



DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF HEARINGS AND APPEALS



In the matter of:

_____, _____
SSN: _____

Applicant for Security Clearance

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ISCR Case No. 07-18481

Appearances

For Government: Jeff A. Nagel, Esquire, Department Counsel
For Applicant: James Green, Esquire

January 22, 2010

Decision

WHITE, David M., Administrative Judge:

Applicant was convicted of Statutory Rape in 1983, and admitted engaging in an extensive pattern of deviant sexual activities over a period of several decades. He failed to prove his claims that his misconduct was sufficiently known to family, friends, and coworkers to alleviate his susceptibility to coercion or duress. Based upon a thorough review of the case file, pleadings, exhibits, and testimony, eligibility for access to classified information is denied.

Applicant submitted his security clearance application on August 24, 2006. On May 13, 2009, the Defense Office of Hearings and Appeals (DOHA) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guidelines D (Sexual Behavior), E (Personal Conduct), and J (Criminal Conduct). The action was taken under Executive Order 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; Department of Defense Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the revised adjudicative guidelines (AG) promulgated by the President

on December 29, 2005, and effective within the Department of Defense (DoD) for SORs issued after September 1, 2006.

Applicant acknowledged receipt of the SOR on May 19, 2009. He answered (AR) the SOR in writing on June 1, 2009, and requested that his case be decided by an administrative judge on the written record without a hearing. On August 28, 2009, Department Counsel indicated his readiness to proceed and requested a hearing before an administrative judge in accordance with Directive ¶ E3.1.7. Applicant was notified of this election by letter dated August 31, 2009, and DOHA assigned the case to me on September 22, 2009. Neither Applicant nor his counsel raised any objection to Department Counsel's request for a hearing on timeliness or other grounds.

DOHA issued a Notice of Hearing on October 1, 2009, and I convened the hearing as scheduled on October 27, 2009. Department Counsel offered Government Exhibits (GE) 1 through 6, which were admitted without objection. Applicant testified on his own behalf, as did three other witnesses, and offered Applicant Exhibits (AE) A through D. These exhibits were admitted subject to Department Counsel's reservation of the right to further evaluate and possibly rebut AE D, which he first received right before the hearing. I granted both counsel's request to leave the record open until November 3, 2009, for submission of additional evidence. On that date, Applicant submitted additional evidence, with a copy to Department Counsel and requested that it be considered. Department Counsel expressed no objection to their admissibility, and submitted no other evidence. Applicant's new exhibits were marked AE E through K, and admitted. DOHA received the transcript of the hearing (Tr.) on November 4, 2009.

Findings of Fact

Applicant is a 56-year-old engineer who has worked for a federal contractor for almost four years. In his answer to the SOR, he denied the allegations in SOR ¶¶ 1.b, 2.a, 3.a, and 3.b, with explanations. He admitted the allegations in SOR ¶¶ 1.a, 1.c, and 1.d, including 1.d(1) through 1.d(10), with explanations. Applicant's admissions are incorporated into the following findings of fact.

Applicant is married for the second time. He has two adult daughters, one by each of his wives, and an adult stepson. He enlisted in the Army from 1971 to 1976, when he was medically discharged. He has never held a security clearance except a temporary interim clearance with his current employer. (GE 1 at 6, 10, 14-20, 25-26, 32; Tr. at 114-116, 120.)

Applicant pled guilty to, and was convicted of, Statutory Rape, 2nd Degree, in December 1983. This offense involved his sexual molestation between January 1982 and August 1983 of his stepson, who was then 11 to 13 years old. He was sentenced to ten years confinement, which was suspended subject to his successful participation in and completion of the Sexual Psychopathy program at a state psychiatric hospital. As part of his plea bargain, a second charge of Indecent Liberties involving other sexual

contact with the stepson, also a felony, was dropped. Applicant was also sentenced to ten years of probation, restitution and costs. (AR; GE 2.)

After his August 1983 arrest, but before his December conviction, Applicant attended a group outpatient sexual psychological treatment program. Applicant claims that he “wholeheartedly participated in the treatment program, and followed all rules, procedures, and treatment plans.” (AR at 3.) He found the program insufficient to meet his needs, however, and sought additional treatment elsewhere. He “freely shared with the group [his] concerns and the fact that he was seeking other treatment. This was looked on unfavorably by the group and directly led to [his] being voted out of that group.” (*Id.*) His subsequent assessment at the state hospital states that his course at the outpatient treatment program “indicates that there was only superficial compliance with the program, poor compliance with conditions, and perhaps a great deal of rationalization by seeking the easiest way out, namely ‘obtaining Christian counselling’.” (GE 4 at 2-3.) The outpatient program director described Applicant as “very antagonistic and quite unhelpful to the other men in the group” and “a chronic, out-of-control pedophile with both male and female victims.” The director recommended inpatient treatment because Applicant “wished to control treatment, diagnose himself, and [was] resistant to counseling.” (GE 4 at 24.) After being dismissed from this outpatient program in October 1983, Applicant received treatment from a Ph.D. managerial psychologist for several months. (GE 4 at 13; AE D; Tr. at 126-127.)

