

**United States Department of Energy
Office of Hearings and Appeals**

In the Matter of Ayyakkannu Manivannan)	
)	
Filing Date: November 29, 2017)	Case Nos.: FIA-17-0049
)	FIA-17-0050
_____)	

Issued: January 11, 2018

Decision and Order

On November 29, 2017, Dr. Ayyakkannu Manivannan (Appellant) appealed two Redetermination Letters issued to him from the Department of Energy’s (DOE) National Energy Technology Laboratory (NETL) (Request Nos. HQ-2017-00833-F/NETL-2017-01017-F, HQ-2017-00890-F/NETL-2017-01016-F). In the Redetermination Letters, NETL responded to two Requests filed under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, as implemented by DOE in 10 C.F.R. Part 1004. NETL released various responsive documents, but redacted portions of some documents pursuant to Exemption (b)(5) of the FOIA. The Appellant appealed, asserting that NETL did not perform an adequate search, improperly invoked the FOIA Exemptions, and waived its right to invoke Exemption 5. This Appeal, if granted, would require an additional search for responsive information and would require NETL to release some or all of the redacted information.

I. Background

The Appellant submitted two separate FOIA Requests, on April 4, 2017, and April 12, 2017, seeking several different categories of information. FOIA Requests from A. Manivannan (April 4, 2017; April 12, 2017). In the April 4, 2017, Request, enumerated item 12 sought “all communication documents, including phone calls and emails with Centre County officials,” and “video/audio tape records pertaining” to an investigation against him. In enumerated item 16, the Appellant requested “information regarding the identity of the person who prepared the ‘Notice of [P]roposed [R]emoval.’”

In response to the April 4, 2017, Request, NETL issued a Determination Letter on October 6, 2017, which the Appellant appealed to our office in *Ayyakkannu Manivannan*, Case No. FIA-17-0035

(2017).¹ In relevant part, we determined that NETL did not perform an adequate search with regard to items 12 and 16. We, therefore, referred the matter back to NETL to conduct an adequate search. *Id.* Following this decision, NETL issued a Redetermination Letter on November 22, 2017, in which it responded to item 12, releasing 66 pages of responsive records and redacting 89 portions pursuant to Exemption 5 of the FOIA.² With respect to item 16, NETL released 41 pages of responsive records, redacting 13 portions pursuant to Exemption 5.

In his Request of April 12, 2017, the Appellant requested numerous records, including the notes of a NETL attorney (NETL Attorney); all communications between the NETL Attorney and the police and Centre County district attorneys; all records, including a video/audio tape, regarding requests made to NETL from the police and district attorney; a report from the NETL Attorney to NETL management regarding his observations at the Appellant's trial; and the testimony of a particular individual to a DOE contracted investigator. FOIA Request (April 12, 2017). In response to the April 12, 2017, Request, NETL first issued a Determination Letter on May 19, 2017, which it subsequently withdrew. It then issued two partial responses before ultimately issuing a Redetermination Letter on November 3, 2017. In the Redetermination Letter, NETL released 157 pages of responsive records, making 29 redactions pursuant to Exemption 5 of the FOIA.

On November 29, 2017, the Office of Hearings and Appeals (OHA) received the Appellant's challenges to NETL's Redeterminations. FOIA Appeals (November 29, 2017). In the Appeals, the Appellant contends that NETL has not conducted adequate searches on either of the FOIA Requests as certain documents, including a video/audio tape, are missing. *Id.* He further contends that NETL has inappropriately invoked Exemption 5 of the FOIA, and that NETL has waived its right to invoke Exemption 5 as it has already shared the requested documents with the Centre County District Attorney's Office and the Penn State Police. *Id.*

II. Analysis

A. Adequacy of the Search³

In responding to a request for information filed under the FOIA, it is well established that an agency must "conduct a search reasonably calculated to uncover all relevant documents." *Truitt v. Dep't of State*, 897 F.2d 540, 542 (D.C. Cir. 1990). The standard of reasonableness we apply "does not require absolute exhaustion of the files; instead, it requires a search reasonably calculated to uncover the sought materials." *Miller v. Dep't of State*, 779 F.2d 1378, 1384-85 (8th Cir. 1985); accord *Truitt*, 897 F.2d at 542. We have not hesitated to remand a case where it is evident that the search conducted was in fact inadequate. *See, e.g., Ralph Sletager*, Case No. FIA-14-0030 (2014).

