



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
REGION 29  
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June 19, 2012

Lester A. Heltzer  
Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, DC 20570

Re: Domsey Trading Corp., et. al  
Case No. 29-CA-14548 et al.

Dear Secretary Heltzer:

Please consider this letter as Counsel for the Acting General Counsel's opposition to Respondent's Request for Permission to File a Special Appeal from Rulings of Administrative Law Judge Michael Marcionese. For the reasons set forth below, we request that Respondent's Special Appeal be denied, including its request that the remanded hearing that is scheduled to open on June 26, 2012 be stayed.

A party who seeks a Special Appeal from a ruling of an administrative law judge during the course of the proceeding has the burden of demonstrating that the administrative law judge (ALJ) abused his discretion in making his ruling. See e.g., *American Medical Response of Connecticut, Inc.* 2012 WL 1833151 (May 18, 2012); *Nexeo Solutions, LLC*, 2012 WL 1574110 (May 7, 2012). In the instant matter, Respondents have neither argued nor shown that the ALJ abused his discretion in making his pre-hearing rulings that limit the number of discriminatees that Respondent may unconditionally and conditionally examine on their immigration status. Thus, the Board should deny Respondent's request.

In his June 4, 2012 Order, the ALJ ruled Respondents were entitled to examine 27 discriminatees set forth in the attached May 1, 2012 submission from Counsel for the Acting General Counsel (p. 6), and conditionally examine any remaining discriminatees."<sup>1</sup>

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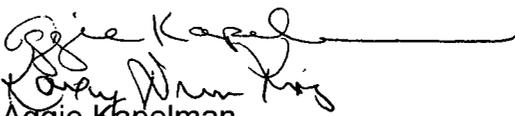
<sup>1</sup> The ALJ correctly excluded from examination those employees who had "already been questioned about their immigration status or whose status was determined in the prior decisions of the Board, and those who were American citizens during the backpay period..." and pre-IRCA hires who Respondents already had the opportunity to examine. (p. 3)

Respondents undermine any assertion that the ALJ's ruling on the conditional right to examine the remaining discriminatees is an "abuse of discretion" by acknowledging in their submission (¶¶ 7 and 8) that the Court of Appeals ruled that the Board could "require an employer, before embarking on a cross-examination of a substantial amount of claimants, to proffer a reason why its IRCA-required verification of immigration status with regard to a particular claimant now seems questionable, or in error." *NLRB v. Domsey Trading Corp* 636 F.3d 33, 38 (2d. Cir. 2011).

The ALJ has not closed the door on Respondents right to examine the 120 witnesses who Respondents own expert established "used a valid social security number during their employment with the Respondent." (p.3) Rather, he ruled "Respondent must demonstrate that there is a basis for questioning their eligibility to work before they will be recalled to the stand." In his June 7 Order, the ALJ underscored that his ruling was predicated on ensuring that Respondents' desire to question discriminatees is consistent with preserving "the integrity of the Board's processes"<sup>2</sup> and is "more than a fishing expedition." (p. 2) See also *Flaum Appetizing Corp.*, 357 NLRB No. 162 (2011).

In summary, Respondent's special appeal fails to establish that the ALJ has abused his discretion by following the Board's and Court's guidance on the rules governing litigation of Respondents' immigration-related affirmative defense. Thus, Counsel for the Acting General Counsel urges the Board to deny Respondents' Special Appeal and their request that the remanded hearing scheduled to resume on June 26 be stayed.

Respectfully submitted,



Aggie Kapelman  
Kathy Drew King  
Counsel for the Acting General Counsel

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<sup>2</sup> The Second Circuit acknowledged that Respondents' pursuit of their affirmative defense needed to be balanced against the Board's need to fashion "rules that preserve the integrity of the proceedings." *Id.*

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

DOMSEY TRADING CORPORATION, DOMSEY  
FIBER CORPORATION AND DOMSEY  
INTERNATIONAL SALES CORPORATION,  
A Single Employer AND  
ARTHUR SALM, Individually

and

Case Nos. 29-CA-14548  
29-CA-14619  
29-CA-14681  
29-CA-14735  
29-CA-14845  
29-CA-14853  
29-CA-14896  
29-CA-14983  
29-CA-15012  
29-CA-15119  
29-CA-15124  
29-CA-15137  
29-CA-15147  
29-CA-15323  
29-CA-15324  
29-CA-15325  
29-CA-15332  
29-CA-15393  
29-CA-15413  
29-CA-15447  
29-CA-15685

