

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
CIVIL DIVISION

THE PITTSBURGH WATER AND SEWER AUTHORITY  
Appellant/Plaintiff

v.

No: SA -17 - 000486

ALLEGHENY COUNTY HEALTH DEPARTMENT  
Appellee/Defendant

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CLERK OF COURT

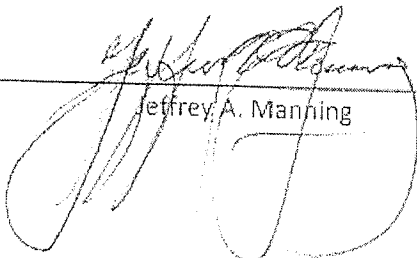
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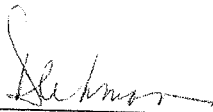
TO: MAX SLATER

You are hereby ordered to file in the Allegheny County Department of Court Records, Civil/Family Division, the entire record or certified copies thereof, together with a copy of this Writ, concerning the above-captioned appeal within twenty (20) days from service of this Writ.

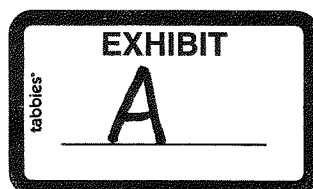
WITNESS the Honorable Jeffrey A. Manning, President Judge of the Court of Common Pleas of Allegheny County, this 6th day of MAY 2017.

BY THE COURT:

  
\_\_\_\_\_, P.J.  
Jeffrey A. Manning

  
\_\_\_\_\_  
Clerk

Revised 1/30/16



IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

THE PITTSBURGH WATER AND  
SEWER AUTHORITY,

Appellant,

v.

ALLEGHENY COUNTY  
HEALTH DEPARTMENT,

Appellee.

CIVIL DIVISION

No. SA-17-

486

**NOTICE OF STATUTORY APPEAL**

Filed on behalf of Appellant,  
The Pittsburgh Water and Sewer Authority

Counsel of Record for this Party:

Mark F. Nowak, Esquire  
Pa. I.D. No. 37474

Danny P. Cerrone, Jr., Esquire  
Pa. I.D. No. 201091

Samuel A. Hornak, Esquire  
Pa. I.D. No. 312360

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CLERK OF COURT  
ALLEGHENY COUNTY  
COURTHOUSE  
301 GRANT STREET  
PITTSBURGH, PA 15219

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SA-17-000486

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

CIVIL DIVISION

THE PITTSBURGH WATER AND  
SEWER AUTHORITY,

No. SA-17-

Appellant,

v.

ALLEGHENY COUNTY  
HEALTH DEPARTMENT,

Appellee.

**NOTICE OF STATUTORY APPEAL**

AND NOW comes the Appellant, The Pittsburgh Water and Sewer Authority (the “PWSA”), by and through its counsel, and files the within Notice of Statutory Appeal as follows:

1. The PWSA is a municipal authority that operates a public sewer system that serves, among other areas, certain areas in the City of Pittsburgh, Pennsylvania.
2. On August 10, 2016, the Allegheny County Health Department (the “ACHD”) sent a letter (the “Letter”) to the PWSA, stating that sewage is discharging behind the property located at 2625 Brownsville Road in the City of Pittsburgh, Pennsylvania (the “Property”). A true and correct copy of the Letter is attached hereto as Exhibit A.
3. The Letter stated that, on January 1, 2016 and July 26, 2016, the ACHD viewed sewage emanating from a sewer line behind the Property (the “Sewer Line”).
4. The Letter stated that the sewer line is part of the PWSA system and that the continuing discharge of sewage constituted a violation of the Pennsylvania Clean Streams Law,

Sections 201 and 202, and the ACHD Rules and Regulations, Article XIV, Sections 1404.1 B, C, E and 1404.2.

5. On August 19, 2016, the PWSA filed a Notice of Appeal in response to the Letter, stating that the Sewer Line is private and not part of the PWSA's sewer system. A true and correct copy of the Notice of Appeal is attached hereto as Exhibit B.