Applicant participated in the inpatient sex offender treatment program at the state psychiatric hospital from July 1984 until late October or early November 1985, when he announced that he no longer desired to participate in the program after completing three of the ten required steps. Among other things he admitted during treatment were multiple molestation incidents involving both his elder daughter and stepson from 1976 to 1983, and early stage grooming behavior toward his younger daughter who was only seven years old at the time of his arrest. (GE 4 at 6, 25.) In late November 1985, he was returned to the custody of the county sheriff. The hospital reported to the court that Applicant “was no longer amenable to treatment in the Sex Offender Program . . . and that, as a sexual psychopath who was considered untreatable, he was not safe to be at large. The prognosis is very poor.” (GE 4 at 25-26.) His final diagnosis was “Paraphilia, pedophilia, predominantly homosexual. Alcoholism, in remission due to confinement. History of street drug abuse. Antisocial personality disorder with passive-aggressive traits.” (*Id.*)

As part of his sexual psychotherapy treatment, Applicant wrote a sexual autobiography. In it, and during subsequent therapy sessions, he admitted to a pattern of deviant sexual activities beginning at approximately age 6, and continuing to the time of his arrest in August 1983, at age 30. As set forth in SOR ¶¶ 1.d(1) through 1.d(10), these included heterosexual and homosexual acts with children and adults, many of whom were relatives including his children, a nephew, and his brother-in-law. They also involved engaging his first wife in group sex, acts of bestiality, using pornography for arousal, and using alcohol and illegal drugs as disinhibitors towards physical and sexual urges. (GE 4; AR; Tr. at 128-129.)

After release from the state psychiatric hospital, in November 1985, Applicant was confined in the county jail pending probation revocation proceedings. The court held a series of hearings concerning Applicant's amenability to further treatment and work-release. On June 23, 1986, the judge ordered his release into active, intensive, supervised probation, and an outpatient sex offender counseling program by an approved psychologist. No evidence was provided by either party concerning this course of treatment or its outcome, but on May 23, 1988, the court granted Applicant's petition and ordered termination of his suspended sentence, his discharge from probation, and restoration of his civil rights. (GE 2 at 29-46.) There is no evidence of any subsequent sexual misconduct, although he and his wife remain aware of and discuss potential concerns and he avoids close or unsupervised contact with any children except his grandchildren. (AR at 6; Tr. at 85-86.)

From June 1986 to November 2003, Applicant worked in the maintenance department of an aviation services company, and ultimately became the director of maintenance. He left that job under unfavorable circumstances after a dispute with the owner over unsafe practices in connection with recording and scheduling maintenance requirements about which he ultimately wrote a letter to the Federal Aviation Administration. (GE 1 at 12, 28; Tr. at 118-119, 147-150.) He was then self-employed performing aircraft maintenance services until his present employer hired him in June 2006. (GE 1 at 11; Tr. at 119-120.)

Applicant submitted letters from his stepson and younger daughter saying that they had forgiven him, have reconciled, and presently have a good and loving relationship. They claim in general terms to know all about their father's past, but have not told their children about it in detail. Instead, they taught their children to avoid and report any improper touching by anyone. Applicant has a close and loving relationship with his seven grandchildren, who are ages 10 to 18. (AE E; AE G; AE H; AE K; Tr. at 85-86.)

Applicant submitted testimony and letters from longtime friends, professional acquaintances, coworkers, and supervisors expressing their opinions of his high integrity, trustworthiness, responsibility, good judgment, and reliability. Many of these people claimed to know, in general terms, about Applicant's past "mistakes" and his conviction for Statutory Rape in 1983. (AE A; AE B; AE C; AE F; AE I; AE J; Tr. at 36-73.) None of these people demonstrated any specific or detailed knowledge about the quantity and range of sexually deviant behavior to which Applicant admitted during his sex offender treatment programs, and Applicant took the position that he disclosed his past to the degree he thought someone needed to know. (GE 6 at 3; Tr. at 103-109, 138-141, 174-177.)

