STATE PERSONNEL BOARD, STATE OF COLORADO
Case No. **2009G006**

INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE

TIMOTHY NAWROCKI,
Complainant,

vs.

DEPARTMENT OF PUBLIC SAFETY, COLORADO STATE PATROL,
Respondent.

Administrative Law Judge Hollyce Farrell held the hearing in this matter on January 20, 2009, at the State Personnel Board, 633 - 17th Street, Courtroom 6, in Denver, Colorado. Assistant Attorney General Diane Marie Dash represented Respondent. Respondent's advisory witness was Major Hal Butts, the appointing authority. Complainant appeared and was not represented by counsel.

MATTER APPEALED

Complainant, Timothy Nawrocki (Complainant), appeals a corrective action issued to him by Respondent, Department of Public Safety, Colorado State Patrol (Respondent). Complainant seeks rescission of the corrective action and all references to it. He further seeks that he issues surrounding the corrective action not be considered in any of his performance evaluations. Finally, he seeks "discontinuation from unfair and retaliatory treatment and a workplace free of harassment and hostility." Respondent seeks to have the corrective action affirmed.

For the reasons set forth below, Respondent's action is **affirmed.**

ISSUES

1. Whether Complainant committed the acts for which he received a corrective action;

2. Whether Complainant's receipt of the corrective action was arbitrary, capricious or contrary to rule or law.

FINDINGS OF FACT

Background

1. Prior to May of 2007, Complainant was employed as a Captain, working in Respondent's Pueblo office. As Captain, Complainant was the Troop Commander for that office.

2. On May 8, 2007, Complainant received a disciplinary demotion to Master Sergeant, and was transferred out of the Pueblo office, and assigned to Respondent's Denver office. Complainant appealed his disciplinary action, and had a hearing before the State Personnel Board on August 30, 2007. The Initial Decision regarding that appeal was issued on October 4, 2007. Complainant returned to the Pueblo office in December of 2007.

3. The Administrative Law Judge who held the hearing concerning Complainant's disciplinary demotion, affirmed the disciplinary demotion, but rescinded the transfer out of the Pueblo office.

4. After Complainant was demoted, Scott Copley became the Captain and Troop Commander for Respondent's Pueblo office. He was Complainant's supervisor from December of 2007 until June of 2008. A Troop Commander oversees the entire operation of the troop.

Evidence Procedures at CSP

5. Shortly after Complainant returned to the Pueblo, Captain Copley assigned Complainant to be the troop's evidence custodian. Evidence held by the Colorado State Patrol must be secured or tracked. It is critical to insure that evidence is maintained properly, and properly destroyed if necessary. To that end, each piece of evidence has a form, known as a CSP 83, which should be with the evidence at all times.

6. In the Pueblo office, there are two sets of keys to the evidence lockers. The evidence custodian has possession of one set of keys and the Captain has possession of the other set.

7. Colorado State Patrol Operation and Administrative Procedures, Chapter 308.01, governs evidence control, including the destruction of evidence. The following sections of Chapter 308.01 outline the procedures for the destruction of evidence:

   XXIII. EVIDENCE CUSTODIAN

A. Requests written authorization from the troop/section commander in which to destroy any unclaimed, non-salable, or contraband items of evidence (excludes firearms).

XXIII. TROOP/SECTION COMMANDER

A. Upon review, provides written authorization to destroy an unclaimed, non-salable, or contraband items of evidence.

XXIV. TROOP/SECTION COMMANDER OR SUPERVISOR DESIGNEE

A. Accompanies the evidence custodian and monitors the destruction of any unclaimed, non-salable, or contraband items of evidence and initial witnessed by block under the disposition of the hard-card.

1. An incinerator will be used to destroy any schedule I-V controlled substances, suspected or counterfeit controlled substances, or prescription and non-prescription drugs.

XXV. EVIDENCE CUSTODIAN

A. Files the hard-card and any supporting documents for a period of not less than seven calendar years from the date of destruction.

B. Forwards a photocopy of the completed hard-card for inclusion in the original case file.

8. Evidence is deemed appropriate for destruction when the district attorney for the judicial district where the evidence was relevant provides Respondent with a destruction order.

