Docket No. DA-0752-14-0539-I-1
Party: Appellant's Representative

Aaron Martin
P.O.Box 3597
Fayetteville, AR 72702

UNITED STATES OF AMERICA
MERIT SYSTEMS PROTECTION BOARD
DALLAS REGIONAL OFFICE

JOHNNIE D. GREEN,
Appellant,

v.

SMALL BUSINESS ADMINISTRATION,
Agency.

DOCKET NUMBER
DA-0752-14-0539-I-1

DATE: February 27, 2015

Aaron Martin, Fayetteville, Arkansas, for the appellant.

Anthony G. Parham, Esquire, and Larry G. Webb, Esquire, Washington, D.C., for the agency.

BEFORE
Mary Ann Garvey
Administrative Judge

INITIAL DECISION

The appellant timely appealed the action of the agency which suspended him from his position for 30 days. The Board has jurisdiction over this appeal. *See* 5 U.S.C. §§ 7511-7513. At the appellant's request, a hearing was conducted on December 9, 2014.

Based on the following analysis and findings, the agency's action is REVERSED.

ANALYSIS AND FINDINGS

The agency violated the appellant's right to due process.

The agency suspended the appellant based on four charges: (1) using the agency's e-mail system improperly; (2) failing to follow instructions; (3) neglecting his duties; and (4) lack of candor. In the proposal notice, Shirley Walls, the proposing official states the following in relevant part:

> In proposing this action, I considered your most recent performance rating for 2013 of a "level 2", below expectations. In mitigation, I considered your extensive federal service of 18 years and that you have had no prior disciplinary action.

Appeal File, Tab 1.

In support of its action, the agency submitted a copy of the *Douglas* factors considered by Sarah Hawkins, the deciding official. In her analysis of the first Douglas factor, Hawkins determined that the appellant's conduct relating to charges one and two was intentional. She found that the appellant's conduct "appears" to be intentional regarding charge three and, when discussing the fourth charge, she found his conduct was "willful and intentional." Appeal File, Tab 7.

Regarding the second *Douglas* factor, Hawkins stated the following in relevant part: "Mr. Green is an employee who has performed Loan Officer tasks for more than 17 years. He is one of the senior loan officers at the Center. As such he should be held to a higher standard." *Id.* Hawkins noted that the appellant's last three performance evaluations were at a level 3 or meets expectations.[1] However, in analyzing *Douglas* factor five, she stated: "I am concerned that outside employment may have affected his ability to perform his

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[1] The record reflects that the appellant challenged the 2013 performance rating of level 2, and it was changed to a level 3, or meets expectations, prior to the issuance of the decision in this appeal.

assigned tasks." *Id.* She also noted that the appellant's Supervisor has concerns "that the employee is not focused on the task or willing to complete the assigned tasks." *Id.* In her discussion of *Douglas* factor nine, Hawkins stated the following in relevant part: "The employee continued to violate the Agreement regarding use of equipment and performance of outside employment functions on company time."

At the hearing, Hawkins related that in sustaining the charge of misuse of the e-mail system, she determined that the appellant solicited outside employment and used agency fax machines for his outside employment. She also testified that she found the appellant's conduct to be intentional regarding all four charges.

Hawkins testified that she created the *Douglas* factor analysis prior to issuing her decision. She stated that she held the appellant to a higher standard than other loan officers who had not worked at the agency for as long as the appellant had worked there. She explained that the appellant was a seasoned employee and, therefore, he was expected to be a role model. However, later her testimony, Hawkins said that she did not really hold the appellant to a higher standard. When asked why it was in her written *Douglas* factor analysis, she said she put it in her analysis because of the appellant's "knowledge and experience." but said she it but did not use it in making her decision.

Hawkins also related that she determined that the appellant's outside employment negatively affected his performance. When it was pointed out that the appellant's performance met expectations for the last three years, she explained that they had started the process of lowering the appellant's performance, but he challenged it, and it remained as a meets expectations. She also stated that the appellant's performance may have been affected by his misuse of the e-mail system. Hawkins said that she did not find that there were any mitigating circumstances to consider.