INTERNATIONAL LADIES' GARMENT  
WORKERS' UNION, AFL-CIO

LOCAL 99, INTERNATIONAL LADIES'  
GARMENT WORKERS' UNION, AFL-CIO

**COUNSEL FOR THE ACTING GENERAL COUNSEL'S  
PRE-TRIAL MEMORANDUM**

Aggie Kapelman  
Kathy Drew King  
Counsel for the Acting General Counsel  
National Labor Relations Board  
Region 29  
Two Metrotech Center Suite 5100  
Brooklyn, New York 11201-3838

## **BACKGROUND**

On March 23, 1993, the Board issued its Decision and Order in these cases (310 NLRB 777), which directed Domsey Trading Corporation, Domsey Fiber Corporation and Domsey International Sales Corporation, a single employer, herein called Respondents, to offer immediate and full reinstatement to over 200 discriminatees and to make them whole for any loss of earnings or other benefits they may have suffered. On February 18, 1994, the United States Court of Appeals for the Second Circuit entered a Judgment which enforced, in full, the National Labor Relations Board's ("Board") Order. *See Domsey Trading Corp. v. NLRB*, 16 F.3d 517 (2d Cir. 1994). On August 20, 1997, the Regional Director, Region 29, of the Board issued a Compliance Specification and Notice of Hearing in these cases. On October 27, 1997, a hearing before the administrative law judge ("ALJ") opened and closed on December 16, 1998. Over the course of 14 months of hearing, approximately 150 witnesses testified in this proceeding.

On October 4, 1999, the ALJ issued his supplemental decision in which he awarded backpay to a number of the discriminatees. On September 30, 2007, the Board issued its Supplemental Decision and Order in which the Board reversed the ALJ's award of backpay to four discriminatees<sup>1</sup> who admitted that they were undocumented. finding that in light of the Supreme Court's decision in *Hoffman Plastic Compounds v. NLRB*, 535 U.S. 137 (2002), these discriminatees were not entitled to backpay. The Board also determined that strike benefits should be deducted from the backpay of 165 discriminatees and remanded their awards to the Region for recalculation and remanded six discriminatees to the ALJ for resolution of their immigration status during the

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<sup>1</sup> Those discriminatees were Louine Joseph, Fritho Lapomarede, Francisco Moreira and Vincente Suazo.

backpay period. In its Second Supplemental Decision and Order (353 NLRB No. 12), the Board adopted the ALJ's findings that three of the remanded discriminatees, Atulie Balan, Bardinal Brice and Marie Jose Francois were authorized to be employed during, part of or their entire adjudicated backpay periods, and were owed the backpay amounts set forth. The Board also accepted the reduced backpay amounts calculated by the Region. Thereafter, the Board sought enforcement of its Second Supplemental Decision and Order in the United States Court of Appeals for the Second Circuit. Respondents filed a cross petition for review of the Board's Decision and Order.

In its decision in *NLRB v. Domsey Trading Corp.*, 636 F. 3d. 33 (2d Cir. 2011), the court denied the Board's application to enforce its decision and granted the Respondents' petition for review of the Board's decision, based on its conclusion that the Board abused its discretion in failing to address Respondents' objections to "the immigration-related evidentiary rulings of the Administrative Law Judge that were based on pre-*Hoffman* Second Circuit and NLRB case law." The Court remanded the case to the Board.

On December 30, 2011, the Board issued its Fourth Supplemental Decision and Order (357 NLRB No. 164) remanding this proceeding to the ALJ for "further appropriate action" consistent with the Court decision. In its Order, the Board directed the ALJ, to "afford the parties an opportunity to present evidence on the remanded issue, subject to those limits generally approved by the court."

The primary purpose of this Memorandum is to analyze, on the basis of the court remand, Board law, and 53 days of record testimony (including over 300 Respondents'

exhibits), which discriminatee witnesses Respondents are entitled to recall in support of their affirmative defenses.