December 2007 Evidence Burn

9. Brad Kennerson, a trooper working in Respondent's Hazardous Materials section, was the evidence custodian for the Pueblo office prior to Complainant being assigned to that position. After Kennerson received a destruction order for a piece of evidence, he would go to the evidence room, and set it aside for destruction.

10. After Kennerson had accumulated enough evidence for destruction, usually enough to fill the back of a pick up truck, he would take the evidence to the steel mill in Pueblo for incineration. Sometimes, it would take a few weeks to accumulate enough evidence, and other times it could take up to a few months.

11. A few days before December 7, 2007, Kennerson concluded that he had accumulated enough evidence authorized for destruction to fill the back of a pick-up truck. There were approximately one hundred items of evidence slated for destruction. However, he did not compare the evidence to the CSP 83 forms to make sure that all of the evidence was there.

12. Kennerson completed an evidence card which listed all of the evidence to be destroyed. Neither Kennerson, nor any other person in the Pueblo office, received written authorization from Captain Copley to destroy the evidence that Kennerson collected.

13. Kennerson had previously worked under Complainant's command when Complainant was the Troop Commander of the Pueblo office, and thought he was correctly following procedure when he gathered the evidence and made the decision to destroy it.

14. When Complainant was the Trooper Commander, Kennerson got his written approval on at least one occasion before doing an evidence burn. It was unclear whether Kennerson was aware that he needed approval from the Troop Commander before doing an evidence burn.

15. Kennerson asked Complainant to accompany him to do the evidence burn at the steel mill in Pueblo on December 7, 2007, and Complainant agreed to do so. That conversation took place a few days before December 7. Captain Copley did not designate Complainant, or anyone else, to be his designee for the evidence burn. Captain Copley was unaware that burn was taking place. Complainant was with Kennerson when the evidence was loaded, and when the evidence was burned at the steel mill.

16. Complainant was not the evidence custodian when the December 7, 2007 burn took place; his duties fell under that of a supervisor designee, who was to accompany the evidence custodian and monitor the destruction of the evidence. However, Complainant was not designated by Copley to perform that task.

17. Complainant did not take any steps to ascertain that the evidence listed on the evidence card was actually destroyed. After the evidence burn was complete, Kennerson initialed the paperwork which indicated that the evidence had been burned. Complainant also initialed the CSP 83s to verify that the evidence listed had been burned. Complainant believed that he was following the policy concerning the destruction of evidence.

18. Complainant did not believe that he had an obligation to verify that the evidence listed was actually loaded and destroyed as he believed that Kennerson had correctly followed the policy. He also did not verify whether Copley had given his approval for the evidence burn.

Evidence Room Audit

19. In mid-January of 2008, after Complainant was assigned the evidence custodian position, Copley asked Complainant to conduct an audit of the evidence locker in Pueblo. During that audit, Complainant discovered several bricks of marijuana in a duffle bag, weighing about forty pounds, which did not have accompanying required documentation, the CSP 83. Complainant submitted an audit report to Copley on February 28, 2008. In that report, Complainant reported that he had found the marijuana, and that it contained no documentation. Complainant also reported other discrepancies he found in the audit of the evidence room.

20. In the February 28, 2008, memorandum, Complainant also stated that he and Corporal Lathrop, another officer, had conducted the inventory of the Pueblo evidence room on January 15, 2008. Complainant failed to mention that the inventory was not completed on that day, and he, without Corporal Lathrop, completed the inventory alone the next day.

Copley's Discovery of Evidence Discrepancies and Investigation

21. Copley later discovered on March 31, 2008, that the marijuana should have been included in the December 7, 2007 evidence burn. Both Kennerson and Complainant initialed the paperwork indicating that the marijuana had been burned.

22. When Copley discovered this information, he became aware for the first time that there had been an evidence burn in December, and that Complainant had been present at that burn.

23. Copley notified Major Butts, his Appointing Authority, of the unauthorized burn and the discrepancy between the evidence card and what had actually been burned.

24. Copley was out of the office for most of the month of March. When he returned, he met with Complainant to discuss the evidence discrepancies on March 26, 2008. As a result of the discussion, Copley discovered that Complainant had done little to resolve the discrepancies. On that date, Copley took the keys to the evidence locker away from Complainant and removed him from the evidence custodian position because Copley had questions which had not yet been resolved concerning the evidence discrepancies.

25. On April 3, 2008, Copley sent a memorandum to Major Butts describing what had happened regarding the evidence discrepancies.

