DEPARTMENT OF DEFENSE
DEFENSE LEGAL SERVICES AGENCY
DEFENSE OFFICE OF HEARINGS AND APPEALS
APPEAL BOARD
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Date: March 25, 2024

In the matter of:	)	
------	)	ISCR Case No. 23-01207
Applicant for Security Clearance	)	

APPEAL BOARD DECISION

APPEARANCES

FOR GOVERNMENT
Andrew H. Henderson, Esq., Department Counsel
Julie R. Mendez, Esq., Chief Department Counsel

FOR APPLICANT
Todd A. Hull, Esq.

The Department of Defense (DoD) declined to grant Applicant a security clearance. On July 25, 2023, DoD issued a Statement of Reasons (SOR) advising Applicant of the basis of that decision – security concerns raised under Guideline H (Drug Involvement and Substance Misuse) and Guideline E (Personal Conduct) of the National Security Adjudicative Guidelines (AG) in Appendix A of Security Executive Agent Directive 4 (effective June 8, 2017) and DoD Directive 5220.6 (Jan. 2, 1992, as amended) (Directive). On December 14, 2023, Defense Office of Hearings and Appeals Administrative Judge Darlene D. Lokey Anderson granted Applicant's security clearance eligibility. The Government appealed pursuant to Directive ¶¶ E3.1.28 and E3.1.30.

Background

Applicant is in his late twenties. He holds dual master's degrees, one in Mechanical Engineering and one in Engineering Technology and Innovation Management, and he holds several additional certifications. Applicant is employed with a defense contractor as Lead Artificial Intelligence Architect.

In his July 2019 security clearance application (SCA), Applicant disclosed occasional marijuana use from June to August 2018 while he was living in California and asserted that he had no intention of using the drug again in the future. Government Exhibit (GE) 2 at 37. He confirmed the foregoing period of marijuana use and his future intent during his associated interview in September 2019 and was subsequently granted a Secret security clearance in about April 2020. GE 4 at 3; GE 1 at 39.

Several months later, in October 2020, Applicant participated in a polygraph examination. During the initial testing, he disclosed that he used marijuana for the first time in May or June 2018 after he moved to California, which continued until August 2018. GE 3 at 5. He asserted that he ceased using the drug when he returned to Pennsylvania because he was not able to obtain it as easily as he had in California and because the drug was not legal in Pennsylvania. After "physiological reactions to the topic regarding personal involvement with illegal drugs" were perceived, Applicant revealed more extensive information about his drug use history, including off-and-on marijuana use beginning when Applicant was in high school in 2012 and continuing through July 2020, and two incidents of cocaine use in 2015 and 2018. *Id*. at 4. Applicant explained that he was aware when he was granted his clearance of the policy against drug involvement and acknowledged that his use in July 2020 occurred while holding a Secret clearance. *Id*. at 6. He declined to report the incident to his employer because he did not want to lose his job. Applicant also explained that he intentionally withheld the foregoing drug involvement due to "being ashamed and because he did not want his involvement with illegal drugs to affect him in the clearance process as he did not think he would be eligible for a clearance." *Id*. He "also withheld this information due to the fear of losing his position with [the defense contractor], as they are not aware of [Applicant's] involvement with illegal drugs while employed with them and while holding a SECRET clearance." *Id*.

Applicant was referred for a new security clearance investigation and, in both his March 2021 SCA and July 2021 interview, he disclosed marijuana use from June 2011 to September 2019, and asserted, "I smoked marijuana for the first time in high school, and then stopped until college. In college I smoked with friends on occasion. I smoked more in grad school because I was done football and then stopped once I intended to sign with" the defense contractor employer. GE 1 at 37; GE 5 at 2. Applicant disclosed no cocaine use in either of the 2021 investigation components.[1]

Based on the foregoing, the SOR alleged under Guideline H that Applicant consumed a gummy edible containing Tetrahydrocannabinol (THC) in July 2020 while he was granted access to classified information, that he used and purchased marijuana and products containing THC from about June 2011 until July 2020, and that he used cocaine twice, in 2015 and 2018. Under

[1] Applicant subsequently completed another SCA in April 2023, which he submitted into evidence after the hearing and was not considered in drafting the SOR. Post-Hearing Exhibit (PHE) A at 33. In that third SCA, Applicant asserted that he stopped using marijuana in March 2019 when he intended to sign with the defense contractor employer, and that he did not use from 2019 until 2021 when he "unknowingly ate a marijuana gummy when on vacation with [his] brother." *Id*. He again disclosed no cocaine use, despite that the 2018 use remained within the reportable timeframe.

