

ADMINISTRATIVE MEMORANDUM

SUBJECT Collection of debts owed the State by
State employees, officials, and legislators
(G. S. Chapter 143, Article 60)

NUMBER 132

DATE January 22, 1980

The 1979 Session of the General Assembly enacted two bills relating to the collection of debts owed the State. The first enactment was the Set-Off Debt Collection Act (referred to hereinafter as "SODCA"), which is codified as G. S. 105A and is the subject of a previous Administrative Memorandum, Number 127, dated October 30, 1979. That act provides, in general, that a debt owed the State by any person may be collected by levying against any State income tax refund otherwise due the debtor. The second enactment was the State Employee Debt Collection Act (referred to hereinafter as "SEDCA"), which is now codified as G. S. Chapter 143, Article 60 (though the ratified bill referenced Article 59). This second act in general promotes payment of a debt owed the State by an employee, official, or legislator of the State through the threat of prescribed sanctions (e.g., discharge of employee from State employment) if the debt is not paid. [See Attachment A for a copy of the ratified bill.]

This Administrative Memorandum provides guidance in interpreting and administering the second legislative program, SEDCA, which is concerned with the collection of debts owed the State by employees, officials, and legislators of the State. Among other sources of guidance, this Administrative Memorandum relies on guidelines issued by the Office of State Budget and Management under date of December 12, 1979. This Administrative Memorandum also supplies, in bracketed sections, a description of some SODCA provisions that are significantly different from SEDCA.

Debtors subject to SEDCA.

SEDCA was written to assist in the collection of debts owed the State by employees, public officials, and legislators of the State [G. S. 143-541, -544, and -547]. The definition of "public official" contained in G. S. 143-543(3) includes those members of State boards, commissions, councils, committees, and other State agencies "created by law" whose personnel positions are not salaried by the State. "Public officials," therefore, would include members of the Board of Governors, the Boards of Trustees of the constituent institutions, the Boards of Trustees of the institutional endowment funds, the Board of Directors of North Carolina Memorial Hospital, the Board of Directors of the State Education Assistance Authority, and the Board of Trustees of the University of North Carolina Center for Public Television. Where an individual is

both a salaried State employee and a nonsalaried member of a State agency created by law, the individual, if a debtor to the State, we believe, should be treated procedurally under SEDCA as a State employee, not as a "public official" (e.g., the President of The University, who is both a State employee and ex officio a trustee of The University of North Carolina Center for Public Television).

[By contrast, SODCA makes any debtor to the State (whether or not an employee, official, or legislator of the State) potentially subject to debt collection through tax refund set-off.]

Debts collectible under SEDCA.

Under SEDCA any "delinquent" debt owed the State by a State employee, public official, or legislator may be pursued under the act [G. S. 143-541(b), -544, and -547].

[By contrast, SODCA may be used to collect debts only if the debt is 90 days in arrears or reduced to judgment, if the debt is at least \$50, and if the debtor is due a North Carolina income tax refund of at least \$50.]

Method of debt collection under SEDCA.

Under SEDCA the means of inducing debt payment by State employees is the threat of termination of employment [G. S. 143-541]. Similarly, public officials are faced with termination of appointment for nonpayment [G. S. 143-545]. Nonpaying legislators, however, are to be dealt with by the Legislative Ethics Commission, as authorized by G. S. Chapter 120, Article 14, which means a debtor Assemblyperson may have nonpayment of debt referred by the Commission to his or her Chamber for "appropriate action," that may include censure, suspension, or expulsion for unethical conduct [G. S. 143-547, 120-102, and 120-103(3)].

[By contrast, under SODCA, debt collection is to be realized where a debt of the statutorily prescribed nature can be set off against a tax refund, of at least \$50, otherwise due the debtor.]

Responsibilities of State agencies under SEDCA.

In basic outline, SEDCA requires (1) identification of employees, officials, or legislators of the State who are indebted to the State, (2) transmission of notice of the identity of the debtor and the fact of indebtedness to the entity that employs the debtor (or that appointed the official or that is responsible for superintending the conduct of legislators), and (3) specified actions by the debtor's employing entity relative to the debtor and his indebtedness, including ultimately the possibility of terminating the State employment of the debtor.