26. As a result of his March 26, 2008, meeting with Complainant, Copley requested a follow-up memorandum from Complainant. In response, Complainant submitted a memorandum to Copley on April 8, 2008. In that memorandum, Complainant disclosed that he completed the evidence room inventory on January 16, 2008, alone, without Corporal Lathrop. However, he stated that he and Corporal Lathrop had inventoried an area of the evidence room known as the "Warrant Issued Shelf."

27. Complainant's April 8, 2008 memorandum raised additional questions for Copley, and he asked Complainant for additional information. For example, Complainant told Copley that there was no evidence in any of the storage lockers in Trinidad. Yet, Copley found evidence in those lockers of which Complainant should have been aware. Complainant felt pressured to give a "yes" or "no" answer concerning evidence in the Trinidad lockers, and felt he answered the question truthfully.

28. Copley asked Complainant for more additional information. As a result, Complainant gave Copley another memorandum dated April 14, 2008. In that memorandum, Complainant stated that he had made an error when he wrote that he and Corporal Lathrop had inventoried the Warrant Issued Shelf together; he stated that he had inventoried it alone. Complainant stated that is misstatement was a mistake and no malice was intended by it. He further explained that he had overlooked some matching case numbers from one bin and the Warrant Issued Shelf. With respect to the Trinidad evidence storage lockers, Complainant stated that it was recollection that there was no evidence in those lockers the last time he checked.

29. Copley became concerned because of the conflicting information he received from Complainant. He was also concerned that he continued to get more information from Complainant that he felt should have disclosed in their March 26, 2008 meeting. Copley felt like had to keep asking for additional memoranda from Complainant before he got a complete picture of what had transpired.

30. On April 14, 2008, Copley wrote a memorandum to Butts, the subject of which is "Master Sergeant Nawrocki's Conduct and Performance." In that memorandum, he described the incident regarding the evidence burn, Complainant's failure to initially take responsibility for his role in the evidence burn, problems with the evidence lockers in Walsenburg and Trinidad, and the inconsistent information Complainant had provided to him.

31. Copley sent the memorandum to Butts because he was still unsure of what had transpired. He did not know if the matter should be referred to Internal Affairs for investigation. He also did not know if Butts would want to impose a disciplinary action on Complainant. Because Butts is Complainant's Appointing Authority, he was the only person who could impose a disciplinary action.

Complainant's Corrective Action

32. In May of 2008, Butts advised Copley that there would be no disciplinary action imposed on Complainant, nor would there be an Internal Affairs investigation. Butts further advised Copley that it was within his discretion as to whether he wanted to issue a corrective action.

33. Copley decided, based on the totality of the circumstances, to give Complainant a corrective action. The corrective action, which was issued on June 4, 2008, mandated that Complainant take the following corrective action: "When conducting any function related to the collection, storage, or destruction of evidence, you will ensure you follow all policies, rules and procedures. You will also adhere to all General Orders listed above. All reports and statements made during an investigation will be accurate and truthful to the best of your ability."

34. Copley found that Complainant was in violation of Policy 308.01 as it related to the destruction of evidence procedures, as well as CSP General Orders Two, Three and Six.

35. CSP General Order Two provides, "Members will obey lawful orders and directions. Orders may appear as, but are not limited to, verbal directives, written directives, memorandums, policies, rules, procedures, goals, mission and vision statements."

36. CSP General Order Three provides, "Members will be truthful and complete in their accounts and reports."

37. CSP General Order Six provides, "Members will avoid any conduct that may bring discredit upon, or undermine, the credibility of themselves, the Colorado State Patrol, or the police profession."

38. Copley thought a corrective action was important because he wanted Complainant to understand the proper way to destroy evidence, and to help Complaint get on a "better path" at CSP.

39. Complainant disagreed with Copley's findings, as he felt his only duty with respect to the evidence burn was to ensure that the evidence presented was destroyed. He also testified that he had been truthful with Copley in his statements regarding the evidence discrepancies. Complainant was never intentionally untruthful or inaccurate during his communications with Copley concerning the evidence discrepancies.

40. Copley does not agree with Complainant's interpretation of the policy concerning the destruction of evidence. As Troop Commander, Copley has personally gone

through evidence with a trooper before the evidence is destroyed. Copley was also concerned because he had not given authorization for the evidence to be burned, and had not designated Complainant to accompany Kennerson to an evidence burn.