Guideline E, the SOR further alleged that Applicant deliberately failed to disclose his cocaine use and 2020 THC use on his March 2021 SCA, and that he deliberately failed to disclose the vast majority of his alleged drug use on his earlier July 2019 SCA.

In response to the SOR, Applicant denied that he consumed THC in July 2020, asserting instead that he incorrectly answered the question on his 2021 SCA and actually last used THC "while spending time with his brother in California in June 2019." SOR Response at 5-6. He admitted using marijuana, but only from June 2012 to June 2019, and admitted using cocaine twice, but in 2016 and 2018. *Id*. at 7, 8. With respect to the Guideline E concerns, Applicant denied deliberately falsifying either his 2019 or 2021 SCA. He explained that the omissions from his 2019 SCA regarding his cocaine use and 2019 THC use were the result of him failing to recall the incidents. *Id*. at 13. He provided no explanation for his failure to report his pre-2018 marijuana use on the 2019 SCA. For his 2021 SCA, Applicant purportedly "believed that the investigators would simply use recent information from his previous clearance investigation, which had occurred only two years earlier, [and] mistakenly assumed that he did not have to provide any additional information to supplement his upgrade investigation." *Id*. at 12.

Finding both the Guideline H and Guideline E concerns fully mitigated, the Judge held in Applicant's favor on all allegations and concluded, "Applicant now clearly understands that illegal drug use is prohibited in any form while holding a security clearance or while in a sensitive position. He also understands that he must be honest and truthful throughout the entire security clearance investigation process and be extremely thorough. He must do everything to avoid any mistakes or errors. He knows that he is held to a high standard and he must consistently demonstrate this understanding." Decision at 9.

Discussion

There is a strong presumption against the grant or maintenance of a security clearance. *See Dorfmont v. Brown*, 913 F. 2d 1399, 1401 (9th Cir. 1990), *cert. denied*, 499 U.S. 905 (1991). After the Government produces evidence raising security concerns, an applicant bears the burden of persuasion concerning mitigation. *See* Directive ¶ E3.1.15. The standard applicable in security clearance decisions is that a clearance may be granted only when "clearly consistent with the interests of the national security." *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). "Any doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security." AG ¶ 2(b).

On appeal, the Government argues that the Judge's applications of the Guideline H and Guideline E mitigating conditions and her analysis under the Whole-Person Concept were arbitrary, capricious, and not supported by the record evidence. For the reasons stated below, we reverse the Judge's decision.

A judge's decision can be found to be arbitrary or capricious if it "fails to examine relevant evidence, fails to articulate a rational connection between the facts found and the choice made, fails to be based on a consideration of relevant factors, involves a clear error of judgment, fails to consider an important aspect of the case, or is so implausible as to indicate more than a mere

difference of opinion." ISCR Case No. 94-0215, 1995 WL 396942 at *3 (App. Bd. Apr. 13, 1995) (citing *Motor Vehicle Mfr. Ass'n v. State Farm Mut. Ins. Co.*, 463 U.S. 29, 43 (1983)).

Guideline E Analysis

Having found that "Applicant failed to provide thorough and complete information concerning his illegal drug use in response to questions on his [SCAs] dated July 31, 2019, and March 24, 2021," the Judge determined that disqualifying conditions AG ¶¶ 16(a), 16(b), 16(d)[2] were applicable. Decision at 8. She went on to conclude that Applicant's conduct was mitigated through application of AG ¶ 17(d) because he now "understands what is required of him and how to properly complete his security clearance applications" and "will hire counsel if he needs to." *Id*. Application of this mitigating condition is both at odds with the Judge's disqualification analysis and unsupported by the record.