## ARGUMENT

### OVERVIEW:

The Second Circuit's remand decision was procedural. It does not endow Respondents with an unconditioned right to examine every discriminatee witness. It merely bars the Board from precluding the examination of discriminatees on the basis of "pre-*Hoffman* Second Circuit and NLRB case law." The pre-*Hoffman* case law controlled during the 1997-1999 compliance hearing. At that time, your Honor correctly ruled that the immigration status of the discriminatees during their backpay periods was irrelevant. Post-*Hoffman*, it became relevant.

The Court, however, ruled that while the Respondents had the right to assert an affirmative defense that challenges an employee's lawful right to be employed, the Board has the right to set rules for witness examination on this subject that preserve the integrity of its processes. *NLRB v. Domsey Trading Corp.*, 636 F. 3d at 39. In making this observation, the Court was mindful of your Honor's finding that Respondents' pursuit of their affirmative defenses appeared to be a "fishing expedition," at odds with the post-IRCA, pre-hire verification process to which their employees were subject. *Id.* p. 35. The Court recognized the same concerns as you had about a "fishing expedition" when it held that the Board could "require an employer, before embarking on a cross-examination of a substantial amount of claimants, to proffer a reason why its IRCA-required verification of immigration status with regard to a particular claimant now seems questionable, or in error." *Id.* pp. 35, 38.

The court's holding establishes that the Board has the right to require that Respondents, for each "particular claimant", set forth a factual foundation that supports an inquiry into their work-eligibility status. In essence, the court recognizes that there is a presumption that all post-IRCA hires are "entitled" to be employed during their backpay period.

On the same day as it issued the *Domsey* remand, the Board, in *Flaum Appetizing Corp.*, 357 NLRB No. 162 (2011), established a procedural framework for addressing immigration related affirmative defenses. In *Flaum*, the Board found that the court in *Domsey* did not hold that it was precluded from structuring the inquiry into immigration status according to its ordinary rules of pleadings and evidence. Rather, the Board found that "to the contrary, the court made clear that in a case where the employer had pleaded lack of work authorization as an affirmative defense, 'we find that employers may question discriminatees about their immigration status while also underscoring the Board's legitimate interest in fashioning rules that preserve the integrity of its proceedings. See *Flaum*, 357 NLRB No. 162, slip op at p. 4, quoting *NLRB v. Domsey*, 636 F.3d 33, 39. The Board held that the right to pursue an affirmative defense which challenges a discriminatee's eligibility to be lawfully employed in the United States implicates policy considerations involving the National Labor Relations Act and the Immigration Reform and Control Act of 1986 (IRCA). Relying, in part, upon the fact that it violates IRCA to require discriminatorily discharged employees to re-verify their eligibility to be employed in the United States, the Board held that it would not permit the equivalent of re-verification in a supplemental proceeding unless the respondent had an articulated factual basis to support such a defense. *Id.* Slip op. at p 6. More

fundamentally, the Board concluded that it would be an “abuse” of its processes and would “chill the exercise of statutory rights” to permit Respondents to reflexively plead such a defense without a foundation. More basically, it violates the fundamental rules of pleadings imbedded in the Federal Rules of Civil Procedure, in particular Fed R. Civ. P. 9(b) and 11(a), (b)(3). In fact, Respondents’ continued pursuit of its affirmative defenses, in the absence of a “factual basis” or “articulated” reasons is arguably sanctionable. *Id.* slip op at pp. 5-6. Respondents’ counsels’ admission during both conference calls that they are not familiar with the trial record and are relying solely on the terms of the remand suggests that Respondents have no basis for recalling any witness, in particular any witness whose recall Counsel for the Acting General Counsel contests.

Thus, in the absence of additional testimony from the expert witness who Respondents have been given a May 1, 2012 deadline to declare they intend to call at the re-opened hearing. Respondents must live with the record in this case, consisting of 53 days of testimony and their over 300 exhibits to support, their right to recall any witness to overcome that post-IRCA hire’s presumptive employment-eligibility.