41. Kennerson did not receive a corrective or disciplinary action for his actions pertaining to the evidence burn. Copley was confident that Kennerson had never received formal training on the duties of an evidence custodian.

42. Complainant feels that he was treated unfairly because Kennerson did not receive a corrective or disciplinary action and because there was an evidence discrepancy in the Walsenburg office where CSP 83s were not attached to some of the evidence there, and the person at fault did not receive a corrective or disciplinary action. Complainant thought Respondent was retaliating against him for filing an appeal regarding his demotion.

43. Complainant's June 4, 2008 corrective action was unrelated to the appeal Complainant filed regarding his demotion. The corrective action was based solely on Complainant's actions with respect to the evidence discrepancies discussed in the corrective action. Copley was not involved in the issues surrounding Complainant's demotion.

44. Copley did not believe that Complainant acted maliciously, but felt that the expectations for him were higher than they were for Kennerson.

45. Complainant filed a grievance concerning his corrective action. After holding a formal meeting with Complainant, Major Butts upheld the corrective action on June 17, 1008.

46. Complainant timely appealed that decision. On his appeal form, Complainant alleged retaliation.

DISCUSSION

I. GENERAL

The Board's jurisdiction to hear grievance appeals has been limited by statute. "The board may grant the petition [for review of a final agency grievance decision] only when it appears that the decision of the appointing authority violates an employee's rights under the federal or state constitution, part 4 of article 34 of this title [the State Employee Protection Act], article 50.5 of this title [The Colorado Anti-Discrimination Act], or the grievance procedures adopted pursuant to subsection (1) of this section." C.R.S. § 24-50-123(3).

A. Complainant committed the acts for which he received the corrective action.

There was no dispute regarding Complainant's actions with respect to the evidence discrepancies. Complainant does not contest the allegation that he accompanied Kennerson to the steel mill to destroy the evidence. He also does not contest the allegation that he was designated by Copley to supervise Kennerson. Moreover, Complainant did not disagree that were discrepancies in the audit report and that he gave incorrect information regarding the evidence in the Trinidad storage locker. Complainant alleges that he did not violate any policies by his actions, and that Respondent's motives for issuing the corrective action were retaliatory. Complainant's actions did violate policy 308.01 as he was not designated by Copley, the Troop Commander, to accompany and monitor Kennerson during the destruction of evidence. Moreover, although Complainant was not trying to be untruthful, he failed to provide complete and accurate information to Copley initially. Complainant did commit the acts for which he received the corrective action.

B. Retaliation.

Complainant alleges that Respondent imposed the corrective action on him as a means of retaliating, or discriminating, against him for appealing his disciplinary demotion. This allegation is not a standard discrimination claim covered by the Colorado Anti-Discrimination Act [CADA]. However, the analysis utilized in CADA discrimination claims is useful in analyzing a claim of retaliation. To establish a *prima facie case* ("*pfc*") of retaliation, Complainant must establish that he:

1. engaged in protected activity of opposing discriminatory conduct or filing a charge of discrimination;
2. was subjected to adverse employment action subsequent to or contemporaneous with such employee activity; and
3. a causal connection exists between the protected activity and the adverse action.

Berry v. Stevinson Chevrolet, 74 F.2d 980, 985 (10th Cir. 1996).

Complainant filed an appeal based on his disciplinary demotion, which he is entitled to do under the Colorado Constitution. Colorado Const. Art. XII, Sec. 13(8). Because he was exercising a constitutional right, Complainant was engaged in a protected activity when he appealed his disciplinary demotion. Thus, Complainant has met the first prong of a *pfc* of discrimination.

