

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

**DIGNITY HEALTH d/b/a MERCY GILBERT  
MEDICAL CENTER**

**and**

**Cases 28-CA-229160  
28-CA-238137**

**SERVICE EMPLOYEES INTERNATIONAL  
UNION-UNITED HEALTHCARE WORKERS WEST**

**GENERAL COUNSEL'S EXCEPTIONS TO THE DECISION  
OF THE ADMINISTRATIVE LAW JUDGE AND BRIEF IN SUPPORT**

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**GENERAL COUNSEL’S EXCEPTIONS  
TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE**

Counsel for the General Counsel (CGC) excepts to the Decision of Administrative Law Judge Ariel L. Sotolongo (the ALJ) [JD(SF) 09-20], issued on March 19, 2020 (the ALJD), as follows:

1. The ALJ’s failure to find that Dignity Health d/b/a Mercy Gilbert Medical Center (Respondent) violated Section 8(a)(1) of the Act by engaging in surveillance of employees engaged in union activities. (ALJD 15:18-20)<sup>1</sup> In support of this exception, CGC relies on the ALJ’s findings of fact (ALJD 5:21-26; 7: 1-4, 7:13-14, 7:14-17, 7:17-18, 7:18-19,14:37-38), sworn testimony (Tr. 229-230), and documentary evidence (GC Ex. 5).

2. The ALJ’s failure to find that Respondent directed its employees to send questions from other employees directly to Respondent. (ALJD 17: 4-6) In support of this exception, CGC relies on the ALJ’s findings of fact (ALJD 11:22-23, 12: 33-36, 16: 3-6, 16: 10-

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<sup>1</sup> As used herein, the numbers following the abbreviation “ALJD” refer to the Administrative Law Judge’s March 19, 2020 decision, “Tr.” refer to the page numbers of the transcript, and “GC Ex.” refers to General Counsel’s exhibits.

13, ), sworn testimony (Tr. 37, 163), and documentary evidence (GC Ex. 7 pg. 4; Ex. 8; Ex.12 pg. 5, 6; Ex. 13).

3. The ALJ's failure to find that Respondent interrogated employees about their protected concerted activities. (ALJD 17: 4-6) In support of this exception, CGC relies on the ALJ's findings of fact (ALJD 2: 29, 33-36, 11: 22-23, 12: 2-4, 12:8-14, 12: 33-36, 13:35-36, 14:28-30, 15: 29-32, 16: 32-36), sworn testimony (Tr. 36, 158-160, 162, 163 ), and documentary evidence (GC Ex. 7 pg. 4; GC 12 pg. 1-2. 4-6).

4. The ALJ's failure to find that Respondent, by telling employees that it knew about their discussions with other employees about terms and conditions of employment, created the impression among its employees that their protected concerted activities were under surveillance by Respondent. (ALJD 17: 4-6) In support of this exception, CGC relies on the ALJ's findings of fact (ALJD 15: 29-32, 16: 15-16), sworn testimony (Tr. 159-160) , and documentary evidence (GC Ex. 12 pg. 7-8).

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**BRIEF IN SUPPORT OF THE  
GENERAL COUNSEL'S EXCEPTIONS**

**I. INTRODUCTION**

For more than a decade, Jon-Paul Placencio (Placencio) has been a hard-working and dedicated employee of Dignity Health d/b/a Mercy Gilbert Medical Center (Respondent). Seeking better working conditions and benefits, Placencio began an effort to assist Service Employees International Union-United Healthcare Workers West (the Union) with organizing Respondent's employees, in the hopes of establishing a collective voice with his coworkers at his workplace. In his decision, the ALJ readily and consistently credited Placencio's testimony. Though the ALJ took Placencio's word as fact, the ALJ failed to find that Respondent surveilled employees engaged in union activities, directed its employees to send questions from other employees directly to Respondent, interrogated employees about their protected concerted activities, and created the impression among its employees that their protected concerted activities were under surveillance by Respondent, all as described by Placencio.

Tellingly, the ALJ found that Respondent violated the Act by creating the impression among its employees that their union activities were under surveillance by Respondent and that

Respondent had interrogated employees about their union activities, incidents also relayed by Placencio. Specifically, the ALJ properly found that about August 28, 2018, Respondent, by Dawn Kimball (Kimball), at Respondent's facility, by telling its employees that it knew they were speaking to the Union, created the impression among its employees that their union activities were under surveillance by Respondent. In addition, the ALJ held that about September 27, 2018, Respondent, by Joshua Harrison, at Respondent's facility, interrogated its employees about their union membership, activities, and sympathies.