6. Further, the PWSA's Notice of Appeal stated that the PWSA does not own, operate or maintain the Sewer Line and that the Letter unlawfully directs the PWSA to take certain actions that the PWSA cannot, by law, undertake.

7. On February 7, 2017, a hearing was held before Administrative Hearing Officer Max Slater.

8. At the hearing, the PWSA presented uncontroverted evidence that the sewer line is a private line and not part of the PWSA system.

9. The ACHD did not present any evidence to contradict the PWSA's evidence.

10. On May 18, 2017, Hearing Officer Slater issued an Administrative Decision, finding that the Sewer Line is public and that the PWSA is responsible for repairing and maintaining the Sewer Line. A true and correct copy of the Administrative Decision is attached hereto as Exhibit C.

11. The PWSA does not own, operate or maintain the Sewer Line.

12. The City and the PWSA entered into a Capital Lease Agreement, dated July 15, 1995, whereby the City agreed to demise and let to the PWSA, and the PWSA agreed to take and lease from the City, the entire network of water and sewage transmission pipelines as detailed in the City's engineering maps.

13. The PWSA only agreed to lease, and thereby operate and maintain, City-owned water and sewage transmission lines.

14. The PWSA did not agree to lease, operate or maintain privately-owned water or sewage lines.

15. Pursuant to the PWSA Rules and Regulations, Section 605.1, "Ownership of Sewer Laterals serving Residential Property and Business Use Property, up to and including the connection of the Sewer Lateral to the Sewer Main, lies with the property Owner. The property Owner is responsible for the operation, inspection, maintenance, repair, replacement, abandonment, and removal of the Sewer Lateral as so described."

16. Privately owned sewer lines, commonly referred to as sewer laterals, are the possession of private owners and such private owners are responsible for the maintenance of the sewer laterals. *See* PWSA Rules and Regulations §605.1.

17. The Sewer Line is a private sewer lateral because: (a) the Sewer Lateral was never dedicated to the City of Pittsburgh (and, therefore, the PWSA did not assume the Sewer Lateral under the Capital Lease Agreement between the PWSA and the City of Pittsburgh), (b) the Sewer Line was marked as private on the City of Pittsburgh's records (now the PWSA's records), (c) the Sewer Line is not in the public right-of-way, and (d) there is no easement related to the Sewer Line (even though there are easements for other public utilities).

18. The Administrative Decision improperly directs the PWSA to take certain actions that the PWSA cannot, by law, undertake.

19. The Administrative Decision contains an improper recitation of facts, including but not limited to the fact that the ACHD did not offer any evidence for the proposition that the sewer line is public.

20. The Administrative Decision improperly directs the PWSA to take actions with respect to conditions (a) caused by third parties over which the PWSA does not have control, (b) caused by events that are beyond the reasonable control of the PWSA, and (c) caused by a sewer lateral that is owned, operated or maintained by third parties, and not by the PWSA.

21. The Hearing Officer acted beyond the scope of his authority in attempting to determine the ownership of the Sewer Line and lacks the authority to enter the Administrative Decision.

22. The Administrative Decision is improper insofar as it addresses matters beyond the scope of the Letter.

23. The Administrative Decision is improper insofar as it directs the PWSA to undertake activities that can result in criminal or civil penalties to the PWSA, including potential claims for trespass.

24. ACHD failed to join all parties necessary for resolution of the issues that are the subject matter of the Letter.

25. The portions of the ACHD Rules and Regulations cited in the Letter as violations are enabling provisions and do not contain any substantive requirements.

26. The Administrative Decision is otherwise arbitrary, unreasonable, an abuse of discretion, and contrary to law.

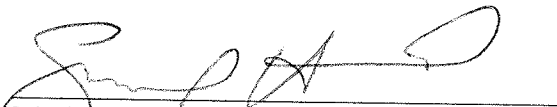
27. The PWSA has exhausted all administrative remedies available to it prior to the commencement of the instant appeal.