Complainant received a corrective action, which he construes as an adverse employment action. The 10th Circuit liberally defines the term "adverse employment action." *Sanchez v. Denver Public Schools,* 164 F.3d 527, 532 (10th Cir. 1998);

adverse employment actions are not simply limited to monetary losses in the form of wages and benefits. *Id., Berry v. Stevinson Chevrolet,* 74 F.3d 980, 986-87 (10th Cir. 1996). In determining if an adverse employment action exists, a case-by-case approach should be taken, reviewing the unique factors relevant to each situation. *Sanchez* at 532. A "mere inconvenience" or an alteration of job responsibilities is not an adverse employment action. *Sanchez* at 532, citing *Crady v. Liberty National Bank & Trust Company*, 993 F.2d 132, 136 (7th Cir. 1993). Conversely, an action is an adverse employment action if it "constitutes a significant change in employment status, such as hiring, firing, failing to promote, reassignment with significantly different responsibilities, or a decision causing a significant change in benefits." *Sanchez v. Denver Public Schools* at 532, quoting *Spring v. Sheboygan Area School District*, 865 F.2d 883, 886 (7th Cir. 1989). The U.S. Supreme Court held that a plaintiff's burden of establishing a materially adverse employment action is less onerous in the retaliation context than in the discrimination context. *Burlington Northern & Santa Fe Railway Co. v. White*, 548 U.S. 53 (2006). A materially adverse employment action in the retaliation context consists of any action that "well might have dissuaded a reasonable worker from making or supporting a charge of discrimination." *Burlington Northern* expanded the definition for "materially adverse employment action" for retaliation claims. The same employment action that may not be "materially adverse" in a discrimination context may be "adverse" in a retaliation context. In the retaliation context, the employer's actions must be harmful to the point that they could dissuade a reasonable worker from making or supporting a charge of discrimination.

In this case, Complainant may have suffered a materially adverse change in the terms and conditions of his employment when he received the corrective action. His corrective action only required him to comply with the rules surrounding the destruction of evidence and to provide accurate and truthful information. However, before the corrective action was imposed, Complainant was removed from his assignment as the troop's evidence custodian. Reassignment of job duties is not automatically actionable. Whether a particular reassignment is materially adverse depends upon the circumstances of the particular case, and should be judged from the perspective of a reasonable person in the plaintiff's position considering all the circumstances. *Burlington Northern & Santa Fe Railway Co. v. White*, 548 U.S. 53 (2006). In this case, it was not unreasonable for Copley to remove the evidence custodian duties from Complainant given the circumstances. CSP, including Copley, considers it very important to track evidence. Nevertheless, a reasonable person in Complainant's position may have found the reassignment to be materially adverse. Additionally, a corrective action is often the first step in progressive discipline, and may be viewed as materially adverse.

If Complainant did suffer an adverse employment action, he must demonstrate that a causal connection exists between the protected activity and the adverse action. The causal connection may be demonstrated by evidence of circumstances that justify an inference of retaliatory motive, such as protected conduct closely followed by adverse action. *Love v. RE/MAX of America, Inc.*, 738 F.2d 383, 386 (10th Cir. 1984);

Anderson v. Coors Brewing Co., 181 F.3d 1171, 1179 (10th Cir. 1999). The inference of retaliation generally requires a "close temporal proximity" between the protected activity and the subsequent adverse action. *Marx v. Schnuck Markets, Inc.*, 76 F.3d 324, 329 (10th Cir. 1996). For instance, the Tenth Circuit has held that a six-week period between protected activity and adverse action may, by itself, establish causation for purposes of the *prima facie* case. *Id.* at 328. Generally, unless the adverse action is "*very closely* connected in time to the protected activity, the plaintiff must rely on additional evidence beyond temporal proximity to establish causation." *Id.* (citations omitted; emphasis in original).

In this case, Complainant appealed his disciplinary demotion in May of 2007, and there was an Initial Decision regarding that appeal issued on October 4, 2007. The evidence discrepancy was not discovered until January of 2008 when Complainant discovered the marijuana bricks. Complainant was not removed from the evidence custodian position until March of 2008, ten months after Complainant filed his appeal. Complainant did not receive the corrective action, which is the subject of this appeal, until June 4, 2008, a full year after Complainant filed his appeal of the disciplinary action. Thus, Complainant has failed to establish any temporal proximity between his protected conduct and the actions he claims are adverse, and no inference of retaliation is warranted.

Moreover, there was insufficient evidence to establish that Copley was motivated in any way by Complainant's appeal when he removed him from the evidence custodian duties and when he imposed the corrective action. Copley was not involved in the disciplinary demotion, and the evidence demonstrates that he was motivated only by his desire to have Complainant follow the rules regarding the destruction of evidence. Copley was in no way motivated by Complainant's filing of an appeal in the disciplinary demotion case. Complainant has failed to establish a causal connection between his appeal and the actions taken as a result of the evidence discrepancies.

