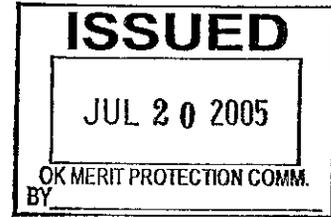


OKLAHOMA MERIT PROTECTION COMMISSION

STATE OF OKLAHOMA



A.M. COLEMAN, J.F. BERRY,
R.M. SUTTON, J.K. BYNUM,
and E.P GISSANDANER,

Appellants,

v.

OKLAHOMA DEPARTMENT
OF HUMAN SERVICES,

Appellee.

Case No. MPC 05-117
05-118
05-119
05-120
05-121

Final Order

The hearing on these consolidated cases was held over the course of three days on June 17, June 20, and June 24, 2005 at the offices of the Oklahoma Merit Protection Commission in Oklahoma City, OK. Appellants appeared in person and through their counsel, Thomas Prince, and Appellee appeared through counsel Richard Resetaritz and table representative Jean Derry, Director of Field Operations for the Oklahoma Department of Human Services. Throughout this Order, the Appellants will be referred to collectively as Appellants or by surname if individual reference is appropriate. Appellee will be referred to as DHS.

Appellants have alleged violations of the following:

- Okla. Stat. tit. 74, § 840-2.9
- OAC 455:10-19-46
- OAC 455:10-3-5
- OAC 530:10-3-2
- OAC 530:10-5-2
- OAC 530:10-5-3
- OAC 530:10-5-4
- OAC 530:10-5-34

At the hearing, sworn testimony of witnesses for both Appellants and DHS was presented, along with exhibits, which are incorporated by reference. After careful consideration of all evidence, testimony, and exhibits, I make the following findings of fact and conclusions of law, and enter the Order accordingly.

Findings of Fact

The Reorganization

In 1999, the Office of Personnel Management ("OPM") reorganized the system of classification of state job titles. Prior to the reclassification, Appellants' job classification was Senior Social Services Supervisor; after the reclassification, Appellants were placed in the Job Family Descriptor ("JFD") of County Director at level II, even though they did not have ultimate authority or responsibility for their counties. The function of their position before and after the 1999 reclassification was as assistant county director, or the person second in charge. OPM also placed the first in charge of the county in the JFD of County Director because OPM believed the tasks and purposes of both positions were related.

DHS objected to including those second in charge in the same JFD as those first in charge, but OPM would not permit DHS to make such a distinction. OPM's suggested resolution was to assign different working titles to distinguish on a day-to-day basis the ultimately-responsible county director from a non-ultimately responsible assistant county director. Thus were born the working titles of County Director and Assistant County Director, although both employees are formally considered County Directors by OPM by virtue of their JFD.

The Confusion Create by the Reorganization

Under the new system, DHS wound up with a broad JFD of County Director that included both the person with ultimate responsibility for a county, and the person or persons who were second in charge - the assistants - in the county. The title of County Director II ("CD II") consequently did not clearly denote the true functions or responsibilities for a person occupying that position. A CD II might be the County Director, or just as easily the Assistant County Director. OPM's inclusion of those second in charge with those first in charge in the JFD of County Director also required DHS to distinguish between County Directors acting as County Directors ("CD") and County Directors acting as Assistant County Directors ("ACD").

At all times, CD's were ultimately responsible for all programs and personnel within their respective counties. In contrast, at no time was any ACD ultimately responsible for any program or personnel within their respective counties. However, if a CD was away from the office for any of a variety of reasons, the ACD was in charge on a temporary basis until the CD returned. The nomenclature of County Director acting as County Director and County Director not acting as County Director created confusion among community members, clients and even staff with respect to who was in charge of a particular county office.¹

¹In effort to show that there is no significant or substantive difference in the positions of CD and ACD, one of the Appellants produced during the hearing a business card

The duties of a CD (as well as an ACD) are set forth in separate sections in a form called the OPM 111. Each particular group of duties is categorized as an "accountability" and a section immediately following then describes the actual performance of the employee's duties in that category. For example, representative (but not all) duties of a CD include (1) supervision of all personnel actions; (2) ensurance of delivery of all program services provided in that county; (3) service as principal spokesperson for the county; and (4) maintenance of the county's physical plant. As part of that first category of supervision of personnel actions, the CD signs off on the OPM 111 (otherwise known as the annual job evaluation) of the ACD because the CD is the ACD's immediate supervisor. (A person in the position of Area Director signs the OPM 111 and evaluates the CD.)

