

MINUTES OF THE MEETING OF THE
TEXAS REAL ESTATE COMMISSION
December 15, 2008
Room 235, 1101 Camino La Costa
Austin, Texas

On Monday, December 15, 2008, at 11:00 a.m. there was a duly posted regular meeting of the Texas Real Estate Commission (the "Commission"). Chairman John Eckstrum presided, and Patricia Holder recorded the minutes. The following commissioners, constituting a quorum, were in attendance:

John Eckstrum, Chairman

Troy C. Alley, Jr.

Adrian Arriaga

Mary Frances Burleson

Elizabeth Leal

Tom Mesa

Avis Wukasch

Staff present included Karen Alexander, Devon Bijansky, Loretta DeHay, Patricia Holder, Tim Irvine, Gwen Jackson, Della Lindquist, and Tom Watson.

Chairman Eckstrum asked Commissioner Leal to lead the attendees in the pledges of allegiance to the United States and Texas flags.

The Chairman recognized Gary Maler (Research Center at Texas A&M); Lori Levy (Texas Association of Realtors) and former Commissioner Henry Santamaria and his wife, Rita Santamaria. The Chairman introduced his wife, Alice Eckstrum.

Mr. Eckstrum moved to agenda item two, approval of minutes of the October 27, 2008, Commission meeting. Upon motion of Mr. Mesa, duly seconded by Ms. Leal, the Commission unanimously approved the minutes of the meeting as presented.

Chairman Eckstrum moved to agenda item number three, discussion and possible action to excuse commissioner absence(s). Upon motion of Ms. Wukasch, seconded by Mr. Mesa, the Commission unanimously excused the absences of Commissioners Day and Flores.

The Chairman moved to agenda item four, staff reports. Ms. Jackson introduced a new employee in Licensing Services, Jessica Calderon who will be working in the Communication department. She also introduced Michelle Bowens, the manager of Licensing; Lorie Deanda, the manager of Communication; Diane Fletcher, the manager of Cashier; and Margarita White, the manager of Education. Ms. Jackson stated that in

comparing fiscal year-to-date October 2008 with October 2007 there has been a 33.95% decrease in total original applications received and a 29.90% decrease in total licenses issued from original applications.

. The total number of brokers and salespersons as of October 2008 was 153,504. The total number for October 2007 was 159,234. The total number of brokers for October 2008 was 42,845 and for October 2007 it was 42,435. The total number of salespersons for October 2007 was 110,888 and for October 2008 the total was 104,945. The number of inspectors had decreased but the number of easement or right-of-way agents had increased. Mr. Maler, Director of the Real Estate Center at Texas A&M, stated that research suggested there would be a 25-30% decrease in the number of licensees over the next three years.

Ms. Lindquist, Director of Enforcement, reported on the division's activities. She stated that so far in FY 2009 staff was closing more cases than were being opened. Ms. Lindquist delivered the report she had prepared in answer to Chairman Eckstrum's request for information concerning the case backlog. There was discussion concerning how older cases were assigned. The Chairman stated his concern for getting older cases resolved without causing more backlogs. There was further discussion concerning the prioritization of cases, the projection for the next few months and the affect on the measures for the Enforcement division.

Mr. Watson, Director of Technology Services, reported on the web activity during the current fiscal year.

Ms. Alexander, Director of Staff Services, reported on the current status of the budget. She also reported on the two recovery funds and any payments that were made from them.

Mr. Irvine gave a brief report on the agency's self-reporting on the State Auditor's Office audit.

The Chairman moved to agenda item five, supplemental report from Commissioner Wukasch on the ARELLO Annual Conference. Ms. Wukasch reported on the meetings she attended at the Conference in Indianapolis and the various education, enforcement, complaint, and fingerprinting issues that were discussed. Ms. Wukasch also reported on the way the internet and electronic communications may alter the way real estate licensees conduct their business and are regulated by the different oversight agencies. Mr. Arriaga reported that Ms. DeHay had been elected to the board of directors to represent District 2, which includes Texas and other southern states.

Mr. Eckstrum moved to agenda item six, general comments from visitors. Hearing no comments, the chairman moved to agenda item seven, executive session to discuss pending litigation pursuant to Texas Government Code §551.071 and, if necessary, to receive legal advice from counsel on posted agenda items. The Executive session began at 12:00 p.m. The meeting was back in open session at 12:52 a.m.

