

GOVERNMENT OF THE DISTRICT OF COLUMBIA



OFFICE OF ADMINISTRATIVE HEARINGS

ONE JUDICIARY SQUARE
441 FOURTH STREET, NW
SUITE 450
WASHINGTON, DC 20001-2714

November 7, 2017

Norma B. Hutcheson
Board Member
Board of Ethics and Government
Accountability
441 4th Street, NW, 830 South
Washington, D.C. 20001

Carol Schwartz
Board Member
Board of Ethics and Government
Accountability
441 4th Street, NW, 830 South
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Shomari Wade
Board Member
Board of Ethics and Government
Accountability
441 4th Street, NW, 830 South
Washington, D.C. 20001

Tameka Collier
Chairperson
Board of Ethics and Government
Accountability
441 4th Street, NW, 830 South
Washington, D.C. 20001

Re: Office of Open Government Complaint: OOG-0003_7.03.17

Dear Chairperson Collier and BEGA Board Members:

I recognize that my communication is unusual and I reluctantly transmit this to your attention, particularly given the nature of my longstanding, collegial relationship with Ms. Hughes. But the Office of Administrative Hearings ("OAH") requires your immediate intervention and involvement: specifically, I am seriously concerned that BEGA's Office of Open Government ("OOG") has unfairly and completely mishandled a complaint about a meeting notice issued by OAH on behalf of Commission on the Selection and Tenure of Administrative Law Judges ("COST"), a government entity whose sole purpose is to hire, reappoint and discipline Administrative Law Judges ("ALJs") who work at the OAH.

As a result of that complaint, the OOG undertook a surprisingly exhaustive review of COST practices that dated back more than three years and then opined on a number of issues well beyond the scope of a permissible complaint—in a manner that calls the OOG's fairness and impartiality into question and leaves the OAH to conclude, for the reasons stated below, that the OOG Director's motives are impure and arguably illegal. In the course of its inquiry and the preparation of an Advisory Opinion (which it shared with us a week ago), the OOG violated its

own regulations, policies and practices, made material misrepresentations about its reasons for undertaking the inquiry and then withheld important information about those motivations.

The consequence of these actions is a draft Advisory Opinion prepared by the OOG that is inaccurate, misleading, biased and intended to disparage as to render it useless. Although that opinion is “embargoed” at the BEGA pending its approval for release by the Board, the OOG has indicated its intention to publish it as soon as possible, apparently oblivious to the potential harms of such a release. To that end, the OAH respectfully requests that the BEGA withhold release of the opinion until such time as it can reasonably inquire into all the facts and circumstances addressed here.

The Director of the OOG, despite not having attempted to conciliate the original complaint as required by OOG regulations, has evinced a desire to publish the opinion as soon as possible, contending that OAH’s ability to offer (and publish) a rebuttal would suffice to meet the implicit fairness considerations that attend this process. This is simply not true—the nature of the opinion is such that its premature release cannot be counter-balanced by an OAH submission to the BEGA website, particularly if there are serious questions about the appropriateness of any release of the opinion in question. In fact, the Director’s conduct and representations alone are, arguably, a sufficient justification to maintain the current embargo on its release.

By way of background, the OAH was first contacted by the OOG about this matter several months ago. In a letter dated July 5, 2017 from Ms. Hughes to OAH’s General Counsel Vanessa Natale and me, she first reports a complaint received by the OOG which alleges that “the COST failed to properly notice (sic) June 29, 2017 meeting in violation of D.C. Official Code Section 2-576(1)(2)(A)(B).”¹

On the complaint form itself, “M. Borbely” is identified as the individual making the allegations about the subject meeting. In the “Action Sought” portion of the same form, that individual asks only that the meeting be reconvened with the appropriate notice to consider the reappointments at issue, underscoring the fact that the technical notice violation is the sole allegation in the complaint.² This is—and should have been—the appropriate resolution to the complaint if it is found to be meritorious. A cursory review of the OOG’s past practices suggests that this is how such matters have been handled—until now.

The complaint did not require any additional action or a deeper inquiry. But Ms. Hughes, for unknown reasons and murkier motivations, opted to inexplicably exceed her authority and the

¹ See Attachment 1, July 5, 2017 letter from Traci Hughes.