28. Through the instant Notice of Statutory Appeal, the PWSA timely appeals the ACHD's Administrative Decision.

WHEREFORE, the PWSA hereby appeals the ACHD's May 18, 2017 administrative decision.

Respectfully submitted,

Dated: June 5, 2017

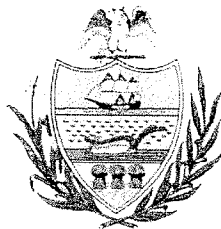


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Danny P. Cerrone, Jr., Esquire  
Pa. I.D. No. 201091  
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*Attorneys for Appellant,  
The Pittsburgh Water and Sewer Authority*

COUNTY OF



ALLEGHENY

RICH FITZGERALD  
COUNTY EXECUTIVE

August 10, 2016

Pittsburgh Water & Sewer Authority  
Penn Liberty Plaza I  
1200 Penn Avenue  
Pittsburgh, PA 15222

ATTENTION: David L. Donahoe, Interim Executive Director  
Rick Obermeier, Director of Sewer Operations

RE: SEWERAGE  
SEWAGE DISCHARGE  
BEHIND 2625 BROWNSVILLE ROAD  
CITY OF PITTSBURGH  
SERVICE REQUEST NO. 16-093

Dear Sirs:

In January 2016 this Department's Plumbing Inspection Program received a citizen's complaint of a sewage discharge at the rear of 2625 Brownsville Road, in the City of Pittsburgh. Investigations by the Department on January 7, 2016 and July 26, 2016 confirmed that sewage is discharging through a retaining wall at that location. The sewage originates from a sanitary sewer directly behind the subject property.

Pittsburgh Water & Sewer Authority (PWSA) maps of its public sewer system include the sewer line behind 2625 Brownsville Road as part of PWSA's system. Carrick Borough (the owner of sewers in this area prior to annexation by the City of Pittsburgh) maps of this area also include the line behind 2625 Brownsville Road as part of the public sewer system.

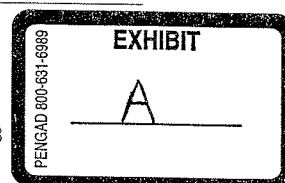
Please be advised that this discharge of sewage is in violation of the Pennsylvania Clean Streams Law, approved June 22, 1937, P.L. 1987, Sections 201 and 202, as amended; and of the Allegheny County Health Department's Rules and Regulations, Article XIV, "Sewage Management", as amended, Sections 1404.1 B, C, E, G and 1404.2.

This discharge constitutes a health hazard as determined by this Department. Under the authority vested in this Department by Section 12 of the Local Health Administration Law, Act 315 of 1951, P.L. 1304, PWSA is hereby ORDERED to submit to this office in writing by August 26, 2016 a plan and schedule for eliminating this sewage discharge.



KAREN HACKER, MD. MPH. DIRECTOR  
ALLEGHENY COUNTY HEALTH DEPARTMENT

PUBLIC DRINKING WATER AND WASTE MANAGEMENT PROGRAM  
3901 PENN AVENUE • BUILDING 5 • PITTSBURGH, PA 15224-1318  
PHONE: 412.578.8040 • FAX: 412.578.8053 • WWW.ACHD.NET



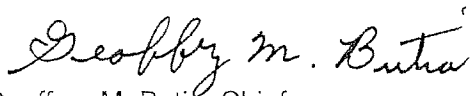


Pittsburgh Water & Sewer Authority  
RE: Service Request No.16-093  
August 10, 2016  
Page 2

Pursuant to Article XI, entitled "Hearings and Appeals", you are hereby notified that you have ten (10) days in which to file an appeal from the date of this Order. The notice of appeal shall be filed in the Office of the Director, 542 Fourth Avenue, Pittsburgh, Pennsylvania 15219. In the event that an appeal is not filed within ten (10) days from the date of this Order, the within action shall become final.