Chairman Eckstrum moved to agenda item eight, discussion and possible action to authorize payments from recovery funds or other action on items considered in executive session. Ms. Bijansky presented the following recovery fund cases for consideration and possible payment:

RF09-001, Brenda Stanley and Leona Taylor v. Susan Schutt and Michael Schutt, in the amount of \$5,717 in actual damages and \$17,676 in attorney fees. Mr. Mesa, seconded by Mr. Arriaga, moved to make the payment as requested. The motion was adopted by unanimous vote.

RF 09-002, Jon and Deborah Kixmiller v. Marlene Grindinger, actual damages in the amount of \$6,000 and \$25,827 in attorney fees, with \$6,000 already paid. Ms. Wukasch, seconded by Mr. Mesa, moved to pay \$25,827 in attorney fees. The motion was adopted by unanimous vote.

Chairman Eckstrum moved to agenda item nine, discussion and possible action to propose amendments to 22 TAC §535.64 concerning Accreditation of Schools and Approval of Courses and Instructors. Ms. Bijansky presented the agenda item for discussion and possible action. The amendments to §535.64 adopt by reference Form ED 3-1, Course Application, which has been revised to obtain additional information regarding the type of course, the provider's contact information, the delivery format, a sample course completion certificate, approval from a distance learning certification center for online courses, and a permission letter for courses using another provider's materials. The amendments also correct two erroneous references to a form and a subsection of the rule. Upon motion of Mr. Mesa, duly seconded by Ms. Wukasch, the Commission unanimously approved to propose the rule and form adopted by reference as presented.

The Chairman moved to agenda item ten, discussion and possible action to adopt new: (a) 22 TAC §537.51 concerning Addendum for Reservation of Oil, Gas, and Other Minerals and (b) 22 TAC §537.52 concerning Short Sale Addendum. Ms. Bijansky presented the agenda items for discussion and possible action. This agenda item adopts amendments to 22 TAC Chapter 537 by adding new §537.51 concerning Standard Contract Form TREC No. 44-0 and new §537.52 concerning Standard Contract Form TREC No. 45-0 without changes to the rules but with changes to the forms as proposed in the November 14, 2008 issue of the *Texas Register* (33 TexReg 9197).

New 22 TAC §537.51 adopts by reference a new TREC addendum for reservation of oil, gas, and other minerals. The addendum would be used in situations where a seller in a real estate transaction wishes to reserve all or an identified percentage interest in the mineral estate owned by the seller, as defined in the addendum.

New 22 TAC §537.52 adopts by reference a new TREC short sale addendum. The addendum would be used in transactions where the seller requires the consent of the lienholder to sell the property and the lienholder agrees to accept the seller's net proceeds in full satisfaction of the seller's liability under the mortgage loan.

The changes to the forms as adopted from those that were originally proposed include the following: The Commission made typographical corrections to the forms adopted by reference and made other changes to the text of the forms in response to comments and further review and recommendation by staff and the Broker

Lawyer Committee. A number of comments did not result in changes to the text of the forms. All comments regarding this adoption were fully considered by the Commission and the Broker-Lawyer Committee.

Drafts of the contract forms were released for comment and displayed on the TREC web site during the notice and comment period after posting in the *Texas Register*. Approximately 7 comments were received during the notice and comment period.

Upon motion of Ms. Wukasch, duly seconded by Ms. Leal, the Commission unanimously approved the adoption of 22 TAC §537.51 and §537.52 and the forms adopted by reference, with an effective date of March 1, 2009.

Chairman Eckstrum moved to agenda item eleven, discussion and possible action to adopt amendments to: (a) 22 TAC §534.2 concerning Processing Fees for Dishonored Payments; (b) 22 TAC §535.51 concerning General Requirements; (c) 22 TAC §535.52 concerning Individuals; (d) 22 TAC §535.400 concerning Registration of Easement or Right-of-Way Agents and (e) 22 TAC §541.1 concerning Criminal Offense Guidelines.

