

**FIRST JUDICIAL DISTRICT COURT  
STATE OF NEW MEXICO  
COUNTY OF SANTA FE**

Human Rights Defense Center,

Plaintiff,

v.

No. \_\_\_\_\_

Centurion Correctional Healthcare  
of New Mexico, LLC,  
The New Mexico Corrections Department,  
Kevin L. Nault, in his official capacity  
as records custodian for the New Mexico  
Corrections Department, and DOES 1  
through 3, in their official capacities,

Defendants.

**COMPLAINT FOR PRODUCTION OF PUBLIC RECORDS,  
FOR MANDAMUS, DAMAGES, AND  
DECLARATORY AND INJUNCTIVE RELIEF**

1. The Human Rights Defense Center (“HRDC”) brings these causes of action to enforce the New Mexico Inspection of Public Records Act, NMSA 1978, §§ 14-2-1 to 14-2-12 (“IPRA”).

**I. INTRODUCTION**

2. Our democratic system of government requires public transparency. *Republican Party v. N.M. Tax’n & Revenue Dep’t*, 2012-NMSC-026, ¶ 1, 283 P.3d 853.

3. HRDC, a non-profit journalism and advocacy organization, brings this action under IPRA to compel production of records maintained or controlled by Defendants and for injunctive relief and damages arising from the willful failure and refusal to produce public records as required by law.

4. The records sought relate to a private company performing public functions through contract with New Mexico Corrections Department (“NMCD”) and other government entities in New Mexico. HRDC sought these records both from the private contractor and, for the subset that relates to work performed under contract for NMCD, from NMCD.

## **II. PARTIES, JURISDICTION, AND VENUE**

5. HRDC is a non-profit organization, incorporated in the State of Washington and with headquarters in Lake Worth Beach, Florida. It is a “person” as defined by IPRA.

6. Defendant Centurion Correctional Healthcare of New Mexico, LLC (“Centurion”), is a domestic limited liability company incorporated in the State of New Mexico. Centurion contracted with government entities in New Mexico to provide healthcare services to inmates of prisons and jails. Centurion contracted with NMCD to provide medical, mental health, pharmaceutical, and related services to incarcerated persons. Centurion also provided similar services through contracts with county governments, including, for example, a contract with Bernalillo County to provide medical and mental health services to detainees of the Metropolitan Detention Center in Albuquerque.

7. Defendant NMCD is a department of the State of New Mexico and a “public body” as defined by IPRA. NMCD is charged with the operation of prison facilities in the State.

8. NMCD has contracted with Centurion to provide healthcare services to prisoners at NMCD facilities, including Central New Mexico Correctional Facility,

Northeast New Mexico Correctional Facility, Northwest New Mexico Correctional Center (formerly New Mexico Women's Correctional Facility), Penitentiary of New Mexico, Roswell Correctional Facility, Southern New Mexico Correctional Facility, Springer Correctional Facility, Western New Mexico Correctional Facility.

9. Through inter-governmental agreements, NMCD also houses prisoners at three privately operated county corrections facilities: Guadalupe County Correctional Facility, Lea County Correctional Facility, and Otero County Prison Facility. Those county corrections facilities have separately contracted with third-party, private entities to provide healthcare services to inmates. Upon information and belief, Centurion has provided healthcare services to NMCD inmates housed at these three facilities.

10. Further, some of the county governments with whom Centurion contracted have entered into inter-governmental agreements with NMCD to house NMCD prisoners.

11. Defendant Kevin L. Nault was assigned as Public Records Custodian for the NMCD. Nault is Deputy General Counsel in the NMCD Office of General Counsel and is sued in his official capacity.

12. Upon information and belief, Defendant DOES 1 through 3 were employed by Centurion or NMCD and acted as records custodians, were responsible for maintaining public records, and/or participated in the decision or were responsible for denying the inspection of records responsive to Plaintiff's records requests.

