



NOTICE OF SPECIAL MEETING

NOTICE IS HEREBY GIVEN the Board of Education of Fresno Unified School District will meet:

MONDAY, MAY 18, 2026, 12:00 P.M.

In the Education Center, Second Floor, Board Room, 2309 Tulare Street, Fresno, California 93721.

CALL TO ORDER

Immediately following the CALL TO ORDER the Board of Education will CONVENE the meeting to Open Session to discuss the following:

1. **DISCUSS and APPROVE Resolution No. 26-88, Authorizing the Board to Reduce or Eliminate Particular Kinds of Certificated Services and to Permit the Layoff of Certificated Employees for the 2026/27 School Year**

Included in the Board material is Resolution 26-88, authorizing the Board to reduce or eliminate particular kinds of certificated services and to permit the layoff of certificated employees for the 2026/27 school year pursuant to Education Code 44949 and 44955 and it is in the best interest of the District that the number of certificated employees be reduced or discontinued and approve related documents and actions. The Superintendent **recommends approval**. Fiscal impact: There is no fiscal impact to the district at this time. Contact person: David Chavez, telephone (559) 457-3713.

UNSCHEDULED ORAL COMMUNICATION

Individuals who wish to address the Board on the topics listed on this agenda may do so when the Board President calls for public comment. While time limitations are at the discretion of the Board President, generally members of the public will be limited to a maximum of three (3) minutes per speaker for a total of thirty (30) minutes of public comment. Individuals with questions on any item on this agenda may submit them in writing. The Board will automatically refer formal request to the Superintendent for response by the appropriate staff member.

By direction of the Board of Education.

A handwritten signature in blue ink, appearing to read 'Mao Misty Her', with a stylized, cursive script.

**Mao Misty Her, Secretary to the
Board of Education**

Fresno, California

Posted: Friday, May 15, 2026

Fresno Unified School District
Board Agenda Item

BOARD MEETING DATE: May 18, 2026

ACTION REQUESTED: DISCUSS AND APPROVE

TITLE AND SUBJECT: Discuss and Approve Resolution No. 26-88, Authorizing the Board to Reduce or Eliminate Particular Kinds of Certificated Services and to Permit the Layoff of Certificated Employees for the 2026/27 School Year

ITEM DESCRIPTION: Included in the Board material is Resolution 26-88, authorizing the Board to reduce or eliminate particular kinds of certificated services and to permit the layoff of certificated employees for the 2026/27 school year pursuant to Education Code 44949 and 44955 and it is in the best interest of the District that the number of certificated employees be reduced or discontinued and approve related documents and actions.

FINANCIAL SUMMARY: There is no fiscal impact to the district at this time.

PREPARED BY: Annarita Howell

DIVISION: Human Resources/Labor Relations

CABINET APPROVAL PHONE: (559) 457-3713

CABINET APPROVAL: Chief of Human Resources/Labor Relations, David Chavez



**BEFORE THE BOARD OF EDUCATION OF THE
FRESNO UNIFIED SCHOOL DISTRICT
COUNTY OF FRESNO, STATE OF CALIFORNIA**

RESOLUTION NO. 26-88

**RESOLUTION REGARDING REDUCTION OR ELIMINATION OF CERTAIN
CERTIFICATED SERVICES**
(Education Code sections 44949 and 44955)

WHEREAS, on or about February 25, 2026, the Board of Education of the Fresno Unified School District adopted Resolution No. 26-60 reducing or eliminating particular kinds of services performed by certificated employees for the 2026-2027 school year; and

WHEREAS, on March 11, 2026, the Board of Education of the Fresno Unified School District adopted Resolution No. 26-66 reducing or eliminating particular kinds of services performed by certificated employees for the 2026-2027 school year; and

WHEREAS the services to be reduced or discontinued as set forth in Resolution No. 26-60 and Resolution No. 26-66 are determined to be particular kinds of services within the meaning of Education Code section 44955;

WHEREAS, before March 15, 2026, pursuant to the direction of this Board, the Superintendent and/or her designed representatives serviced notice to certain probationary and permanent certificated employees, that it has been recommended that each of their services will not be required for the 2026-2027 school year in their current capacities, pursuant to Education Code sections 44949 and 44955; and