Contradictory Disqualification and Mitigation Analyses

As an initial matter, the Judge's mitigation analysis of the Guideline E concerns hinges on her finding that Applicant now understands how to properly complete an SCA, which implies that he previously did not and that his multiple failures to provide full and complete answers were inadvertent rather than intentional. This analysis is directly at odds with the Judge's finding that Applicant "was attempting to conceal the true extent of his illegal drug history." *Id*. Although not raised by either party on appeal, such contradictory findings constitute error and render the resulting dependent mitigation analysis unsustainable.

Application of Guideline E Mitigating Condition

Turning to the issues raised on appeal, the Government first argues that the Judge's mitigation analysis erroneously focused on "Applicant's purported naiveté and changed circumstances," and thereby failed to consider important aspects of the case, including "Applicant's numerous, varied, incomplete, and inconsistent disclosures of his drug use; the timing of his disclosures; and his education level" and also "substituted a favorable credibility determination for record evidence." Appeal Brief at 10-11. The Government contends that the record does not support finding that Applicant's falsifying conduct is mitigated. We agree.

[2] AG ¶ 16(a) – Deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine national security eligibility or trustworthiness, or award fiduciary responsibilities; AG ¶ 16(b) – Deliberately providing false or misleading information; or concealing or omitting information, concerning relevant facts to an employer, investigator, security official, competent medical or mental health professional involved in making a recommendation relevant to a national security eligibility determination, or other official government representative; AG ¶ 16(d) – Credible adverse information that is not explicitly covered under any other guideline and may not be sufficient by itself for an adverse determination, but which, when combined with all available information, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the individual may not properly safeguard classified or sensitive information.

After finding that Applicant falsified information on his 2019 and 2021 SCAs, the Judge went on to find mitigation through application of AG ¶ 17(d), a three-prong condition that affords mitigation when the individual 1) has acknowledged the behavior, 2) has obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances, or factors that contributed to untrustworthy, unreliable, or other inappropriate behavior, and 3) such behavior is unlikely to recur. Application of this condition necessarily requires that an applicant first acknowledge the concerning behavior – in this case, the intentional falsification of relevant information from Applicant's 2019 and 2021 SCAs. The record is devoid of evidence that Applicant has *ever* acknowledged having intentionally falsified his 2019 or 2021 SCAs. To the contrary, he has consistently and flatly denied falsifying the two documents. *See, e.g.*, Tr. at 83, 107. As a result, application of AG ¶ 17(d) fails at the first prong.

Applicant's failure to acknowledge the established falsifications also leads to AG ¶ 17(d) failing at the third prong, which requires a showing that the conduct is unlikely to recur. An applicant's acknowledgement of concerning conduct is an initial step in demonstrating acceptance of responsibility for his or her actions. When an applicant is unwilling or unable to accept such responsibility, that failure "is evidence that detracts from a finding of reform and rehabilitation." ISCR Case No. 96-0360, 1997 WL 1882602 at *3 (App. Bd. Sep. 25, 1997).

Moreover, in cases involving the deliberate omission, concealment, or falsification of material information, an applicant has a "heavy burden in demonstrating evidence of reform, rehabilitation, or changed circumstances sufficient to justify a conclusion that it is clearly consistent with the national interest to grant him access to classified information." ISCR Case No. 01-03132, 2002 WL 32114509 at *4 (App. Bd. Aug. 8, 2002). Other than to say that Applicant "understands what is required of him and how to properly complete his [SCAs]" and that he "will hire counsel" as necessary in the future, the Judge points to no evidence and provides no analysis to support a finding that Applicant's conduct will not recur. To the contrary, Applicant's concealment of the full extent of his drug use persisted from 2019 to as recently as April 2023, across multiple SCAs, multiple interviews, and a polygraph examination. The Judge's implied finding that Applicant's conduct will not recur is entirely speculative and entitled to less weight against the myriad unfavorable record evidence reflecting Applicant's actual past conduct. *See* ISCR Case No. 06-17541, 2008 WL 351349 at *3 (App. Bd. Jan. 14, 2008) ("[P]romises of future good behavior carry less weight than a track record of reform and rehabilitation.").