Reporting debtors. The various components of State government, in total, are responsible for identifying delinquent debtors to the State who also are employees, officials, or legislators of the State. The pertinent legislative language [G. S. 143-541(b), -544, and -547] puts that identifying responsibility on "employing entities" of the State. For example, if a constituent institution is owed a sum of money and the institution knows that the debtor is an employee of the Department of Transportation, the University institution is responsible for initiating application of SEDCA to that Transportation employee by conveying notice of the indebtedness to the appropriate authority, viz., the Department of Transportation, which is the employer of the debtor. The same University responsibility would apply with respect to reporting a public official to the entity that appointed that public official to public office and with respect to reporting a legislator to the Legislative Ethics Commission.

In recognition of the difficulty likely to be encountered by a State governmental entity in identifying debtors to it who also are employees of another State entity, the State Department of Budget and Management in its December 12 memorandum (Appendix B) prescribes a system for addressing the basic reporting responsibility. Again, using the University context for purposes of illustration, the December 12 memorandum requires a constituent University institution to report to the Office of State Budget and Management all "past due accounts" for which "satisfactory provisions for repayment" have not already been made. That agency in turn will compare the list supplied with the comprehensive list of State employees and identify those debtors who are State employees. The constituent University institution then will be given the name of any debtor to the institution who also is an employee of the State (in whatever entity employed, University or otherwise); and the constituent University institution then is responsible for notifying the employing entity that one of the entity's employees is indebted to the constituent University institution.

The "representative" of the employing entity responsible for reporting debtors to the employer of the debtor is not defined by the legislation. The term reasonably appears to suggest that a designated official of the State entity (e.g., Vice Chancellor for Finance of a constituent University institution) should be identified and authorized to perform the reporting requirement.

Unlike SODCA, which has an annual reporting date of December 1, SEDCA establishes no timetable for periodic reportings of debtors to the entities responsible for acting on such reports. However, by means of the December 12 memorandum, the State Budget Office has directed that it be sent the names and social security numbers of "individuals with past due accounts" for which no satisfactory provisions for repayment has been made. In short, each constituent institution should send to the State Budget Office a list of delinquent debts for which the constituent institution has not been

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able to induce the debtor to repay or to begin to repay the constituent institution.

Under SEDCA the State Budget Office does not itself have a debt collection authority or coordinating role analogous to that expressly given the State Department of Revenue under SODCA, so the memorandum of December 12, 1979 (Appendix B) should be seen merely as a compulsory aid to identifying debtors who are State employees.

Privacy law with respect to SEDCA. In its memorandum of December 12 the State Budget Office has called for providing to it the debtor's social security number. SEDCA, unlike SODCA, however, contains no statutory authorization for such a disclosure and use (deemed by the Attorney General to be proper under SODCA, as SODCA is associated with the "administration of a tax"). In fact, SEDCA at G. S. 143-549 expressly states: "Nothing in this Article is intended to conflict with any provision of federal law If the exchange among employing entities of information necessary to effectuate the provisions of this Article would conflict with this intention, the exchange of information shall not be made." In light of these circumstances, staff of the State Budget Office have responded to an inquiry from this office by orally agreeing that an employing entity need not transmit to the State Budget Office the social security number of an individual debtor if that number was received by the employing entity under conditions that would cause the federal Privacy Act of 1974 to prohibit its disclosure. For purposes of applying this policy, the following guidelines seem required by the Privacy Act of 1974:

- (1) Social security numbers obtained by an employing entity prior to December 31, 1974, having been acquired prior to the effective date of the Privacy Act, were unconditionally received and may be disclosed to the State Budget Office.
- (2) Social security numbers obtained on or after December 31, 1974, are conditioned by the Privacy Act and may not lawfully be disclosed to the State Budget Office unless their disclosure to the employing entity was made with foreknowledge of and consent by the individual that the number might be given to and used by another State agency for collection of debts owed the State.

[Note. As the Teachers' and State Employees' Retirement System was, before January 1, 1975, maintaining and operating a system of records under which disclosure of the employee's social security number was required by State law, disclosure of an employee's number to TSERS is not inhibited by the Privacy Act. In fact, that number is already in the TSERS data banks. However, the disclosure called for by the memorandum of December 12, 1979, is to the State Budget Office. And, even if TSERS and the Budget Office are viewed as "family," many debtors, perhaps most debtors, whose social security numbers are to

be sent to the Budget Office for an employment check, will prove not to be State employees. Therefore, an employing entity would be sending "at risk" to Raleigh social security numbers it has obtained after December 31, 1974.]