Ms. Bijansky presented agenda item eleven (a), amendments to 22 TAC §534.2 concerning Processing Fees for Dishonored Payments, for discussion and possible adoption. The staff recommends the adoption of the amendment with one change. The change from the amendments as proposed is as follows: the remaining reference to a "check" in the second sentence of subsection (a) is changed to read "payment." The amendment changed the title to the section and amends the rule to clarify that the processing fee for dishonored payments does not only apply to dishonored checks but to any other type of dishonored payments such as a charge back to a credit card. Mr. Arriaga, duly seconded by Mr. Mesa, moved to adopt the amendments to §534.2 with the change from the proposed language. The motion was adopted by unanimous vote.

Ms. Bijansky presented agenda item eleven (b), amendments to 22 TAC §535.52 concerning General Requirements, for discussion and possible adoption, without changes from the proposed language. The amendments adopt by reference the ten revised application forms that clarify and, when possible, simplify certain licensure requirements for applicants and renewing licensees. All ten forms revise the language of the question regarding the criminal background of the applicant, designated manager, or designated officer to clarify that deferred adjudication must be disclosed to the Commission. Form BLC-6, Application for a Real Estate Broker License by a Corporation, is updated to reflect current terminology regarding corporate records as amended by the Texas Business Organizations Code. Form BLR-9, Application for Late Renewal of a Real Estate Broker License, is updated to simplify the fee structure by eliminating a separate category of fees for expired licensees who are applying for late renewal after the license expired under a previous fee structure, and

a question concerning permanent mailing address information, which was inadvertently omitted, will be included. Form BLRC-6, Application for Late Renewal of Real Estate Broker License by a Corporation, is updated to include the corporate terminology changes of form BLC-6, to eliminate the separate category of fees as in form BLR-9, and to correct a typographical error on page 1 of the form which referred to the separate category of fees of \$95. Form SLR-10, Application for Late Renewal of Real Estate Salesperson License, is updated to eliminate the separate category of fees as in form BLR-9. Form BLLLC-6, Application for Real Estate Broker License by a Limited Liability Company, is updated to reflect current terminology regarding records of limited liability companies as amended by the Texas Business Organizations Code and to include a question concerning permanent mailing address information which was inadvertently omitted

. Form BLRLLC-6, Application for Late Renewal of a Real Estate Broker License by a Limited Liability Company, is updated both to incorporate the limited liability company terminology changes of form BLLLC-6 and to eliminate the separate category of fees as in form BLR-9. Not all the forms in the meeting material referred to signatures as "required original signatures." Information contained on all forms will be corrected to reflect "required original signatures" instead of "required signatures or original required signatures" for consistency. Upon motion of Ms. Leal, duly seconded by Ms. Wukasch, the Commission unanimously approved the adoption of the amendments to 22 TAC §535.51 concerning General Requirements and the forms adopted by reference without changes from the proposed language and forms.

Ms. Bijansky presented agenda item eleven (c), amendments to 22 TAC §535.52 concerning Individuals, for discussion and possible adoption. The amendments were proposed for adoption without changes to the published text as proposed in the November 14, 2008, issue of the *Texas Register* (33 TexReg 9195). The amendments to §535.52 clarify the conduct that the commission believes tends to demonstrate that an applicant for a license or registration with the commission does not meet the requisite honesty, trustworthiness, and integrity required by Texas Occupations Code Chapters 1101 and 1102. Upon motion of Mr. Alley, duly seconded by Ms. Leal, the Commission unanimously approved the adoption of amendments to 22 TAC §535.52 concerning Individuals as recommended by staff.

Ms. Bijansky presented agenda item eleven (d), amendments to 22 TAC §535.400 concerning Easement or Right-of-Way Agents, for discussion and possible adoption. The amendments to §535.400 adopt by reference two revised application forms. Both forms revise the language of the question regarding the criminal background of the applicant, designated manager, or designated officer to clarify that deferred adjudication must be disclosed to the Commission. Form ERW 2-3, Application for Easement or Right-of-Way Agent Registration for a Business, is updated to reflect current terminology regarding corporate records as amended by the Texas Business Organizations Code. Since the amendments were proposed, staff corrected three typos and

two outdated references to the Texas Guaranteed Student Loan Corporation. Upon motion of Ms. Leal, duly seconded by Mr. Arriaga, the Commission unanimously adopted the amendments to 22 TAC §535.400 concerning Easement or Right-of-Way Agents and the forms adopted by reference as recommended by staff.