When an agency intends to rely on aggravating factors as the basis for the imposition of a penalty, such factors should be included in the advance notice of

adverse action so that the employee will have a fair opportunity to respond to those factors before the agency's deciding official. *Lopes v. Department of the Navy*, 116 M.S.P.R. 470, ¶ 5 (2011). When a deciding official relies on information, which the appellant is not on notice may be considered, the information is referred to as an ex parte communication. *See Stone v. Federal Deposit Insurance Corporation*, 179 F.3d 1368, 1376-77 (Fed. Cir. 1999) (discussing when ex parte concerns arise in connection with an adverse action). The U.S. Court of Appeals for the Federal Circuit has explained that, if an employee has not been given notice of aggravating factors contributing to an enhanced penalty, the ex parte communication with the deciding official may constitute a constitutional due process violation because it potentially deprives the employee of notice of all the evidence being used against him and the opportunity to respond to it. *Ward v. U.S. Postal Service*, 634 F.3d 1274, 1280 (2011). However, "[o]nly ex parte communications that introduce new and material information to the deciding official" constitute due process violations. *Stone*, 179 F.3d at 1377. The "ultimate inquiry" is whether the ex parte communication is "so substantial and so likely to cause prejudice that no employee can fairly be required to be subjected to a deprivation of property under such circumstances." *Ward*, 634 F.3d at 1279.

The Board will consider the following factors, among others, to determine whether an ex parte contact is constitutionally impermissible: (1) whether the ex parte communication merely introduces "cumulative" information or new information; (2) whether the employee knew of the information and had a chance to respond to it; and (3) whether the ex parte communications were of the type likely to result in undue pressure upon the deciding official to rule in a particular manner. *Bennett v. Department of Justice*, 119 M.S.P.R. 685, ¶ 8 (2013). A due process violation is not subject to the harmless error test; instead, the employee is automatically entitled to a new, constitutionally-correct removal proceeding. *Ward*, 634 F.3d at 1279. The Board has determined that this analysis applies not

only to ex parte communications introducing information that was previously unknown to the deciding official, but also to information personally known and considered by the deciding official, if that information was not included in the notice of proposed removal to the appellant. *Wilson v. Department of Homeland Security*, 120 M.S.P.R. 686, ¶ 9 (2014).

I find less than credible Hawkins testimony that although she stated in her written *Douglas* factor analysis that she held the appellant to a higher standard, she did not consider that in making her decision. *See Hillen v. Department of the Army*, 35 M.S.P.R 453, 458-62 (1987) (factors to be considered in assessing a witness' credibility). Hawkins emphasized in her testimony that she spent a long time researching and considering the *Douglas* factors. In the beginning of her testimony, she acknowledged that she held the appellant to a higher standard because of his many years of service and said that he should have been a role model. Only later in her testimony did she "waffle" on this issue and say that, although she listed it in her *Douglas* factor analysis, she did not consider it in her decision. In light of the above, I find that Hawkins considered the appellant's many years of service to be an aggravating factor and not a mitigating factor as the proposing official stated in the proposal notice.

It is also clear from her testimony, her decision letter, and her *Douglas* factor analysis that Hawkins found the appellant's conduct to be intentional. However, nowhere in the proposal notice was he charged with any intentional misconduct. Moreover, Hawkins indicated in her testimony that she considered the appellant's performance to be less than satisfactory, although it is clear from the record that his last three performance evaluations were at the meets expectations level.

I also find that in making her decision, Hawkins found that the appellant had misused agency fax machines for outside employment and also violated an agreement regarding outside employment. However, the appellant was not charged with either of these offenses.

In light of the above, I find that Hawkins' *Douglas* factor analysis introduced new information which was not included in the notice of proposed suspension. There is no evidence in the record to suggest that Hawkins shared any of these aggravating factors with the appellant prior to issuing her decision. Therefore, I find that the deciding official's consideration of the additional considerations discussed above was new information not included in the agency's proposal notice.

To find a violation of the appellant's due process rights, not only must the ex parte communication considered by the deciding official be new, but the communication also must be material. *See Ward*, 634 F.3d at 1279. An ex parte communication is material when it influences the deciding official's penalty determination. *Seeler v. Department of the Interior*, 118 M.S.P.R. 192, ¶ 9 (2012). In her testimony. Hawkins explained that she created the *Douglas* factor analysis prior to issuing her decision. Although she did not explicitly state that she was influenced by the additional considerations, I find that her *Douglas* factor analysis, combined with her testimony at the hearing shows that these considerations were material to her decision to suspend the appellant for 30 days. *See Silberman v. Department of Labor*, 116 M.S.P.R. 501, ¶ 12 (2011).