**DISCRIMINATEES WHO RESPONDENTS ESTABLISHED HAD VALID  
SOCIAL SECURITY NUMBERS**

The record includes the testimony of Respondents’ expert witness, Andrea Azarm, who was qualified as an expert on social security numbers. She testified with the benefit of exhibits that 117 discriminatees possessed “valid” numbers. See Tr. 4040 – 4122 (10/29/1998), Respondents’ Exhibits 330, 335 and 336 and Appendix A. Her testimony further reinforces the presumption that these 117 post-IRCA hires are legally entitled to work during their respective backpay periods. Accordingly, Respondents

should be precluded from recalling any of these 117 discriminatees to testify at the remanded hearing.

**THE IMMIGRATION STATUS OF ATULIE BALAN, BARDINAL BRICE AND MARIE JOSE FRANCOIS HAS BEEN FULLY LITIGATED**

In a Second Supplemental Decision, issued on July 1, 2008, the ALJ made the following findings of fact, that Atulie Balan obtained authorization to work in the United States on September 20, 1990, that Bardinal Brice obtained authorization to work in the United States on January 22, 1991, and that Marie Josie Francois obtained authorization to work in the United States on January 12, 1984. These work-eligibility facts were not contested by Respondents, your Honor adopted them in your findings of fact, and awarded backpay to these discriminatees consistent with these findings. Accordingly, based on the foregoing, Respondents should be precluded from recalling any of these three discriminatees to testify at the remanded hearing.

**WITNESSES WHO HAVE ALREADY TESTIFIED THAT THEY WERE LAWFULLY ENTITLED TO BE EMPLOYED IN THE UNITES STATES SHOULD NOT BE RECALLED TO TESTIFY**

At the underlying hearing there were discriminatees who testified about their immigration status. Virgelie Arnier testified that she came to the United States in 1973 with her green card and that she is a citizen of the United States. Tr. 1478 (12/9/97). Marie Mondestin testified that she came to this country legally with her green card. Tr. 851 (11/12/97). Antoinette Romain testified that that she had a green card. Tr. 15 (2/27/98). With regard to this last witness, we note that Respondents reviewed her alien registration card and social security card before she was allowed to return to work on August 24, 1990. *See* 310 NLRB at 804. Respondents questioned Therese Jean, a pre-

IRCA hire about her immigration status. She testified that she had a green card. Tr. 578 (10/31/1997). Respondents also questioned Leanna Joseph, a pre-IRCA hire about her immigration status. She testified that she was a permanent resident of the United States and that she had a green card. Tr. 1970 (4/29/1998). Witness Marie Louima testified, when directly questioned by Respondents' counsel, that she had a green card in August 1990. Tr. 394-95 (10/30/1997). Nevius Lambert testified that he began working for Respondents on September 18, 1986 and that he obtained his residency in 1988. Tr. 1937, 1939 (4/30/1998). Additionally, the testimony of Inovia Brutus testified that she had a green card, Ghislane Carsithene testified that she had a work permit. Tr. 420 – 426 (10/30/97). Marie Jean Charles and Marie Rose Joseph both testified that they had a work permits. Jean Michelet Louisma and Milton Allan Ramos both testified that they had green cards. Monique Samedy testified that she was a permanent resident of the United States. Accordingly, based on the clear testimony of these fourteen (14) discriminatees in which they establish their eligibility to be employed during their backpay periods. Respondents should be precluded from recalling any of them to testify at the remanded hearing.

**RESPONDENTS WAIVED THEIR RIGHT TO QUESTION CERTAIN  
WTINESSES ABOUT THEIR STATUS**

Respondents neither questioned nor attempted to question witness Ana Hernandez about her immigration status. Tr. 62 – 122 (3/2/1998). Respondents did not question witness Marie Thelismond at all. Tr. 2038 (5/1/1998.) Respondents' counsel stated on the record that he did not care about witness Felciano Reyes' immigration status. Tr.

2105 (5/12/1998).<sup>2</sup> In *Tortilleria La Poblana*, 357 NLRB No. 22, slip op at 4, fn 7 (July 28, 2011), the Board found that because immigration status is an affirmative defense that may be raised by an employer under appropriate circumstances at the compliance stage of an unfair labor practice proceeding, the defense is waived by the employer if not raised at an appropriate time. Thus, Respondents have waived any right to question these witnesses about their immigration status and should be precluded from recalling any of them to testify at the remanded hearing.