The OPM 111's of CD's and ACD's are similar in some respects, and intentionally so, because ACD's must function in a temporary CD role in the absence of the CD. Notwithstanding the similarities, though, the jobs are substantively and significantly different because of the difference in ultimate responsibility, and the OPM 111's reflect that ultimate difference. In other words, the buck stops at the desk of the CD but not at the desk of the ACD. All Appellants testified that they do not have ultimate or final responsibility in their respective counties, even though they consider themselves peers and colleagues with their CD's.

As part of the broad scope of responsibility of the CD, the CD may delegate certain tasks to an ACD. (However, an ACD cannot delegate tasks to a CD. The delegation and power flows only one way.) No Appellant disputed that the CD can delegate duties to the ACD and even change the work of the ACD based on particular needs of the county. The final and ultimate responsibility of the CD for all operations in the county is uncontested.

Nevertheless, the position of the ACD is critical to adequate and competent functioning of the county. The ACD is not a glorified secretary, not a personal assistant, and not an administrative assistant. The ACD occupies a critical managerial position that in turn supervises others within the county office, but at the same time, the ACD does not have ultimate responsibility for operations within the county. In addition, the pool of ACD's is that to which DHS looks to fill openings as CD's. Consequently, the ACD's not only

carrying the Appellant's name and the title of County Director II. Tellingly, the business card did not refer to the Appellant as County Director or Assistant County Director. Community members, clients, or other staff would have no way from the business card to distinguish between the scope of authority of a CD II who was a County Director functioning as a County Director, and a CD II who was functioning as an Assistant County Director. Clients or members of the public would have no understanding of JFD's, working titles, or any of the bureaucratic language used by OPM and DHS. The title on the business card only serves to further demonstrate the confusion that could be and sometimes was generated by combining positions with such different ultimate responsibilities in the same JFD.

participate in important management functions of the daily operations of the county, but they also comprise the training ground for new CD's.

DHS's Plan

This differential status between the CD and ACD has long historical roots in DHS, regardless of the titles used to describe the functions of the first in charge and the second in charge. DHS also has a history of low wages for managerial jobs that carry such great responsibility. In efforts to increase the compensation of CD's who carry ultimate responsibility for operations in their county, DHS had for some time been seeking ways to increase pay of CD's.² DHS had even undertaken market research in Oklahoma and surrounding states to assess pay levels of corresponding first-in-charge administrators in social service agencies; the results of the market research showed DHS trailing. As long as CD's remain in the classified service under the Merit Protection Rules, raises can only be given at the approval of the legislature. DHS determined that the only way to obtain salary increases for CD's and to compensate them for their high level of responsibility was to place them in the unclassified service where they would serve as employees at will without the protection of the Merit Protection Rules. Transfer from the classified service to the unclassified service would serve DHS's goals of rewarding first-in-charge CD's with more money, being able to hold them accountable for the performance of their county, and streamlining the disciplinary process if they could not meet high performance standards.

The Offer

On October 1, 2003, DHS extended an offer ("the Offer") to all first-in-charge County Directors - otherwise referred to as County Directors serving as County Directors - to leave the classified service and move to the unclassified service in a position called, appropriately enough, County Director (unclassified). All but one chose to do so.³ The Offer did not initially include a pay raise, but DHS stated its intent to attempt to raise the unclassified CD's salaries at the beginning of the next fiscal year on July 1, 2004. The raise was subsequently granted in the new fiscal year, but at the time of the Offer, no promise was made.

In the Offer, DHS announced that County Director positions functioning as primary County Directors, or those first in charge, would be transferred to the unclassified service as the positions were vacated. In other words, DHS announced its intent to move all first-in-charge County Directors to the unclassified service, without requiring any current first-in-charge County Directors to leave the classified service. DHS made clear its intent to phase out the classified first-in-charge County Director positions as they were vacated.

²DHS had also recognized the need to increase the pay for ACD's, but had approached the process by first addressing the pay and accountability of the CD's.

³The one who declined is a black male.