² See Attachment 2, July 1, 2017 complaint of M. Borbely. The relevant text from the complaint itself says “This body announced on June 30, 2017, via a notice published in the DC Register on that date that it would meet on June 29, 2017, at 11AM, to consider the reappointment of five Administrative Law Judges. I can’t find any other notice of the meeting posted online. If the meeting was not lawfully noticed, then meet again to consider the reappointment of these judges, after having provided the lawfully required notice.”

scope of her investigation in a manner that is unfair, unethical and in violation of her own regulations, policies and practices.

At least initially, the OOG processed the complaint as it should have. Its July 5, 2017 letter, after summarizing the complaint, OOG asked OAH to supply information related to that June 29, 2017 meeting, including the website links, the meeting publication request, the request date, the meeting's agenda and the subsequent "rejection" email from the D.C. Register sent to OAH due to a document formatting issue. Ms. Hughes asked that this information be provided by July 19, 2017 and it was.

Apart from a few email exchanges between Ms. Hughes and Ms. Natale in late July about the audio recording of the June 29, 2017 COST meeting, there were no substantive communications about any other aspect of this inquiry until early October. About a month ago—and long after the subject complaint should have been closed despite OAH not having been given the opportunity to "conciliate" the matter pursuant to OOG regulations—Ms. Hughes again contacted the OAH. She asked if OAH could provide copies of all notices, agendas and recordings of both open and closed session meetings from January 1, 2014 through July 30, 2017. In an email dated September 13, 2017, Ms. Hughes stated that she needed these records because, "OOG conducted a training of all COST members" and needed to ascertain their compliance with the Open Meetings Act following the date of this initial training. OAH, nonetheless, complied, on or about October 11, 2017, not knowing that this information was, in fact, the basis for a significantly expanded inquiry based on a second complaint that Ms. Hughes had never mentioned—even at the time she asked for the additional information—until my meeting with her on November 1, 2017.

By email dated October 26, 2017, Ms. Hughes asked to meet with OAH to discuss her investigation. Following a brief exchange, OAH met with Ms. Hughes on Monday, October 30th in OAH's office. The four attendees were Ms. Hughes, Ms. Natale, Deputy General Counsel Louis Neal and myself.

Ms. Hughes presented us with a draft of the Advisory Opinion now at issue, explained her methodology and the anticipated timeline for its publication. She indicated that it was, at her direction, "embargoed" at the BEGA and offered OAH the opportunity to respond, while stating that she did not expect to change her opinion and that OAH could submit a response to it that would also be posted on the BEGA's website.

More problematically, she had, without notice or explanation, also enlarged her inquiry to include the appointment terms of the three voting COST members. In fact, the most substantive part of her opinion focuses on this latter issue, replete with a color-coded timeline of the COST member appointments, and reflects an analysis that goes back to the very beginnings of the COST in 2003. The nexus between the appointed terms of COST members and the single complaint about a meeting notice is not apparent under any circumstances and speaks to an agenda well beyond her mandate to look into and resolve the original complaint. This is particularly so because her opinion contains unsolicited, unnecessary and inaccurate legal

conclusions that completely change the focus of this document to a position paper on the make-up of the COST and the legality of its decisions.

But there is more that makes this “change of course” (originally arising from a single complaint about one COST meeting where the notice was alleged to be deficient) troubling and inappropriate: when specifically asked—at the October 30th meeting—why she expanded her inquiry, she said she simply exercised her “discretion” to do so. While there is a reasonable debate to be had about whether she has—or could exercise—this “discretion” in this circumstance, her stated reason is simply untrue. And, her advice to us at that meeting—while withholding information and wearing her “PR hat” (her words)—was we should just get rid of the COST and start over (with new members)!

In a second meeting with Ms. Hughes two days later to clarify some information she had reported earlier, she told me—for the first time—that the real reason she expanded the inquiry to include an opinion on the COST member terms and their decisions was because she had received another complaint, a fact she had never divulged because that individual had requested anonymity.

Although anonymity and “Open Government” in the context of these BEGA operations seems to be an oxymoron, Ms. Hughes declined to elucidate about the anonymous complaint during my meeting with her AND in subsequent email exchanges, attached here for easy reference. In addition to refusing to identify the complainant, she would not say 1) when the complaint was received, 2) why it was appropriate to protect the complainant’s identity, or 3) even what the specific allegations were.

In response to my email inquiries, she stated that there was not even a written complaint that contained these allegations although BEGA regulations seem to require this because “the complainant came in person.” In the absence of an actual complaint, I asked for any notes and other written materials that would specify the allegations made by the individual she was protecting and was, again, rebuffed.³

My hope was to review them so OAH could respond appropriately and better understand how a straightforward review of a meeting notice complaint could morph into a polemic on the COST and its actions—not the procedural hiccups cited in the only complaint for which there is a government record, but on substantive matters (hires, reappointments and discipline of ALJs) that the COST handles.

