## BEFORE THE COMMISSION ON PROFESSIONAL COMPETENCE STATE OF CALIFORNIA

In the Matter of the Dismissal of:

OAH Case No. 2014020810

BARBARA HOMOKAY, A Permanent Certificated Employee,

Respondent.

#### DECISION

The Commission on Professional Competence (Commission) heard the above-captioned matter in Los Angeles on April 22 and 23, and May 23, 2014. The Commission members were John Gove, Mary Ann Meysenburg, and Joseph D. Montoya, Administrative Law Judge (ALJ), Office of Administrative Hearings (OAH). Complainant was represented by Susan E. Hyman, Assistant General Counsel, Los Angeles Unified School District (District). Respondent Barbara Homokay appeared at all hearings with her attorney, James T. Studer.

The matter was submitted for decision on May 23, 2014. The Commission hereby makes its factual findings, legal conclusions, and order.

### INTRODUCTION AND STATEMENT OF THE CASE

In this proceeding the District seeks the termination of one of its tenured teachers, Respondent Barbara Homokay. While half a dozen statutory grounds are asserted as justifying termination, the factual claims may be summarized as follows: Respondent, on three occasions in a two year period, appeared for work at Chase Street School while apparently intoxicated.

Respondent does not deny that she appeared for duty within hours of consuming a substantial amount of alcohol, denying that she was actually under the influence in some of the cases. She adduced evidence that she has been engaged in rehabilitation efforts, and has been heavily involved in Alcoholics Anonymous for nearly two years.

As detailed below, the District has proven the vast majority of its factual claims, and has established that Respondent should be terminated.

## **FACTUAL FINDINGS**

### The Parties and Jurisdiction

- 1. Justo H. Avila executed the Accusation in this matter while acting in his official capacity as Interim Chief Human Resources Officer of the District.
- 2. The District commenced this proceeding on November 26, 2013, when Vivian K. Ekchian, then the District's Chief Human Resources Officer, executed a Statement of Charges against Respondent. That Statement of Charges was filed with the District's governing board, which thereafter determined to terminate Respondent.
- 3. On January 22, 2014, the District gave Respondent written notice of its intent to terminate her, and served Respondent with a copy of the Statement of Charges. Respondent made a timely request for hearing, which led to the issuance of the Accusation. She then filed a Notice of Defense, and this hearing endued. All jurisdictional requirements have been met.
- 4. Respondent is a certificated teacher in the District's employ, credentialed to teach special education. During the time relevant to this proceeding—May 2010 through May 2012—Respondent was assigned to teach special education students at Chase Street Elementary School (Chase Street) in Panorama City, California. She was teaching both fourth and fifth grade students.

Findings On the Factual Allegations Made Against Respondent

The Incident in May 2010

- 5. On May 26, 2010, Respondent appeared for work at approximately 7:40 a.m. while under the influence of alcohol. She physically manifested that condition by slurring her words when she spoke, and by swaying when she stood. Other staff members could smell alcohol on her person. This included office workers, the principal of the school, and the vice-principal.
- 6. Respondent's condition was first noticed by office staff, and the school's principal, Mr. Andres E. Chait (Chait). He confirmed his suspicions in conversation with the office staff, who had observed Respondent when she signed into work, at approximately 7:40 a.m. The principal then asked Ms. Aleta Johnson (Johnson), the vice-principal, to go and speak to Respondent at her classroom. The two went there, and both perceived Respondent to be under the influence. Respondent went with Johnson to the latter's office, while the principal waited with Respondent's class until another teacher could come and cover it.
- 7. On May 26, 2010, after meeting with the principal and vice-principal, Respondent was driven from Chase Street, in the San Fernando Valley, to the District's main office, in downtown Los Angeles. Respondent met with Rosa Mercado, M.D. Dr. Mercado perceived

that Respondent was disheveled and she smelled alcohol on Respondent's person. Respondent's speech was slow, she was flushed, and she appeared impaired. Respondent told Dr. Mercado, as she had told the principal and vice-principal, that she had had much to drink the night before.