¹ Decisions issued by the Office of Hearings and Appeals (OHA) are available on the OHA website located at www.energy.gov/oha.

² Although NETL released 66 pages with 89 redactions, NETL notes in its Redetermination Letter that "there are many duplications" within the released documents.

³ NETL confirmed that it released a collection of documents to the Centre County District Attorney's Office in cooperation with a subpoena; however, it did not retain an additional copy of the documents. As such, it must conduct searches for the Appellant's documents anew. Email Chain between NETL and OHA (December 12, 2017).

1. April 4th Request: Items 12 and 16

NETL provided our office with information regarding the additional search it conducted to process the Redetermination for Appellant's requested items 12 and 16. Beginning with item 12, NETL explained that it searched its email database using the search terms "Manivannan," "investigation," "Management Directed Investigation (MDI)," "Centre County," and the name of the former NETL Chief Counsel.⁴ Email Chain between NETL and OHA (December 7-11, 2017). NETL also explained that it examined its investigative file and contacted multiple individuals and offices throughout NETL who may have had additional documentation. *Id.* Within the investigative file, NETL located the requested phone call lists and provided them to the Appellant in a previous determination letter. *Id.* NETL clarified that these phone call lists were comprehensive and would not be located anywhere else. *Id.* NETL stated that there is "nowhere remaining to search." *Id.*

With regard to the requested video/audio recordings, NETL explained that any recordings were made by a non-DOE investigator for transcription purposes only. *Id.* NETL contacted this investigator when the FOIA request was submitted, and the investigator explained that she deleted any recordings once she had completed her investigative report. *Id.* Therefore, any such recording no longer exists and cannot be provided in response to the FOIA request.

Turning to item number 16, in conducting its additional search, NETL explained that it searched its email database using the term "Manivannan." Memorandum of Phone Call between OHA and NETL (December 7, 2017). Then within the emails that surfaced, it searched the terms "removal," "discipline," and "Management Directed Investigation." *Id.* NETL also searched for the name of the NETL Attorney, and the name of a human resources specialist. *Id.* Although it could find no document identifying the person who drafted the Notice of Proposed Removal, NETL provided the Appellant with 41 pages of relevant, responsive records. *Id.*

Based on NETL's description of its search with regard to items 12 and 16, we conclude that NETL conducted a search reasonably calculated to uncover the records sought by the Appellant, and that the search was therefore adequate.

2. April 12th Request

NETL also provided our office with information regarding the additional search it conducted for the Redetermination for the Appellant's April 12th Request. With regard to items 4 and 5, requesting records and communications between, and regarding, NETL, the district attorney's office, and the police department, NETL informed us that it searched its email database for the terms "Manivannan," "Centre County," "Penn State," the name of the NETL Attorney, and the names of the three attorneys from the district attorney's office listed in the Request. Email Chain between NETL and OHA (December 12, 2017). It also examined the NETL Attorney's hard copy files and contacted NETL's Equal Employment Opportunity (EEO) office for any relevant documentation.⁵ *Id.*

⁴ For the privacy of these individuals, we omit the use of their names.

⁵ While the Appellant additionally sought "audio/visual tape records," as we explained above, NETL searched for these records, and they no longer exist.

Turning to item 7, the Appellant requested the release of the testimony of a particular individual given to the non-DOE investigator. NETL informed us that it searched its email database for the terms “Manivannan” and the name of the individual. *Id.* It also contacted the NETL Attorney, who was present when the testimony of NETL personnel was given to the investigator, and the Attorney indicated that this individual never testified. *Id.* Accordingly, the requested testimony does not exist. NETL nonetheless provided the Appellant with “[d]ocuments relating to [the individual’s] knowledge of the case.” Redetermination Letter at 2 (November 3, 2017).

Based upon NETL’s explanation of its search with regarding the April 12th Request, we conclude that NETL conducted a search reasonably calculated to uncover the records sought by the Appellant, and that the search was therefore adequate.