Consistent with her earlier statements to me, Ms. Hughes also refused to give OAH any notes (even in redacted form) that might give this agency some unvarnished sense of what the complaint actually was that led her to prepare a 19-page, single-spaced opinion that addressed COST meetings from 2014 to the present AND question the validity of the COST composition and the legality of its decisions. The stated reason for her refusal was “attorney work product”, a

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See Attachment 3, November 1, 2017 email from CALJ Adams to Ms. Hughes.

privilege she is likely unable to assert as an agency director who simply happens to be an attorney but was not hired to work as one.⁴ OAH was not given the opportunity to “conciliate” the second complaint either, even though it seems to be, from the OOG’s actions, a far broader complaint.

Instead, she simply told me to, essentially, take “her word for it” that the heretofore unreported allegations from an anonymous source dovetail with what she has written in her Advisory Opinion.⁵ In light of recent discoveries and Ms. Hughes’ own actions, OAH simply cannot—and will not—accept those assertions and asks the BEGA to direct Ms. Hughes to provide complete information about the mysterious second complaint that is, thus far, unsubstantiated from OAH’s perspective and may be non-existent.

More to the point, the BEGA should bar Ms. Hughes from any further involvement in this matter because of how she has handled this very simple matter. OAH is deeply concerned that she will release this *ultra vires* opinion, compromise the COST’s important work in doing so and expose the agency/city to additional attacks, threats and unfounded legal action in a circumstance where it is wholly unwarranted.

To recount OOG’s significant procedural and ethical lapses:

- the OOG failed to properly address and resolve a straightforward complaint about a COST meeting notice for ONE meeting, where the complainant specified the relief he/she sought that was not proper due to a technical error;
- the OOG failed to provide the opportunity to conciliate EITHER complaint (assuming a second exists) despite the requirement to do so in its regulations;
- the OOG requested information related to its inquiry and NEVER mentioned a second complaint until November 1st, despite beginning this process in early July of this year;
- the OOG knowingly withheld critical information relating to its inquiry and only provided it when asked, i.e., the second complaint;
- the OOG did not memorialize a complaint from the anonymous complainant even though its regulations appear to require it;
- the OOG, even after admitting that a second complaint was received, has refused to share ANY information about that complaint to allow OAH to respond;
- the Director was untruthful when she said that her “discretion” was the impetus for the expanded opinion when in fact, she later (two days) acknowledged that the second complaint was what prompted the augmented inquiry; and
- the OOG asserted the “attorney work product” privilege in declining to provide written information about the second complaint after it did not require a written complaint from the

⁴ *Id.*, November 1, 2017 email from Ms. Hughes to CALJ Adams.

⁵ *Id.*, November 2, 2017 email from Ms. Hughes to CALJ Adams.

individual, whose identity it declines to reveal, also notable because the OOG Director does not work as an attorney in her capacity as the Director.

As the OOG notes, the OAH does act as the administrative arm of the COST. These responsibilities include preparing agendas, noticing and submitting information about scheduled meetings to the D.C. Register, and providing the COST with the information and documents that support their decision-making duties. For this reason, some lapses are—or should be—attributable to OAH staff, not the COST. It is a very small commission with a very narrow set of responsibilities, all of which relate to personnel actions.

The COST is comprised of three voting members and two *ex officio* members—only one member, the Chief Administrative Law Judge routinely has anything to do with the OAH. All of the others are employed in different capacities and rely on OAH to schedule its periodic meetings by coordinating COST member schedules, publishing meeting notices and by securing appropriate venues for those meetings, consistent with the agenda OAH also prepares.

So, in a situation such as the instant one, a failure to properly notice a particular meeting due to a technical error cannot—fairly or accurately—be blamed on the COST, unless there is an ulterior motive. The OOG is acutely aware of this dynamic, having advised OAH on numerous occasions about matters related to COST meetings. But instead of taking OAH staff to task for the original lapse complained of, the OOG focused on the COST for an alleged offense that was not even theirs and then “bootstrapped” its broader inquiry from that situation, wandering further into areas that are not only unnecessary, but also inappropriate given how this matter has been handled.