CONCLUSIONS OF LAW

1. Complainant committed the acts for which he received the corrective action.

2. Respondent's imposition of the corrective action on Complainant was not arbitrary, capricious or contrary to rule or law.

3. Respondent did not retaliate against Complainant for filing an appeal of his disciplinary demotion.

ORDER

Respondent's action is **affirmed**. Complainant's appeal is dismissed with prejudice.

Dated this 6th day of March, 2009.

[redacted]

Hollyce Farrell
Administrative Law Judge
633 – 17th Street, Suite 1320
Denver, CO 80202
303-866-3300

NOTICE OF APPEAL RIGHTS

EACH PARTY HAS THE FOLLOWING RIGHTS

1. To abide by the decision of the Administrative Law Judge ("ALJ").

2. To appeal the decision of the ALJ to the State Personnel Board ("Board"). To appeal the decision of the ALJ, a party must file a designation of record with the Board within twenty (20) calendar days of the date the decision of the ALJ is mailed to the parties. Section 24-4-105(15), C.R.S. Additionally, a written notice of appeal must be filed with the State Personnel Board within thirty (30) calendar days after the decision of the ALJ is mailed to the parties. Both the designation of record and the notice of appeal must be received by the Board no later than the applicable twenty (20) or thirty (30) calendar day deadline. Vendetti v. University of Southern Colorado, 793 P.2d 657 (Colo. App. 1990); Sections 24-4-105(14) and (15), C.R.S.); Board Rule 8-68B, 4 CCR 801.

3. The parties are hereby advised that this constitutes the Board's motion, pursuant to Section 24-4-105(14)(a)(II), C.R.S., to review this Initial Decision regardless of whether the parties file exceptions.

RECORD ON APPEAL

The cost to prepare the record on appeal in this case is $50.00. This amount does not include the cost of a transcript, which must be paid by the party that files the appeal. That party may pay the preparation fee either by check or, in the case of a governmental entity, documentary proof that actual payment already has been made to the Board through COFRS. A party that is financially unable to pay the preparation fee may file a motion for waiver of the fee. That motion must include information showing that the party is indigent or explaining why the party is financially unable to pay the fee.

Any party wishing to have a transcript made part of the record is responsible for having the transcript prepared. Board Rule 8-69B, 4 CCR 801. To be certified as part of the record, an original transcript must be prepared by a disinterested, recognized transcriber and filed with the Board within 59 days of the date of the designation of record. For additional information contact the State Personnel Board office at (303) 866-3300.

BRIEFS ON APPEAL

The opening brief of the appellant must be filed with the Board and mailed to the appellee within twenty calendar days after the date the Certificate of Record of Hearing Proceedings is mailed to the parties by the Board. The answer brief of the appellee must be filed with the Board and mailed to the appellant within 10 calendar days after the appellee receives the appellant's opening brief. An appellant may file a reply brief within five days. Board Rule 8-72B, 4 CCR 801. An original and 8 copies of each brief must be filed with the Board. A brief cannot exceed 10 pages in length unless the Board orders otherwise. Briefs must be double-spaced and on 8 1/2 inch by 11 inch paper only. Board Rule 8-73B, 4 CCR 801.

ORAL ARGUMENT ON APPEAL

A request for oral argument must be filed with the Board on or before the date a party's brief is due. Board Rule 8-75B, 4 CCR 801. Requests for oral argument are seldom granted.

PETITION FOR RECONSIDERATION

A petition for reconsideration of the decision of the ALJ must be filed within 5 calendar days after receipt of the decision of the ALJ. The petition for reconsideration must allege an oversight or misapprehension by the ALJ. The filing of a petition for reconsideration does not extend the thirty-calendar day deadline, described above, for filing a notice of appeal of the ALJ's decision. Board Rule 8-65B, 4 CCR 801.

CERTIFICATE OF SERVICE

This is to certify that on the 9th day of March, 2009, I placed true copies of the foregoing **INITIAL DECISION OF ADMINISTRATIVE LAW JUDGE and NOTICE OF APPEAL RIGHTS** in the United States mail, postage prepaid, addressed as follows:

Timothy Nawrocki
[redacted]

and in the interagency mail, to:

Diane Marie Dash
[redacted]

[redacted]

Andrea C. Woods