B. Exemption (b)(5)

The FOIA requires that documents held by federal agencies generally be released to the public upon request. The FOIA, however, lists nine exemptions that set forth the types of information that may be withheld at the discretion of the agency. 5 U.S.C. § 552(b)(1)-(9). Those nine categories are repeated in the DOE regulations implementing the FOIA. 10 C.F.R. § 1004.10(b)(1)-(9). We must construe the FOIA exemptions narrowly to maintain the FOIA’s goal of broad disclosure. *Dep’t of the Interior v. Klamath Water Users Prot. Ass’n*, 532 U.S. 1, 8 (2001) (citation omitted). The agency has the burden to show that information is exempt from disclosure. *See* 5 U.S.C. § 552(a)(4)(B). Agencies are also required to “consider whether partial disclosure of information is possible whenever [it] determines that a full disclosure of the requested records is not possible.” 5 U.S.C. § 552(a)(8)(A). DOE must “take reasonable steps necessary to segregate and release nonexempt information.” *Id.*

The Appellant challenges NETL’s use of Exemption (b)(5) to redact the documents that it provided to him in response to the April 4th and April 12th FOIA Requests. FOIA Appeals (November 29, 2017). Exemption 5 of the FOIA exempts from mandatory disclosure “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with an agency.” 5 U.S.C. § 552(b)(5); 10 C.F.R. § 1004.10(b)(5). The Supreme Court has held that this provision exempts “those documents, and only those documents, normally privileged in the civil discovery context.” *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 149 (1975). The courts have identified three traditional privileges, among others, that fall under Exemption 5: the attorney-client privilege, the attorney work-product privilege, and the executive “deliberative process” privilege. *Coastal States Gas Corp. v. Dep’t of Energy*, 617 F.2d 854, 862 (D.C. Cir. 1980).⁶

Under the deliberative process privilege, agencies are permitted to withhold documents that reflect advisory opinions, recommendations and deliberations comprising part of the process by which government decisions and policies are formulated. *Sears*, 421 U.S. at 151. The privilege is intended to promote frank and independent discussion among those responsible for making governmental

⁶ Although the Redetermination Letters stated that NETL relied on the three traditional privileges in redacting information, NETL clarified that it relied only on the attorney-client privilege and the deliberative process privilege to redact the responsive records. Redetermination Letters (November 3, 2017; November 22, 2017); Email Chain between NETL and OHA (December 12, 2017). Therefore, we will only address those privileges herein.

decisions. *EPA v. Mink*, 410 U.S. 73, 87 (1973) (quoting *Kaiser Aluminum & Chem. Corp. v. United States*, 157 F. Supp. 939 (1958)). The ultimate purpose of the Exemption 5 deliberative process privilege is to protect the quality of agency decisions. *Sears*, 421 U.S. at 151. In order to be shielded by the privilege, a record must be both predecisional, generated before the adoption of agency policy, and deliberative, reflecting the give-and-take of the consultative process. *Coastal States*, 617 F.2d at 866. The deliberative process privilege does not exempt purely factual information from disclosure. *Petroleum Info. Corp. v. Dep't of the Interior*, 976 F.2d 1429, 1435 (D.C. Cir. 1992). However, “[t]o the extent that predecisional materials, even if ‘factual’ in form, reflect an agency’s preliminary positions or ruminations about how to exercise discretion on some policy matter, they are protected under Exemption 5.” *Id.* The deliberate process privilege routinely protects certain types of information, including “recommendations, draft documents, proposals, suggestions, and other subjective documents which reflect the personal opinions of the writer rather than the policy of the agency.” *Coastal States Gas Corp.*, 617 F.2d at 866.

The attorney-client privilege exists to protect confidential communications between attorneys and their clients made for the purpose of securing or providing legal advice. *In Re Grand Jury Subpoena of Slaughter*, 694 F.2d 1258, 1260 (11th Cir. 1982); 8 J. Wigmore, *Evidence*, § 2291, p. 590 (McNaughton Rev. Ed. 1961); McCormack, *Law of Evidence*, Sec. 87, p.175 (2d ed. E. Cleary 1972). Not all communications between attorney and client are privileged, however. *Clark v. American Commerce National Bank*, 974 F.2d 127 (9th Cir. 1992). The courts have limited the protection of the privilege to those disclosures necessary to obtain or provide legal advice. *Fisher v. United States*, 96 S. Ct. 1569, 1577 (1976). In other words, the privilege does not extend to social, informational, or procedural communications between attorney and client.