Despite these significant findings and Placencio's credited testimony, it is striking that the ALJ nonetheless failed to find that Respondent violated the Act by engaging in surveillance of employees engaged in union activities, directing its employees to send questions from other employees directly to Respondent, interrogating employees about their protected concerted activities, and creating the impression among its employees that their protected concerted activities were under surveillance by Respondent especially where his own findings of fact would compel such conclusions. The Board should correct these oversights, as described more fully below, and enter an appropriate order.

## **II. RESPONDENT VIOLATED SECTION 8(a)(1) OF THE ACT BY ENGAGING IN SURVEILLANCE OF EMPLOYEES ENGAGED IN UNION ACTIVITIES**

The Order Consolidating Cases, Consolidated Complaint and Notice of Hearing (the Complaint) (GC 1(1)) alleges that, about November 2018, a more precise date being unknown to the General Counsel, Respondent, by Brian Biggs (Biggs) and Dawn Reh (Reh), at the employees' entrance to the Emergency Room at Respondent's facility, by observing its employees distribute union flyers, engaged in surveillance of employees engaged in union activities. (Complaint paragraph 5(c)) Though, as discussed below, the evidence established such a violation, the ALJ failed to so find.

In terms of the facts surrounding the November 2018 surveillance, the ALJ found that sometime in November just before he was scheduled to start making the rounds with Reh (Respondent's Nursing Manager), Biggs (Respondent's Director of Medical-Surgical Floors) received 2 phone calls from charge nurses complaining that people in uniforms were passing out flyers outside the administrative entrance near the chapel. (ALJD 7: 1-4) Biggs reported these phone calls to Reh and both went to look out of a window that was near the entrance in question, but could not see anything, since it was dark outside. (ALJD 7: 13-14) Biggs then walked out of the north entrance and approached a group of about 4-5 staffers in uniform. (ALJD 7: 14-17) He told this group that he had received complaints that they were delaying staff coming in and told them not to do that. (ALJD 7: 17-18) Biggs also asked them if they were on "shift," and they replied that they were not. (ALJD 7: 18-19) As Biggs started to walk back inside the facility, he heard a male voice asking if he wanted to know anything about the Union and offered him a flyer. (ALJD 7: 19-21) He declined and went back inside; he and Reh then went on to do their rounds. (ALJD 7: 21-22)

The ALJ noted that Placencio's account of the event differed from that of Biggs and Reh. (ALJD 7: 37-38) The ALJ acknowledged that the main difference was that Placencio testified that both Reh and Biggs were outside during the incident in question. (ALJD 7: 38-39) Additionally, Placencio did not testify that Biggs or Reh engaged in conversation with employees distributing union flyers, whereas Biggs testified to a brief conversation with these employees. (ALJD 7: 40-41, 8: 1-2) The ALJ noted that both Placencio and Reh estimated Biggs' encounter lasting 1 to 3 minutes, whereas Biggs testifies it lasted about 20 seconds. (ALJD 8: 2-4) The ALJ credited Placencio and Reh that the encounter lasted 1 to 3 minutes, and that Biggs then returned inside the building. (ALJD 14: 37-38) The ALJ did not resolve the

differences in testimony and he did not make credibility resolutions regarding whether Reh joined Biggs outside for this encounter and whether or not Biggs had a conversation with employees because he considered them immaterial to applying the legal analysis of whether unlawful surveillance took place. (ALJD 8: 6-9)

Despite the evidence to the contrary, the ALJ found that Biggs' action did not violate the Act. The ALJ ruled that the employees were openly and publicly distributing union literature at Respondent's parking lot and that the alleged observation by Biggs (and maybe Reh) was neither prolonged nor repeated. (ALJD 15: 12-15)

The ALJD focused on the fact the interaction lasted "1 to 3 minutes" and mischaracterized the CGC's position that Biggs, merely by "walking outside and 'watching' the employees distribute union leaflets, albeit for only less than 3 minutes, Respondent engaged in unlawful surveillance". (ALJD 15: 2-5) According to the ALJ, it is well-settled that where employees are conducting their (union or protected) activities openly on or near company premises, open observation of those activities by an employer is not unlawful. (ALJD 15:7-10)

However, in addition to the *duration* of an observation, other factors must be considered in determining whether an employer's observation of employees engaged in Section 7 activity is out of the ordinary and thereby constitutes unlawful surveillance:

Surveillance is supervisors watching "employees engaged in Section 7 activity by observing them in a way that is out of the ordinary and thereby coercive." *Aladdin Gaming, LLC*, 345 NLRB 585, 585–586 (2005), rev. denied sub nom. *Local Joint Executive Bd. of Las Vegas v. NLRB*, 515 F.3d 942 (9th Cir. 2008). It depends upon the nature and duration of the supervisors' observation. *Id.* Factors showing the observation was coercive include the duration of observation, the employer's distance while making the observation and whether the employer engaged in other unlawful activity. *Id.* at 586.