WHEREAS, the preliminary layoff notices served upon the certificated employees advised them that they may request a hearing to determine if there is cause for not reemploying them in their current positions for the 2026-2027 school year, and that if they failed to timely request a hearing, that failure shall constitute a waiver of their right to a hearing;

WHEREAS, of the certificated employees served preliminary notices, thirty-five (35) timely requested a layoff hearing as party of OAH Case No. 2026040558;

WHEREAS, before the date of the layoff hearing, the District rescinded some layoff notices. Of the thirty-five (35) employees that requested a hearing, twenty-seven (27) remained (the "Respondents");

WHEREAS, Education Code section 44955, subdivision (c), requires final Board action on the layoff, reduction, displacement or termination of employment and notifications to the affected employee(s) no later than May 14, 2026, unless that date is extended within a hearing pursuant to Education Code section 44949, subdivision (e);

WHEREAS, on April 22, 2026, the administrative law judge assigned to OAH Case No. 2026040558 exercised his authority to continue the hearing and extend the statutory deadlines by twelve (12) days to May 4, 2026; and

WHEREAS, the administrative law judge has jurisdiction only over the Respondents in OAH Case No. 2026040558, and the continuance of the hearing and extension of the statutory deadlines apply to Respondents, and the continuance of the hearing and extension of the statutory deadlines does not apply to the employees who waived their right to a hearing;

WHEREAS, employees who did not timely request a hearing, who were required by law to receive notice of their layoff prior to May 15, 2026, all received timely notice that their services would not be required for the 2026-2027 school year;

WHEREAS, on May 12, 2026, the District received the proposed decision of the administrative law judge;

WHEREAS, the proposed decision affirms the District's action to reduce or eliminate the particular kinds of services identified in Resolution No. 26-60 and sustains the Statement of Reduction in Force;

WHEREAS, the proposed decision also requires the District to adopt a tie-breaking criteria based upon the "needs of the district and the students" and select two preschool teachers with a seniority date of August 10, 2022, whose layoffs shall be rescinded;

WHEREAS, the services of no permanent or other employee are being terminated, reduced, or displaced while any probationary employee or any other employee with less seniority is being retained to render a service which the permanent or other employee is certificated and competent to render, within the meaning of, and except as permitted by, Education Code section 44955 and Board-adopted criteria; the individuals whose employment is being terminated are not certificated and competent (within the meaning of, and except as permitted by, Education Code section 44955 and Board-adopted criteria) to render the service being performed by any employee with less seniority who is being retained;

NOW, THEREFORE, BE IT RESOLVED that the above recitals are true and correct, and this Board hereby orders final layoff action in the proceeding described above;

BE IT FURTHER RESOLVED that the layoff notices of two preschool teachers with a seniority date of August 10, 2022 will be rescinded;

BE IT FURTHER RESOLVED that the District and the Fresno Teachers Association has agreed that tie-breaking of seniority for layoffs with identical seniority dates will be determined by a single random drawing of the employees' name from a hat (or other suitable container). The first name drawn shall be deemed the most senior for layoff purposes, and the process shall continue in the order drawn until all tied employees have been ranked;

BE IT FURTHER RESOLVED that the employment of the remaining Respondents, except those for which the tie breaking criteria is required, preliminary layoff notices is hereby terminated, reduced, or displaced effective upon the close of the current school year (i.e., the end of such employee's last working day on or prior to June 30, 2026);

BE IT FURTHER RESOLVED that this decision is effective immediately and that the certificated employees named in the attached Final Layoff List, shall be given appropriate notice

by the Superintendent or designee of the termination, reduction, or displacement of the employees' services, with said notice to be given on or before May 26, 2026, in the manner prescribed by law; and finally

BE IT FURTHER RESOLVED that rights to reemployment pursuant to Education Code section 44956 and/or 44957 shall be provided to certificated employees whose services are terminated as a result of this layoff, if and when reemployment is available.

Adopted by the Board of Education of the Fresno Unified School District this 18th day of May, 2026 by the following vote.

AYES: _____

NAYS: _____

ABSTENTIONS: _____

ABSENT _____

Dated: _____, 2026

Genoveva Islas
President, Board of Education
Fresno Unified School District
County of Fresno, State of California

STATE OF CALIFORNIA]

COUNTY OF FRESNO]

I, _____, Clerk of the Board of Education of the Fresno Unified School District of Fresno, California, hereby certify that the foregoing is a full, true, and correct copy of a resolution adopted by said Board at a regular meeting thereof held at its regular place of meeting at the time and by the vote above stated, which resolution is on file in the office of said Board.