Applicant's only acknowledgement of having intentionally falsified any information pursuant to any investigation component came after his unsuccessful attempt to conceal his drug use history for a third time, which occurred during the initial testing of his 2020 polygraph. Only after that attempted deception resulted in a perceived physiological response and triggered further interviewing did Applicant admit his drug use history *and* that he intentionally withheld the information due to concerns that it would prevent him from obtaining a security clearance and result in the loss of his job. The Judge appears to have given Applicant some minor credit for this eventual disclosure of his drug use history, noting only that he "reveal[ed] it during his polygraph examination." Decision at 8. The record reflects, however, that this disclosure was hardly voluntary, coming only after Applicant first tried to conceal the information and was caught, which vitiates any credit afforded to it and raises serious concerns about his willingness to disclose

security-significant conduct.[3] It is not only troubling but also amounts to error that the decision is silent on this important unfavorable evidence. *See* ISCR Case No. 02-22603, 2004 WL 2896741 at *3 (App. Bd. Sep. 3, 2004) (A judge may not ignore or disregard "significant record evidence that a reasonable person could expect to be taken into account in reaching a fair and reasoned decision."). The Judge erred in failing to identify Applicant's additional and admitted 2020 polygraph falsification and in failing to analyze it in terms of Applicant's pattern of falsifying misconduct.

The Directive is clear that an applicant's failure to provide truthful and candid answers during a security clearance investigation is of special concern, specifically stating that the "refusal to provide full, frank, and truthful answers to lawful questions of investigators, security officials, or other official representatives" in connection with a security clearance investigation and adjudication will normally result in an unfavorable eligibility determination. AG ¶ 15. Considering the record as a whole, the Judge's reliance on AG ¶ 17(d) and her favorable Guideline E findings are not sustainable.

Guideline H Analysis

The Judge found that Applicant used marijuana from about June 2011 until June 2019 and used cocaine on two occasions in 2015 and 2018, which was sufficient to raise disqualifying conditions AG ¶¶ 25(a) and 25(c).[4] Despite her finding that Applicant last used marijuana in June 2019 and the record evidence that Applicant was not granted a security clearance until April 2020, the Judge also found AG ¶ 25(f) applicable, which disqualifies based on an applicant's illegal drug use while holding a sensitive position (*i.e.*, one that requires security clearance eligibility). She went on to conclude that Applicant's past drug use was mitigated through the four-year passage of time since Applicant quit using illegal drugs in June 2019 and his signed statement of intent to abstain from future drug involvement.

Erroneous June 2019 Finding

The Government first challenges the Judge's finding that Applicant stopped using marijuana in June 2019, arguing that the finding was unreasonable because Applicant's story was

[3] *See, e.g.*, ISCR Case No. 17-02785, 2019 WL 3308102 at *3 (App. Bd. May 8, 2019). Further diminishing any indication that Applicant has accepted responsibility for falsifying multiple components of multiple security clearance investigations were his misleading assertions, both in response to the SOR and at hearing, that he realized his error in completing the 2019 SCA when he participated in the 2020 polygraph and then voluntarily corrected the mistake. *See* SOR Response at 14 ("[Applicant] voluntarily offered [previously unreported drug use] information during his polygraph examination in 2020 out of a good-faith effort to correct his prior information."); Tr. at 83 ("I elected to take the polygraph in the following year, and divulged everything that we're talking about here today, and that was an elective thing. Just like I went in and took that polygraph because I had nothing to hide."). These mischaracterizations of the actual order of polygraph events are further evidence, which the Judge failed to consider, that Applicant has yet to accept responsibility for his multiple falsifications and that his attempts to obfuscate the record continued through its closing.

[4] AG ¶ 25(a) – Any substance misuse; AG ¶ 25(c) – Illegal possession of a controlled substance, including cultivation, processing, manufacture, purchase, sale, or distribution; or possession of drug paraphernalia.

"completely self-serving and . . . contradicted by the weight of the record." Appeal Brief at 15. Here again, we agree.

The Judge's finding that Applicant stopped using marijuana in June 2019 was based entirely on the following evidence, all of which post-dates the July 2023 SOR. In his September 2023 SOR Response, Applicant asserted – for the first time during any record security clearance processing – that his "last instance of illicit drug use of any kind occurred in June 2019 when he ingested a THC gummy while spending time with his brother in California." SOR Response at 6. In support of this, he provided a photo of himself with his brother in California, dated June 5, 2019. *Id*. at Enc. 7. He also asserted – again, for the first time – that it was "an honest error" and he "accidentally input July 2020 as his last instance of drug use, instead of June 2019." *Id*. at 6. Applicant reiterated this June 2019 date and explanation for the error at hearing, and his brother testified that he gave Applicant a THC gummy in June 2019.