*T-Mobile USA, Inc.*, 369 NLRB No. 50, slip op. at 18 (April 2, 2020).

The sustained presence of Biggs and Reh in the parking lot while employees were distributing literature *coupled* with the uncontested fact that Placencio had disclosed his status as a union organizer only weeks earlier, Biggs' testimony that he was aware that union flyers had been handed out at Respondent's facility in the recent past and his testimony, credited by the ALJ, that he interrupted employees to ask if they were on duty and telling them not to delay other employees was conspicuously out of the ordinary and constituted coercive and unlawful surveillance of employees' union activities.<sup>2</sup> (ALJD 5:21-26; 14:37-38, GC Ex. 5, Tr. 229-230)

Accordingly, Respondent engaged in the unlawful surveillance of employees' union activities in violation of Section 8(a)(1) of the Act.

### **III. RESPONDENT VIOLATED SECTION 8(a)(1) OF THE ACT BY DIRECTING ITS EMPLOYEES TO SEND QUESTIONS FROM OTHER EMPLOYEES DIRECTLY TO RESPONDENT**

The Complaint alleged that about February 7, 2019, Respondent, by Dawn Kimball (Respondent's Emergency Room Department Director), at Respondent's facility, directed its employees to send questions from other employees directly to Kimball. (Complaint paragraph 5(d)(2)) Though, as discussed below, the evidence established such a violation, the ALJ failed to so find.

As noted by the ALJ, it is undisputed that Kimball and Biggs met with Placencio in Kimball's office on February 7, 2019. (ALJD 11:22-23) During this conversation Placencio took contemporaneous notes, and the ALJ credited his testimony and to the extent his notes amplify the nature of the conversation or clarify the context of what was said, the ALJ gave the notes more weight. (ALJD 12: 33-36; GC Ex. 12) The ALJ found that Kimball had received reports

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<sup>2</sup> Although the ALJ did not find it necessary to the legal analysis to resolve the factual difference between Placencio's testimony and that of Biggs and Reh, it is the CGC's position that an analysis of whether the situation was "ordinary" or "typical" would be aided by a finding of whether one or two high-ranking supervisors descended upon a group of employees engaging in union activity in an employer's parking lot.

from other employees that Placencio was spreading rumors that the emergency room department was eliminating its technician positions. (ALJD 16: 3-6)<sup>3</sup> According to the ALJ it was these “rumors” that prompted Kimball to direct Placencio to come to her and to tell others “to come to her—and tell others to come to her—for clarification, rather than keep spreading information that was false and causing consternation”. (ALJD 16: 10-13) The ALJ held that there is no authority that spreading false rumors is automatically protected activity. (ALJD 16:6-10) The ALJ states that it isn’t reasonable to conclude that even if that activity is protected that employers would be defenseless to stop such rumors or prevent their spread. (ALJD 16:13-15) Given this context, the ALJ found that Kimball indisputably telling employees to come to her to “clear it up” was lawful. *Id.* However, this analysis is misplaced.

The ALJ correctly points out that the facts are undisputed. As the testimony and Placencio’s credited notes of the conversation make plain, Kimball directed him, a known union organizer, to direct employees who had concerns directly to Respondent instead of discussing it amongst themselves. (Tr. 37, 163; GC 7 pg. 4; GC 12 pg. 5, 6.) The term *concerns* is general and nowhere in the testimony or in the evidence is it posited that the only thing Placencio and Kimball discussed was employees’ preoccupation with the elimination of the technician position.

Kimball communicated multiple times to Placencio that a “positive work environment” meant not engaging in protected concerted activities. She documented this directive in her November 29, 2018, email to herself and Reh where in describing a conversation she had with Placencio: “Upon ending the conversation, I made it very clear that moving forward, he needed to use clear communication, ask for help until it is received. I also asked JP to come to us with any safety concerns and not continue speaking co-workers about it without notifying us. He needs to be part of a positive environment.” GC 13. She repeated this instruction during her meeting with

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<sup>3</sup> The ALJ did not credit this rumor, but credits Kimball’s representation that she had a good faith reason to believe that Placencio or someone else was involved. (ALJD 12:fn.25)

Placencio on February 7, 2019: Placencio was not to discuss his questions or concerns with his fellow employees; he was to come to her because this is what constituted maintaining a “positive” and “cohesive” work environment. GC 7, 8, 13.