**RESPONDENT ARE ENTITLED TO RECALL CERTAIN DISCRIMINATEES  
TO TESTIFY**

Based on Counsel for the Acting General Counsel's review of the record, in light of the criteria set forth above, Counsel for the Acting General Counsel believes that Respondents, upon articulating a factual basis to support its defense, would be entitled to question the following witnesses about their immigration status:

- |  |                                  |
|--|----------------------------------|
| 1. Marie Ahrendts (deceased)           | 15. Eloge Jean Baptiste          |
| 2. Francois Alexander                  | 16. Rachel Louissant             |
| 3. Andreze Andral                      | 17. Nilda Matos                  |
| 4. Joseph Aris                         | 18. Alta Meuse                   |
| 5. Marie Camille                       | 19. Marie Narcisse (deceased)    |
| 6. Adrian Castillo                     | 20. Rufino Morales               |
| 7. Eugenie Charles                     | 21. Oscar Nunez                  |
| 8. Anne Cidieufort (deceased)          | 22. Juana Peralta                |
| 9. Gertha Denaud                       | 23. Rene Geronimo                |
| 10. Jean Joseph Bonny Eliacin          | 24. Idiemese Lovinski (deceased) |
| 11. Eduardo Roman Feliciano (deceased) | 25. Marcus Pitillo               |
| 12. Luis Ramos Frederick               | 26. Romulo Ramirez               |
| 13. Marie Gresseau                     | 27. Victor Agare                 |
| 14. Rufino Guity                       |                                  |

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<sup>2</sup> Both discriminatees had a very short backpay period. Reyes returned to work for Respondent on September 19, 1990 and Thelismond returned to work on September 20, 1990.

## **LOCATED MISSING WITNESSES**

Counsel for the Acting General Counsel has located the following witnesses who were listed as missing in the Board's 2008 Second Supplemental Decision:

1. Evodia Joseph
2. Marie May Joseph
3. Hilda Medina (Fernandez)
4. John Sigay Pierre
5. Kathy Toussaint
6. Jose Valentin

Discriminatees Marie May Joseph, Evodia Joseph, and Kathy Toussaint are discriminatees who Azarm, Respondents' own witness, testified and confirmed in Respondents Exhibit 336 had valid social security numbers. Thus Respondents should be precluded from examining any of them concerning their immigration status at the remanded hearing. Further, if Respondents assert their affirmative defense against any formerly missing witnesses, Respondents should be required to make an offer of proof showing the factual basis for posing questions relating to their eligibility to be employed in the United States. The Board's decision in *Flaum* mandates such disclosure before Respondents can examine such witnesses on this subject.

## **RESPONDENTS SHOULD BE REQUIRED TO PAY TRANSLATOR COSTS**

It is respectfully urged that your Honor affirm your ruling during the conference call, held on March 22, 2012, requiring Respondents to cover translator costs. The Board upheld your Honor's decision in the initial compliance proceeding wherein your Honor correctly held that Respondent must pay for the cost of the translator. *Domsey Trading Corp.*, 325 NLRB 429 (1998). Nothing has changed to alter that decision. As in the prior

hearing, the only issues in the forthcoming hearing relate to mitigation of the discriminatees gross backpay, which remains Respondents' burden to establish. Thus, any witnesses called are Respondents' and the testimony to be elicited from them by Respondents relate specifically to its burden. *A & A Insulation Services*, 344 NLRB 322, 324 (2005). Furthermore, there is no evidence that Respondents are incapable of paying for the cost of the translator. *A & A Insulation* at 324. Thus, in that nothing has changed to alter the facts of your ruling in the initial compliance proceeding, it is respectfully requested that you affirm your ruling that Respondents cover the costs of the translator. See also *Ji Shiang, Inc.*, 357 NLRB No. 108 (2011).

## CONCLUSION

In sum, Counsel for the Acting General Counsel believes that Respondents should not be allowed to recall witnesses to testify about their immigration status where:

- Respondents' Social Security expert witness' testimony and reports established that the discriminatee was employed using a valid social security number.
- The discriminatees' status was determined in the Board's September 25, 2008, Decision and Order.
- Respondents already questioned a witness about his or her immigration status at the underlying hearing and the witness testified that he or she has authorization to work in the United States.
- The witness testified that he/she was a United States citizen or a resident alien.
- Respondents waived questioning of a witness about his/her immigration status
- The discriminatee was a pre-IRCA hire whose examination on this subject was not precluded.