In light of the foregoing, it is our understanding that an employing entity may delete from the requested SEDCA debtor list a social security number whose disclosure is, in effect, prohibited by the Privacy Act of 1974 but should indicate which deletions are made with reference to that Act, as opposed to mere lack of information.

Informing the employing entity. When an employing entity to whom a State debt is owed learns for itself or through the State Budget Office that the debtor is a State employee, public official, or legislator, the employing entity to whom the debt is owed must inform the employing entity of the debtor or the appointing authority of a public official or the Legislative Ethics Commission, as the case may be. Paragraph 4 of the December 12 memorandum lists the procedural elements for this step and for subsequent steps in dealing with an employee/debtor.

[Caveat. Because a debtor to the State may be both a State employee, public official, or legislator and also a taxpayer due a refund of at least \$50 from the Department of Revenue, some debts of an individual will prove collectible under both SEDCA and SODCA. When an employing entity to whom the debt is owed learns that both SEDCA and SODCA may pertain to collection of the debt, that employing entity should so inform the entity actually employing the debtor. This will help minimize the possibility that sanctions will be imposed under SEDCA for a debt collected or in the process of being collected under SODCA.]

Notifying the debtor. State employees have an "employing entity" and public officials have an "appointing authority" under SEDCA to whom notice of the debt must be made and by whom notice of debt delinquency must be made to the debtor. [See G. S. 143-541(b) and (c) and G. S. 143-545.] At this point in the procedure of implementing SEDCA, the statutory duties shift from the employing entity owed the debt to the employing entity (or appointing authority) of the debtor. Of course, in some instances one employing entity will be both creditor and employer of the debtor, but whether or not creditor and employer are the same, the employer upon receiving notice of the debt must initiate debt resolution.

Debt resolution. Depending upon the nature of the employee or public official's position with the State, SEDCA prescribes one or another procedure for resolution of the debt to the State by the employing entity:

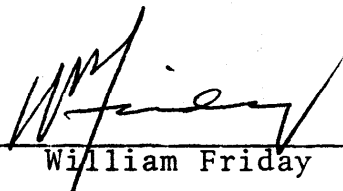
- (1) Public officials - "Upon receipt of notification, the appointing authority shall investigate the circumstances of the claim of money owed to the State for purposes of determining if a debt is owed and its amount" [G. S. 143-544]. SEDCA then provides for notice of termination of duties unless a repayment plan permitted under G. S. 143-545 is fulfilled or undertaken, as the case may be.
- (2) State employees - G. S. 143-541 calls for termination of employment if payment is not effected within a "reasonable period." However, passage of a reasonable time without payment is not cause for termination if there is (a) a "genuine dispute" over the existence or amount of the debt, (b) "an unresolved issue concerning insurance coverage," or (c) pursuit by the employee of administrative or judicial remedies in the matter. And, as with public officials, a State employee is saved from sanctions under SEDCA if the employee is undertaking repayment as permitted by SEDCA. With respect to employees, one acceptable plan is to agree to have periodically withheld for installment repayments "not less than ten percent (10%) of . . . net disposable earnings." ["Net disposable earnings" are defined by G. S. 143-540(3) to constitute salary less statutory deductions such as taxes and state retirement, which appear to leave subject to dunning that part of an employee's salary otherwise to be voluntarily paid over to such as retirement funds other than TSERS and the Optional Retirement Plan.] Unlike public officials, however, State employees, even after termination, have a right of termination review as provided by G. S. Chapter 126 if they are subject to the State Personnel Act. [See G. S. 143-542.]

Appeal of debt findings or of termination. Only at G. S. 143-542(a) does SEDCA establish or acknowledge specific appeal remedies of debt resolution, and that section is restricted to SPA employees. However, at G. S. 143-541(b) SEDCA acknowledges generally the possibility of "pursuing administrative or judicial remedies," which might be, respectively, proceedings for administrative review of personnel matters established by University policies or judicial review of a "final agency decision in a contested case" as provided under G. S. Chapter 150A, Article 4 (a part of the Administrative Procedure Act applicable to The University). SEDCA, then, "reads into" its provisions the usual array of remedies available to an aggrieved member of the University community. Essentially, then, SEDCA requires a constituent institution to sit down with its employees who are debtors to the State to work out repayment; but if the employee contests the debt, the constituent institution should treat the process of debt collection under SEDCA as a serious, contested personnel action.