Dated: _____, 2026

Andy Levine
Clerk, Board of Education
Fresno Unified School District
County of Fresno, State of California

FRESNO UNIFIED SCHOOL DISTRICT

CERTIFICATED LAYOFF

FINAL LAYOFF LIST

#	<u>Last Name</u>	<u>First Name</u>
1	Yang	Xher
2	Ramos	Veronica
3	Aguilar Torres	Alondra
4	Conner	Morgan
5	Renderos	Reyna
6	Hiyama	Allyson
7	Pham	Carol
8	Vang	Pavour
9	Yang	Roland
10	Taylor	Coupe
11	Romero	Giovanni
12	Vasquez	Nelson
13	Rodriguez	Serena
14	Pineda	Jorge
15	Magana Chavez	Diana
16	Barajas-Cazares	Reyna
17	Barba	Maria
18	De Los Santos	Miriam
19	Manzo	Rosa
20	Kuykendall	Kristina
21	Railing	Sophia
22	Rodriguez	Monica
23	Yang Xiong	Mai
24	Xyong	Migow
25	Osuna	Celeste
26	Mota	Alyssa
27	Alvarenga Barrera	Morena

**BEFORE THE
GOVERNING BOARD OF THE
FRESNO UNIFIED SCHOOL DISTRICT
STATE OF CALIFORNIA**

In the Matter of the Reduction in Force of:

CERTAIN CERTIFICATED EMPLOYEES, Respondents.

OAH No. 2026040558

PROPOSED DECISION

Luke VanderDrift, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter by videoconference on May 4, 2026, from Sacramento, California.

Dustin Stroeve, Attorney at Law, Atkinson, Andelson, Loya, Rudd & Romo, represented the Fresno Unified School District (District).

Ernest Tuttle, Attorney at Law, Gibson & Tuttle, represented respondents Morena Alvarenga-Barrera, Reyna Ambriz-Renderos, Reyna Barajas-Cazares, Maria Barba, Morgan Conner, Miriam De Los Santos, Luis Figueroa-Palacios, Allyson Hiyama, Gabriela Lamendi-Chevez, Diana Magana-Chavez, Rosa Manzo, Alyssa Mota, Celeste Osuna, Sophia Railing, Monica Rodriguez, Veronica Ramos, Bao Vang, Nelson Vazquez, Yer Vue, Migow Xyong, Rolando Yang, and Xher Yang.

Respondents Kristina Kuykendall, Jorge Pineda, Serena Rodriguez, Giovanni Romero, and Coupe Taylor appeared on their own behalf.

Evidence was received, the record closed, and the matter submitted for decision on May 4, 2026.

FACTUAL FINDINGS

Jurisdictional Matters

1. On February 25, 2026, the Board of Education of the Fresno Unified School District (Board) adopted Resolution No. 26-60 (Resolution) reducing or discontinuing particular kinds of services and a corresponding number of certificated employees. The Board found layoffs “in the best interests of the District and the welfare of the schools and the pupils.”

2. The Resolution mandated a reduction of 84 full-time equivalent (FTE) positions for the 2026-2027 school year. The Resolution identified the particular kinds of services to be reduced, including, among other positions, 19 preschool teachers, 22 counselors, and four child development center supervisors. The Board directed the District Superintendent or their designee to initiate layoffs.

3. On the day following the Resolution, February 26, 2026, Assistant Superintendent Annarita Howell served respondents with notices that they would not be employed during the following school year. The documents included a Notice and Statement of Reduction in Force informing respondents the Board had eliminated particular kinds of services resulting in their terminations. The Statement of Reduction in Force included an attachment listing the 54 employees whose positions were being eliminated.

4. As part of the notice packet sent to the respondents on February 26, 2026, the District included a form to request a hearing. Respondents were instructed to submit a written request for hearing on or before March 26, 2026, if they wished to contest their layoffs.

5. Thirty-seven employees timely requested a hearing. The hearing was initially scheduled for April 22, 2026. However, the District did not provide 11 self-represented respondents with timely notice of the hearing because the District mistakenly believed all respondents were represented by counsel. Consequently, the hearing was continued to May 4, 2026, to ensure all parties received proper notice. The District provided adequate notice to all respondents for the May 4, 2026 hearing.