In her zeal to address the alleged lapses by the COST with respect to its meeting notices, Ms. Hughes conveniently omits a broader discussion of the most recent COST meeting on September 29th. After a troublingly long interval occasioned by Chairman Mendelson’s July 17, 2017 letter to the COST asking that it delay any reappointment decisions until the formal reappointment of the Council’s representative to the COST, the COST finally reconvened to consider a number of pending ALJ reappointments.

Ms. Hughes was present at that meeting. During the time the COST was in closed, executive session to consider the reappointments on the agenda, Ms. Hughes was seen in conversation with a Washington Post reporter and ALJ union representatives. While the “optics” of these interactions could be harmless, our recent experiences with Ms. Hughes suggest otherwise, particularly because the union representatives later approached City Council staff to gather information on a planned story about the COST and the sensitive reappointment decision that was pending at the time, stating they were working with that very reporter.

We note these events were contemporaneous with Ms. Hughes overly-broad inquiry into the complaint about an alleged meeting notice violation AND her apparent decision to also look into the COST member appointments and their impact on decisions it made. More problematically, Ms. Hughes did not interject herself at the meeting to ensure COST compliance with the

protocols for going into and coming out of closed, executive session, even though she described the meeting she observed as “horrible” to OAH’s GC and the Deputy GC.

She had not, heretofore, been reluctant to offer guidance to the OAH and the COST about the technical procedures for conducting its meetings and their business. On that day, she did nothing except criticize what she saw and did not even suggest that the OAH GC and Deputy GC offer guidance to the COST as part of its administrative arm. Why wouldn’t she provide advice at that moment either by pointing the deficiency out to the Chair of the COST or by way of a conversation with the OAG’s COST representative, or the GC (or Deputy GC) from OAH, all of whom were present? To say nothing of what she observed, which she believed to be a deficiency, along with her knowledge of the importance of the meeting is malfeasance.

OAH readily concedes that OOG’s actions at the last COST meeting may have been perfectly above-board, but Ms. Hughes’ actions to that point and since (described at length above) belie that assumption.

In conclusion, there are simply too many questionable actions and unanswered questions surrounding OOG’s inquiry into a simple, straightforward allegation about a particular meeting notice for their conduct to go unnoticed and unaddressed. What has transpired in this situation is not the law or the spirit of open government.

Had Ms. Hughes simply followed her own regulations in investigating the original complaint, this matter would have been resolved months ago. Had she even timely divulged the existence of another complaint, or shared information about it and again, followed her own practices and policies, we would not be here today.

It is not the OOG’s purview to opine on COST member appointments, the terms of those appointments or the validity of any COST decisions—and it should not do so irresponsibly and where critical information has not been shared, if it even exists. The OOG’s mandate is to entertain complaints about alleged violations of the Open Meeting Act and address them as needed. IF there are allegations of impropriety about any COST actions, they must be addressed in another forum that has the authority to hear such claims and enforce the applicable law. The OOG is not that place and its efforts to usurp that authority cannot prevail.

For the foregoing reasons, the OAH respectfully asks that the BEGA:

- 1) maintain the “embargo” on the Advisory Opinion that is the subject of this correspondence;
- 2) investigate the actions or inactions of the OOG Director in this matter;
- 3) remove the OOG Director from any more involvement in this matter;
- 4) require the OOG to disclose any information and documents related to the second complaint she never mentioned until last week; and
- 5) preclude the OOG from opining on any matters that are fairly or legally outside its purview.


Complaint: OOG-0003_7.03.17

November 7, 2017

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Thank you for your attention to this matter. Please do not hesitate to contact me at any time to discuss your questions and concerns.

Sincerely,



Eugene A. Adams
Chief Administrative Law Judge
Office of Administrative Hearings

cc: Traci Hughes, Director of the Office of Open Government
Brian Flowers, Interim Director of BEGA

Attachment 1

BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY
OFFICE OF OPEN GOVERNMENT



July 5, 2017

VIA ELECTRONIC MAIL

Honorable Eugene Adams
Chief Judge
Office of Administrative
Hearings
One Judiciary Square
441 4th Street, NW, Suite 450N
Washington, DC 20001
eugene.adams@dc.gov

Ms. Vanessa Natale
General Counsel
Office of Administrative
Hearings
One Judiciary Square
441 4th Street, NW, Suite 450N
Washington, DC 20001
vanessa.natale@dc.gov

RE: #OOG-0003_7.03.17 Notice of Complaint_COST

Dear Chief Judge Adams:

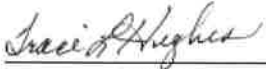
The Director of the Office of Open Government (OOG), pursuant to the authority set forth in § 503(a)(4) of the District of Columbia Administrative Procedure Act, effective March 31, 2011, (D.C. Law 18-350); D.C. Official Code § 2-593 *et seq.* (2017), and 3 DCMR §§ 10400 *et seq.* (2016), is investigating an Open Meetings Act (OMA) (D.C. Official Code §§ 2-571 *et seq.* (2017)) complaint regarding the June 29, 2017 meeting of the District of Columbia Commission on Selection and Tenure of Administrative Law Judges (COST) The complaint, **#OOG-0003_7.03.17**, is attached for your review.

Specifically, the complaint alleges the COST failed to properly notice June 29, 2017 meeting in violation of D.C. Official Code § 2-576(1)(2)(A)(B). Accordingly, please provide all records regarding the timely notice of the June 29, 2017 meeting of the COST, and any links on the Office of Administrative Hearings (OAH) website to the meeting. Please provide all records, including the meeting publication request, the request date, and the corresponding agenda for the June 29th meeting.¹ Please provide all requested records by July 19, 2017.

¹ The OOG has undertaken a review of the OAH website, and finds no indication the meeting was published on the OAH website, nor on the central calendar maintained by the OOG.¹ (Please see attached screen shot of the calendar search results on the OAH website.) To meet the notice requirements of the OMA, the OAH had previously published to the OOG central calendar. The last COST meeting published on the OOG calendar was for a meeting which occurred on June 21, 2016. (See, <https://www.open-dc.gov/meeting/commission-selection-and-tenure-administrative-law-judges-office-administrative-hearings>). The COST has not published to the central calendar since June 3, 2016.

Thank you for your attention to this matter. Please do not hesitate to contact the OOG should you have any questions regarding this Notice of Complaint.

Sincerely,



TRACI L. HUGHES, ESQ.

Director, Office of Open Government

Board of Ethics and Government Accountability

Additionally, please provide any meeting minutes or recordings from the June 20, 2017 meeting.

Attachment 2

Subject: OMA Complaint Acknowledgement

Date: Saturday, July 1, 2017 at 3:25:11 PM Eastern Daylight Time

From: OMA Complaint <opengovoffice@dc.gov>

To: Barton, Johnnie (BEGA) <Johnnie.Barton2@dc.gov>, Hughes, Traci (BEGA) <traci.hughes@dc.gov>

Submitted on Saturday, July 1, 2017 - 15:25

Contact Information

First Name: M

Last Name: Borbely

Address:

City: Washington **State:** DC **ZIP Code:**

Phone number: **Extension:**

Email: .com

Public Body that is the subject of this

Name of the public Body: DISTRICT OF COLUMBIA COMMISSION ON SELECTION AND TENURE OF ADMINISTRATIVE LAW JUDGES

Specific person(s), if any, you allege Committed the violation:

If the complaint pertains to more than one meeting date:

Date or dates of alleged violation:

Thu, 06/29/2017

Description of Alleged Violation / Action Sought

This body announced on June 30, 2017, via a notice published in the DC Register on that date (<http://dcregs.dc.gov/Gateway/NoticeHome.aspx?noticeid=6615902>) that it would meet on June 29, 2017, at 11am, to consider the reappointment of five Administrative Law Judges. I can't find any other notice of the meeting posted online.

If the meeting was not lawfully noticed, then meet again to consider the reappointment of these judges, after having provided the lawfully required notice.

Disclosure and Withdrawal

Under most circumstances, your complaint, and any documents submitted with your complaint, will be considered a public record and available to any member of the public upon request. In response to such a request, the office of Open Government generally will not disclose your contact information.

A complainant may request at any time prior to any of the above actions being taken by the Director, that his/her request be withdrawn from further review. Any such request to withdraw the complaint must be made in writing with "Open Meetings Complaint Withdrawal" on the envelope or in the subject line or heading of electronic

Attachment 3

Adams, Eugene (OAH)

From: Adams, Eugene (OAH)
Sent: Thursday, November 02, 2017 2:09 PM
To: Hughes, Traci (BEGA)
Subject: Re: OOG-0003_7.03.17 Notice of Complaint_COST

I did say that—however, I may need more in light of what I now know. Is that going to be a problem?