The Offer was not extended to second-in-charge County Directors, and herein lies the rub of the entire case. The ACD's allege that the Offer had a discriminatory impact because, although the Offer did not intentionally discriminate on the basis of race or gender, proportionately more CD's were White and proportionately more ACD's were not White.

There was some discrepancy in the testimony about the numbers of employees in the respective job classifications, but not enough to alter the conclusions. At the time of the Offer, there were 65 first-in-charge County Directors, of which 5 were Black and 57 were White, which means that 8.7% were Black. There were also 16 second-in-charge County Directors, of whom 9 were Black and 7 were White, which means that 56% were Black. Of all 81 persons in the JFD of County Director, 64 were White and 19 were non-White, which means that 23% were non-White.⁴

At the time of the Offer, there were 44 females in the JFD of County Director and 23 males, which means that 65% of those in the JFD of County Director were female. Of the second-in-charge County Directors, 10 were female and 6 were male, which means that 63% were female. During the hearing, allegations of gender discrimination were abandoned by Appellants.

The Grievance

When Appellants learned that they were not included in the Offer, they filed a group grievance on July 29, 2004, alleging discrimination on the basis of race and gender. A description of the racial and gender status of the Appellants follows:

Alberta Coleman	Black Female
Jennie Berry	Black Female
Rosa Sutton	Black Female
Janis Bynum	White Female
Eugene Gissandaner	Black Male

The grievance alleged discriminatory conduct on the basis of race and gender under the provisions identified above. The grievance was investigated by Roger Scott, an investigator employed by DHS. Scott's conclusion that the Offer to the first-in-charge CD's had a discriminatory impact on the Appellants was based in large part on the fact that the OPM-111's of the CD's and ACD's were similar. While he acknowledged DHS's stated reasons of business necessity for the action taken, he did not provide analysis for his

⁴Native Americans are considered by DHS as non-White.

conclusion that the Offer created a discriminatory impact on the ACD's. Instead, he relied on paperwork rather than actual job functions and responsibilities to conclude that the jobs were similar enough to be considered in tandem. He recommended that the Appellants' grievance be granted in whole.

The Resolution

As the Step Two Decision Maker, Farilyn Ballard responded to Appellants on October 27, 2004, describing a new unclassified JFD for Assistant County Director that had been created for the Appellants and all other second-in-charge CD's. OPM set the compensation at salary band M, the band within which all Appellants were then compensated. Appellants would be permitted to resign from the classified service to enter the unclassified service as ACD (unclassified) at the minimum salary of \$3,600 or a 5% pay raise, whichever was greater.

Appellants rejected the proposed resolution (or counteroffer), instead requesting that they be permitted to remain in the classified service with a salary increase of \$650/month retroactive to the date of exclusion. Ballard explained in her letter to Appellants that OPM had determined that classified ACD's belonged in pay band M, the band within which all Appellants were currently paid, and that thus no salary increase was available while the Appellants remained classified. Although Ballard's counteroffer was accepted by other second-in-charge CD's to move from the classified service to the unclassified service in the new JFD of ACD (unclassified), Appellants declined to accept Ballard's counteroffer and filed this appeal with OMPC alleging violation of Okla. Stat. tit. 74, § 840-2.9(a), including race and gender discrimination, along with the other alleged violations stated above.

The Statistics

Statistics are slippery territory, as recognized by authors diverse as Benjamin Disraeli and Mark Twain, not to mention myriad court decisions. Because disparate impact cases do not require a showing of intent, alleged discrimination in disparate impact cases may under some circumstances be demonstrated by statistical evidence. In this case, DHS offered testimony from an expert in statistics, Kenneth Kickam, that the sample size at issue of 65 CD's and 16 ACD's is simply too small from which to draw any valid or reliable conclusions about disparate impact based on race. He stated that although the raw numbers showed that Blacks received the Offer at less than 80% of the rate that Whites received the Offer, the sample size was still too small to draw any valid or reliable conclusions. A sample size of at least 200 is the minimal size necessary to draw any reliable inferences. Appellants offered no expert testimony of their own on the statistical issue. Mr. Kickam's opinion about lack of validity of the 80% marker (also called the 4/5th's Rule) based on such a small sample drawn from such a large pool is sufficient evidence to conclude that use of statistics in this instance yields neither valid nor reliable results.