13. The Court has jurisdiction over this case pursuant to NMSA 1978, § 14-2-12 and NMSA 1978, §§ 44-2-1 to 44-2-14.

14. Venue lies in the District Court for Santa Fe County pursuant to NMSA 1978, § 38-3-1(G).

15. There is an actual controversy between the parties about Defendants' duties under IPRA. As a result, an action for declaratory relief is authorized under NMSA 1978, §§ 44-6-2 and 44-6-4.

### III. FACTUAL ALLEGATIONS

16. IPRA creates a foundation for open, functioning democracy. It is the public policy of this state, that all persons are entitled to the greatest possible information regarding the affairs of government and the official acts of public officers and employees. It is further the intent of the legislature, and it is declared to be the public policy of this state, that to provide persons with such information is an essential function of a representative government and an integral part of the routine duties of public officers and employees.

NMSA 1978, § 14-2-5.

17. IPRA broadly defines the records which the public may access: "all documents . . . that are used, created, received, maintained or held by or on behalf of any public body and relate to public business, whether or not the records are required by law to be created or maintained." NMSA 1978, § 14-2-6(G).

18. IPRA also broadly defines the organizations to which it applies to include "all advisory boards, commissions, agencies or entities created by the constitution or any branch of government that receives any public funding, including political subdivisions, special taxing districts, school districts and institutions of higher education." NMSA 1978, § 14-2-6(F).

19. Settlement agreements resulting from civil claims against a third-party private entity for conduct arising under a contract with a public entity to provide a public function, such as providing medical care to incarcerated persons, are subject to disclosure under IPRA.

20. On August 12, 2020, HRDC sent Centurion a records request “seeking all records of litigation against Centurion and/or its employees or agents where Centurion and/or its insurers paid \$1,000 or more to resolve claims against it” “from January 1, 2010 to the present.” The request stated that it was “directed where Centurion or any of its subsidiaries or affiliates provides inmate healthcare under a contract within the boundaries of New Mexico.” That letter is attached as Exhibit 1.

21. The records sought in this request are public records.

22. HRDC mailed its records request to the same address that Centurion provided in its contract with NMCD as the location to receive notice required by the contract: 1593 Spring Hill Road, Suite 600, Vienna, VA 22182.

23. The letter was sent by certified mail, a receipt for which is attached as Exhibit 2. USPS delivered the letter on August 15, 2020, at 12:39 PM. See Exhibit 2.

24. To date, Centurion has not responded to the August 12, 2020 records request.

25. On August 12, 2020, HRDC sent a request to NMCD for verdicts, settlements, and other records of litigation against Centurion and/or its employees or agents where Centurion and/or its insurers paid \$1,000 or more to resolve claims against it related to inmate healthcare services by Centurion or its subsidiaries within the boundaries of New Mexico. The records requested from the NMCD were a

subset of those requested from Centurion. The August 12, 2020 request to NMCD is attached as Exhibit 3.

26. On August 19, 2020, NMCD Deputy General Counsel Kevin L. Nault emailed a response to HRDC stating that NMCD “has no records responsive” to HRDC’s August 12, 2020 request. The email stated that NMCD forwarded the request to Centurion, who “declined to provide any records to NMCD in response.” The email indicated that HRDC’s request was considered closed. The August 19, 2020 NMCD email is attached as Exhibit 4 and copied below:

**RE: Public records request from the Human Rights Defense Center**

**Nault, Kevin, NMCD <Kevin.Nault@state.nm.us>**

Thu 8/20/2020 9:35 AM

**To:** FOIA General Mailbox <FOIA@humanrightsdefensecenter.org>

**Cc:** Dan Marshall <dmarshall@humanrightsdefensecenter.org>; Paul Wright <pwright@prisonlegalnews.org>; Eric Taylor <etaylor@humanrightsdefensecenter.org>; NMCD-IPRA <NMCD-IPRA@state.nm.us>

**Ms. Browne:**

The New Mexico Corrections Department has no records responsive to your request. Your request was forwarded to Centurion, but they declined to provide any records to NMCD in response.

