, could lead a reasonable person to conclude that Davis had acted in a wanton or reckless manner.

"Wanton misconduct" is the failure to exercise any care toward those to whom a duty of care is owed in circumstances in which there is great probability that harm will result. "Reckless conduct" is characterized by the conscious disregard of or indifference to a known or obvious risk of harm to another that is unreasonable under the circumstances and is substantially greater than negligent conduct.

Davis had been notified of the ongoing harassment and torment, and Davis further assured the Thompsons of J.T.'s safety. However, because Davis failed to report the harassment, torment, and threats and later transported the students to his residence where he failed to monitor them, the court held that the Thompsons had sufficiently alleged reckless and wanton disregard. Further, Davis placed J.T. in a situation with a great probability of harm by leaving him unattended with someone who was known to harass and torment him. The court determined that this conscious disregard to a known risk of harm was substantially greater than negligent conduct and was reckless.

Next, the appellate court held that civil liability could be "expressly imposed" on a school teacher or school employee by another section of the Ohio Revised Code, R.C. 2151.421, for failure to report child abuse. Finally, the court held that Davis was being sued in his individual capacity. Therefore, the teacher must now defend a civil suit in this case.

What This Means for Your District

School personnel should remember that qualified immunity is just that – qualified. Only when certain conditions are fulfilled is a public employee immune from litigation. School employees are mandatory reporters who should familiarize themselves with Ohio's child abuse reporting requirements. It is recommended that school districts provide district-wide training specifically to address this reporting obligation, including to whom abuse or neglect must be reported and how the reports must be made. Not only could district employees face possible civil damages for failure to report child abuse, but they could also risk their state-issued educator license being suspended or revoked as a result.

– *Thompson v. Buckeye Joint Vocational School District*, 2016-Ohio-2804

Function of SROs Is Safety and Security, Not Discipline

In an effort to improve school climates, ensure safety, and support student achievement, the U.S. Departments of Education and Justice issued joint "Dear Colleague" letters to states and school districts on the appropriate use of school resource officers (SROs) and the importance of well-designed SRO programs. The guidance called on education leaders to empower schools, educators, and staff to handle most disciplinary issues and to cease relying on SROs to enforce discipline policies and practices. The core message is that SROs exist to provide and improve safety and security – but not to discipline students.

"We must ensure that school discipline is being handled by trained educators, not by law enforcement officers."

The goal of the administrative communications is not to remove resource officers from schools. Both letters clearly noted that SROs fulfill critical roles as mentors, role models, and professionals who are present and engaged in

schools. Rather, the goal is to ensure that those who *do* discipline students – the educators – have the proper educational training, limit suspensions and expulsions, and work to create a trusting environment between students and administrators. “School staff and administrators should be well trained to address behavioral issues through a variety of corrective, nonpunitive interventions.”

As U.S. Secretary of Education John B. King Jr. said succinctly: “School resource officers can be valuable assets in creating a positive school environment and keeping kids safe. But we must ensure that school discipline is being handled by trained educators, not by law enforcement officers.” And to be clear, King said he wants to ensure that SROs “have no role in administering school discipline.”

To this end, the Justice and Education Departments collaborated to develop a rubric to assist districts in improving SRO policy. The Safe, School-based Enforcement through Collaboration, Understanding and Respect (SECURE) Rubric includes five common-sense action steps for schools with SROs:

1. Create sustainable partnerships and formalize memoranda of understanding (MOUs) among school districts, local law enforcement agencies, juvenile justice entities, and civil rights and community stakeholders.
2. Ensure that MOUs comply with constitutional and statutory civil rights requirements.
3. Recruit and hire effective SROs and school personnel.
4. Keep SROs and school personnel well trained.
5. Continually evaluate SROs and school personnel, and recognize good performance.

Going forward, federal funding for SROs will be contingent upon creation of MOUs, but the rubric is not mandatory. More information on the rubric, the Dear Colleague letters, and additional materials is available on the U.S. Department of Education [website](#). If you have concerns about how the rubric might be used, please consult your legal counsel.

Ethics on Gifts for the Public Employee

’Tis the season! ... the season to refresh public employees on ethics regarding gifts.

Ohio’s ethics laws are found in R.C. Chapter 102, in a number of statutes in the criminal code, and in other statutes regarding specific public officials. The Ohio Ethics Commission enforces noncriminal ethics laws.

R.C. Chapter 102 generally prohibits the use of official influence for personal gain. Chapter 102 is applicable to any “public official or employee” including any person elected or appointed to a public office or an employee of a public agency. Specifically excluded are teachers, instructors, professors, or any other educator whose position does not involve administrative or supervisory functions; however, these individuals are still subject to some prohibitions of Ohio’s ethics laws. Thus, Chapter 102 still applies to teachers acting as supervisors, assistant principals, assistant superintendents, or in other administrative or supervisory capacities. It also applies to athletic directors, coaches, superintendents, principals, nonteaching personnel, and school board members.