As to the second *Stone* factor, there is no evidence in the record that the appellant knew that the deciding official was considering factors not in the proposal notice. The appellant did not present an oral reply and presented only a written reply to the deciding official. I find no evidence that the appellant had the opportunity to respond to these additional considerations.

In *Ward*, the U.S. Court of Appeals for the Federal Circuit clarified that the third *Stone* factor of undue pressure is only one of several enumerated factors and is not the ultimate inquiry in the *Stone* analysis. *See Ward*, 634 F.3d at 1280 n.2. The court added that, although ex parte communications of this type may "make it more likely that an appellant was deprived of due process," the lack of undue pressure may be less relevant to finding a constitutional violation where the

deciding official "admits that the ex parte communication influenced his penalty determination." *Id.* Here, I find that the factors listed in Hawkins' *Douglas* factors analysis, along with the manner in which the information was used in her penalty determination, establishes that the appellant's right to due process was violated by the deciding official's ex parte communication, and that the third factor is thus less relevant. Therefore, I find that the agency violated the appellant's right to due process and its action in suspending the appellant for 30 days must be reversed.

The appellant has not proven that the agency suspended him in reprisal for filing equal employment opportunity complaints.

Although I have reversed the agency's action, I am required to consider his claim of reprisal for filing equal employment opportunity (EEO) complaints. *See Tottes v. U.S. Postal Service*, 68 M.S.P.R. 253, 257 (1995). In order to establish a *prima facie* case of prohibited reprisal in such situations, the appellant must prove by preponderant evidence (1) that he engaged in a protected activity; (2) that the officials responsible for this adverse action knew about that activity; (3) that the appealed action, under the circumstances, could have been retaliation; and (4) after a careful balancing of the intensity of the motive to retaliate against the gravity of the misconduct, a nexus is established between the motive and the subsequent action. *Warren v. Department of the Army*, 804 F.2d 654 (Fed. Cir. 1986); *Redschlag v. Department of the Army*, 89 M.S.P.R. 589, 624 (2001).

It is undisputed that the appellant filed EEO complaints, and that both Walls and Hawkins were aware of this activity. I find, therefore, that the appellant's suspension could have been taken in retaliation for his engaging in this protected activity. The key to finding prohibited reprisal, however, is the fourth and crucial step of the *Warren* test. The appellant must prove by preponderant evidence that there is a true nexus or causal connection between his

suspension and his prior protected activity. *Peterson v. Department of Transportation*, 54 M.S.P.R. 178 (1992).

Walls stated that although she was aware that the appellant had filed EEO complaints, it was his "right" to do so. Hawkins also acknowledged that she was aware of the appellant's protected activity but testified that it had no effect on her decision. The appellant testified that Walls was the subject of his EEO complaints. However, he offered nothing other than his unsupported allegations to show that the agency suspended him because he had filed EEO complaints. An appellant's mere allegation of reprisal, unsupported by probative and credible evidence, does not prove reprisal. *Romero v. Equal Employment Opportunity Commission,* 55 M.S.P.R. 527, 539 (1992). Considering the evidence of record, I find that the appellant failed to show by preponderant evidence that there was a true nexus or causal connection between his suspension and his filing of EEO complaints. Accordingly, this affirmative defense fails.

DECISION

The agency's action is REVERSED.

ORDER

I **ORDER** the agency to cancel the suspension and retroactively restore appellant effective **June 29, 2014**. This action must be accomplished no later than 20 calendar days after the date this initial decision becomes final.

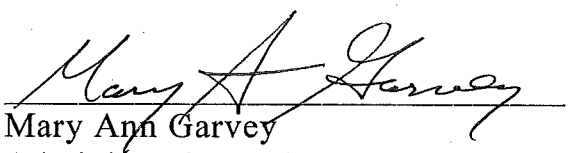
I **ORDER** the agency to pay appellant by check or through electronic funds transfer for the appropriate amount of back pay, with interest and to adjust benefits with appropriate credits and deductions in accordance with the Office of Personnel Management's regulations no later than 60 calendar days after the date this initial decision becomes final. I **ORDER** the appellant to cooperate in good faith with the agency's efforts to compute the amount of back pay and benefits due and to provide all necessary information requested by the agency to help it comply.

If there is a dispute about the amount of back pay due, I **ORDER** the agency to pay appellant by check or through electronic funds transfer for the undisputed amount no later than 60 calendar days after the date this initial decision becomes final. Appellant may then file a petition for enforcement with this office to resolve the disputed amount.