In sum, Appellants argued that because their OPM 111's are similar to the OPM 111's of the CD's, they should have received the same Offer. They further argue that

failure by DHS to select them for the Offer invokes the 4/5th's rule because more than 80% of Whites received the Offer, but fewer than 40% of Blacks received the Offer. DHS argues that there was no "selection" in the first place because CD's and ACD's are not comparable positions, but more akin to apples and oranges, in the words of this author.

I am persuaded of the difference and so find based on the overwhelming and undisputed testimony that CD's have ultimate responsibility for all operations in their county, while ACD's do not. In fact, I am persuaded that not only are the jobs different, but that they are substantially enough different that when DHS extended the Offer to CD's, there was no impact created on the ACD's. In other words, there was no selection at all. The fact that OPM places ACD's and CD's in the same JFD of County Director elevates form over substance. Yes, there are similarities in the OPM 111's, but fundamental differences in the ultimate responsibility of the two positions outweigh similarities for the purpose of disparate impact review. But even assuming *arguendo* that there was an impact, DHS has shown business necessity for its actions.

Conclusions of Law⁵

Clarification of OMPC Jurisdiction

Appellants have alleged numerous violations, including violation of an Oklahoma statute, OMPC administrative rules, and OPM administrative rules. The consolidated cases come to OMPC as an appeal alleging race and gender discrimination in DHS's resolution of their group grievance. To that extent, the OMPC has jurisdiction to determine whether the resolution of the group grievance violated any of the Appellants' rights to be free from race and/or gender discrimination. See OAC 455:10-19-46. However, the issues on appeal "shall be limited to those raised in the formal grievance or discovered during the internal agency grievance process *over which the Commission has jurisdiction.*" OAC 455:10-19-46(c)(emphasis supplied).

I am not persuaded that an Administrative Law Judge for the OMPC has jurisdiction to mediate disputes between OPM and DHS with respect to job classification. Appellants' allegations of violations of OAC 530:10-5-2, 10-5-3, 10-5-4 and 10-5-34 tread closer to the line of that distinction that I believe my authority permits. The OMPC rules specifically provide that "[a]gency classification and reclassification decisions shall not be subject to appeal to the Oklahoma Merit Protection Commission. An employee may allege a violation of any law or rule over which the Commission [OMPC] has jurisdiction in the classification or reclassification process pursuant to OAC 455:10-3-3." OAC 455:10-19-35(c)(5)(emphasis supplied).

⁵Any findings of fact that are properly conclusions of law are so incorporated as conclusions of law. The Oklahoma Merit Protection Commission has jurisdiction over the parties and subject matter in this appeal.

Thus, the provision in OAC 455:10-3-3 is applicable in this case insofar as it grants jurisdiction to the OMPC over alleged violations of discrimination or whistleblowing, and this Final Order should not be construed as a determination on the merits of any alleged conduct by OPM pursuant to OAC Title 530. This Final Order is limited entirely to the allegations made by Appellants that the Resolution offered to them by Farilyn Ballard discriminated against them on the basis of race and gender under the disparate impact theory of Title VII. See OAC 455:10-3-5(c). *The only legal issue to be decided is whether DHS's resolution of the Appellants' grievance resulted in an impermissible disparate impact based on race and/or gender.*

Disparate Impact Analysis

Under Title IV, the federal statute that prohibits race and gender discrimination in the workplace, discrimination may be proved by either of two ways. First, a plaintiff may prove that an employer intentionally treated him differently on the basis of race through a series of burden-shifting steps set forth in McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973). Those are called disparate treatment cases. In the alternative, a plaintiff may prove that an employer discriminated unintentionally if a policy or practice has an unintended discriminatory impact on a minority group. Griggs v. Duke Power Co., 401 U.S. 424 (1971). "The factual issues and the character of the evidence are inevitably somewhat different when the plaintiff is exempted from the need to prove intentional discrimination." Watson v. Fort Worth Bank & Trust, 487 U.S. 977 (1988). Those are called disparate impact cases, and the instant case concerns allegations made under the latter theory of Title VII jurisprudence.