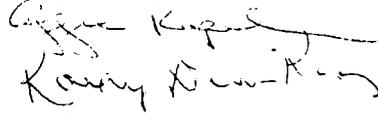
Counsel for the Acting General Counsel requests that you issue an Order which would:

1. Preclude Respondents from eliciting testimony from any of the 150 discriminatees that have already testified in this hearing with the exception of the twenty-seven (27)

individuals that counsel for the acting general counsel has acknowledged may be recalled;

2. For those discriminatees who have not yet testified and who are post-IRCA hires, require that Respondents, before examining any of them in support of their affirmative defense to submit an offer of proof that demonstrates the factual foundation for such a defense and to articulate reasons why it now believes their IRCA-required verification of immigration status seems questionable or in error; and
3. Require Respondents to continue to pay the costs of interpreters.

Respectfully submitted,



Aggie Kapelman  
Kathy Drew King  
Counsel for the Acting General Counsel  
National Labor Relations Board  
Region 29

May 1, 2012  
Brooklyn, New York

**EXHIBIT 330 SUMMARY**

ADOLPHE	JEAN MAX	\$10,320 20
AMADOR	CESAR	\$148 37
BALAN	ATULIE	\$5,500.95
BAPTISTE	ELOGE JEAN	\$2,752 00
BAPTISTE	RONALD J.	\$700 00
BERNARD	GLADYS	\$3,454 00
BONNY ELIACIN	JEAN MAX	\$6,110.65
CASTILLO	SIMON	\$5,738 87
DELEON	JOSE	\$6,802 00
ESTIVAINÉ	MARIE	\$2,044 00
HEURETELOU	YOLANDA	\$6,976 00
JEAN CHARLES	MARIE	\$4,014.94
JEAN CHARLES	LOUIS P	\$767 82
LACAYO	MAXIMO	\$2,584 75
LECONTE	MARIE	\$1,031.44
RAMOS	MILTON	\$7,516.00
ROCHEZ	RENE	\$4,232 58
ROMAIN	ANTOINETTE	\$2,605 00
SAMEDI	MONIQUE	\$2,736 00
ST FELIX	MARGARET	\$2,938 26
		\$78,973 83
	(with interest)	\$191,906 41

**EXHIBIT 335 SUMMARY**

ABREU	ROSA	\$1,664 00
ANDRE	ANDREA	\$588 00
ARMAND	MARIE ROSE	\$5,313 00
BENOIT	GERDA	\$3,658 00
BLANC	EDAIZE	\$1,408.60
BRUTUS	INVONIA	\$7,438.00
CAMILLE	CLAIRE	\$554 23
CAMILLUS	GETHA	\$6,396 00
CARASCO	SOLANGE	\$564 00
CARISTHENE	GHISLAINE	\$5,815.55
CASSUES	MARIE	\$5,545.36
CASTOR a/k/a Remple	ROSÉ MARIE	\$1,817 54
CHARLES	BRIGITTE	\$586 50
CHARLES	JAMES A	\$12,150 55
DORMÉTUS	FRANCESCA	\$196 03
JACQUES	MARIE	\$320 00
JESULA	DENIS	\$5,338.11
JOSEPH	ACCESS	\$4,033.14
JOSEPH	CLORINA	\$380 00
LACROIX	MIMOSE	\$323 63
LOUIS	ALMA	\$456 85
MACK	ANDREW	\$570 00
MALBRANCHE	PIERRE	\$855 69
MASSENA	JESULA	\$384 00
MATHIEU	MARIE N	\$7,848 67
MIDY	JEAN D	\$8,687 20
PHILOGENE	JOSETTE	\$576 00
PIERRE	MARIE	\$412.00
RAMOS	ORLANDO	\$4,123 00
RAYMOND	LOFICIANE	\$460 00
RODRIGUE	EDDY	\$344 00
ROMAIN	MARIE A	\$216 00
ROSEAU	MARIE	\$474 30
SURIN	PIERRE	\$255 40
THERESE	JEAN D	\$6,633 10
THOMAS	ANNA	\$156 00
VIRGILE	ANIER	\$4,716 00
VIRGILE	JOSEPH	\$2,087.15
VIRGILE	WILFRED	\$460 00
WILIAMS	LOURDES	\$1,781 25
ZAMA	AUGUSTE	\$460 00
		\$106,046 85
	(with interest)	\$257,693 85