I **ORDER** the agency to inform appellant in writing of all actions taken to comply with the Board's Order and the date on which it believes it has fully complied. If not notified, appellant must ask the agency about its efforts to comply before filing a petition for enforcement with this office.

For agencies whose payroll is administered by either the National Finance Center of the Department of Agriculture (NFC) or the Defense Finance and Accounting Service (DFAS), two lists of the information and documentation necessary to process payments and adjustments resulting from a Board decision are attached. I **ORDER** the agency to timely provide DFAS or NFC with all documentation necessary to process payments and adjustments resulting from the Board's decision in accordance with the attached lists so that payment can be made within the 60-day period set forth above.

FOR THE BOARD:



Mary Ann Garvey
Administrative Judge

NOTICE TO PARTIES CONCERNING SETTLEMENT

The date that this initial decision becomes final, which is set forth below, is the last day that the parties may file a settlement agreement, but the administrative judge may vacate the initial decision in order to accept such an agreement into the record after that date. *See* 5 C.F.R. § 1201.112(a)(4).

NOTICE TO APPELLANT

This initial decision will become final on **April 3, 2015**, unless a petition for review is filed by that date. This is an important date because it is usually the last day on which you can file a petition for review with the Board. However, if you prove that you received this initial decision more than 5 days after the date of issuance, you may file a petition for review within 30 days after the date you actually receive the initial decision. If you are represented, the 30-day period begins to run upon either your receipt of the initial decision or its receipt by your representative, whichever comes first. You must establish the date on which you or your representative received it. The date on which the initial decision becomes final also controls when you can file a petition for review with the Equal Employment Opportunity Commission (EEOC) or with a federal court. The paragraphs that follow tell you how and when to file with the Board, the EEOC, or the federal district court. These instructions are important because if you wish to file a petition, you must file it within the proper time period.

BOARD REVIEW

You may request Board review of this initial decision by filing a petition for review.

If the other party has already filed a timely petition for review, you may file a cross petition for review. Your petition or cross petition for review must state your objections to the initial decision, supported by references to applicable laws, regulations, and the record. You must file it with:

The Clerk of the Board
Merit Systems Protection Board
1615 M Street, NW.
Washington, DC 20419

A petition or cross petition for review may be filed by mail, facsimile (fax), personal or commercial delivery, or electronic filing. A petition submitted by electronic filing must comply with the requirements of 5 C.F.R. § 1201.14, and may only be accomplished at the Board's e-Appeal website (https://e-appeal.mspb.gov).

Criteria for Granting a Petition or Cross Petition for Review

The criteria for review are set out at 5 C.F.R. § 1201.115, as follows:

The Board normally will consider only issues raised in a timely filed petition or cross petition for review. Situations in which the Board may grant a petition or cross petition for review include, but are not limited to, a showing that:

(a) The initial decision contains erroneous findings of material fact; (1) Any alleged factual error must be material, meaning of sufficient weight to warrant an outcome different from that of the initial decision. (2) A petitioner who alleges that the judge made erroneous findings of material fact must explain why the challenged factual determination is incorrect and identify specific evidence in the record that demonstrates the error. In reviewing a claim of an erroneous finding of fact, the Board will give deference to an administrative judge's credibility determinations when they are based, explicitly or implicitly, on the observation of the demeanor of witnesses testifying at a hearing.

(b) The initial decision is based on an erroneous interpretation of statute or regulation or the erroneous application of the law to the facts of the case. The petitioner must explain how the error affected the outcome of the case;

(c) The judge's rulings during either the course of the appeal or the initial decision were not consistent with required procedures or involved an abuse of discretion, and the resulting error affected the outcome of the case;

(d) New and material evidence or legal argument is available that, despite the petitioner's due diligence, was not available when the record closed. To constitute new evidence, the information contained in the documents, not just the documents themselves, must have been unavailable despite due diligence when the record closed;

(e) Notwithstanding the above provisions in this section, the Board reserves the authority to consider any issue in an appeal before it.