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The effect of SEDCA on a stale debt.

At G. S. 143-550 SEDCA sets forth the provision that payment on a debt under SEDCA, where collection of the debt is barred by an applicable statute of limitations, "shall not be construed to revive" the debt or any part of the debt or to "extend" the statute of limitations. While this provision may serve to induce voluntary compliance with SEDCA by some debtors, it is also likely to raise in the minds of the same debtors and certainly other debtors the question whether or not a debtor whose debt to the State is barred from collection by a statute of limitation can lawfully be terminated under SEDCA for nonpayment. SEDCA itself contemplates at G. S. 143-541(b) the pursuit by the debtor of judicial remedies, which could include discharge of the debt in bankruptcy; and it is a logical step from recognizing the erasure of a debt in bankruptcy to recognizing the immunization of a debtor by reference to a statute of limitations. Either one, bankrupt or immune debtor, if employed by the State, may have a property interest in the job that is protected by the "due process" requirements of the Fifth Amendment to the United States Constitution. Consequently, we request that in complying with SEDCA by your institution, no employee or public official of The University be terminated for nonpayment of debt whose collection is barred by bankruptcy decree or a statute of limitations without prior consultation with legal staff of this office.



William Friday

Attachments

GENERAL ASSEMBLY OF NORTH CAROLINA
SESSION 1979
RATIFIED BILL

CHAPTER 864

HOUSE BILL 561

AN ACT TO REQUIRE THE REVIEW OF CLAIMS AND IMPOSITION OF
PENALTIES AGAINST STATE AND CERTAIN LOCAL EDUCATIONAL ENTITY
EMPLOYEES, NONSALARIED PUBLIC OFFICIALS, AND LEGISLATORS FOR
FAILURE TO REPAY MONEY OWED TO THE STATE.

The General Assembly of North Carolina enacts:

Section 1. Chapter 143 of the North Carolina General
Statutes is hereby amended by adding thereto a new Article 59, to
be entitled "State and Certain Local Educational Entity
Employees, Nonsalaried Public Officials, and Legislators Required
to Repay Money Owed to State" and to read as follows:

"Article 59. [*]

"State and Certain Local Educational Entity Employees,
Nonsalaried Public Officials, and Legislators Required
to Repay Money Owed to State.

"Part 1.

"State and Local Educational Entity Employees.

"§ 143-540. Definitions.--As used in this Part:

(1) 'Employing entity' means and includes:

- a. any State entity enumerated in G.S. 143B-3 of the
Executive Organization Act of 1973;
- b. any city or county board of education under Chapter
115 of the General Statutes; or

[* Note- This article when codified in the General Statutes
was redesignated as "Article 60."]

c. any board of trustees of a community college or technical institute under Chapter 115A of the General Statutes.

(2) 'Employee' means any person who is appointed to or hired and employed by an employing entity under this Part and whose salary is paid in whole or in part by State funds.

(3) 'Net disposable earnings' means the salary paid to an employee by an employing entity after deduction of withholdings for taxes, social security, State retirement or any other sum obligated by law to be withheld.

"§ 143-54|. Conditional continuing employment; notification among employing entities; repayment election.--(a) All persons employed by an employing entity as defined by this Part who owe money to the State and whose salaries are paid in whole or in part by State funds must make full restitution of the amount owed a condition of continuing employment.

(b) Whenever a representative of any employing entity as defined by this Part has knowledge that an employee owes money to the State and is delinquent in satisfying this obligation, the representative shall notify the employing entity. Upon receipt of notification an employing entity shall terminate the employee's employment if after written notice of his right to do so he does not repay the money within a reasonable period of time; provided, however, that where there is a genuine dispute as to whether the money is owed or how much is owed, or there is an unresolved issue concerning insurance coverage, the employee shall not be dismissed as long as he is pursuing administrative

or judicial remedies to have the dispute or the issue resolved.

(c) An employee of any employing entity who has elected in writing to allow not less than ten percent (10%) of his net disposable earnings to be periodically withheld for application towards a debt to the State shall be deemed to be repaying the money within a reasonable period of time and shall not have his employment terminated so long as he is consenting to repayment according to such terms. Furthermore, the employing entity shall allow the employee who for some extraordinary reason is incapable of repaying the obligation to the State according to the preceding terms to continue employment as long as he is attempting repayment in good faith under his present financial circumstances, but shall promptly terminate the employee's employment if he ceases to make payments or discontinues a good faith effort to make repayment.