"To establish a prima facie case of disparate impact discrimination, plaintiffs must show that a specific identifiable employment practice or policy caused a significant disparate impact on a protected group." Ortega v. Safeway Stores, Inc., 943 F.2d 1230, 1242 (10th Cir. 1991). This proof is often made in the form of statistical evidence, but mere demonstration of statistical differences is insufficient to establish the prima facie case. Watson, 487 U.S. at 994. The plaintiff must also show causation, linking the practice in question to exclusion of the protected group. Watson, 487 U.S. at 994. No rigid mathematical formula is required, but it must simply be "sufficiently significant" to raise an inference of causation. Id. Courts and defendants are not obligated to take plaintiff's statistical evidence at face value, but may question it through impeachment, rebuttal with other evidence, or disparagement in briefs and arguments. Id. at 996. The Court in Watson mentioned several ways that a plaintiff's statistical evidence might be found lacking, including small or incomplete data sample size, inadequate statistical techniques, or statistics based on an applicant pool containing individuals lacking qualifications for the job. Id. at 996.

Once a plaintiff has made a prima facie case, the defendant/employer must produce evidence of business justification for the challenged practice. Ortega, 943 F.2d at 1243. However, the burden of persuasion at all times remains with the plaintiff. Id. at 1243-44. When defending statistical evidence, employers are not required to introduce formal

validation studies. Watson, 487 U.S. at 998. Instead, especially when “in the context of subjective or discretionary employment decisions, the employer will often find it easier than in the case of standardized tests to produce evidence of a ‘manifest relationship to the employment in question.’” Id. The Watson Court cautioned that “courts are generally less competent than employers to restructure business practices, and unless mandated to do so by Congress they should not attempt it.” Id. at 999, *quoting Furnco Constr. Corp. v. Waters*, 438 U.S. 567, 578 (1978).

After the employer has shown business necessity, the plaintiff must “show that other tests or selection devices, without a similarly undesirable racial effect, would also serve the employer’s legitimate interest in efficient and trustworthy workmanship.” Watson, 487 U.S. at 998. “Factors such as the cost or other burdens of proposed alternative selection devices are relevant in determining whether they would be equally effective as the challenged practice in serving the employer’s legitimate business goals.” Id. However, equal effectiveness may be difficult for a plaintiff to prove. Ortega, 943 F.2d at 1244. Courts should be cautious before mandating that an employer adopt a plaintiff’s alternative selection practice in response to disparate impact allegations. *See Ortega*, 943 F.2d at 1244.

The Arguments

In the context of this framework, Appellants have alleged that DHS’s Offer to first-in-charge County Directors (CD’s) to move to the unclassified service, and the accompanying pay raise on July 1, 2004, without an offer to second-in-charge Assistant County Directors (ACD’s) to move to the unclassified service with a pay raise, constituted racial discrimination under Okla. Stat. tit. 74, § 840-2.9 because the “selection rate” for Black ACD’s is less than 80% of the selection rate for Black CD’s. They also allege that Farilyn Ballard’s resolution violated § 840-2.9 because it did not include retroactive pay.

In support of drawing such inferences about a group of 16 people who occupy different jobs than the 65 others with whom they want to be included, Appellants rely on Pegues v. Mississippi State Employment Serv., 699 F.2d 760 (5th Cir. 1983). Their reliance is misplaced, however, because even that court recognized that statistical evidence has less probative value where the sample size is small. Id. at 769. Although the court in Pegues permitted use of small sample size, it did so in consideration that the county at issue was predominantly Black and suffering from “displacement of black agricultural workers following the mechanization of farm labor in the 1960’s....” Id. at 772. Other legal authorities cited by Appellants have permitted use of small sample sizes, but in factually distinguishable contexts such as administration of tests. *See Bunch v. Bullard*, 795 F.2d 384 (5th Cir. 1986).

The Legal Consequences

As a matter of law, Appellants have not demonstrated a policy or practice taken by DHS that has a discriminatory impact on them. DHS made the Offer to first-in-charge CD’s

to move to the unclassified service. To conclude that the Offer created a discriminatory impact requires a distorted and unwarranted comparison of the two groups. The first-in-charge CD's carry far different and far greater responsibility than do the second-in-charge CD's. Consequently, the second-in-charge CD's have not shown that they were on comparable footing or similarly situated as the first-in-charge CD's. As the Court in Watson pointed out, comparison to a group with different or inadequate qualifications⁶ may doom a plaintiff's prima facie case. Thus, DHS's Offer to the first-in-charge CD's did not act as a policy, practice, or procedure that produced any selection.