As stated in 5 C.F.R. § 1201.114(h), a petition for review, a cross petition for review, or a response to a petition for review, whether computer generated, typed, or handwritten, is limited to 30 pages or 7500 words, whichever is less. A reply to a response to a petition for review is limited to 15 pages or 3750 words, whichever is less. Computer generated and typed pleadings must use no less than 12 point typeface and 1-inch margins and must be double spaced and only use one side of a page. The length limitation is exclusive of any table of contents, table of authorities, attachments, and certificate of service. A request for leave to file a pleading that exceeds the limitations prescribed in this paragraph must be received by the Clerk of the Board at least 3 days before the filing deadline. Such requests must give the reasons for a waiver as well as the desired length of the pleading and are granted only in exceptional circumstances. The page and word limits set forth above are maximum limits. Parties are not expected or required to submit pleadings of the maximum length. Typically, a well-written petition for review is between 5 and 10 pages long.

If you file a petition or cross petition for review, the Board will obtain the record in your case from the administrative judge and you should not submit anything to the Board that is already part of the record. A petition for review must be filed with the Clerk of the Board no later than the date this initial

decision becomes final, or if this initial decision is received by you or your representative more than 5 days after the date of issuance, 30 days after the date you or your representative actually received the initial decision, whichever was first. If you claim that you and your representative both received this decision more than 5 days after its issuance, you have the burden to prove to the Board the earlier date of receipt. You must also show that any delay in receiving the initial decision was not due to the deliberate evasion of receipt. You may meet your burden by filing evidence and argument, sworn or under penalty of perjury (*see* 5 C.F.R. Part 1201, Appendix 4) to support your claim. The date of filing by mail is determined by the postmark date. The date of filing by fax or by electronic filing is the date of submission. The date of filing by personal delivery is the date on which the Board receives the document. The date of filing by commercial delivery is the date the document was delivered to the commercial delivery service. Your petition may be rejected and returned to you if you fail to provide a statement of how you served your petition on the other party. *See* 5 C.F.R. § 1201.4(j). If the petition is filed electronically, the online process itself will serve the petition on other e-filers. *See* 5 C.F.R. § 1201.14(j)(1).

A cross petition for review must be filed within 25 days after the date of service of the petition for review.

ATTORNEY FEES

If no petition for review is filed, you may ask for the payment of attorney fees (plus costs, expert witness fees, and litigation expenses, where applicable) by filing a motion with this office as soon as possible, but no later than 60 calendar days after the date this initial decision becomes final. Any such motion must be prepared in accordance with the provisions of 5 C.F.R. Part 1201, Subpart H, and applicable case law.

NOTICE TO AGENCY/INTERVENOR

The agency or intervenor may file a petition for review of this initial decision in accordance with the Board's regulations.

NOTICE TO THE APPELLANT REGARDING YOUR FURTHER REVIEW RIGHTS

You have the right to request further review of this decision only after it becomes final, as set forth above.

Discrimination Claims: Administrative Review

You may request review of this decision on your discrimination claims by the Equal Employment Opportunity Commission (EEOC). *See* Title 5 of the United States Code, section 7702(b)(1) (5 U.S.C. § 7702(b)(1)). If you submit your request by regular U.S. mail, the address of the EEOC is:

Office of Federal Operations
Equal Employment Opportunity Commission
P.O. Box 77960
Washington, D.C. 20013

If you submit your request via commercial delivery or by a method requiring a signature, it must be addressed to:

Office of Federal Operations
Equal Employment Opportunity Commission
131 M Street, NE
Suite 5SW12G
Washington, D.C. 20507

You, or your representative if you are represented, should send your request to EEOC no later than 30 calendar days after the date this decision becomes final. If you choose to file, be very careful to file on time.

Discrimination and Other Claims: Judicial Action

If you do not request EEOC to review this final decision on your discrimination claims, you may file a civil action against the agency on both your discrimination claims and your other claims in an appropriate United States

district court. *See* 5 U.S.C. § 7703(b)(2). You, or your representative if you are represented, must file your civil action with the district court no later than 30 calendar days after the date this decision becomes final. If you choose to file, be very careful to file on time. If the action involves a claim of discrimination based on race, color, religion, sex, national origin, or a disabling condition, you may be entitled to representation by a court-appointed lawyer and to waiver of any requirement of prepayment of fees, costs, or other security. *See* 42 U.S.C. § 2000e5(f) and 29 U.S.C. § 794a.