Respondent, via this directive, gave Placencio the duty of sending questions and discussion directly to Respondent rather than engage with his coworkers on these topics. However, it is well established that an employer cannot lawfully instruct employees to bring concerns about terms and conditions of employment to the employer and not to other employees. *See Orient Tally Co., Inc. and California Cartage Co., LLC*, 367 NLRB No. 36, slip op. at 1 fn.1 (2018) (Board adopted ALJ’s finding that respondent violated Section 8(a)(1) by telling an employee to bring his work-related concerns directly to management rather than voice them elsewhere).

Accordingly, Respondent’s directive to Placencio violated Section 8(a)(1) of the Act.

#### **IV. RESPONDENT VIOLATED SECTION 8(a)(1) OF THE ACT BY INTERROGATING EMPLOYEES ABOUT THEIR PROTECTED CONCERTED ACTIVITIES**

The Complaint alleged that about February 7, 2019, Respondent, by Kimball interrogated employees about their protected concerted activities. (Complaint paragraph 5(d)(3)) Though, as discussed below, the evidence established such a violation, the ALJ failed to so find.

As noted above, the ALJ analyzed this interaction as having originated from the fact that Kimball had been told by employees that Placencio was spreading rumors about the elimination of the technician position. (ALJD 16: 32-36) Through this narrow lens, the ALJ concluded that given this context Respondent was not interrogating Placencio about who was engaged in protected concerted activity but was simply “trying to stop a false rumor about the elimination of tech positions.” *Id.*

In determining whether an unlawful interrogation occurred, the Board considers “whether under all the circumstances the interrogation reasonably tends to restrain, coerce, or interfere with rights guaranteed by the Act.” *Rossmore House*, 269 NLRB 1176, 1177-78, 1178 fn. 20 (1984), citing *Bourne v. NLRB*, 332 F.2d 47 (2d Cir. 1964). Relevant factors include: (1) the background, i.e. is there a history of employer hostility and discrimination; (2) the nature of the information sought -- did the interrogator appear to be seeking information on which to base taking action against individual employees; (3) the identity of the questioner, i.e. how high was he in the company hierarchy; (4) the place and method of interrogation, e.g. was employee called from work to the boss’s office, and whether there an atmosphere of unnatural formality; and (5) the truthfulness of the employee’s reply to the questioning. *Medcare Associates, Inc.*, 330 NLRB 935, 939 (2000).

Here again, the facts are not in dispute and the ALJ readily credited Placencio’s account. The ALJ erred in not even considering or applying the *Rossmore House* factors to Kimball’s interaction with Placencio which clearly establish that Kimball interrogated him about his protected concerted activities.

As evidenced by the ALJ’s own findings of two independent 8(a)(1) violations, one of which had to do with an unlawful interrogation, Respondent has demonstrated a great degree of hostility toward employees’ union and protected concerted activities. (ALJD 13:35-36, 14:28-30) *See Hydro-Dredge Accessory Co.*, 215 NLRB 138, 149 (1974) (in light of other violations, employer’s interrogation was “inextricably interwoven” with employer’s interest in keeping employees away from the union); *G.R.I. Corp.*, 216 NLRB 34 (1975) (not isolated considering other unfair labor practices; interrogation does not have to be stated as a query).

Concerning the substance of the questioning, Kimball's questioning—first confronting Placencio with an allegation that he had warned employees that the technician position was going away and thereby inviting an admission or denial, and then outright asking him about who was coming to him with concerns and what their concerns were—went directly to Placencio's protected concerted activities, his discussions with other employees about terms and conditions of employment. (ALJD 15: 29-32; Tr. 36-37, 159, 160, 162-163; GC 7 pg. 4; GC 12 pg. 4-5, 6) The questioning was conducted by Kimball, the highest-level supervisor in Placencio's department, and in the presence of Biggs, Respondent's Director of Medical Surgical Services, another high-level supervisor. (ALJD 2: 29, 33-36), and the interrogation was conducted in a setting that, to Placencio, would have felt disciplinary—in Kimball's office, in the presence of two high-level supervisors. (ALJD 11: 22-23)

Moreover, the questioning occurred during a meeting that began with an accusation that Placencio had falsified a checkoff list. (ALJD 12: 33-36; Tr. 158; GC 12 pg. 1-2)

Finally, in response to the questioning, Placencio responded vaguely, stating very generally that a lot of people came to him with different things, an obfuscation that demonstrated the intimidating nature of the questioning. (ALJD 12: 2-4; Tr. 160) In this context, Kimball's admitted questioning of Placencio about his communications with other employees about workplace concerns was unquestionably coercive. (ALJD: 12:8-14; Tr. 160, 163; GC 12 pg. 6)

Accordingly, Respondent violated Section 8(a)(1) by interrogating employees about their protected concerted activities.