"§ 143-542. Right of employee appeal.--(a) Any employee or former employee of an employing entity within the meaning of G.S. 143-540(1)a. whose employment is terminated pursuant to the provisions of this Part shall be given the opportunity to appeal the employment termination to the State Personnel Commission according to the normal appeal and hearing procedures provided by Chapter 126 and the State Personnel Commission rules adopted pursuant to the authority of that Chapter; however, nothing herein shall be construed to give the right to termination reviews to anyone exempt from that right under G.S. 126-5.

(b) Before the employment of an employee of a local board of education within the meaning of G.S. 143-540(1)b. who is either a

superintendent, supervisor, principal, teacher or other professional person is terminated pursuant to this Part, the local board of education shall comply with the provisions of G.S. 115-142. If an employee within the meaning of G.S. 143-540(1)b. is other than one whose termination is made reviewable pursuant to G.S. 115-142, he shall be given the opportunity for a hearing before the local board of education prior to the termination of his employment.

(c) Before the employment of an employee of a board of trustees of a community college or technical institute within the meaning of G.S. 143-540(1)c. is finally terminated pursuant to this Part, he shall be given the opportunity for a hearing before the board of trustees.

"Part 2.

"Public Officials.

"§ 143-543. Definitions.--As used in this Part:

(1) 'Appointing authority' means the Governor, Chief Justice of the Supreme Court, Lieutenant Governor, Speaker of the House, President Pro Tempore of the Senate, members of the Council of State, all heads of the executive departments of State government, the Board of Governors of The University of North Carolina, and any other State person or group of State persons authorized by law to appoint to a public office.

(2) 'Employing entity' means and includes:

- a. any State entity enumerated in G.S. 143B-3 of the Executive Organization Act of 1973;
- b. any city or county board of education under Chapter

||5 of the General Statutes; or

- c. any board of trustees of a community college or technical institute under Chapter ||5A of the General Statutes.

(3) 'Public office' means appointive membership on any State commission, council, committee, board, including occupational licensing boards as defined in G.S. 93B-1, board of trustees, including boards of constituent institutions of The University of North Carolina and boards of community colleges and technical institutes created pursuant to G.S. ||5A-7, and any other State agency created by law; provided that 'public office' does not include an office for which a regular salary is paid to the holder as an employee of the State or of one of its departments, agencies, or institutions.

(4) 'Public official' means any person who is a member of any public office as defined by this Part.

"§ 143-544. Notification of the appointing authority; investigation.--Whenever a representative of an employing entity as defined by this Part has knowledge that a public official owes money to the State and is delinquent in satisfying this obligation, the representative shall notify the appointing authority who appointed the public official in question. Upon receipt of notification the appointing authority shall investigate the circumstances of the claim of money owed to the State for purposes of determining if a debt is owed and its amount.

"§ 143-545. Conditional continuing appointment; repayment

election.--If after investigation under the terms of this Part an appointing authority determines the existence of a delinquent monetary obligation owed to the State by a public official, he shall notify the public official that his appointment will be terminated 60 days from the date of notification unless repayment in full is made within that period. Upon determination that any public official has not made repayment in full after the expiration of the time prescribed by this section, the appointing authority shall terminate the appointment of the public official; provided however, the appointing authority shall allow the public official who for some extraordinary reason is incapable of repaying the obligation according to the preceding terms to continue his appointment as long as he is attempting repayment in good faith under his present financial circumstances, but shall promptly terminate the public official's appointment if he ceases make payments or discontinues a good faith effort to make repayment.

"Part 3.

"Legislators.

"§ 143-546. Definition of employing entity.--For the purposes of this Part 'employing entity' shall have the same meaning as provided in G.S. 143-540(1) and G.S. 143-543(2).

"§ 143-547. Notification to the Legislative Ethics Committee; investigation.--Whenever a representative of any employing entity as defined by this Part has knowledge that a legislator owes money to the State and is delinquent in satisfying this obligation, this information shall be reported to the Legislative

Ethics Committee established pursuant to Chapter 120, Article 14 of the General Statutes for disposition.

"Part 4.