The Department has responded to your request as we understand it, and it is now considered closed. Any denial herein is the responsibility of records custodian Kevin L. Nault.

Kevin L. Nault  
Deputy General Counsel  
New Mexico Corrections Department  
P.O. Box 27116  
Santa Fe, NM 87502  
4337 NM 14, Santa Fe  
(505) 827-8690

27. To date, Defendants have produced no records responsive to either IPRA requests.

**COUNT ONE:**

**VIOLATIONS OF THE INSPECTION OF PUBLIC RECORDS ACT**  
(Against All Defendants)

28. Plaintiff incorporates by reference the above allegations.

29. Defendants have violated IPRA as they have failed to produce public records requested by Plaintiff on August 12, 2020.

30. Plaintiff properly directed its IPRA records request to NMCD's public records custodian and to the address that Centurion designated for service in its contract with NMCD.

31. NMCD failed to provide records responsive to HRDC's August 12, 2020 request, which was properly directed at NMCD's records custodian.

32. NMCD acknowledged the request, did not claim that the records sought were not public records nor that the records were exempt from IPRA. Rather, NMCD claimed that another entity possessed the records and that such entity declined to provide them to NMCD. NMCD produced no responsive records.

33. By providing healthcare and related services to people incarcerated in NMCD prisons and county jails, Centurion performed public functions and thus records related to those services are "public records" as defined by IPRA.

34. Centurion has not provided any responsive documents nor acknowledged Plaintiff's request in any way.

35. If Defendants are relying on any exemptions as a basis for withholding records, then they have failed, when withholding documents responsive to the records requests, to issue a proper denial of the records requests.

36. Plaintiff has a right to recover damages, at up to \$100 per day per violation of each record Defendants failed to produce under Section 14-2-11(C) of the IPRA.

37. Plaintiff has a right to recover its costs and attorney's fees in pursuing this action under Section 14-2-12(D) of IPRA.

**COUNT TWO:**

**DECLARATORY RELIEF**  
(Against All Defendants)

38. Plaintiff incorporates by reference the above allegations.

39. There is an actual controversy between Plaintiff and Defendants whether Defendants' conduct, as alleged above, violates IPRA.

40. The law is clear that Centurion was performing a public function in providing inmate healthcare in New Mexico on behalf of NMCD and other government entities, and records created in that capacity are public records. Thus, Centurion had a clear legal duty to provide public records to Plaintiff.

41. The law is also clear that Kevin L. Nault, as NMCD records custodian, is responsible for NMCD's public records, even if the records are not in his actual physical custody and control.

42. Despite Defendants' legal duties to permit Plaintiff to inspect public records, no Defendant has complied with IPRA, produced any records, or properly denied such records.



43. Plaintiff is entitled to declaratory relief that Defendants have violated IPRA, and that Defendants must provide the requested records to Plaintiff.

**COUNT THREE:**

**INJUNCTIVE RELIEF AND MANDAMUS**  
(Against All Defendants)

44. Plaintiff incorporates by reference the above allegations.

45. Under NMSA 1978, § 14-2-12(B), Plaintiff is entitled to a writ of mandamus or injunction ordering Defendants comply with their mandatory, non-discretionary duties to produce all relevant public records responsive to Plaintiff's requests.

WHEREFORE, Plaintiff prays that the Court

1. declare that Defendants have violated IPRA in failing to respond to Plaintiff's records requests;
2. issue a writ of mandamus or injunction ordering Defendants to produce the records and information requested without further delay, and to produce all similar such records in the future; and,
3. enter an order for such other and further relief as the Court deems just and proper, including, but not limited to, damages, costs, and reasonable attorney's fees.