- 8. Dr. Mercado formed the opinion that Respondent was in no condition to do her job. That was not just a function of alcohol use; Respondent was emotional, alternating between tears and composure.
- 9. Dr. Mercado obtained a urine sample from Respondent at approximately 10:30 a.m. The sample was tested by an independent laboratory, and were positive for alcohol. The test results, while not stated in terms of blood alcohol content (BAC), indicated that Respondent's BAC was between 0.11 and 0.13 percent, above the legal limit for driving.
- 10. Dr. Mercado spent some time talking to Respondent, who appeared cooperative and remorseful. She learned that Respondent has significant challenges at home, including a disabled child and a husband who liked to drink. Dr. Mercado also learned that Respondent had challenges at the work site. Dr. Mercado recommended that Respondent seek help, including a rehabilitation program, and ongoing support. She informed Respondent that the District had programs available that might assist Respondent.
- 11. On June 8, 2010, Respondent met with Chait and Johnson, along with her union representative, Donna Logan. They discussed the events of May 26. At that time Respondent advised that she was going to take a week off work. Later, Respondent made a written statement regarding the incident, in which she stated that she had been upset the day before, and had had much to drink on the night of May 25. According to her statement, when she came to school, she didn't realize she still had alcohol in her system, and acknowledged that she should have stayed home. She told Mr. Chait that she was seeing a doctor about stress, and had begun to attend meetings once a week at a local church, the nature of the meetings not disclosed.
- 12. During the following semester, on September 17, 2010, Respondent received a written Notice of Unsatisfactory Acts and Notice of Suspension, for three days.

## The September 6, 2011 Incident

13. On September 6, 2011, Respondent arrived late to work, by approximately one hour, and appeared to be under the influence of alcohol. On that day, no classes were scheduled; school was to start the next day and staff was meeting to prepare for the new school year, and this involved various presentations by the school's new principal, Ms. Susan Babit (Babit). When there was a break in the activities, the assistant principal, Johnson, asked Babit to speak to Respondent, and see if she smelled anything. Babit did so, and to her, Respondent "reeked" of alcohol; she smelled alcohol on Respondent's body and breath.

- 14. At the lunch break Babit and Johnson went to speak to Respondent, who was in her class room, getting it ready for the new school year. When Babit expressed her concern about Respondent's condition, Respondent stated she was fine, and expressed surprise that Babit and Johnson smelled alcohol. Respondent did say she had had six beers with her husband, the night before the school meeting. In the discussion that followed, Respondent did not deny the prior incident, and said she was trying not to drink, and had been attending AA meetings, but couldn't find a sponsor; such was her next step in the process, but she claimed it was hard to find a sponsor. Respondent acknowledged that there was much stress at home. At one point Respondent admitted, "I kinda fell off the wagon." Babit told Respondent that she couldn't drink at all, and that she needed to get help; Babit pointed out that the District had an employee assistance line that could be called for help.
- 15. On September 8, 2011, Babit spoke further to Respondent about the incident, reminding her that it is never appropriate to report to work under the influence of drugs or alcohol. She also provided a copy of the District's Ethics Policy Statement to Respondent, and Babit emphasized the provision that states that the District's employees are entrusted with the physical and mental well-being of the students. Respondent was also provided with a District Bulletin which gave notice that the District was implementing a zero-tolerance policy for establishing a drug, alcohol, and tobacco free zone.
- 16. Babit sent Respondent a memorandum that detailed and documented the events that occurred between September 6 and 9, 2011. That memorandum stated, in part, that failure to adhere to directives could lead to disciplinary actions, including to dismissal. The memorandum, issued on September 9, 2011, also provided that Respondent could make a response to the memo, in writing, within five days.
- 17. Respondent waited over a month to make a written response to Babit's September 9, 2011 memorandum. In her response, dated October 20, 2011, she claimed she was only 25 minutes late, because she had been up a good portion of the night with an upset stomach, and she had overslept. She denied smelling of alcohol, and stated that she was "ruddy" faced because of a skin condition.
- 18. In October 2011, Respondent received a Notice of Unsatisfactory Acts and a Notice of Suspension, for 10 days.

The May 9, 2012 Incident

19. On May 9, 2012, Respondent reported for work while under the influence of alcohol. On that day, state-wide tests were being administered to the students, described as CST/CMA tests. Eric Diance (Diance), who had been a teaching assistant with Respondent for approximately four years, was assigned to proctor the tests. He observed Respondent in the classroom at approximately 8:30 a.m., while she was with her students.