On September 10, 1992, Applicant confronted his stepson over stealing Applicant's property to sell or pawn for funds to support the stepson's cocaine use. Applicant physically assaulted the stepson, after which he admitted the thefts. Applicant was subsequently arrested and charged with Assault in the Fourth Degree. After a contested bench trial, he was found guilty on November 10, 1992. After a series of

continuances, his sentencing was deferred for 12 months on April 7, 1993, on condition that he have no further violations, pay a \$50 fee, and complete an anger management program. On March 22, 1996, the court found that Applicant had substantially complied with his deferred sentencing conditions, and dismissed the charge. (GE 3; GE 6 at 2; AR at 5; Tr. at 88-90.)

In preparation for his hearing, Applicant and his wife visited the managerial psychologist from whom he received several months of treatment between his post-arrest outpatient program and his sentencing to inpatient therapy. This psychologist had neither records nor recollection of his earlier course of treatment, but provided a psychological evaluation based on two interviews with Applicant and one with his wife. He found “many elements of a strong and healthy psyche,” and stated that it was “difficult to find many weaknesses in [Applicant’s] psychological profile.” The psychologist further stated that Applicant does not believe he is susceptible to blackmail or leverage because he had “disclosed his full past” to his employer, and his family and most of his friends are “fully aware of all issues.” He concluded “[Applicant’s] psychological/mental health is excellent. There are no psychological factors that should prevent [Applicant] from being granted full security clearance.” The psychologist’s description of the “issues” from Applicant’s “full past” consisted of “illegal sexual behavior,” “child sexual abuse,” and “pleading guilty to statutory rape.” There is no indication this psychologist was aware or informed of the extent of sexually-deviant behavior to which Applicant admitted during his other treatment programs. (AE D; Tr. at 109-111.)

Policies

When evaluating an applicant’s suitability for a security clearance, the administrative judge must consider and apply the revised adjudicative guidelines (AG). In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are to be used in evaluating an applicant’s eligibility for access to classified information.

These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in AG ¶ 2, describing the adjudicative process. The administrative judge’s overarching adjudicative goal is a fair, impartial, and commonsense decision. According to AG ¶¶ 2(a) and (c), the entire process is a conscientious scrutiny of applicable guidelines in the context of a number of variables known as the whole-person concept. The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that “[a]ny doubt concerning personnel being considered for access to classified information will be resolved in favor of the national security.” In reaching this decision, I have drawn only those conclusions that are reasonable, logical and based on

the evidence contained in the record. Likewise, I have avoided drawing inferences grounded in mere speculation or conjecture.

Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, “[t]he applicant is responsible for presenting witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by the applicant or proven by Department Counsel, and has the ultimate burden of persuasion as to obtaining a favorable clearance decision.” Section 7 of Executive Order 10865 provides, “[a]ny determination under this order adverse to an applicant shall be a determination in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.”

A person applying for access to classified information seeks to enter into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk that the applicant may deliberately or inadvertently fail to protect or safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified information.

Analysis

Guideline D, Sexual Behavior

AG ¶ 12 expresses the security concern under this guideline:

Sexual behavior that involves a criminal offense, indicates a personality or emotional disorder, reflects lack of judgment or discretion, or which may subject the individual to undue influence or coercion, exploitation, or duress can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. No adverse inference concerning the standards in this Guideline may be raised solely on the basis of the sexual orientation of the individual.

AG ¶ 13 describes conditions that could raise a security concern and may be disqualifying (DCs):

- (a) sexual behavior of a criminal nature, whether or not the individual has been prosecuted;
- (b) a pattern of compulsive, self-destructive, or high risk sexual behavior that the person is unable to stop or that may be symptomatic of a personality disorder;

(c) sexual behavior that causes an individual to be vulnerable to coercion, exploitation, or duress; and

(d) sexual behavior of a public nature and/or that reflects lack of discretion or judgment.

AG ¶ 14 provides conditions that could mitigate security concerns (MCs):

(a) the behavior occurred prior to or during adolescence and there is no evidence of subsequent conduct of a similar nature;

(b) the sexual behavior happened so long ago, so infrequently, or under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

(c) the behavior no longer serves as a basis for coercion, exploitation, or duress; and

(d) the sexual behavior is strictly private, consensual, and discreet.