If you have any questions, please contact Norma M Ruffing at 412-578-8040.

Sincerely,

Handwritten signature of Geoffrey M. Butia in cursive script.

Geoffrey M. Butia, Chief  
Public Drinking Water and Waste Management

GMB/ge

CC: PA DEP  
Kevin Halloran, PA DEP Clean Water  
City of Pittsburgh  
Michael Como, ACHD Plumbing Inspection

# CLARK HILL

---

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August 19, 2016

## VIA HAND DELIVERY

Allegheny County Health Department  
Office of the Director  
542 Fourth Avenue  
Pittsburgh, PA 15219

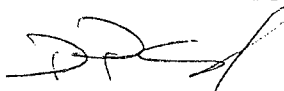
Re: 2625 Brownsville Road  
Notice of Appeal

To Whom it May Concern:

The Pittsburgh Water and Sewer Authority hereby files the enclosed Notice of Appeal to the August 10, 2016 letter from Geoffrey M. Butia of the Allegheny County Health Department.

Very truly yours,

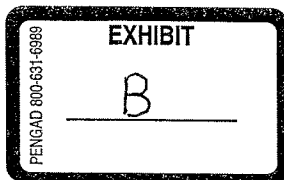
CLARK HILL PLC



Danny P. Cerrone, Jr.

DPC/tjr  
Enclosure

cc: Geoffrey M. Butia (w/Enclosure, via First Class Mail)  
David L. Donahoe (w/Enclosure, via Electronic Mail)  
Rick Obermeier (w/Enclosure, via Electronic Mail)  
Tracy Smith (w/Enclosure, via Electronic Mail)  
Mark F. Nowak (w/Enclosure, via Electronic Mail)



BEFORE THE ALLEGHENY COUNTY HEALTH DEPARTMENT  
3333 FORBES AVENUE  
PITTSBURGH, PENNSYLVANIA 15213

THE PITTSBURGH WATER AND SEWER AUTHORITY ) In re:  
Penn Liberty Plaza I ) Sewerage  
1200 Penn Avenue ) Sewer Discharge  
Pittsburgh, PA 15222 ) Behind 2625 Brownsville Road  
) City of Pittsburgh  
) Service Request No. 16-093

NOTICE OF APPEAL

Appellant, The Pittsburgh Water and Sewer Authority (the "PWSA"), pursuant to Allegheny County Health Department ("ACHD") Article XI, appeals the letter dated August 10, 2016 from Geoffrey M. Butia to the PWSA ("the Letter"), which includes an order directed to the PWSA and relates to sewage discharge in the vicinity of the property located at 2625 Brownsville Road, City of Pittsburgh, Pennsylvania (the "Property"). The PWSA files this Notice of Appeal from the Letter, in accordance with ACHD Rule 1104. In accordance with ACHD Rule 1104.B, this Notice of Appeal sets forth the manner in which the PWSA is aggrieved by the Letter, the extent to which the PWSA has a direct interest in the action, and the grounds for this appeal:

1. The PWSA is a municipal authority that, *inter alia*, operates a public sewer system that serves, among other areas, certain areas of the City of Pittsburgh.
2. The sewer facilities at issue in this Appeal are private, and are not part of the PWSA's sewer system.

Manner in Which Aggrieved / Appellant's Direct Interest

3. The PWSA is aggrieved by the Letter and has a direct interest in the subject matter of this appeal because the PWSA does not own, operate or maintain the private sewer facilities that are subject to the ACHD's Order and the PWSA is unlawfully directed, in the Letter, to take certain actions that it cannot, by law, undertake.

Grounds for Appeal

4. The Letter unlawfully directs the PWSA to take actions with respect to conditions (a) caused by third parties over which the PWSA does not have control, (b) caused by events that are beyond the reasonable control of the PWSA, and (c) caused by facilities that are owned, operated or maintained by third parties, and not by the PWSA.