- 20. Mr. Diance saw that Respondent was flushed, and looked upset. She was reprimanding a student, but to her aide, Diance, she was not using a normal voice, and she looked anxious, uncomfortable, and disheveled. She did not seem to have all of her faculties.
- 21. After Diance took some students, who were not testing that day, to the library, he went and spoke to Donna Logan (Logan), a certificated teacher who served as the UTLA (United Teachers of Los Angeles) representative at Chase Street. He told her that something seemed to be wrong with Respondent, and asked if Logan would look in on her. Logan asked if it looked like she had been drinking, and he stated it did. Logan called the office to have someone check on the situation.
- 22. Diance went back to the classroom. He observed Respondent was slurring her words while giving instructions for the test to the students. She was swaying while she was reading the instructions, and at one point she stopped reading, closed her eyes, and appeared to go to sleep. The phone in the classroom rang, and after Respondent answered it, she appeared agitated. Shortly after that, Babit appeared with an administrative assistant, and they removed Respondent from the classroom.
- 23. Babit had a brief opportunity to see Respondent in the classroom, before the latter's removal, and she saw Respondent unsteady on her feet, red-faced, and slurring her speech. Babbit smelled alcohol on Respondent. Babit formed the opinion that Respondent was then unable to do her job.
- 24. Babit spoke to a District Director, who advised her to take Respondent downtown for an examination by Dr. Mercado. Dr. Mercado perceived Respondent to be under the influence of alcohol, and she conducted another urine test. That test, like the one administered in May 2010, came back positive for alcohol in Respondent's system. Dr. Mercado again estimated the BAC between .11 and .13 per cent.
- 25. Babit met with Respondent and her UTLA representative, Mr. Kaz, on June 14, 2012. The May 9 incident was discussed in some detail. Babit provided advice and counsel, including the advice that Respondent review the District's zero-tolerance bulletin, and that she continue with A.A., and not drink alcohol at all. Another copy of the ethics policy, which Respondent had received in June 2010 and October 2011, was provided. She directed Respondent to enroll in and complete a rehabilitation program by August 19, 2012. Respondent was warned that she remained subject to discipline, up to and including termination. A memo summarizing the June 14, 2012 meeting was given to Respondent.
- 26. On June 19, 2012, Respondent made a written response to Babit. She described the conference summary prepared by Babit for the June 14, 2012 meeting as "fabricated and exaggerated at my expense." (Ex. 22, p. 1.) She described the claims of her inebriation and the symptoms thereof as "grossly misleading and false." (*Id.*) She denied that her speech had been slurred, or that she was unsteady on her feet or that she smelled of alcohol; she again blamed the red tone of her skin on a skin condition.

27. In March 2013, Respondent received her third Notice of Unsatisfactory Acts and Notice of Suspension, for 15 days. The third Notice stated that the Section Administrator was recommending her dismissal.

## Respondent's Efforts at Sobriety

- 28. Since the May 2012 incident, Respondent has taken steps to obtain sobriety. To be sure, she may have, for at time prior to that incident, attended A.A. meetings, but, as she admitted in her conversation with Babit in September 2011, she had "fallen off the wagon."
- 29. At the time of the September 2011 incident, it appears that Respondent was making no real effort at obtaining and maintaining sobriety, and she was not being completely honest with the principal about her efforts; her claim of not being able to find a sponsor after a period of weeks or even months strains credulity.
- 30. It is plain that Respondent's efforts at sobriety between September 2011 and June 19, 2012, when Respondent gave her written response to the previous conference summary, were insufficient. When Respondent wrote her June 19, 2012 response, she was plainly deep in the sort of denial that plagues alcoholics and other addicts. Thus, her statement claims that the conference memo was fabricated and exaggerated; she called the claims that she was slurring her speech in her class room to be false. She denied she smelled of alcohol, and before. (Ex. 22.) She then asserted that the alcohol would stay in her body for up to 24 hours, and that what was in her body was minimal.
- 31. Respondent's efforts at sobriety improved after 2012. She found a sponsor, who she speaks to every day. Respondent began attending meetings on a regular basis, and has been through the time of the hearing. She has begun acting as a sponsor, and has become a person others in the meetings rely on to get things done. Her sponsor, who has sponsored scores of alcoholics, believes that Respondent has a very positive prognosis.
- 32. There was no evidence presented that two of the main stressors in Respondent's personal life have been diminished. They include a husband who likes to drink, and a disabled son who presents serious challenges. It must be noted that the position held by Respondent, teaching special education students in a mixed fourth and fifth grade class is very demanding. In these circumstances, and given the plainly obdurate nature of Respondent's alcoholism, as illustrated by her three episodes at her school site, and her response thereto, it cannot be found that Respondent's sobriety is such that she would be unlikely to appear for work under the influence in the future.