DFAS CHECKLIST

INFORMATION REQUIRED BY DFAS IN ORDER TO PROCESS PAYMENTS AGREED UPON IN SETTLEMENT CASES OR AS ORDERED BY THE MERIT SYSTEMS PROTECTION BOARD

AS CHECKLIST: INFORMATION REQUIRED BY IN ORDER TO PROCESS PAYMENTS AGREED UPON IN SETTLEMENT CASES

CIVILIAN PERSONNEL OFFICE MUST NOTIFY CIVILIAN PAYROLL OFFICE VIA COMMAND LETTER WITH THE FOLLOWING:

1. Statement if Unemployment Benefits are to be deducted, with dollar amount, address and POC to send.
2. Statement that employee was counseled concerning Health Benefits and TSP and the election forms if necessary.
3. Statement concerning entitlement to overtime, night differential, shift premium, Sunday Premium, etc, with number of hours and dates for each entitlement.
4. If Back Pay Settlement was prior to conversion to DCPS (Defense Civilian Pay System), a statement certifying any lump sum payment with number of hours and amount paid and/or any severance pay that was paid with dollar amount.
5. Statement if interest is payable with beginning date of accrual.
6. Corrected Time and Attendance if applicable.

ATTACHMENTS TO THE LETTER SHOULD BE AS FOLLOWS:

1. Copy of Settlement Agreement and/or the MSPB Order.
2. Corrected or cancelled SF 50's.
3. Election forms for Health Benefits and/or TSP if applicable.
4. Statement certified to be accurate by the employee which includes:
   a. Outside earnings with copies of W2's or statement from employer.
   b. Statement that employee was ready, willing and able to work during the period.
   c. Statement of erroneous payments employee received such as; lump sum leave, severance pay, VERA/VSIP, retirement annuity payments (if applicable) and if employee withdrew Retirement Funds.
5. If employee was unable to work during any or part of the period involved, certification of the type of leave to be charged and number of hours.

USDA UNITED STATES DEPARTMENT OF AGRICULTURE

NATIONAL FINANCE CENTER CHECKLIST FOR BACK PAY CASES

Below is the information/documentation required by National Finance Center to process payments/adjustments agreed on in Back Pay Cases (settlements, restorations) or as ordered by the Merit Systems Protection Board, EEOC, and courts.

1. Initiate and submit AD-343 (Payroll/Action Request) with clear and concise information describing what to do in accordance with decision.

2. The following information must be included on AD-343 for Restoration:

a. Employee name and social security number.
b. Detailed explanation of request.
c. Valid agency accounting.
d. Authorized signature (Table 63)
e. If interest is to be included.
f. Check mailing address.
g. Indicate if case is prior to conversion. Computations must be attached.
h. Indicate the amount of Severance and Lump Sum Annual Leave Payment to be collected. (if applicable)

Attachments to AD-343

1. Provide pay entitlement to include Overtime, Night Differential, Shift Premium, Sunday Premium, etc. with number of hours and dates for each entitlement. (if applicable)

2. Copies of SF-50's (Personnel Actions) or list of salary adjustments/changes and amounts.

3. Outside earnings documentation statement from agency.

4. If employee received retirement annuity or unemployment, provide amount and address to return monies.

5. Provide forms for FEGLI, FEHBA, or TSP deductions. (if applicable)

6. If employee was unable to work during any or part of the period involved, certification of the type of leave to be charged and number of hours.

7. If employee retires at end of Restoration Period, provide hours of Lump Sum Annual Leave to be paid.

NOTE: If prior to conversion, agency must attach Computation Worksheet by Pay Period and required data in 1-7 above.

The following information must be included on AD-343 for Settlement Cases: (Lump Sum Payment, Correction to Promotion, Wage Grade Increase, FLSA, etc.)

a. Must provide same data as in 2, a-g above.
b. Prior to conversion computation must be provided.
c. Lump Sum amount of Settlement, and if taxable or non-taxable.

If you have any questions or require clarification on the above, please contact NFC's Payroll/Personnel Operations at 504-255-4630.

CERTIFICATE OF SERVICE

I certify that the attached Document(s) was (were) sent as indicated this day to each of the following:

Appellant

U.S. Mail

Johnnie D. Green
6606 Bluebird Drive
Little Rock, AR 72205

Appellant Representative

U.S. Mail

Aaron Martin
P.O.Box 3597
Fayetteville, AR 72702

Agency Representative

Electronic Mail

Larry G. Webb
Small Business Administration
409 3rd Street SW, Suite 7200
Washington, DC 20416

Electronic Mail

Mr. Anthony G. Parham, Esq.
Small Business Administration
409 3rd Street, SW, Suite 7200
Washington, DC 20416

February 27, 2015
(Date)

Olivia H. Hunter
Paralegal Specialist