**V. RESPONDENT VIOLATED SECTION 8(a)(1) OF THE ACT BY CREATING THE IMPRESSION AMONG ITS EMPLOYEES THAT THEIR PROTECTED CONCERTED ACTIVITIES WERE UNDER SURVEILLANCE BY RESPONDENT**

The Complaint alleged that about February 7, 2019, Respondent, by Kimball created the impression among its employees that their protected concerted activities were under surveillance by Respondent. (Complaint paragraph 5(d)(4)) Though, as discussed below, the evidence established such a violation, the ALJ failed to so find.

As noted above, the ALJ analyzed this conversation as having originated from the fact that Kimball had been told by employees that Placencio was spreading rumors about the elimination of the technician position. (ALJD 15: 29-32) Here, the ALJ found that “by telling Placencio that other employees had reported that he was spreading rumors about the elimination of tech positions,” Kimball did not create the impression that Respondent was engaged in surveillance. (ALJD 16: 37-39) According to the ALJ, the very use of the words that *others have reported* the activity in question, legally and logically forecloses the suspicion that the source of the information is the employers’ surveillance, and thus no reasonable employee could come to that conclusion. (ALJD 16:39-42)

CGC excepts to this finding. Here again, the facts are not in dispute, and Placencio’s account is credited. The Board’s test for determining whether an employer unlawfully creates an impression of surveillance is whether, under the circumstances, an employee reasonably could conclude from the statement in question that his protected activities are being monitored.

*Mountaineer Steel, Inc.*, 326 NLRB 787 (1998), *enfd.* 8 Fed. Appx. 180 (4th Cir. 2001). The standard is an objective one, based on the rationale that “employees should be free to participate in union organizing campaigns without the fear that members of management are peering over their shoulders, taking note of who is involved in union activities, and in what particular ways.”

*Flexsteel Industries*, 311 NLRB 257 (1993). “The gravamen of such violation is that employees are led to believe that the employer has placed union activities under its watch.” *Consolidated Communications of Texas Company*, 366 NLRB No. 172, slip op. at 1 n. 1 (2018), citing *Bridgestone Firestone South Carolina*, 350 NLRB 526, 527 (2007).

Kimball created the impression that employees’ protected concerted activities were under surveillance when she told Placencio that she had observed him whispering at the nurse’s station. (ALJD 16: 15-16; Tr. 159; GC Ex. 12 pg. 7-8) She also told him that she overheard his conversation the other day and told him it was not work related. Tr. 160. This clearly unlawfully sent a message to Placencio that his protected concerted activities were being watched. Even if the CGC had alleged, as represented by the ALJ, that Kimball had only told Placencio that *others* had reported to her that he was spreading rumors about the elimination of the technician position, that statement would also have unlawfully created the impression of surveillance under current Board law. See *Orchids Paper Products Co.*, 367 NLRB No.33, slip op. at 3 fn.10 (2018) (Board adopts ALJ’s finding that respondent unlawfully created the impression of surveillance when site manager told an employee “people are reporting to me saying you are doing union business on company time”.)

Accordingly, Respondent violated Section 8(a)(1) by creating the impression among its employees that their union activities were under surveillance.

## **VI. CONCLUSION**

Based upon the foregoing and the record evidence considered as a whole, the General Counsel respectfully requests that the Board find that Respondent violated Section 8(a)(1) by engaging in surveillance of employees engaged in union activities, directing its employees to send questions from other employees directly to Respondent, interrogating employees about their

protected concerted activities, and creating the impression among its employees that their protected concerted activities were under surveillance by Respondent, and that the Board issue an order providing a full and appropriate remedy for such violations.

Dated at Phoenix, Arizona, this 16<sup>th</sup> day of April 2020.

Respectfully submitted,

/s/ Judith E. Dávila

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of GENERAL COUNSEL'S EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE AND BRIEF IN SUPPORT in *Dignity Health d/b/a Mercy Gilbert Medical Center*, Cases 28-CA-229160 and 28-CA-238137, was served by E-Gov, E-Filing, and E-Mail on this 16<sup>th</sup> of April 2020, on the following:

### **Via E-Gov, E-Filing:**

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