Ms. Bijansky presented agenda item eleven (e), amendments to 22 TAC §541.1 concerning Criminal Offense Guidelines. The amendments to §541.1 clarify the types of criminal offenses that the commission believes relate to the duties and responsibilities of a real estate broker, salesperson, easement or right-of-way agent, professional inspector, real estate inspector or apprentice inspector in that the offenses tend to demonstrate the person's inability to represent the interest of another with honesty, trustworthiness and integrity required by Texas Occupations Code, Chapters 1101 and 1102. Upon motion of Mr. Mesa, duly seconded by Ms. Burleson, the Commission unanimously adopted the amendments to 22 TAC §541.1 concerning Criminal Offense Guidelines as published in the *Texas Register* (33 TexReg 9197).

The Chairman moved to agenda item twelve, discussion and possible action to renew for an additional 60-day period emergency rules concerning: (a) 22 TAC §535.51 concerning application requirements for salespersons, brokers, and easement and right-of-way registrants in such counties; (b) 22 TAC §535.95 concerning license or registration renewal requirements for salespersons, brokers, and easement and right-of-way registrants in such counties; (c) 22 TAC §535.208 concerning application requirements for apprentice, real estate, and professional home inspectors in such counties; and (d) 22 TAC §535.216 concerning license renewals requirements for apprentice, real estate, and professional home inspectors in such counties. Ms. Bijansky presented the agenda items for discussion and possible action to renew the emergency rules. Upon motion of Ms. Leal, duly seconded by Ms. Burleson, the Commission unanimously approved the renewal of the emergency rules for an additional 60 days.

Chairman Eckstrum moved to agenda item thirteen, discussion and possible action to approve staff recommendation for TREC licensing and information system vendor and update on Request for Offers for TREC's licensing and information system. Mr. Irvine presented the agenda item for discussion and possible action. He stated that there had been presentations by three vendors and there will be a fourth in the near future. Mr. Watson gave an overview of the process and reported on the various vendors. There was discussion concerning the programs and their differences.

Mr. Eckstrum moved to agenda item fourteen, legislative update. Ms. Bijansky presented the update as follows:

HB 70 by Guillen - Would amend the Occupations Code relating to the consideration of applicants for occupational licenses that have criminal conviction issues in their background; creates a presumption

that, with few exceptions, after five years from the act leading to a conviction, the matter is no longer grounds for denial of a license.

HB 114 by Pickett - Would eliminate the requirement of obtaining fingerprints for new and renewing real estate license applications. Fingerprints are necessary for TREC to obtain FBI background checks.

HB 128 by Solomons - Would require a person applying for an occupational license to provide specific documents to establish their eligibility for employment in the United States.

HB 23 by Leibowitz – Would require a landlord to disclose to a prospective tenant any actual knowledge of the landlord of previous use of the leased premises for the manufacture of methamphetamine.

HB 28 by Leibowitz – Would require a seller of property to give written notice to a purchaser indicating whether the seller has received notice from a municipality under Section 43.052, Local Government Code, that the property is included in the municipality's annexation plan and may be subject to annexation by the municipality.

HB 133 by Villareal – Except as provided by the bill, would require a person that records an instrument conveying real property under a contract for sale to attach a sales price disclosure form as described in the bill.

SB 234 by West – Regarding the sale of real property subject to restrictive covenants, would amend the disclosure required by section 5.012 of the Property Code to provide notification of the buyer's right to obtain copies of restrictions, bylaws, and a resale certificate from a property owners' association from the seller; would amend section 207.003 of the Property Code to require that a resale certificate provide, among other things, a statement of all fees associated with the transfer of ownership, including a description of each fee, to whom each fee is paid, and the amount of each fee.

There was discussion concerning the number of bills that might be filed that would concern the Commission. Lori Levy, Texas Association of Realtors, spoke concerning the bills tracked by her organization.

Chairman Eckstrum moved to agenda item fifteen, discussion and possible action regarding any changes to the Legislative Appropriations Request pursuant to an October 13, 2008, letter from Governor Rick Perry. Mr. Irvine presented this agenda item for discussion and possible action. There was discussion concerning the exceptional items and the scheduling of meetings.