Specifically regarding gifts, board of education members and employees may not misuse their position with the board of education for their own personal benefit or the benefit of their immediate family members or business associates. Such individuals should neither solicit nor accept things of value from those parties they regulate or with whom they do business.

Small gifts, such as a book, a meal at a family restaurant, a promotional item, an inexpensive entertainment activity, and other things of nominal value, are not prohibited from being accepted. However, board members and

employees should guard against accepting multiple items of nominal value from the same source if the value of these items, added together, is substantial. Any board members or employees who are offered a gift, meal, entertainment, or other item should ask their supervisor or the board's legal counsel whether accepting such offer would violate this policy or the law.

Likewise, board members or employees should not accept anything of value from any source other than the board of education as compensation for the performance of their public duties. Compensation includes anything of value, such as wages, gifts, and travel expenses, provided to a board member or employee in exchange for a service.

Any board members or employees who are required by law to file a financial disclosure statement should keep complete records of any gifts and any meals, food or beverages, or travel expenses provided in connection with their public duties, including the source and amount of items provided, for later disclosure purposes.

Gifts may not:

- Be solicited
- Be of a substantial value
- Be from a prohibited source
- Be for the performance of public job duties

Gifts may:

- Be of nominal value
- Be small, promotional items
- Be from people with no relationship with the public office you serve

Other tips for a happy and compliant holiday season are available on the Ohio Ethics Commission website.

Supreme Court Docket: Hot-Topic Cases to Watch

The U.S. Supreme Court has accepted several education-related cases onto its docket for the current term. Below are highlights of these important cases.

Fry v. Napoleon Public Schools

Issue: Whether a school must permit a child with a disability to bring her service dog to school.

This case originated in the Sixth Circuit, which includes Ohio, Michigan, Kentucky, and Tennessee. A Michigan school district denied a five-year-old girl with cerebral palsy the right to bring her service dog, Wonder the goldendoodle, to school. The district contends that the student had a one-on-one aide who satisfied her needs, and both federal district court and the Sixth Circuit sided with the school district. The parents, however, say that the Handicapped Children's Protection Act of 1986 was designed to bar school districts from relying on the IDEA to excuse compliance with ADA or the Rehabilitation Act of 1973. This case was argued before the Supreme Court on October 31, 2016.

Star Athletica LLC v. Varsity Brands

Issue: Whether the design of stripes, chevrons, and zigzags may be copyrighted.

This is an intellectual property battle between two companies that design cheerleader uniforms for the school and college market. Upstart Star Athletica contends in its suit that industry leader Varsity Brands copyrights all manner of designs so that it can sue competitors for infringement, thus driving up the price of uniforms for schools and families. This case was argued before the Supreme Court on October 31, 2016.

Andrew F. v. Douglas County School District

Issue: The level of educational benefit that school districts must confer on children with disabilities to provide them with a free appropriate public education guaranteed by the Individuals with Disabilities Education Act.

The Supreme Court agreed on September 29 to hear this case, which involves a circuit split – different appellate courts have ruled differently on the same issue. The parents of an autistic child, unhappy with the school district's provision of services for their son, enrolled him in a private school and requested tuition reimbursement. In *Andrew v. Douglas*, the Tenth Circuit Court of Appeals ruled that schools must merely provide “some educational benefit”; other courts of appeals have ruled that schools must provide a “meaningful benefit,” while still other courts fall somewhere in the middle. The justices asked the federal government to weigh in earlier this year, and in a brief filed in August, the federal government recommended that review be granted. It urged the court to reverse the Tenth Circuit's ruling, which “is not consistent with the text, structure, or purpose of the IDEA ... and it has the effect of depriving children with disabilities of the benefits Congress has granted them by law.”

Lee v. Tam

Issue: Whether the disparagement provision of the Lanham Act is facially invalid under the Free Speech Clause of the First Amendment.

The Supreme Court agreed on September 29 to hear this intellectual property case involving registering trademarks such as mascots. The Lanham Act is found in 15 U.S.C. 1052(a) – no trademark shall be refused registration on account of its nature unless, among other things, it “[c]onsists of ... matter which may disparage ... persons, living or dead, institutions, beliefs, or national symbols, or bring them into contempt, or disrepute.” The lawsuit was filed by an Asian band member, whose band was not allowed to trademark its name, the Slants. This case has implications for mascots such as Warriors, Redskins, Chiefs, and others that are trademarked or seeking trademark.

Gloucester County School Board v. G.G.

Issues: (1) Whether courts should extend deference to an unpublished agency letter that, among other things, does not carry the force of law and was adopted in the context of the very dispute in which deference is sought; and (2) whether, with or without deference to the agency, the Department of Education's specific interpretation of Title IX and 34 C.F.R. § 106.33, which provides that a funding recipient providing sex-separated facilities must “generally treat transgender students consistent with their gender identity,” should be given effect.

The Supreme Court agreed on October 28 to hear this extremely high profile case in which transgender student G.G., who was born a girl but identifies as a boy, requested to use boys' bathroom to align with his gender identity. The date of oral arguments has not been set. We have previously addressed this case in prior newsletter articles and blog posts. We will continue to monitor this case closely and will provide clients with an update when a decision is released.