Respectfully submitted,

*/s/ Caroline "KC" Manierre*

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Mark H. Donatelli  
Caroline "KC" Manierre  
Rothstein Donatelli LLP  
P.O. Box 8180  
Santa Fe, NM 87504  
Tel: (505) 988-8004  
mhd@rothsteinlaw.com  
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-and-

Jesse W. Isom  
*Pro Hac Vice* application forthcoming  
Human Rights Defense Center  
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Lake Worth, FL 33460  
Tel: (561) 360-2523  
jwisom@humanrightsdefensecenter.org

*Attorneys for Plaintiff*



# Human Rights Defense Center

DEDICATED TO PROTECTING HUMAN RIGHTS

August 12, 2020

Centurion Managed Care  
Attn: Public Records Officer  
1593 Spring Hill Road, Suite 600  
Vienna, VA 22182

Sent via certified mail: 7020 1290 0000 2794 3121

**Re: Request for Settlement and Verdict Records**

To the Public Records Officer:

The Human Rights Defense Center (“HRDC”) makes this request pursuant to the New Mexico Inspection of Public Records Act, N.M. Stat. Ann. § 14-2-1, *et seq.* HRDC is a non-profit dedicated to advocacy and education around criminal justice issues. Among other activities, HRDC publishes the journals *Prison Legal News* and *Criminal Legal News*.

This request is directed where Centurion or any of its subsidiaries or affiliates provides inmate healthcare under a contract within the boundaries of New Mexico, in accordance with the recent changes to New Mexico’s public records law which affirm that private entities performing a public function for a public agency are subject to the Inspection of Public Records Act.

HRDC is seeking all records of litigation against Centurion and/or its employees or agents where Centurion and/or its insurers paid \$1,000 or more to resolve claims against it. These payments include but are not limited to settlements, damages, attorney fee awards, and sanctions, irrespective of the identity of the plaintiff or claimant. Specifically, HRDC requests the following records, provided in electronic native format where possible, and otherwise in electronic format:

1. Records, regardless of physical form or characteristics, sufficient to show for all claims or lawsuits brought against Centurion and/or any of its agents or employees in which payments totaling \$1,000 or more were disbursed from January 1, 2010 to the present:
  - The name of all parties involved;
  - The case or claim number;
  - The jurisdiction in which the case or claim was brought (*e.g.*, US District Court for the District of New Mexico, New Mexico Supreme Court, etc.);
  - The date of resolution;
  - The amount of money involved, if any, in the resolution and to whom it was paid,

2. For each case or claim detailed above:

- The complaint or claim form and any amended versions;
- The verdict form, final judgment, settlement agreement, consent decree, or other paper that resolved the case.

I request that the above-described public records be provided to me in electronic format if they exist in electronic format, pursuant to NMSA § 14-2-9(B). In the event that such documents are only available in hard copy format, I request an opportunity to inspect and copy the specific public records I select from the records identified above.

If this request encompasses information or records that Centurion claims are exempt from disclosure pursuant to any applicable statute or law, then please redact such information, as required by NMSA 1978, §14-2-1(B), from the document or record rather than withhold the entire document from disclosure. If you apply any redactions, please describe the redacted information and provide a basis for your claim that the redacted information is not subject to disclosure.

If you claim that any of the requested records are not a public record, or if you claim a privilege not to disclose any record, please describe the record(s) being withheld and state the basis for your claim of privilege or confidentiality. Please produce all public records for which you do not claim an exemption or privilege, as the above requests are segregable.

HRDC is a non-profit organization. These records are not for any profit-related or commercial purpose. Should there be any fees incurred related to the production of the public records I am requesting, I request a waiver of such fees.

Please respond to this records request within fifteen (15) days of receipt of same. Note that failure to respond to this records request within fifteen (15) days will be considered a denial of my public records request, and I will duly take appropriate action. If you need additional time in which to produce the requested records, please advise in writing so I may consider your request for an extension of time.