5. The Letter directs the PWSA to take actions that are impossible or impracticable.

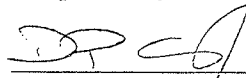
6. ACHD has failed to join all parties necessary for resolution of the issues that are the subject matter of the Letter.

7. The portions of the Rules and Regulations cited in the Letter as violations are enabling provisions and do not contain any substantive requirements.

8. The Letter is otherwise arbitrary, unreasonable, an abuse of discretion, and contrary to law.

9. The PWSA reserves the right to amend the factual and legal contentions contained herein as authorized by ACHD Rules and Regulations.

Respectfully submitted,



Mark F. Nowak, Esquire  
Pa. I.D. No. 37474

Danny P. Cerrone, Jr., Esquire  
Pa. I.D. No. 201091

Samuel A. Hornak, Esquire  
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(412) 394-7711

*Attorneys for The Pittsburgh Water and  
Sewer Authority*

Dated: August 19, 2016

ALLEGHENY COUNTY HEALTH DEPARTMENT  
ADMINISTRATIVE DECISION

PITTSBURGH WATER AND SEWER AUTHORITY,  
Appellant,  
v.  
ALLEGHENY COUNTY HEALTH DEPARTMENT,  
Appellee.

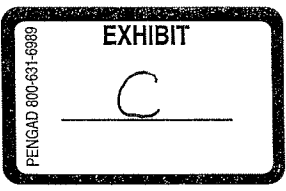
In re: Public Sanitary Sewer  
2625 Brownsville Road,  
Pittsburgh, PA 15227

**INTRODUCTION**

At issue in this case is whether a sewer line is public or private, and who is responsible for repairing and maintaining it. In January of 2016, the Allegheny County Health Department (“ACHD”) received a citizen’s complaint of sewage discharge at the rear of 2625 Brownsville Road (the “Property”). Appellant Pittsburgh Sewer and Water Authority (“PWSA”) appeals a determination by the ACHD that the sewer line behind the Property is a public line. PWSA contends that the line is private, and marshals a series of maps and title search documents in support of its argument. The ACHD argues that PWSA’s evidence is insufficient to prove that the line is private. Based on the evidence presented, I find that the sewer line is public and that PWSA is responsible for repairing and maintaining it.

**EVIDENCE**

- The following exhibits were offered into evidence by PWSA:
- A1: Capital Lease Agreement
- A2: Notebook Drawing
- A3: Profile Drawing



R: 5/22/17

A4: Map  
A5: Abstract title document  
A6: Abstract title document  
A7: Abstract title document  
A8: Abstract title document  
A9: Abstract title document

The following exhibits were offered into evidence by the ACHD:

D1: Map  
D2: Map  
D3: Notice of Violation  
D4: Inspection Reports

### FINDINGS OF FACT

Based on my review of the evidence and having resolved all issues of credibility, I find the following facts:

1. PWSA is a municipal authority created by the City of Pittsburgh. (Hearing Transcript (“H.T.”) at 4).
2. In 1995, PWSA and the City of Pittsburgh entered into a Capital Lease Agreement, under which PWSA agreed to take and lease from the City the entire network of City-owned water and sewage transmission lines. (Ex. A1).
3. In January 2016, the ACHD’s plumbing inspection program received a citizen’s complaint of sewage discharge at the rear of 2625 Brownsville Road. Investigations by the ACHD in January and July 2016 confirmed that sewage was discharging through a retaining wall at 2625 Brownsville Road. (Ex. D3).
4. On August 10, 2016, the ACHD sent a Notice of Violation to PWSA, indicating that there was raw sewage flowing from the base of a retaining wall behind 2625 Brownsville Road. (H.T. at 31; Ex. D4).

5. PWSA engaged a title abstractor to determine whether there were easements for the sewer line. (H.T. at 5).
6. The title abstractor found two easements: One to Equitable Gas Company for gas lines behind the property, and one to Pennsylvania American Water Company for water lines behind the property. (H.T. at 5-6; Ex. A5).
7. On February 7, 2017, a hearing was held before Administrative Hearing Officer.