Eugene A. Adams
Chief ALJ
Office of Administrative Hearings
202/442-5823

On Nov 2, 2017, at 1:17 PM, Hughes, Traci (BEGA) <traci.hughes@dc.gov> wrote:

You mentioned yesterday that you would not need the 30 days. 7-10 at most. Did I mis-hear you?

From: Adams, Eugene (OAH)
Sent: Thursday, November 2, 2017 12:50 PM
To: Hughes, Traci (BEGA)
Subject: Re: OOG-0003_7.03.17 Notice of Complaint_COST

So, the 30-day embargo we talked about is off the table? I told you yesterday that we probably wouldn't need 30 days to do what we wanted to do, but are you unilaterally withdrawing that offer?

Eugene A. Adams
Chief ALJ
Office of Administrative Hearings
202/442-5823

On Nov 2, 2017, at 11:12 AM, Hughes, Traci (BEGA) <traci.hughes@dc.gov> wrote:

Good morning, Gene:

I assure you that the complaints/issues raised are fully outlined in the opinion. There are no other matters the OOG intends to address. And, as I have confirmed, the OAH may submit its reply to the opinion if it so chooses. The reply will be posted along with the opinion.

When we met on Monday, you asked that I give you time to find out whether there is documentation clearing the gaps in the COST member terms. Have you found that information? That missing documentation is the only information that would change the analysis in the opinion.

Otherwise, there is no reason to further delay issuance. Please let me know.

Thanks,

Traci

From: Adams, Eugene (OAH)
Sent: Wednesday, November 1, 2017 5:43 PM
To: Hughes, Traci (BEGA)
Subject: Re: OOG-0003_7.03.17 Notice of Complaint_COST

So that leaves OAH in a situation where we can have no information about the second complaint that was the genesis of your broader inquiry? I understand why you might describe your notes as work product (although it's questionable whether that privilege even applies in your capacity as the Director, which is not an attorney position), but how are we then to know 1) whether the complainant even provided all the information required by your regulations when making a complaint or 2) what the specifics of the complaint were?

This seems inconsistent with the role and responsibilities of your agency as they apply to Open Government.

Eugene A. Adams
Chief ALJ
Office of Administrative Hearings
202/442-5823

On Nov 1, 2017, at 5:03 PM, Hughes, Traci (BEGA) <traci.hughes@dc.gov> wrote:

As much as I would like to help, the notes I took in relation to the second complaint are attorney work product. I cannot turn them over, even in redacted form.

From: Adams, Eugene (OAH)
Sent: Wednesday, November 1, 2017 4:14 PM
To: Hughes, Traci (BEGA)
Subject: Re: OOG-0003_7.03.17 Notice of Complaint_COST

Do you or any one else have written notes that would memorialize the allegations made? I'm assuming there is some written record of the allegations made by the anonymous complainant? If so, can we have a redacted version of those that we can treat as the second complaint?

Eugene A. Adams
Chief ALJ
Office of Administrative Hearings
202/442-5823

On Nov 1, 2017, at 3:48 PM, Hughes, Traci (BEGA)
<traci.hughes@dc.gov> wrote:

It was in person. There was no complaint form filled out for the second complaint.

From: Adams, Eugene (OAH)
Sent: Wednesday, November 1, 2017 3:35 PM
To: Hughes, Traci (BEGA)
Subject: Re: OOG-0003_7.03.17 Notice of Complaint_COST

T—

Since your inquiry was also triggered by the anonymous complainant that visited you, can you also please send me that individual's actual complaint (redacted, of course)? Thanks!

Eugene A. Adams
Chief ALJ
Office of Administrative Hearings
202/442-5823

On Nov 1, 2017, at 1:34 PM, Hughes, Traci (BEGA) <traci.hughes@dc.gov> wrote:

Hi Gene.

As requested, attached is the notice of the complaint, and a copy of the complaint OOG received in writing.

Traci

From: Hughes, Traci (BEGA)
Sent: Wednesday, July 5, 2017 2:48 PM
To: Adams, Eugene (OAH); Natale, Vanessa (OAH)
Cc: Barton, Johnnie (BEGA)
Subject: OOG-0003_7.03.17 Notice of Complaint_COST

Dear Chief Judge Adams, and Ms. Natale --

Please see the attached Notice of Complaint. As always, I remain available to answer any questions you may have.

Kind Regards,

Traci

<OOG-0003_7.03.17 Notice of Complaint_COST.pdf>
<News Room oah.pdf>
<Borbely_Redacted.pdf>