Please contact me if this request does not describe all of the above-requested documents with sufficient specificity for you to make a reasonable response, and I will attempt to reformulate the request in a manner that meets your requirements. If you are not the custodian of the records I am requesting, please promptly forward this request to the custodian of the requested records and notify me accordingly. Please contact me via email, [foia@humanrightsdefensecenter.org](mailto:foia@humanrightsdefensecenter.org), should you require any additional information.

Thank you for your time and attention in this matter.

HUMAN RIGHTS DEFENSE CENTER



Kathrine Browne  
Public Records Manager

7020 1290 0000 2794 3121

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a> ®.	
Vienna VA 22182	
<b>OFFICIAL USE</b>	
Certified Mail Fee	\$3.55
Extra Services & Fees (check box, add fee as appropriate)	\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.55
Total Postage and Fees	\$4.10
Sent To <u>Centurion Managed Care</u>	
Street and Apt. No., or PO Box No. <u>1593 Spring Hill Road, Suite 600</u>	
City, State, ZIP+4® <u>Vienna VA 22182</u>	
PS Form 3800, April 2015 P&N 7530-02-000-9047 See Reverse for Instructions	



**Certified Mail service provides the following benefits:**

- A receipt (this portion of the Certified Mail label).
  - A unique identifier for your mailpiece.
  - Electronic verification of delivery or attempted delivery.
  - A record of delivery (including the recipient's signature) that is retained by the Postal Service™ for a specified period.
- Important Reminders:**
- You may purchase Certified Mail service with First-Class Mail®, First-Class Package Service®, or Priority Mail® service.
  - Certified Mail service is *not* available for international mail.
  - Insurance coverage is *not* available for purchase with Certified Mail service. However, the purchase of Certified Mail service does not change the insurance coverage automatically included with certain Priority Mail items.
  - For an additional fee, and with a proper endorsement on the mailpiece, you may request the following services:
    - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a hardcopy return receipt or an electronic version. For a hardcopy return receipt, complete PS Form 3811, *Domestic Return Receipt*; attach PS Form 3811 to your mailpiece;
    - Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.
    - Adult signature service, which requires the signee to be at least 21 years of age (not available at retail).
    - Adult signature restricted delivery service, which requires the signee to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).
- To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office™ for postmarking. If you don't need a postmark on this Certified Mail receipt, detach the barcoded portion of this label, affix it to the mailpiece, apply appropriate postage, and deposit the mailpiece.
- IMPORTANT: Save this receipt for your records.**

PS Form 3800, April 2015 (Reverse) P&N 7530-02-000-9047

**EXHIBIT 2**

## Track Another Package +

**Tracking Number:** 70201290000027943121

Remove X

Your item was delivered to an individual at the address at 12:39 pm on August 15, 2020 in VIENNA, VA 22182.

### **Delivered, Left with Individual**

August 15, 2020 at 12:39 pm  
VIENNA, VA 22182

Feedback

Get Updates 

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**Text & Email Updates**



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**Tracking History**



**August 15, 2020, 12:39 pm**

Delivered, Left with Individual  
VIENNA, VA 22182

Your item was delivered to an individual at the address at 12:39 pm on August 15, 2020 in VIENNA, VA 22182.

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**August 15, 2020, 9:36 am**

Out for Delivery  
VIENNA, VA 22182

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**August 15, 2020, 9:25 am**

Arrived at Post Office

VIENNA, VA 22180

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**August 14, 2020, 11:56 pm**

Departed USPS Regional Destination Facility

MERRIFIELD VA DISTRIBUTION CENTER

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**August 14, 2020, 11:04 am**

Arrived at USPS Regional Destination Facility

MERRIFIELD VA DISTRIBUTION CENTER

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**August 13, 2020, 7:16 am**

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER

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**August 12, 2020, 6:52 pm**