1. April 4th Request

a) Item 12

In response to item 12, NETL released 66 pages of, primarily, emails to the Appellant and made 89 redactions pursuant to Exemption (b)(5), claiming both the attorney-client privilege and the deliberative process privilege.⁷ The majority of the redacted emails are exchanges between the NETL Attorney and an attorney from the Centre County District Attorney’s Office (DA), with the subject line “RE: Subpoena.” Additionally, there is one email between the NETL Attorney and a Penn State University (PSU) police officer, and four emails which are internal to DOE.

With regard to the email exchanges between the NETL Attorney and the DA, and the NETL Attorney and the PSU police officer, we note that the threshold requirement of Exemption 5 is that the protected documents must be “inter-agency or intra-agency records.” 5 U.S.C. § 552(b)(5); 10 C.F.R. § 1004.10(b)(5). The Supreme Court has defined an “agency” to mean “each authority of the Government of the United States.” *Dep't of the Interior v. Klamath Water Users Protective Ass'n*, 532 U.S. 1, 9 (2001). The Court in *Klamath* also analyzed, but did not directly rule on, the concept of the “consultant corollary,” wherein communications between an agency and a non-

⁷ We note that many of the redacted emails are identical and provided multiple times.

agency consultant are held to be “intra-agency” under Exemption 5.⁸ *Id.* at 9-14. NETL has not shown that either the Centre County District Attorney’s office or the PSU Police Department were acting in the capacity of employees or consultants to NETL, and thus, both fall outside the purview of the protections of Exemption 5. Accordingly, NETL cannot redact any of these emails pursuant to Exemption 5.

Turning now to the remaining four redacted emails in item 12, as we have previously stated, these emails are internal to DOE. Therefore, these emails are intra-agency correspondence and, thus, pass the Exemption 5 threshold. We must now determine if the redacted content of these emails falls within the protection of either the attorney-client or deliberative process privileges. For clarity, we will refer to these emails as Emails A-D.

Email A is from a DOE Assistant General Counsel to the former Chief Counsel of NETL, responding to the Chief Counsel’s question regarding the subpoena. Email Entitled “RE: Subpoena in a Criminal Matter involving a NETL employee” (March 14, 2016). Our review of the redacted portion of the email reveals that the information withheld consists of the DOE Assistant General Counsel providing legal advice to the NETL Chief Counsel. Therefore, we conclude that NETL properly invoked the attorney-client privilege of Exemption 5.

Email B is from the NETL Attorney to a NETL supervisory attorney and the former Chief Counsel. Email Entitled “FW: Subpoena” (April 5, 2016). Our review of this email reveals that the NETL Attorney is merely relaying what he told the DA in his emails to her. This communication does not contain any legal advice, nor is it predecisional and deliberative. Therefore, the redaction of this email pursuant to Exemption 5 was not proper.

Email C is from the NETL Attorney to a NETL supervisory attorney, attaching a draft letter. Email Entitled “Draft” (May 11, 2016). Our review of the redaction reveals that the withheld information consists of the NETL Attorney’s plan moving forward and his concerns about the document. Therefore, this communication is predecisional, as it was generated prior to NETL adopting a final decision on the matter, and it is deliberative, as it reflects the give-and-take of the consultative process. Accordingly, NETL properly invoked the deliberative process privilege of Exemption 5 with regard to Email C. *See Coastal States*, 617 F.2d at 866.

Finally, Email D is from the NETL Attorney to a NETL supervisory attorney. Email Entitled “FW: A. Manivannan and U.S. DOE-NETL” (June 20, 2016). The unredacted portion of the email informs the supervisory attorney that the Appellant resigned. Our review of the redacted portion does not indicate an exchange of legal advice or opinions, nor does it reflect any deliberative communications. Accordingly, this redaction pursuant to Exemption 5 was not proper.