## DISCUSSION

In an administrative appeal of a final agency action of the ACHD, the appellant “shall bear the burden of proof and the burden going forward with respect to all issues.” Article XI § 1105.D.7. Therefore, PWSA bears the burden of proof of showing that the sewer line behind the Property is private.

PWSA makes several arguments in its post-hearing memorandum. First, that the sewer line is private, and therefore PWSA is not responsible for maintaining it. Second, that the ACHD cannot assert alleged violations against the PWSA outside of those set forth in the Letter. And third, that PWSA would be trespassing on private property if it repaired the sewer line without the owners’ consent.

### **The Sewer Line is Public.**

The biggest issue in this appeal is whether the sewer line servicing the Property is public or private. As both sides point out, this case bears many resemblances to *Golankiewicz et al. v. Allegheny County Health Department*. In that case, I found that a sewer line servicing a series of homes on Homehurst Avenue

was public, and that PWSA is responsible for maintaining and repairing the line. *Golankiewicz v. ACHD*, 2 (2016), available [here](#).

I based my decision largely on two factors: (1) The historical and cartographical evidence of the sewer system encompassing the properties at issue; and (2) The results of a title search for easements on the property. *Id.* at 8.

In *Golankiewicz*, these factors weighed in favor of the homeowners because the maps presented indicated that the sewer line at issue was public, and the title search was cursory. Here, the factors weigh in favor of the ACHD.

### **The Maps**

The maps presented as evidence suggest that the sewer line servicing the Property is public. The first map that PWSA introduced was Exhibit A2, a notebook drawing of the sewer lines around the Property. Rick Obermeier, PWSA's Director of Engineering and Construction, testified that the fact that the area to the right of the sewer line on the notebook drawing was marked "private property" indicates that the sewer line servicing the Property is private. (Ex. A2; H.T. at 12). However, there is no indication of when the notebook drawing was made, who gave the drawing to the City of Pittsburgh, and no legend to distinguish between different types of sewer lines. As such, I accord the notebook drawing little weight.

PWSA then introduced a profile drawing ("Profile Drawing") of the sewer submitted to the Department of Public Works and Engineering. (Ex. A3; H.T. at 11). The Profile Drawing show that the sewer behind the Property is located on private property. But there are two problems with PWSA's argument here. First, the fact



that a sewer line is located on private property does not indicate that the sewer itself is private. *See Golankiewicz* at 5-6. Second, the Profile Drawing marks all sewers as solid black lines, and does not differentiate between private and public sewers.

Next, PWSA introduced Exhibit A4, a detailed sewer map of the area surrounding the Property. A4 indicates that the sewer behind the Property is private. (Ex. A4; H.T. at 12-14). But like the maps that PWSA produced in *Golankiewicz*, A4 was produced after the Notice of Violation was issued, in this case nearly five months afterward. The Notice of Violation was issued on August 10, 2016. A4 was produced on January 4, 2017. By contrast, PWSA's map of the Property and its surrounding area produced on July 25, 2016—before the Notice of Violation—indicates that the sewer line behind the property is public. (Ex. D1). I find the pre-Notice of Violation map more credible than the map created after litigation in this case began.

Mr. Obermeier asserted that the discrepancy between the two maps was that PWSA did a more thorough investigation after the Notice of Violation was issued. (H.T. at 14). However, Mr. Obermeier's basis for re-labelling the sewer line behind the property as private was title search documents, which, as indicated below, I did not find indicative of a private sewer.