Mr. Eckstrum moved to agenda item sixteen, discussion and possible action regarding the effective date of the home inspector Standards of Practice and standard inspection report form. Mr. Foster, Chairman of the Inspector Advisory Committee, presented the agenda item for discussion and possible action. Mr. Foster expressed concern about the use of the new form before the effective date of the form and rules. Ms. Leal, seconded by Ms. Wukasch, moved that the Commission establish a policy that authorizes inspector licensees to use the new inspector report form on a voluntary basis prior to February 1, 2009, as necessary, to avoid confusion and redundancy in conjunction with a home inspection conducted under the new standards of practice adopted by rule October 27, 2008. After discussion concerning the policy and what it allowed, the motion was adopted by unanimous vote.

Chairman Eckstrum moved to agenda item seventeen, staff report and discussion of test and updating of Business Continuity Plan. Mr. Irvine reported on an emergency situation that had developed that allowed the agency to test the Business Continuity Plan. He stated that there were some items on the Plan that needed to be updated. Staff is working on updating the Plan and will compile, print, and distribute it to the appropriate staff members once it is complete.

The Chairman moved to agenda item eighteen, discussion and possible action regarding whether a Texas Real Estate Inspector Committee member may teach a course acceptable for core or continuing education credit. Ms. Leal, seconded by Ms. Burleson, moved that the Commission authorize staff to accept courses taught by inspector committee members for inspector core or continuing education credit as long as the course and instructor meet the requirements for approval otherwise established in Chapter 1101 and 1102 of the Texas Occupations Code and the Rules of the Commission.

There was discussion concerning the different types of inspectors and the low percentage of passing scores on the examination. After discussion, the Chairman called for a vote on the motion. The motion was adopted by unanimous vote.

Mr. Eckstrum moved to agenda item nineteen, consideration of and possible action regarding any issues to be addressed by the Texas Real Estate Inspector Committee for 2009. Mr. Foster presented some of the items the committee hoped to consider during the next year.

Chairman Eckstrum moved to agenda item twenty, discussion and possible action to approve recovery trust account and recovery fund investment policies under the Public Funds Investment Act. Ms. Alexander presented the agenda item for discussion and possible action. Upon motion of Ms. Leal, seconded by Ms. Burleson, the Commission unanimously approved the two policies under the Public Funds Investment Act.

The Chairman moved to agenda item twenty-one, discussion and possible action to appoint an Interim Administrator. Mr. Irvine stated that at the end of December he would be returning to the Texas Department of Housing and Community Affairs. Upon motion of Ms. Leal, seconded by Ms. Wukasch, the Commission unanimously appointed Assistant Administrator and General Counsel Loretta R. DeHay Interim Administrator.

Mr. Eckstrum moved to agenda item twenty-two, discussion and possible action regarding the job description, job posting, selection criteria and selection process for the TREC administrator position including the possible appointment of an administrator selection committee. The Chairman stated that he was appointing Commissioners Tom Mesa, Troy Alley, Avis Wukasch and himself as the administrator selection committee.

Chairman Eckstrum moved to agenda item twenty-three, consideration and possible action regarding Proposals for Decision from State Office of Administrative Hearings: (a) SOAH Docket No. 329-08-3518, in

the matter of Joe M. Casillas; (b) SOAH Docket No. 329-08-3803, in the matter of Anthony Brian Chin, and (c) SOAH Docket No. 329-08-3802, in the matter of Jose R. Sanchez.

Ms. Lindquist presented agenda item twenty-three (a) SOAH Docket No. 329-08-3518, in the matter of Joe M. Casillas for consideration and possible action. The Commission disapproved Mr. Casillas' application for a real estate salesperson license due to a 1997 conviction for involuntary manslaughter by reckless conduct and possession of a firearm during the commission of a crime, for which he was sentenced to 15 years confinement. After a hearing, the Administrative Law Judge disagreed with staff and proposed to grant Mr. Casillas a license. The staff then filed exceptions.

Ms. Leal, seconded by Mr. Mesa, moved to adopt the judge's proposal as modified by the judge's letter in response to the exceptions dated October 23, 2008. Ms. Burleson and Mr. Arriaga spoke against the motion. Mr. Mesa, Mr. Alley, Ms. Wukasch and Ms. Leal voted for the modified proposal. Ms. Burleson and Mr. Arriaga voted against the modified proposal. The modified proposal was adopted

Ms. Lindquist presented agenda item twenty-three (b) SOAH Docket No. 329-08-3803, in the matter of Anthony Brian Chin. Staff proposed denying the application of Anthony Brian Chin for a late renewal of real estate salesperson license because he failed to disclose his criminal history on his application. After a hearing was held, the Administrative Law Judge issued a proposal agreeing with staff. Upon motion of Ms. Leal, seconded by Mr. Mesa, the Commission unanimously adopted the findings and conclusions of the administrative law judge.