⁸ The U.S. District Court for the District of Columbia has held that communications between the U.S. Federal Emergency Management Agency (FEMA) and employees of Mississippi and Louisiana to coordinate evacuation plans for Hurricane Katrina were intra-agency documents, and properly withheld under Exemption 5, because they involved non-agency personnel acting in a consulting capacity. *Citizens for Responsibility and Ethics v. Department of Homeland Sec.*, 514 F. Supp. 2d 36, 43-45 (D. D.C. 2007) (citing *Klamath*, 532 U.S. at 9-10, 15).

b) Item 16

With regard to item 16, NETL released 41 pages of responsive records and made 13 redactions to emails pursuant to Exemption 5. Upon examining these redactions, we determine that four of these redactions made pursuant to Exemption 5 were not proper, two were properly redacted in part pursuant to the deliberative process privilege, and the remaining seven were properly redacted pursuant to the deliberative process privilege. As we explain below, we conclude that two redactions that were partially proper are reasonably segregable and require partial disclosure.

The four redactions that we have determined were improper pursuant to Exemption 5 are as follows: Emails Entitled “RE: Manivannan Found Guilty on Five Felony Counts” (April 22, 2016 at 6:06 a.m. and at 7:28 a.m.) and Emails Entitled “RE: Question” (January 13, 2017 and January 17, 2017). These communications primarily discuss scheduling matters, and in one case, an apparent social conversation. As such, the communications do not contain any legal advice or opinions, and they do not reflect any deliberative communications. Accordingly, these redactions were improperly made pursuant to Exemption 5.

The two redactions that we have determined are partially proper pursuant to the deliberative process privilege are emails entitled “Subject: Question” (April 21, 2016 at 10:33 a.m. and January 13, 2017 at 8:12 A.M). The first three sentences of this first email contain no deliberative process and solely contain factual background. With regard to the second email, the first and third sentences contain no deliberative process. Both sentences are factual in nature. Accordingly, these portions were not properly redacted pursuant to Exemption 5.

As we have stated above, we conclude that the remaining seven redactions were properly made pursuant to the deliberative process privilege. All of these emails are internal, “intra-agency” emails and, thus, pass the Exemption 5 threshold. Further, these emails reflect the recommendations, opinions, and deliberations of NETL personnel, including the NETL Attorney, comprising part of the process by which NETL decisions were made regarding the Appellant. *See Sears*, 421 U.S. at 151.

2. April 12th Request

With regard to the April 12th Request, NETL released 157 pages, making 29 redactions.⁹ Upon examining these redactions, we conclude that eight were not properly made pursuant to Exemption 5; five were properly made pursuant to Exemption 5; and an additional eleven were partially proper under Exemption 5, but require segregation.

With regard to the redactions that were not properly made pursuant to Exemption 5, we note that four redacted emails pertain to scheduling matters. They are emails entitled “RE: Rough Draft” (February 23, 2016) and “RE: Update” (May 10, 2016 at 12:07 p.m., May 10, 2016 at 3:07 p.m., and May 11, 2016 at 6:19 a.m.) Another redacted email, “RE: Phone #” (April 7, 2016), pertains to a solely factual matter. As such, these emails do not contain any legal advice or opinions; they

⁹ We will only address 24 of the redactions, as five are duplicative.

do not reflect any deliberative communications. Therefore, they were not properly redacted pursuant to Exemption 5.

Additionally, there is an email chain with the subject line, "I'm Sorry." The initial email and the response are exchanges between the NETL Attorney and the DOE contracted investigator. The NETL Attorney then forwarded this exchange to a NETL employee. There is very limited context contained within these emails, and without further explanation from NETL, we cannot discern if the deliberative process or attorney-client privileges apply. As such, we cannot determine whether Exemption 5 was properly applied, and NETL will need to issue a new determination explaining its justification for withholding the information pursuant to Exemption 5. *See, e.g., Great Lakes Wind Truth*, Case No. FIA-14-0066 (2014).

We will now address the redactions made pursuant to the attorney-client privilege of Exemption 5 with respect to emails entitled, "Subject: Douglas Factors" (March 16, 2016) and "FW: perf ratings" (April 4, 2016). At the outset, we note that these emails are between the NETL Attorney and a NETL employee. In each of these emails, the NETL Attorney is providing legal advice to the NETL employee. However, these two emails require segregation, as not every sentence contains legal advice. Therefore, although some portions of these redactions were properly made pursuant to Exemption 5, other portions were not properly made pursuant to the exemption, and require segregation by NETL.