However, even assuming *arguendo* that the Offer did constitute a selection, Appellants' case fails for several independent reasons. First, their statistical evidence is drawn from a sample size too small to infer racial discrimination. DHS is a very large agency employing hundreds (if not thousands) of employees, and at issue here are at the very most 82 employees. Inference of racial discrimination based on a sample size so small is not valid or reliable, regardless of the 4/5th's Rule.

Second, even assuming *arguendo* that there was a selection and that the 4/5th's Rule was met, DHS has demonstrated more than sufficient and substantial business necessity for its Offer to the first-in-charge CD's. Those persons shoulder the ultimate responsibility of all operations within their counties, unlike the second-in-charge CD's whose job is to act as Assistant County Director. DHS has historically regarded the positions as separate, and combined them under protest in the same Job Family Descriptor only at the behest of OPM.

Blurring of the difference of the two positions undermines the authority of the first-in-charge CD who is ultimately accountable for all operations in that county. The buck cannot stop at several *lateral* desks in a hierarchy. Employees, clients, community leaders, and even the courts are entitled to know the chain of command within an agency that delivers such wide-ranging services. Responsibility that is blurred is responsibility that is shunned. DHS has every right, and indeed a duty, to identify leaders within its management structure and to hold them accountable. For me to intervene in DHS's decision-making process in deciding whom to hold ultimately accountable at the county level would be over-reaching and beyond the purview of the role of an adjudicator. Such would be precisely a course that the United States Supreme Court counseled against in Watson.

Third, Ballard's resolution offered Appellants the opportunity to move to the unclassified service as Assistant County Directors (unclassified) with a pay increase. Several other second-in-charge CD's accepted Ballard's counteroffer, although the Appellants declined. Appellants' request to remain in the classified service and to also

⁶No implication is made or intended that the Appellants were not qualified as ACD's. They are all indeed qualified and bring a wealth of experience in social service delivery to DHS. Nevertheless, they are not "qualified" as first-in-charge CD's because they are not ultimately responsible for operations within their counties.

receive a retroactive pay raise is not only unreasonable but impossible. Absent a finding of unlawful discrimination and an order from the Court, pay raises cannot be made retroactively. Employees in the classified service receive pay raises by the legislature based on OPM classifications.

Appellants had the opportunity to move to the unclassified service, but have declined to do so. They argue that they have been given half a loaf rather than a whole loaf, but they have used the wrong yardstick because their lack of ultimate responsibility changes the measurements. They are paid less than first-in-charge CD's because they do not have ultimate responsibilities, although some of their other duties are similar. However, the key difference of ultimate responsibility draws a bright line that more than justifies DHS's actions as business necessity.

DHS's stated goals were to give a pay increase to first-in-charge CD's, to hold them more closely accountable for operations in their respective counties, and to be able to more quickly discipline or remove them if performance were found lacking. Moving these positions to the unclassified service is compatible with these goals, and in fact, is the only way to obtain these goals within a feasible time frame. The goals are imminently reasonable ones to expect of a person with ultimate responsibility for all operations of a county office. Appellants have shown no way that DHS could achieve these legitimate goals, while also granting Appellants' grievance, without placing a significant and substantial burden on the internal structure of DHS and its ability to manage delivery of services.

Conclusion

In conclusion, Appellants have not demonstrated that DHS made a selection. The groups with the working titles of CD and ACD are fundamentally different and not comparable because CD's have ultimate responsibility for their counties and ACD's do not. Thus, CD's are subject to a level of ultimate responsibility that ACD's are not.

Even if DHS's Offer to the first-in-charge CD's constituted a selection, the selection rate was not statistically significant for race because the sample size was too small. DHS is not *required* to comply with the 4/5th's Rule, as the Court in Watson observed. Moreover, DHS has demonstrated a more than sufficient business necessity for its actions, even assuming that a selection was made and that the 4/5th's Rule was met.

DHS did not violate Okla. Stat. tit. 74, § 840-2.9 in its resolution of the Appellants' grievance; DHS did not discriminate on the basis of race; and thus, the Appellants' appeal to the OMPC is DENIED.

The appeal is also DENIED on the basis of gender because those allegations were abandoned during the hearing.

IT IS SO ORDERED this ____ day of July, 2005.



Maribob L. Lee, OBA #11902
Administrative Law Judge
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