## Other Findings

33. The District has promulgated an Employee Code of Ethics. In general terms, it proscribes conduct such as Respondent's, that is, appearing at work, to teach students, while under the influence. It also promulgated a Code of Conduct for the treatment of children, of which a provision states that teachers are charged with not engaging in behaviors, in the

presence of students, which are unprofessional, unethical, illegal, immoral, or exploitive. The provisions of that policy were brought to Respondent's attention by Chait during June 2010 conference with him.

34. In 2007, the District enacted a zero tolerance policy that would create a drug, alcohol, and tobacco-free workplace. That bulletin that enunciated that policy noted that federal law mandated the District to take steps to maintain drug and alcohol free school sites, and that failure to do so could endanger the District's ability to receive federal funds. The written bulletin clearly stated that it was the District's policy to prohibit the use of alcohol on school premises, by any employee. Respondent was made aware of that policy; it was distributed to all employees. Respondent was also given a copy of the bulletin during her September 2011 conference.

## The Morrison Factors

- 35. Where there is conduct that might justify termination of a teacher, an examination must be made of whether or not that conduct indicates that the Respondent in question is unfit to teach. This requirement was first set forth in *Morrison v. State Board of Education* (1969) 1 Cal.3d 214, 229. There the Supreme Court held that factors that may be examined to determine fitness include the likelihood that the conduct may have adversely affected students or fellow teachers; the degree of such adversity anticipated; and, the proximity or remoteness in time of the conduct. Other factors may include the type of certificate held by the teacher; extenuating or aggravating circumstances; the praiseworthiness or blameworthiness of the motives resulting in the conduct; the likelihood that the conduct in question will recur; and, the extent that discipline will cause an adverse or chilling impact on the constitutional rights of the teacher involved, or other teachers.
- 36. (A) Adverse consequences on students and teachers, and the degree thereof: There were no obvious adverse consequences for students, but plainly such may have occurred. To have a clear role model intoxicated in the classroom may lead to disrespect for that teacher, and others, and in such circumstances, no learning is taking place. Taking the Respondent out of the classroom for a trip to the District's physician did not advance the students' education, and had to have an adverse effect on other teachers, who had to cover her classroom.
- (B) *Proximity in time*: This conduct occurred in the period May 2010 to May 2012, and is fairly recent.
- (C) Type of certificate held by Respondent: Not fully disclosed by the record, but it must be inferred that she holds a special education credential, at least.

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- (D) *Likelihood of recurrence*: The chance of recurrence is significant. While Respondent professes sobriety and has seemingly been working her AA program, there is no evidence that she has taken steps to eliminate the stressors in her home life, and she has not been under the stress of teaching a combined fourth-fifth grade special education class since June 2012. While she has made strides, and there are grounds for optimism, given her prior problems, it there is a substantial chance of a recurrence. <sup>1</sup>
- (E) *Implication of constitutional rights*: No constitutional rights, of either the Respondent or other teachers, are implicated if Respondent is terminated. A teacher has no right to come to work inebriated.
- (F) Extenuating or aggravating circumstances: In aggravation, Respondent's actions occurred more than once, despite warnings from her supervisors, and advice that she get help.
- 37. Under all the circumstances, Respondent's ongoing conduct establishes that she is unfit to teach in the District, within the meaning of the *Morrison* decision, and she should be terminated as a teacher.

### LEGAL CONCLUSIONS

Legal Conclusions Generally Applicable To All Claims:

- 1. The Commission has jurisdiction to proceed in this matter, pursuant to Education Code section 44944,<sup>2</sup> and Factual Findings 1 through 3.
- 2. "Unprofessional conduct" as used in section 44932, subdivision (a)(1), may be defined as conduct which violates the rules or ethical code of a profession or is such conduct that is unbecoming of a member of a profession in good standing. (Board of Education v.