The remaining 14 email redactions were made pursuant to the deliberative process privilege. All of these emails are internal NETL communications and reflect the recommendations, opinions, and deliberations of NETL personnel, including the NETL Attorney, comprising part of the process by which NETL decisions were made regarding the Appellant. *See Sears*, 421 U.S. at 151. However, we do note that the majority of these emails require segregation as not all of the information contained therein is exempt pursuant to Exemption 5. Based upon our examination of the redactions, the emails that were properly redacted in full are entitled, "RE: Douglas Factors" (March 24, 2016); "RE: Question" (April 5, 2016); "Subject: Douglas Worksheet" (April 6, 2016); and "RE: Mani Step Increase" (April 21, 2016 at 12:13 p.m. and 1:36 p.m.). Accordingly, the remaining nine email redactions must be segregated. These emails are entitled, "RE: Status – Personnel Decision" (February 17, 2016); "Subject: Rough Draft" (February 21, 2016) "Subject: Proposal" (April 5, 2016); "Subject: Question" (April 5, 2016);¹⁰ "FW: Question" (April 6, 2016); "Subject: Update" (April 8, 2016); "Subject: Update" (May 10, 2016 at 10:13 a.m.); and "RE: Update" (May 11, 2016 at 10:45 a.m.).

C. Waiver of Exemption 5

As we have stated above, the Appellant contends, on appeal, that NETL has waived its right to invoke Exemption 5 as it has already shared the requested documents with the Pennsylvania Centre County Prosecutor and the Penn State Police. FOIA Appeal (November 29, 2017). NETL confirmed it did release a collection of documents, in their entirety, to the Pennsylvania Centre County Prosecutor in response to a subpoena. Memorandum of Phone Call between OHA and NETL (December 7, 2017). Although "[v]oluntary disclosure of documents, either in whole or in part, to third parties has sometimes been held to waive FOIA exemptions for those documents,"

¹⁰ There are two redactions within this email.

Mobil Oil Corp. v. U.S. E.P.A., 879 F.2d 698, 700 (9th Cir. 1989), NETL provided the record to the district attorney's office in cooperation with a subpoena. Compliance with a subpoena does not constitute a voluntary disclosure and, accordingly, does not constitute a waiver. See *Florida House of Representatives v. U.S. Dep't of Commerce*, 961 F.2d 941, 946 (11th Cir. 1992) ("If documents are exempt from disclosure under the FOIA, the fact that they were involuntarily disclosed by means other than the FOIA should not lead to a finding of waiver.").

D. Exemption 6

Although the Appellant contends that "NETL denied the FOIA request based on Exemptions (b)(5) and 6," in examining the responsive Redetermination Letter, we cannot find that NETL indicated that any information was withheld pursuant to Exemption 6. FOIA Appeal FIA-17-0050 (November 29, 2017); Redetermination Letter (November 3, 2017). Accordingly, we will not address this argument on appeal.

III. Conclusion

For the reasons stated above, we conclude that although NETL conducted an adequate search for responsive records, it improperly redacted certain documents pursuant to Exemption 5. On remand, NETL may reexamine the redactions deemed to be improper and issue a new determination reflecting a revised FOIA analysis. We will therefore grant the appeal, in part, and deny the appeal, in part.

IV. Order

It is hereby ordered that the Appeals filed on November 29, 2017, by Dr. Ayyakkannu Manivannan, Nos. FIA-17-0049 and FIA-17-0050, are granted in part and denied in part.

This matter is hereby referred to the National Energy Technology Laboratory, which shall process the Request in accordance with this Decision and Order.

This is a final order of the Department of Energy from which any aggrieved party may seek judicial review pursuant to the provisions of 5 U.S.C. § 552(a)(4)(B). Judicial review may be sought in the district in which the requester resides or has a principal place of business, or in which the agency records are situated, or in the District of Columbia.

The 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect the right to pursue litigation. OGIS may be contacted in any of the following ways:

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