"Confidentiality Exemption, Preservation of Federal Funds,
and Limitation of Actions.

"§ 143-548. Confidentiality exemption.--Notwithstanding the provisions of any law of this State making confidential the contents of any records or prohibiting the release or disclosure of any information, all information exchange among the employing entities defined under this Article necessary to accomplish and effectuate the intent of this Article is lawful.

"§ 143-549. Preservation of federal funds.--Nothing in this Article is intended to conflict with any provision of federal law or to result in the loss of federal funds. If the exchange among employing entities of information necessary to effectuate the provisions of this Article would conflict with this intention, the exchange of information shall not be made.

"§ 143-550. Applicability of a statute of limitations.--Payments on obligations to the State collected under the procedures established by this Article shall not be construed to revive obligations or any part thereof already barred by an applicable statute of limitations. Furthermore, payments made as a result of collection procedures established by the terms of this Article shall not be construed to extend an applicable statute of limitations."

Sec. 2. G.S. 115-142(e)(1), as the same appears in the 1978 Replacement to Volume 3A, Part II of the General Statutes is

hereby amended by adding a new sub-subdivision "n" at the end thereof to read as follows:

"n. Failure to repay money owed to the State in accordance with the provisions of Article 59, Chapter 143 of the General Statutes."

G.S. 115-142(e)(1)k., as the same appears in the 1978 Replacement to Volume 3A, Part II of the General Statutes, is hereby amended by deleting the word "or" at the end of the second line of that sub-subdivision.

G.S. 115-142(e)(1)l., as the same appears in the 1978 Replacement to Volume 3A, Part II of the General Statutes is hereby amended by deleting the period mark at the end of the third line of that sub-subdivision and substituting in place thereof the semicolon punctuation mark followed by the word "or" at the end of that same line.

Sec. 3. G.S. 120-102, as the same appears in the 1977 Supplement to Volume 3B of the General Statutes, is hereby amended by adding a new subdivision (8) at the end thereof to read as follows:

"(8) Upon receipt of information that a legislator owes money to the State and is delinquent in making repayment of such obligation, to investigate and dispose of the matter according to the terms of this Article."

Sec. 4. This act is effective upon ratification.

In the General Assembly read three times and ratified,
this the 8th day of June, 1979.

JAMES C. GREEN

James C. Green

President of the Senate

CARL J. STEWART, JR.

Carl J. Stewart, Jr.

Speaker of the House of Representatives



STATE OF NORTH CAROLINA
OFFICE OF STATE BUDGET AND MANAGEMENT

JAMES B. HUNT, JR., GOVERNOR
AND DIRECTOR OF THE BUDGET

JOHN A. WILLIAMS, JR.
EXECUTIVE ASSISTANT TO THE GOVERNOR
AND STATE BUDGET OFFICER

December 12, 1979

MEMORANDUM

TO: State Department Heads and Chief Fiscal Officers

FROM: Marvin K. Dorman, Jr.
Deputy State Budget Officer

The 1979 General Assembly enacted House Bill 561 (Chapter 864 of the 1979 Session Laws) relating to the collection of money owed to the State by certain public employees. The purpose of this memorandum is to indicate what procedures to follow in collecting past due accounts owed to the State by state employees, certain local governmental employees and public officials.

1. Send a list to this office of the names and Social Security numbers of individuals with past due accounts owed to the State. Do not include names of individuals with past due accounts when satisfactory provisions have already been made for repayment.
2. This office will arrange to compare your lists with lists of employees who are members of the Teachers and State Employees Retirement System or who are on a central payroll.
3. You will be notified if any of the individuals on your lists are employed by a State department, agency or institution, Community College system or by a city or county Board of Education.
4. You should then write the agency employing the individual who has a past due account with your department and state: (a) individual's name, amount of money owed and for what reason; (b) that a written notice be sent to the employee stating that full restitution of the amount owed is a condition of continued employment (Chapter 143, Article 59 of the North Carolina General Statutes); (c) that the employee obtain and provide written evidence from the department owed that a satisfactory arrangement for payment has been agreed upon; (d) that the employee be given a reasonable time period to accomplish (c) above. If the employee does not provide this evidence, steps must be taken to terminate employment unless the employee is pursuing administrative or judicial remedies.

If you have any questions concerning this matter, please contact Frank Tomczak of this office (733-7061). Thank you for your cooperation in this matter.

MKDjr/abf