6. By the date of the hearing, the District had rescinded layoff notices for some categories of employees. Of the respondents who initially requested a hearing, 13 preschool teachers, 12 counselors, and three child development center supervisors remained with layoff notices.

District's Evidence

7. Annarita Howell testified on behalf of the District. Ms. Howell is Assistant Superintendent of Human Resources and Labor Relations. She has worked for the District for 32 years as a teacher, vice principal, principal, and administrator. In her current role, Ms. Howell's primary job duties involve labor relations, negotiations, and the District budget.

8. The District employs 10,580 people and operates 116 school sites. It educates more than 66,000 students, though enrollment has steadily declined by 1,000 to 1,500 annually since 2019. The decline is projected to continue through 2030. The need for preschool teachers disproportionately dropped after Transitional

Kindergarten was offered to all students, thus reducing the number of preschool students.

9. Because of the decline in enrollment and attendance, the District is experiencing a budget deficit. The District implemented layoffs due to decreased funds and work. The reduction in positions affected management, as well as certificated and classified employees across all bargaining units.

10. The certificated employees in categories subject to layoffs were ranked by seniority. The District grouped the employees by the categories listed in the Resolution. Seniority was determined by the first date of paid service in the certificated role. The seniority lists highlighted the least senior employees scheduled for layoff.

11. Regarding the preschool teachers, the District sent layoff notices to 21 teachers, exceeding the 19 permitted by the Resolution. The District initially planned to designate some preschool teachers for skipping, the retention of junior employees who are certificated and competent to render services which more senior employees are not. After the District and the employees' union failed to agree on skipping criteria, no analysis was done to determine which preschool teachers should be retained over those with more seniority. The District failed to justify issuing layoff notices in excess of the 19 authorized by the Resolution.

12. The preschool teachers who received layoff notices were the least senior in the District. The eight most senior preschool teachers who received layoff notices all share the same seniority date of August 10, 2022. These included respondents Morena Alvarenga-Barrera, Maria Barba, Alyssa Mota, Sophia Railing, and Mai Xiong. The process for determining which two of the eight preschool teachers should have their layoff notice rescinded is discussed below.

13. Regarding the counselors, the 17 individuals at the bottom of the seniority list were highlighted yellow and received layoff notices. Two names above those were highlighted grey, one being respondent Nelson Vasquez. The individuals highlighted grey also received layoff notices, although the other individual highlighted grey, who was more senior than Mr. Vasquez, had since retired.

14. The District made some errors when sending out layoff notices to counselors. Three counselors, Nancy Madrigal, Steve Perez, and Andrea Santillan, had their layoff notices rescinded. Their names had been moved higher up on the spreadsheet by the time of hearing. Ms. Howell explained these individuals had an earlier start date as a counselor than initially believed. There was no evidence suggesting these individuals were more junior than the counselors who still had layoff notices.

15. Regarding the child development center supervisors, the District provided a seniority list with eight employees in this certificated position. The three respondents who were child development center supervisors were Luis Figueroa Palacios, Veronica Ramos, and Xher Yang. They occupied the three lowest positions on the seniority list.

16. Ms. Howell stated that the District is committed to finding a position for each certificated employee where they can continue to receive benefits. In the layoff notice packet, employees were sent a form to assert "bumping" rights to return to a former classification. Ms. Howell further stated the District is looking to find all employees a position closest in status to their current one.

Seniority Dates – Counselors Morgan Conner & Monica Rodriguez

17. Morgan Conner is a counselor in the District. On the District seniority list, she has a September 25, 2023 start date. She began paid training to be a counselor on August 1, 2023, and requested that this date be considered her start date. This start date was used for several other counselors in her training class. At the time of training, Ms. Conner was a substitute teacher but knew a counseling position for her was “in the works.” She was offered the counselor position on September 25, 2023, and she started work in the position that same day.

18. Serena Rodriguez is also a counselor. Like Ms. Conner, the District seniority list identifies her as having a prior position with the District as a substitute. Ms. Rodriguez has a start date of August 2, 2023, on the District seniority list. Ms. Rodriguez signed her contract on August 2, 2023, but believes her first day of work was August 1, 2023. Four other counselors have a start date of August 1, 2023, one day before Ms. Rodriguez. She believes the delay was attributable to her administrator being out of the office and the administrator’s assistant passing away.