Upcoming Dates & Deadlines

As your school district prepares for the next couple of months, please keep in mind the following upcoming deadlines. For questions about these requirements, please contact an Ennis Britton attorney.

- **November 1:** Deadline for classroom teachers to develop online classroom lessons (“blizzard bags”) to make up hours for school closures (RC 3313.482)

- **November 1:** Deadline to submit [Kindergarten Readiness Assessment](#) data into KReady system
- **November 8:** Election day
- **November 8:** [EMIS supplementary graduation rate data](#) submission forms due to ODE
- **November 10:** Deadline to submit district foster care point of contact to [OEDS](#)
- **November 10:** Deadline to appeal [FY16 Graduate/Prepared for Success](#) EMIS data
- **November 30:** Deadline to apply for U.S. Department of Education's [Green Ribbon Schools](#)
- **December 31:** Last day for treasurers to canvass the board to establish a date of the organizational meeting (RC 3313.14)

Upcoming Presentations

2016–2017 ADMINISTRATOR'S ACADEMY SEMINAR SERIES

Tackling Issues in Student Discipline – Archive Available

September 29, 2016

School Employee Leave and Benefits Update

January 26, 2017

Live video webinar

Special Education Legal Update

April 20, 2017

Live seminars in Cincinnati and Cleveland

2016–2017 Education Law Year in Review

July 13, 2017

Live video webinar

Ennis Britton has listened to the valuable feedback from our clients! This year, we will offer the Administrator's Academy seminars in a different format from previous years. The September and April presentations will be provided at live seminar locations in both Cincinnati and Cleveland as well as in a live audio webinar option. The other two presentations will be offered via a live video webinar professionally produced by the Ohio State Bar Association. As always, we will offer an archive for all presentations.

Participants must be registered to attend each event. All four webinars will be archived for those who wish to access the event at a later time. You can register on our [website](#) or contact Hannah Reichle via [email](#) or phone at 614-705-1333.

OTHER UPCOMING PRESENTATIONS

November 13–16: OSBA Capital Conference

November 14: Teacher Termination and Nonrenewal Update – John Britton

November 14: The Specter of Bullying in Schools – Pamela Leist

November 14: Transgender Students in Schools – Erin Wessendorf-Wortman

November 15: School Law Workshop – Legal Issues for Today’s Hottest Tech Toys – Gary Stedronsky

November 15: Warren County ESC – Erin Wessendorf-Wortman

December 6: Brown County ESC & Southern Ohio ESC – Bill Deters and Jeremy Neff

Webinar Archives

Did you miss a past webinar or would you like to view a webinar again? If so, we are happy to provide that resource to you. To obtain a link to an archived presentation, contact Hannah Reichle via [email](#) or phone at 614-705-1333. Archived topics include the following:

- Managing Workplace Injuries and Leaves of Absence
- Special Education: Challenging Students, Challenging Parents
- Fostering Effective Working Relationships with Boosters
- Effective IEP Teams
- Cyberlaw
- FMLA, ADA, and Other Types of Leave
- Levies and Bonds
- OTES & OPES Trends and Hot Topics
- Tax Incentives
- Prior Written Notice
- Advanced Topics in School Finance
- Student Residency, Custody, and Homeless Students
- Student Discipline
- Media and Public Relations
- Gearing Up for Negotiations

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Want to stay up-to-date about important topics in school law?
Check out Ennis Britton’s [Education Law Blog](#).

Ennis Britton Practice Teams

At Ennis Britton, we have assembled a team of attorneys whose collective expertise enables us to handle the wide variety of issues that currently challenge school districts and local municipalities. From sensitive labor negotiations to complex real estate transactions, our attorneys can provide sound legal guidance that will keep your organization in a secure position.

When you have questions in general areas of education law, our team of attorneys help you make competent decisions quickly and efficiently. These areas include:

Labor & Employment Law

Student Education & Discipline

Board Policy & Representation

There are times when you have a question in a more specialized area of education or public law. In order to help you obtain legal support quickly in one of these areas of law, we have created topic-specific practice teams. These teams comprise attorneys who already have experience in and currently practice in these specialized areas.

Construction/Real Estate

Construction Contracts • Easements •
Land Purchases & Sales • Liens •
Mediations • Litigation

Team Members:

Ryan LaFlamme
Bronston McCord
Gary Stedronsky

Workers' Compensation

Administrative Hearings •
Court Appeals • Collaboration with TPAs •
General Advice

Team Members:

Ryan LaFlamme
Pam Leist
Giselle Spencer
Erin Wessendorf-Wortman

Special Education

Due Process Claims • IEPs • Change of
Placement • FAPE • IDEA • Section 504 •
any other topic related to Special Education

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John Britton
Bill Deters
Michael Fischer
Pam Leist
Jeremy Neff
Hollie Reedy
Giselle Spencer
Erin Wessendorf-Wortman
Megan Bair Zidian

School Finance

Taxes • School Levies •
Bonds • Board of Revision

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