Ms. Lindquist presented agenda item twenty-three (c) SOAH Docket No. 329-08-3802, in the matter of Jose R. Sanchez. Staff opposed the application of Mr. Sanchez for a salesperson license for not possessing the requisite honesty, trustworthiness, and integrity because he was placed on community supervision probation for aggravated sexual assault of a child. After a hearing was held the Administrative Law Judge proposed the Applicant be issued a license.

Mr. Sanchez appeared and spoke on his own behalf.

Ms. Wukasch, seconded by Ms. Leal, moved that the Commission enter an order with the following changes to the findings of fact, conclusions of law and proposal for decision:

On Finding of Fact #2: Substitute "Indecency with a Child-Contact, a third degree felony" instead of "Aggravated Sexual Assault of a Child, a first degree felony". The substitution was agreed to by the Judge.

At the end of Finding of Fact #14 add these words at the end, "which on its face, relies on being dishonest to consumers to remain in compliance with the terms and conditions of community supervision probation." This

finding of fact was changed because the evidence clearly demonstrated that the applicant would need to be dishonest to consumers in order to maintain compliance with the sex offender program. By failing to indicate that the applicant will attempt compliance with the terms of the sex offender program by being dishonest, the administrative law judge did not properly interpret Occupations Code, §1101.354(2) and 22 TAC §535.52(a).

Change Finding of Fact #16 by changing “all” to “gives”. This appears to be a typographical or technical error.

Change Finding of Fact #18 to delete “not” and change “or” to “and”. The overwhelming preponderance of the evidence supports a finding that the Applicant continues to be a danger to the public and licensure could give him additional opportunity to engage in criminal behavior. By failing to indicate that the applicant continues to be a danger to the public because of the recentness of the plea of guilty to the crime of indecency with a Child-Contact, a third degree felony, and that licensure could give him additional opportunity to engage in criminal behavior the administrative law judge did not properly interpret Occupations Code, §1101.354(2) and 22 TAC §535.52(a).

Add new Conclusion of Law #4 “The crime of indecency with a child is a crime involving moral turpitude and therefore tends to demonstrate an inability to represent the interest of another with honesty, trustworthiness and integrity.” Case law supports a conclusion that indecency with a child is a crime involving moral turpitude. Therefore, the administrative law judge did not properly interpret Occupations Code, Section 1101.354(2) and 22 TAC Section 535.52(a).

Change current Conclusion of Law #4 (new Conclusion of Law #5) by adding “has not” after “Applicant”. In considering the evidence provided by the Applicant that would require that he maintain a façade of dishonesty, along with the fact that the crime is one of moral turpitude, the Applicant has not demonstrated the requisite honesty, trustworthiness and integrity to obtain a real estate license in Texas. On that basis, the administrative law judge did not properly interpret Occupations Code, §1101.354(2) and 22 TAC §535.52(a).

Replace current Conclusions of Law #5 (new Conclusion of Law #6) with “Based on the findings of fact and conclusions of law the Commission denies applicant a real estate license.” Based on the above Findings of Fact and Conclusions of Law, the Commission has determined that the administrative law judge did not properly apply or interpret applicable law, specifically Occupations Code, §1101.354(2) and 22 TAC §535.52(a).

The motion was adopted by unanimous vote.

Schedule future meetings and adjourn

The next meeting of the Commission was scheduled for February 23, 2008, beginning at 9:00 a.m., with tentative meetings set for May 26, 2009 at 11:00 a.m., August 17, 2009 at 11:00 a.m. and November 16, 2009 at 11:00 a.m. There was discussion concerning scheduling of the February meeting. Commissioners Wukasch, Leal, and Mesa spoke briefly concerning Mr. Irvine's tenure as administrator. The Chairman adjourned the meeting at 2:17 p.m.

Patricia Holder, Secretary for the Meeting

APPROVED this the 23rd day of February, 2009.

John Eckstrum
Chairman

ATTEST: _____
Loretta R. DeHay
Interim Administrator