Excess Layoff Notices to Preschool Teachers

19. The District sent 21 layoff notices to preschool teachers, two more than the Resolution authorized. The eight most senior preschool teachers who received layoff notices all share the same seniority date of August 10, 2022. As between certificated employees with the same seniority date, the Resolution requires the order of termination be determined solely by Board-adopted criteria. There is no evidence the Board has adopted tie-breaking criteria.

20. The District submitted an email exchange between Ms. Howell and a union representative regarding tie-breaking criteria. The union representative

suggested pulling names out of a hat, a process that had been used in the past. Ms. Howell stated the District had not agreed to that method.

Academic & Restorative Counselors

21. Counselors in the District are categorized as academic or restorative. At hearing, the academic counselors requested they not be grouped with the restorative counselors.

22. Restorative counselors focus on mediation and conflict resolution. They provide social-emotional counseling and re-entry following discipline. Conversely, academic counselors monitor students for graduation and assist with college applications and career planning. Besides having different job duties, the positions are placed under different District departments. Restorative counselors are placed under the Department of Prevention and Intervention while academic counselors are under College and Career Readiness. Additionally, the District hires counselors specifically for one role or the other.

23. The layoff notices disproportionately affected academic counselors at certain schools. Specifically, four academic counselors at Edison High School received layoff notices. Edison High School is a highly regarded school in the area. The academic counselors argued they should not be replaced by restorative counselors because the skills for the two positions are different and students would suffer from being served by academic counselors unfamiliar with the role.

24. The District plans to replace academic counselors with restorative counselors to ensure students continue to receive academic counseling. Both positions have the same credential, and the District intends to train the restorative counselors so

they can complete the duties of the academic counselors whose positions are eliminated.

Analysis

25. When in the opinion of the governing board of the District it shall have become necessary by reason of declining enrollment to reduce the number of certificated employees, the District may initiate layoffs. (Ed. Code, § 44955, subd. (b).) "A board's decision as to reduction or discontinuation of a particular kind of service is not tied in with any statistical computation, such as reduction in the number of students. The number of terminations made necessary by particular kind of service reductions depends totally upon the district's decision as to how many services to reduce." (*San Jose Teachers Assn. v. Allen* (1983) 144 Cal.App.3d 627, 635.)

26. The District has a budget deficit due to declining enrollment. This provides cause for it to reduce or discontinue particular kinds of services, which the District effectuated through the layoff notices issued to respondents. As a result, the decision to lay off certificated employees relates to the welfare of the District's schools and their pupils.

SENIORITY DATES – COUNSELORS MORGAN CONNER & MONICA RODRIGUEZ

27. Seniority is measured from the date on which the employee first rendered paid service to the district in a probationary position. (Ed. Code, § 44845.) Based on the evidence at hearing, both Ms. Connor and Ms. Rodriguez's first paid date of service as a counselor was later than other counselors in their training class. Even if the seniority list reflects an inaccurate seniority date for respondents Morgan Connor and Serena Rodriguez, the error did not cause either respondent to receive a layoff

notice they otherwise would not have received. The counselors in their training class received layoff notices as well.

EXCESS LAYOFF NOTICES TO PRESCHOOL TEACHERS

28. Pursuant to Education Code section 44955, subdivision (b), “[a]s between employees who first rendered paid service to the district on the same date, the governing board shall determine the order of termination solely on the basis of needs of the district and the students thereof.” This section also states the Board shall furnish a statement of the tie-breaking criteria to any employee who requests it no later than five days prior to the commencement of the hearing.

29. In this case, eight preschool teachers have the same seniority date. Since these preschool teachers are the most senior preschool teachers who received layoff notices, and the District sent out more layoff notices than authorized, their order must be determined. There is no evidence the Board has created tie-breaking criteria. Additionally, no employee appears to have requested the tie-breaking criteria five days prior to the hearing.

30. As a result, the tie of the eight preschool teachers with the same seniority date has not been resolved. Six may have their positions eliminated, but two must have their layoff notices rescinded. The Board must adopt tie-breaking criteria based on the “needs of the district and the students” and select the two preschool teachers whose layoff notices will be rescinded.