Apparently considering only the foregoing, the Judge found Applicant's latest explanation of mistaken reporting and a cessation date of June 2019 to be credible.[5] In doing so, however, she ignored the following significant and contradictory record evidence, all of which predates the SOR.

During his October 2020 polygraph, Applicant eventually disclosed that he last used marijuana in July 2020 when he consumed a gummy edible that he knew contained marijuana while visiting his brother in California. GE 3 at 4-6. The recency of the reported use – a mere three months prior to the disclosure – lends to the accuracy of the July 2020 date. Applicant also twice acknowledged that his last marijuana use occurred *while* holding a Secret security clearance. Because his security clearance was not granted until April 2020, this acknowledgment further supports the accuracy of the July 2020 date. Finally, Applicant explained that his defense contractor employer at the time was not aware of his "involvement with illegal drugs *while employed with them*" and that he declined to report the incident to them because he did not want to lose his job. *Id*. at 6 (emphasis added). The record reflects that he began said employment in July 2019 – after his June 2019 California trip – which therefore supports that Applicant's last use of marijuana also occurred after the June 2019 California trip. *See* SOR Response at 2; AE A at 2; Tr. at 54. The foregoing details and circumstances entirely undercut Applicant's post-SOR story and overwhelmingly support that he accurately reported in the polygraph that his last marijuana use occurred in July 2020.[6]

When conflicts exist within the record, a judge must weigh the evidence and resolve such conflicts based upon a careful evaluation of factors such as the evidence's "comparative reliability,

[5] *See* Decision at 2 ("Applicant specifically remembers the date of June 2019, as his last use of any illegal drug because at this time of use he was spending time with his brother in California. Applicant submitted a photograph of he and his brother on this occasion.").

[6] During his polygraph, Applicant asserted that he stopped using marijuana after starting with his defense contractor employer, and that he did not use the drug from that time until about July 2020. GE 3 at 4. In his 2023 SCA, Applicant reiterated the explanation that he initially ceased using marijuana after deciding to sign with the defense contractor employer, but that he used the drug again as recently as September 2021 while on vacation with his brother. PHE A at 33. The Judge's decision is completely silent as to this supplemental timeframe.

plausibility and ultimate truthfulness." ISCR Case No. 05-06723, 2007 WL 4379274 at *3 (App. Bd. Nov. 14, 2007). The Judge's failure to explain how she found Applicant's post-SOR explanation and cessation date more credible than other, more contemporaneous record evidence was error. Such error is emphasized in light of Applicant's wildly inconsistent drug history disclosures, which shifted through every major component of the investigation and adjudication processes, and the Judge's own conclusion that Applicant attempted to conceal the true extent of his drug use history on multiple SCAs, all of which detract from his credibility.

Moreover, while the Board typically gives deference to a judge's credibility determination (Directive ¶ E3.1.32.1), that deference is not without limits. When the record contains a basis to question an applicant's credibility, the judge "should address that aspect of the record explicitly," explaining why she finds an applicant's explanation to be trustworthy. ISCR Case No. 07-10158, 2008 WL 4635412 at *4 (App. Bd. Aug. 28, 2008). A judge's failure to do so "suggests that she has merely substituted a favorable impression of an applicant's demeanor for record evidence." *Id*. With no recognition of the contrary evidence even identified, let alone analyzed in the decision, we have no choice but to conclude that such is the case here.

The Board must consider "not only whether there is evidence supporting a judge's findings, but also whether there is evidence that fairly detracts from the weight of the evidence supporting those findings." ISCR Case No. 97-0727 at 3 (App. Bd. Aug. 3, 1998). Considering the record as a whole, we conclude the Judge had an insufficient basis to find that Applicant stopped using marijuana in June 2019.