Complainant's counsel argued that an alcoholic may not teach in the public schools. That unqualified statement is untrue. If an alcoholic, including Respondent, has attained and can maintain sobriety, then they can teach in the public schools. The Commission is entitled to evaluate evidence in light of experience and training (Govt. Code, § 11525.50, subd. (c)), and the ALJ has had some training on the nature of alcoholism. He would observe that he has known physicians, lawyers, and judges who are alcoholics, who have been able to practice their high-stress professions because they have attained, and can maintain, sobriety. The Commission hopes that at some point in the future Respondent can demonstrate such, and return to her profession, but at this time, believes that cause for termination has been established.

<sup>&</sup>lt;sup>2</sup> All further statutory references are to the Education Code.

Swan (1953) 41 Cal.2d 546, 553.) However, the conduct in question, to amount to unprofessional conduct, must indicate unfitness to teach. (*Perez v. Commission on Professional Competence* (1983) 149 Cal.App.3d 1167, 1174.)

- 3. "Evident unfitness for service" as used in section 44932, subdivision (a)(5), properly means "clearly not fit, not adapted to or unsuitable for teaching, ordinarily by reason of temperamental defects or inadequacies." Unlike "unprofessional conduct," "evident unfitness for service" connotes a fixed character trait, presumably not remediable merely on receipt of notice that one's conduct fails to meet the expectations of the employing school district. (Woodland Joint Unified School Dist. v. Commission on Professional Competence (1992) 2 Cal.App.4th 1429, at 1444.)
- 4. "Immoral conduct," of which Respondent has been accused, is not confined to sexual matters. It has been defined to mean that which is hostile to the welfare of the general public and contrary to good morals. It includes conduct inconsistent with rectitude, or indicative of corruption, indecency, depravity, and dissoluteness. Or, it can be conduct that is willful, flagrant, or shameless, conduct showing moral indifference to the opinions of respectable members of the community, and as an inconsiderate attitude toward good order and the public welfare. (Board of Education of the San Francisco Unified School District v. Weiland (1960) 179 Cal. App.2d 808, 811 (Weiland); San Diego Unified School Dist. v. Commission on Professional Competence (2011) 194 Cal. App.4th 1454, 1466.)
- 5. In order for a teacher to be terminated under section 44932, subdivision (a)(7), for persistent disobedience of applicable rules and regulations, it must be established that there has been continuous and constant refusal to obey, or behavior motivated by an attitude of continuing insubordination; a single instance of disobedience is insufficient. (Governing Bd. of the Oakdale Union School Dist. v. Seaman (1972) 28 Cal.App.3d 77, 81-82.)
- 6. Even where unprofessional conduct, immoral conduct, evident unfitness for service, or refusal to follow rules and regulations is or are established, it must also be established that such conduct renders the Respondent unfit to teach. (Morrison v. State Board of Education (1969) 1 Cal.3d 214, 229-230 (Morrison); Fontana, supra, 45 Cal.3d 208; Woodland Joint Unified School District v. Commission on Professional Competence (1992) 2 Cal.App.4th 1429, 1444-1445; See Bourland v. Commission on Professional Competence (1985) 174 Cal.App.3d 317, 321.)
- 7. (A) It is settled that the trier of fact may "accept part of the testimony of a witness and reject another part even though the latter contradicts the part accepted." (Stevens v. Parke Davis & Co. (1973) 9 Cal.3d 51, 67.) The trier of fact may also "reject part of the testimony of a witness, though not directly contradicted, and combine the accepted portions with bits of testimony or inferences from the testimony of other witnesses thus weaving a cloth of truth out of selected material." (Id., at 67-68, quoting from Neverov v. Caldwell (1958) 161 Cal.App.2d 762, 767.) Further, the fact finder may reject the testimony of a witness, even an expert, although not contradicted. (Foreman & Clark Corp. v. Fallon

(1971) 3 Cal.3d 875, 890.) And, the testimony of "one credible witness may constitute substantial evidence", including a single expert witness. (*Kearl v. Board of Medical Quality Assurance* (1986) 189 Cal.App.3d 1040, at 1052.)

(B) The rejection of testimony does not create evidence contrary to that which is deemed untrustworthy. That is, disbelief does not create affirmative evidence to the contrary of that which is discarded. That the trier of fact may disbelieve the testimony of a witness who testifies to the negative of an issue does not of itself furnish any evidence in support of the affirmative of that issue, and does not warrant a finding in the affirmative thereof unless there is other evidence in the case to support such affirmative. (*Hutchinson v. Contractors' State License Bd.* (1956) 143 Cal.App.2d 628, 632-633, quoting *Marovich v. Central California Traction Co.* (1923) 191 Cal.295, 304.)