ACADEMIC & RESTORATIVE COUNSELORS

31. Certificated employees subject to layoff “shall be terminated in the inverse of the order in which they were employed.” (Ed. Code, § 44955, subd. (c).) To

accomplish this, “[t]he governing board shall make assignments and reassignments in such a manner that employees shall be retained to render any service which their seniority and qualifications entitle them to render.” (*Ibid.*)

32. The District treated all its counselors the same and provided layoff notices based on seniority. Because academic and restorative counselors hold the same credential, the District’s reasonably determined that restorative counselors could be trained to provide academic services. The District was not required to prioritize academic counselors ahead of restorative counselors on the seniority list, and such a decision would have drawn an objection from the more senior restorative counselors who had been skipped. Ultimately, applying a uniform seniority-based layoff process was a proper exercise of the District’s discretion.

LEGAL CONCLUSIONS

1. Jurisdiction for this proceeding exists pursuant to Education Code sections 44949 and 44955. All notices and other jurisdictional requirements of sections 44949 and 44955 were met. The burden is on the District to demonstrate the reduction or elimination of particular kinds of services is reasonable and that the District carefully considered its needs before laying off any certificated employee. (*Campbell Elementary Teachers Association v. Abbott* (1978) 76 Cal.App.3d 796, 807-808.)

2. The District is authorized to reduce services within the meaning of Education Code section 44955, subdivision (b). It may do this “either by determining that a certain type of service to students shall not, thereafter, be performed at all by anyone, or it may ‘reduce services’ by determining that proffered services shall be

reduced in extent because fewer employees are made available to deal with the pupils involved." (*Rutherford v. Bd. of Trustees* (1976) 64 Cal.App.3d 167, 178-179.)

3. "A school district may consider its financial circumstances in deciding whether to reduce or discontinue a particular kind of service." (*San Jose Teachers Assn. v. Allen, supra*, 144 Cal.App.3d at 631.) A school district's decision to reduce a particular kind of service must not be fraudulent, arbitrary, or capricious. (*Id.* at p. 637.)

4. Cause exists for the reduction or elimination of the particular kind of services and for the reduction and/or discontinuation of 84 FTE certificated positions for the 2026-2027 school year pursuant to Education Code sections 44949 and 44955. Cause for the reduction of services relates solely to the welfare of the District's schools and pupils within the meaning of section 44949. The Board's decision to reduce the services of preschool teachers, counselors, and child development center supervisors was not arbitrary or capricious but constituted a proper exercise of the Board's discretion. As a result, cause exists to give the Board-approved number of respondents notice that their services will not be required for the 2026-2027 school year.

5. Certificated employees subject to layoff "shall be terminated in the inverse of the order in which they were employed." (Ed. Code, § 44955, subd. (c).) To accomplish this, "[t]he governing board shall make assignments and reassignments in such a manner that employees shall be retained to render any service which their seniority and qualifications entitle them to render." (*Ibid.*)

6. The Board authorized the layoff of 19 preschool teachers, 22 counselors, and four child development center supervisors. The District sent layoff notices to the least senior employees in these categories. Thus, no permanent or probationary

employee with less seniority is being retained to render a service for which respondents are certificated and competent.

7. As discussed above, the District sent more layoff notices to preschool teachers than was authorized by the Resolution. Pursuant to Education Code section 44955, subdivision (b), the Board should determine tie-breaking criteria based on the needs of the district and the students for deciding the order of the eight preschool teachers with an August 10, 2022 seniority date. The two preschool teachers who rank the highest should have their layoff notices rescinded.

RECOMMENDATION

1. The Board of Education of the Fresno Unified School District's action to reduce or eliminate the particular kinds of service identified in Resolution No. 26-60 is AFFIRMED.

2. The Board of Education of the Fresno Unified School District must adopt tie-breaking criteria based on the "needs of the district and the students" and select two preschool teachers with a seniority date of August 10, 2022, whose layoff notices shall be rescinded.

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3. The Statement of Reduction in Force against the remaining respondents is SUSTAINED. Fresno Unified School District may notify them that their services will not be required for the 2026-2027 school year.

DATE: May 12, 2026


Luke VanderDrift (May 12, 2026 13:42:31 PDT)
LUKE VANDERDRIFT
Administrative Law Judge
Office of Administrative Hearings