Applicant's conviction of Statutory Rape and admission of additional child molestation offenses for which he was never prosecuted establish security concerns under AG ¶ 13(a). The record further shows a pattern of compulsive and high risk sexual behavior for almost 25 years. This behavior was diagnosed, during two sex-offender psychiatric treatment programs that he failed to complete, to be symptomatic of his paraphelia, pedophilia, and antisocial personality disorder. This supports potential disqualification under AG ¶ 13(b). The degree and extent of sexual deviancy that Applicant committed, combined with the high regard in which he is now held by friends, coworkers, and grandchildren, who were not shown to be remotely aware of that conduct, establishes an ongoing vulnerability to coercion, exploitation, or duress under AG ¶ 13(c). Finally, as Applicant admitted, his sexual conduct reflected lack of judgment under AG ¶ 13(d). The burden thus shifts to Applicant to extenuate or mitigate these security concerns flowing from his admitted behavior under all four DCs.

Although a substantial number of the deviant sexual acts admitted by Applicant took place prior to or during his adolescence, the substantial evidence of subsequent conduct of a similar (or worse) nature, including a felony conviction, precludes mitigation under AG ¶ 14(a). Applicant's sexual behavior of concern all took place more than 25 years ago, but was frequent and not under unusual circumstances. Its likelihood to recur is reduced by his lengthy abstention from such behavior, but he and his wife remain concerned enough about his possible temptation to re-offend that they discuss it regularly and try to avoid situations in which that might occur. This is commendable, but also reflects their own rational doubts concerning his current reliability, trustworthiness, and judgment, and precludes more than minimal mitigation under AG 14(b).

Applicant's conviction for Statutory Rape was shown to be sufficiently well known that, in itself, might support mitigation under AG ¶ 14(c). However, the nature and extent of the behavior underlying that conviction, as well as all the other deviancy detailed in SOR ¶¶ 1.d(1) through 1.d(10), were not shown to be known to the many friends, coworkers, and grandchildren whose high regard he worked hard to establish and now rightfully values a great deal. Accordingly, his sexual behavior continues to serve as a potent basis for coercion, exploitation, or duress, and AG ¶ 14(c) was not established. Much of Applicant's sexual behavior of security concern was private, in that it was not known to others. That would alleviate concerns under AG ¶ 13(d) for public sexual acts, but his conduct did not reflect good judgment or discretion, and its private nature forms the basis for ongoing coercion concerns under AG ¶ 13(c).

Guideline E, Personal Conduct

AG ¶ 15 expresses the security concern pertaining to personal conduct:

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. Of special interest is any failure to provide truthful and candid answers during the security clearance process or any other failure to cooperate with the security clearance process.

AG ¶ 16 describes the DCs under this guideline. The specific Guideline E concerns raised by the SOR allegations include:

(e) personal conduct, or concealment of information about one's conduct, that creates a vulnerability to exploitation, manipulation, or duress, such as (1) engaging in activities which, if known, may affect the person's personal, professional, or community standing . . .;

and the judgment, reliability, and trustworthiness issues the Appeal Board has found to be inherent under AG ¶ 15. ISCR Case No. 06-20964 (App. Bd. Apr. 10, 2008).

The nature and extent of Applicant's crimes against his children, and his other sexually deviant conduct, together with his concealment of his true culpability from others whose knowledge of it would adversely affect his personal, professional, and community standing, create ongoing vulnerability to exploitation, manipulation, and duress. These acts also raise serious concerns about Applicant's judgment, reliability and trustworthiness.

AG ¶ 17 provides personal conduct MCs. The only MCs with potential applicability to the foregoing security concerns are:

(c) the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances that it is

unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;

(d) the individual has acknowledged the behavior and obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances, or factors that caused untrustworthy, unreliable, or other inappropriate behavior, and such behavior is unlikely to recur; and

(e) the individual has taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or duress.

AG ¶ 17(c) was not established for the reasons discussed above concerning AG ¶ 14(b). Applicant produced evidence to support the first prong of AG ¶ 17(d), and is taking commendable steps to reduce the likelihood of recurrence. This provides some mitigation of the judgment and trustworthiness concerns, but not of the concerns over exploitation, manipulation, or duress. The steps Applicant has taken to reduce vulnerability to exploitation, manipulation or duress are insufficient, because the nature and extent of his sexual conduct understandably have not been revealed to those whose good opinion he values and has worked hard to establish. AG ¶ 17(e) was not shown to be applicable.

Guideline J, Criminal Conduct

AG ¶ 30 expresses the security concern pertaining to criminal conduct, "Criminal activity creates doubt about a person's judgment, reliability, and trustworthiness. By its very nature, it calls into question a person's ability or willingness to comply with laws, rules and regulations." AG ¶ 31 describes Criminal Conduct DCs, two of which are raised by the evidence: "(a) a single serious crime or multiple lesser offenses;" and "(c) allegation or admission of criminal conduct, regardless of whether the person was formally charged, formally prosecuted, or convicted."