Application of Guideline H Mitigating Conditions

The Government next argues that, as a result of her erroneous June 2019 factual finding and her unsupported credibility determination, the Judge's Guideline H mitigation analysis was unsupported by the record. The Judge concluded that Applicant's drug use history was mitigated first through application of AG ¶ 26(a) because he "quit using illegal drugs altogether in June 2019, and has been drug free for the past four years, which he intends to continue." Decision at 7. As discussed above and contrary to the Judge's factual finding, the great weight of the record evidence supports that Applicant last used marijuana in July 2020, or possibly even more recently in September 2021.[7] In either case, the record supports that Applicant's last marijuana use occurred after he submitted his 2019 SCA and participated in his 2019 clearance interview,[8] after he was granted security clearance eligibility in April 2020, with knowledge that such use was inconsistent

[7] *See supra* note 6.

[8] The Appeal Board has "long held that applicants who use marijuana after having been placed on notice of the security significance of such conduct may be lacking in the judgment and reliability expected of those with access to classified information." ISCR Case No. 20-01772, 2021 WL 6202264 at *2 (App. Bd. Sep. 14, 2021). *See also* ISCR Case No. 21-02534, 2023 WL 2351744 at *3 (App. Bd. Feb. 13, 2023) ("[A]fter applying for a security clearance and being adequately placed on notice that such conduct was inconsistent with holding a security clearance, an applicant who continues to use marijuana demonstrates a disregard for security clearance eligibility standards, and such behavior raises substantial questions about the applicant's judgment, reliability, and willingness to comply with laws, rules, and regulations.").

with holding a clearance, and no more than three years prior to the hearing. All of these resulting facts negatively impact upon the soundness of the Judge's application of AG ¶ 26(a).

The Judge also found Applicant's conduct was mitigated through application of AG ¶ 26(b) because he "has signed a statement of intent which indicates that he must abstain from any drug involvement or substance misuse or his security clearance will be immediately revoked." Decision at 7. The Judge failed to explain, however, how she was able to find Applicant's Statement of Intent credible while simultaneously finding his credibility to be in question due to falsifying his 2019 and 2021 SCAs. It is well settled that falsification of a security questionnaire carries serious negative security implications and constitutes misconduct that casts serious doubt on an applicant's judgment, reliability, or trustworthiness. *See, e.g.*, ISCR Case No. 02-07555, 2004 WL 2152778 at *3 (App. Bd. Jul. 19, 2004) ("An applicant who deliberately tries to deceive or mislead the federal government does not demonstrate the high degree of judgment, reliability, and trustworthiness that must be expected of persons granted access to classified information."). Having found that Applicant deliberately falsified not one, but two SCAs, the Judge implicitly opined about Applicant's lack of trustworthiness and should have explained her reasons for believing his most recent promises advanced in his Statement of Intent.

Further with respect to his credibility, the record supports that Applicant's marijuana use continued to either July 2020 or September 2021 in spite of his repeated assertions throughout his 2019 investigation that he had no intention to use illegal drugs again in the future. *See* GE 2 at 37; GE 4 at 3. To that end, the Judge's analysis failed to address why she found Applicant's Statement of Intent to abstain from future drug use credible considering the similar broken promise Applicant made during his 2019 investigation. *See, e.g.*, ISCR Case No. 19-02499, 2021 WL 6201940 at *4 (App. Bd. Jul. 7, 2021) (reversing a favorable Guideline H decision where the Judge "did not provide a meaningful analysis of [the applicant's drug counseling, religious involvement, current sobriety, and his promise to refrain from drug use in the future] in light of the countervailing evidence . . . , particularly Applicant's failed prior promises to abstain."). Moreover, the ongoing and recent nature of Applicant's falsifications, as discussed more fully above, further weaken any credit to be afforded to his Statement of Intent. Overall, the Judge's application of AG ¶ 26(b) is unsupported by the record and unsustainable.

The Government has met its burden on appeal of demonstrating reversible error below. Considering the record as a whole, we conclude that the Judge's decision is arbitrary and capricious as it fails to consider important aspects of the case, fails to articulate a satisfactory explanation for material conclusions, and runs contrary to the weight of the record evidence. Accordingly, the Judge's favorable decision under both Guidelines H and E is not sustainable under the *Egan* standard.

Order

The Judge's decision is **REVERSED**.

Signed: Moira Modzelewski
Moira Modzelewski
Administrative Judge
Chair, Appeal Board

Signed: Gregg A. Cervi
Gregg A. Cervi
Administrative Judge
Member, Appeal Board

Signed: Allison Marie
Allison Marie
Administrative Judge
Member, Appeal Board