Legal Conclusions Pertaining to the Specific Allegations of the Accusation:

- 8. Respondent has engaged in unprofessional conduct, providing cause for her termination pursuant to section 44932, subdivision (a)(1), by her reporting for service at her school site on three occasions while under the influence of alcohol, and on two occasions after receiving warnings, notices of unsatisfactory acts, and suspensions. This conclusion is based on Factual Findings 4 through 27, and 33 and 34.
- 9. Cause has been established to terminate Respondent pursuant to section 44932, subdivision (a)(5), in that she is evidently unfit for service in light of her reporting for service at her school site on three occasions while under the influence of alcohol, and on two occasions after receiving warnings, notices of unsatisfactory acts, and suspensions. This conclusion is based on Factual Findings 4 through 27, and 33 and 34.
- 10. Respondent persistently violated the school laws of the state and or reasonable regulations prescribed for the governing board of the District, by appearing for work on three occasions while under the influence of alcohol, in violation of section 44932, subdivision (a)(7). This conclusion is based on Factual Findings 4 through 27, 33 and 34.
- 11. It was established that Respondent has suffered from alcoholism which makes her unfit to associate with children, and she is therefore subject to termination pursuant to section 44932, subdivision (a)(11). This conclusion is based on Factual Findings 4 through 27, 33 and 34.
- 12. It was not established that Respondent's conduct was immoral, despite its reprehensible nature; to suffer from an addiction is not necessarily immoral. (See *Rice v. Alcohol Beverage Control Appeals Board* (1979) 89 Cal.App.3d 30, 37-38.) Nor was it established that Respondent willfully refused to perform regular assignments, despite the three incidents.

- 13. Applying the *Morrison* factors, it must be concluded that Respondent's conduct and temperament render her unfit to teach in the District, based on Factual Findings 35 through 37.
- 14. (A) Respondent asserted that under the American's with Disabilities Act, and similar legislation, she cannot be terminated because her alcoholism is a disease, and because termination would be discriminatory. Complainant asserted that such a claim will not lie as an affirmative defense before a Commission on Professional Competence.
- (B) Leaving aside the jurisdictional issue, on which the Commission makes no explicit finding, it is noted that even if alcoholism brings Respondent within the protections of anti-discrimination statutes, she is not, in the circumstances of this case, protected from termination. This is a function of the job she hold—where she is entrusted with the health, safety, and welfare of young children—as well as her demonstrated inability to bring her addiction under control.
- (C) In *Grosvenor v. Coastal Corp.* (1996), 51 Cal.App.4th 805, disapproved on other grounds in *Colmenares v. Braemar Country Club, Inc.* (2003) 29 Cal.4th 1019, 1031, fn. 6, the termination of a refinery superintendent, who suffered from alcoholism, was upheld, following a summary judgment in the employer's favor. There, the plaintiff employee had more than one opportunity to bring his alcoholism under control, and he could not. It was noted that the refinery, located near a residential area, was often supervised by the employee alone. Hence, his inability to manage his addiction threatened not only the employer's property, but the lives of other workers, and local residents. The employee had had more than one opportunity, and more than one warning, and the appellate court noted that if the employee could not be terminated, the employer's warning that he had had his last chance would become meaningless.
- (D) Here also Respondent is entrusted with the safety of others—children—as a part of her job. (This leaves aside the threat she posed driving to school, across many miles, while inebriated, a concern expressed by Babit and Johnson.) She had more than one opportunity, had made efforts at sobriety, had failed, and asserts that she is entitled to another chance under anti-discrimination laws. In light of the *Grosvenor* decision, she cannot sustain that claim.
- 15. Based on all the foregoing, Respondent should be terminated as a teacher in the Los Angeles Unified School District.

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# ORDER

Respondent Barbara Homokay	shall be terminated	as a certifi	cated emplo	yee of the
Angeles Unified School District,		p. Market		

August \_/) \_, 2014

Joseph D. Montoya
Administrative Law Judge
Office of Administrative Hearings

July <u>\$/</u>, 2014

July <u>30</u>, 2014