### **The Title Search Documents**

Although the title search in this case appears to be more robust than the one in *Golankiewicz*, it still does not indicate that the sewer behind the Property is

private. In *Golankiewicz*, the title abstractor that PWSA hired looked through the deeds of the houses at issue, and concluded, “None of the chain deeds make reference to sewer easements.” *Golankiewicz* at 8. I found that reasoning unpersuasive because PWSA “[did] not provide any support for their conclusion that the absence of sewer easements indicates the presence of a private sewer line.” *Id.*

Here, PWSA found that although there were easements for gas and water lines for the Property, there was no easement for a sewer line (*Memorandum in Opposition to the Allegheny County Health Department’s August 10, 2016 Letter (“PWSA Brief”)* at 3; Exs. A5-A9). But the absence of evidence is not evidence of absence. Furthermore, the easement exhibits that PWSA submitted do not indicate whether the sewer behind the property is public or private. For example, PWSA emphasized Exhibit A9, a 1979 indenture (“Indenture”), which conveys to a grantee the “right to lay, use and forever maintain sewer, water pipes and gas pipes...[t]ogether with the right at all times to enter upon said property for the purpose of repairing or renewing the same.” (Ex. A9; H.T. at 17-18).

However, there are several issues with the Indenture. First, it refers to the property owner of 2618 Churchview Avenue, not 2625 Brownsville Road. Second, as the ACHD points out, the Indenture grants an easement to John F. Sankey in 1906 for the purpose of laying and maintaining sewer, water and gas pipes. But there was no evidence that Mr. Sankey constructed the Brownsville Road sewer line, when that line was constructed, or through whose property the line would run. (Ex. A9; *The Allegheny County Health Department’s Post-Hearing Memorandum (“ACHD*

*Brief*) at 12-13). The bottom line is that the title search exhibits presented by PWSA are insufficient to show the existence of a private sewer.

**PWSA is Required to Follow ACHD Rules and Regulations, Even Those Not Explicitly Mentioned in the Letter.**

PWSA contends that the ACHD cannot charge it with a violation of Section 1409.5 of the ACHD Rules and Regulations because the ACHD did not cite to that section in the Letter. (*PWSA Brief* at 7). PWSA claims that this failure to list Section 1409.5 among the regulations that ACHD cited in the letter violates PWSA's procedural due process rights. (*Id.*, citing *LT Int'l Beauty Sch. v. Bureau of Prof'l & Occupational Affairs*, 13 A.3d 1004, 1013 (Pa. Commw. Ct. 2011)).

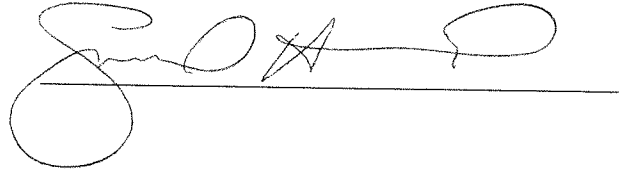
But PWSA's argument falls short. The *LT* court held that the Commonwealth's inspectors violated a beauty school's due process rights by claiming there were missing items from students' beauty kits, but failed to identify which students had incomplete kits or how many students had incomplete kits. 13 A.3d at 1012-13. In other words, the Commonwealth hid the ball by not sufficiently identifying the allegedly unlawful conduct.

Here, there is no such ball-hiding because PWSA identified the allegedly unlawful conduct in the Letter—failing to eliminate sewage discharge behind the Property. (Ex. D3). Moreover, Section 1409.5 is titled “Common Sewer Laterals,” the very subject of this appeal. It states, “It shall be the responsibility of the municipality to manage the repair, upgrade, and maintenance of common sewer laterals within its boundaries so far as it is necessary to undertake the elimination of a public health problem.” ACHD Art. XIV, § 1409.5. The continual discharge of

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Statutory Appeal has been served on all counsel listed below by placing same in the U.S. Mail, first class, postage prepaid, this 5<sup>th</sup> day of June, 2017:

Michael Parker, Esquire  
Vijyalakshmi Patel, Esquire  
301 39<sup>th</sup> Street, Building 7  
Pittsburgh, PA 15201  
*Counsel for Allegheny County Health Department*

A handwritten signature in black ink, appearing to read "Michael Parker", is written over a horizontal line. The signature is stylized with large loops and a prominent "M" and "P".