EXHIBIT 336 SUMMARY		
ALAREZ-CONTRERAS ANA		\$5,590 00
ARZU	ALBERTO	\$2,574 64
AUGUSTIN	MARIE	\$7,004 38
BONI	HUBERT F	\$8,176 00
CARASCO	SOLANGE	\$564 00
CASTRO	MARCIAL S	\$8,889 40
CEPTUS	WILNER	\$8,182 15
CHEIKH	SY	\$8,416 00
CHOUTE	ALOURDES	\$3,278 00
CYPRIEN	JEAN R	\$8,296 00
DELHIA	IMMACULA	\$8,416 00
DÉLVA	CHRISTAIN	\$7,578 30
DELVILLAR	MERCEDES	\$8,416 00
DIANKHA	MAMADOÛ	\$8,416 00
DIAWARA	ALAMA A	\$41 25
ESTIMONDE	WILMIDE	\$8,416 00
FIGUEROA	HIPPOLITE	\$10,600 00
FLEURIMOND	YVETTE	\$368 00
FLORES	MARLON D	\$3,952 00
FRANCOIS	ALEXANDER	\$6,143 55
FRÉDERIQUE	MARC	\$8,416 00
GOMEZ	RAFAEL	\$59 84
GONZALEZ	JOSE	\$12,958 50
GUERRIER	BANILLA	\$4,777 00
GUEVARA	TOMAS RUIZ	\$291 00
GUITY	PABLO	\$1,254 00
IDIESSA	SAKO	\$8,416 00
JOSEPH	GHISLAINE	\$4,341 07
JOSEPH	JULMENE	\$4,793 00
JOSEPH	MARC O	\$5,040 00
JOSEPH	MARIE R	\$3,101 77
JOSPEH	EVODIA	\$4,416 00
JOSPEH	MARIE MAY	\$4,445 00
KERNIZAN	UCEMEZE	\$4,118 86
LACOMBE	JEAN	\$8,416 00
LOUIS	MARIE	\$456 85
LOUIS	MARC-DALA	\$8,889 40
LOUISMA	MARIE	\$8,747 11
LOUISMA	MICHELET	\$3,994 53
LUDOVIC	PIERRE L	\$5,958 50
MATHURIN	FERNADE	\$5,186 00
MAUVAIS	ROSE A	\$1,293 38
MÉRÉDITH	EMILIO	\$8,416 00
MONDESTIN	MARIE	\$4,001 33
MORALES	ROBERTO	\$10,076 63
MURAT	GEORGE	\$1,562 50
NUNÉZ-REYES	IRENE S	\$8,416 00
OLIVIER	JEAN	\$2,893 00
OLIVIO	CAROLINA	\$1,008 00
OSIAS	FELIA	\$8,889 40
PIERRE	JEAN S	\$21,628 13
PORSENNA	MARIE M	\$6,047 66
RAMOS	MILTON	\$7,516 00
RAYMOND	VIOLETTE	\$5,760 00
ROBINSON	GILÉS	\$28,376 29

SIMON	RICHARD	\$1,460 20
ST VAL	JOSEPH VILA	\$3,462 34
SUAZO	JUSTO	\$6,578 44
TOUSSAINT	MARIE KATHY	\$8,416 00
VAVAL	JOSETTE	\$6,916 00
VELASQUEZ	VICTOR	\$8,007 18
VERRIER	IMANITTE	\$6,916 00
VOLTAIRE	DORCIUS	\$8,856 25
ZAMA	MULERT	\$4,916 75
ZAMA	DIEULENVEUX	\$5,107 76
		\$407,915 34
	(with interest)	\$991,234 28
	330	\$191,906 41
	335	\$257,693 85
	336	\$991,234 28
	<b>Total</b>	<b>\$1,440,834.53</b>