Applicant was arrested and convicted of Statutory Rape, 2nd Degree, a felony, in 1983. He was also convicted of assaulting his stepson in 1992. These facts sufficiently raise security concerns under the DCs set forth in AG ¶¶ 31(a) and (c).

AG ¶ 32 sets forth potential criminal conduct MCs. These are:

(a) so much time has elapsed since the criminal behavior happened, or it happened under such unusual circumstances that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;

(b) the person was pressured or coerced into committing the act and those pressures are no longer present in the person's life;

(c) evidence that the person did not commit the offense; and

(d) there is evidence of successful rehabilitation; including but not limited to the passage of time without recurrence of criminal activity, remorse or restitution, job training or higher education, good employment record, or constructive community involvement.

Applicability of the MC set forth in AG ¶ 32(a) is minimal for the reasons discussed above concerning AG ¶ 14(b). There is no evidence Applicant was pressured to commit these offenses by anything other than deviant sexual urges about which he and his wife remain concerned, so AG ¶ 32(b) was not established. AG ¶ 32(c) was not asserted, but Applicant provided sufficient evidence of rehabilitation through the passage of more than 17 years since the assault and 26 years since the sex offenses, his evident remorse, job training, and a good employment record to support mitigation of criminal conduct security concerns under AG ¶ 32(d). Accordingly, Paragraph 3 is found for the Applicant.

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all relevant circumstances. The administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(a):

(1) the nature, extent, and seriousness of the conduct; (2) the circumstances surrounding the conduct, to include knowledgeable participation; (3) the frequency and recency of the conduct; (4) the individual's age and maturity at the time of the conduct; (5) the extent to which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

Under AG ¶ 2(c), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the applicable guidelines and the whole-person concept.

I considered the potentially disqualifying and mitigating conditions in light of all the pertinent facts and circumstances surrounding this case. Applicant's conduct of security concern involves a period of almost 25 years during which he engaged in numerous deviant sexual acts including felonious child molestation for which he was ultimately convicted in 1983. He eventually completed court-ordered sex offender treatment, after failing to complete his first two programs, and was discharged from probation in 1988. He was also convicted of assault in 1992, but that charge was later dismissed after he completed probation and an anger management program. His participation in these events was voluntary and motivated by self-gratification or anger.

There is no evidence of any sexual misconduct since 1983, or criminal conduct since 1992, and Applicant has reestablished a good reputation and affectionate relationships within his family and among his friends. This is positive evidence of rehabilitation. He is highly regarded by professional acquaintances, coworkers and supervisors as well. Many of these people know he was convicted of statutory rape more than 25 years ago, and his children and wife know what he did to them. However, during treatment he also confessed to a number of additional acts of deviant sexual behavior as specified in SOR ¶¶ 1.d(1) through 1.d(10). Information about these actions would be likely to severely damage the esteem in which he is currently held by these people who have become important in his life. Despite his general assertions during the security clearance process, and to the managerial psychologist whose opinion he offered in evidence, that he had fully disclosed his past misconduct, no credible evidence was presented to show that these people knew the specifics of his deviant acts. The two close friends who testified knew very little, in fact. The potential for pressure, coercion, exploitation, or duress arising from this potentially humiliating information continues to date and, if anything, grows in its ability to threaten his increasing reputation as an honorable man.

The likelihood of recurrence of deviant sexual conduct has been reduced by the ongoing efforts of Applicant and his wife to prevent that. However, the potential for coercion, exploitation, or duress from exposure of the [avoid the temptation to editorialize] details of his past sexual conduct is certain to continue. Applicant presented insufficient evidence to mitigate security concerns arising from his sexual behavior and personal conduct. The record generates significant doubt as to his present eligibility and suitability for a security clearance.

Formal Findings

Formal findings for or against Applicant on the allegations set forth in the SOR, as required by section E3.1.25 of Enclosure 3 of the Directive, are:

Paragraph 1, Guideline D:	AGAINST APPLICANT
Subparagraph 1.a:	Against Applicant
Subparagraph 1.b:	Against Applicant
Subparagraph 1.c:	Against Applicant
Subparagraph 1.d:	Against Applicant
Paragraph 2, Guideline E:	AGAINST APPLICANT
Subparagraph 2.a:	Against Applicant
Paragraph 3, Guideline G:	FOR APPLICANT
Subparagraph 3.a:	For Applicant
Subparagraph 3.b:	For Applicant

Conclusion

In light of all of the circumstances presented by the record in this case, it is not clearly consistent with the interests of national security to grant Applicant eligibility for a security clearance. Eligibility for access to classified information is denied.

DAVID M. WHITE
Administrative Judge