Arrived at USPS Regional Origin Facility

SEATTLE WA DISTRIBUTION CENTER

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**August 12, 2020, 3:54 pm**

USPS in possession of item

SEATTLE, WA 98116

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Feedback

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**Product Information**



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**See Less**

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

**FAQs**

**Public records request from the Human Rights Defense Center****EXHIBIT 3**

FOIA General Mailbox &lt;FOIA@humanrightsdefensecenter.org&gt;

Wed 8/12/2020 10:04 AM

To: NMCD-IPRA@state.nm.us &lt;NMCD-IPRA@state.nm.us&gt;

Cc: Dan Marshall &lt;dmarshall@humanrightsdefensecenter.org&gt;; Paul Wright &lt;pwright@prisonlegalnews.org&gt;; Eric Taylor &lt;etaylor@humanrightsdefensecenter.org&gt;

 1 attachments (40 KB)

Centurion - HRDC NM - 8-12-20-Sent to NMCD.pdf;

**Attached, please find a public records request from the Human Rights Defense Center; the text of this request is duplicated in the body of this message.**

To Deputy General Counsel, Kevin Nault:

The Human Rights Defense Center (“HRDC”) makes this request pursuant to the New Mexico Inspection of Public Records Act, N.M. Stat. Ann. § 14-2-1, et seq. HRDC is a non-profit dedicated to advocacy and education around criminal justice issues. Among other activities, HRDC publishes the journals Prison Legal News and Criminal Legal News.

This request is directed where the New Mexico Corrections Department contracts Centurion or any of its subsidiaries or affiliates to provide inmate healthcare under a contract within the boundaries of New Mexico, in accordance with the recent changes to New Mexico’s public records law which affirm that private entities performing a public function for a public agency are subject to the Inspection of Public Records Act.

HRDC is seeking all records of litigation against Centurion and/or its employees or agents where Centurion and/or its insurers paid \$1,000 or more to resolve claims against it. These payments include but are not limited to settlements, damages, attorney fee awards, and sanctions, irrespective of the identity of the plaintiff or claimant. Specifically, HRDC requests the following records, provided in electronic native format where possible, and otherwise in electronic format:

1. Records, regardless of physical form or characteristics, sufficient to show for all claims or lawsuits brought against Centurion and/or any of its agents or employees in which payments totaling \$1,000 or more were disbursed from January 1, 2010 to the present:

- The name of all parties involved;
- The case or claim number;
- The jurisdiction in which the case or claim was brought (e.g., US District Court for the District of New Mexico, New Mexico Supreme Court, etc.);
- The date of resolution;
- The amount of money involved, if any, in the resolution and to whom it was paid,

2. For each case or claim detailed above:

- The complaint or claim form and any amended versions;
- The verdict form, final judgment, settlement agreement, consent decree, or other paper that resolved the case.



I request that the above-described public records be provided to me in electronic format if they exist in electronic format, pursuant to NMSA § 14-2-9(B). In the event that such documents are only available in hard copy format, I request an opportunity to inspect and copy the specific public records I select from the records identified above.

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Please respond to this records request within fifteen (15) days of receipt of same. Note that failure to respond to this records request within fifteen (15) days will be considered a denial of my public records request, and I will duly take appropriate action. If you need additional time in which to produce the requested records, please advise in writing so I may consider your request for an extension of time.

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Thank you for your time and attention in this matter.

## **Kathrine Browne**

*Public Records Manager  
Development Coordinator*

Human Rights Defense Center  
Prison Legal News  
509 Olive Way, Suite 855  
Seattle, WA 98101  
206-257-1355

**RE: Public records request from the Human Rights Defense Center**

Nault, Kevin, NMCD <Kevin.Nault@state.nm.us>

Thu 8/20/2020 9:35 AM

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Kevin L. Nault  
Deputy General Counsel  
New Mexico Corrections Department  
P.O. Box 27116  
Santa Fe, NM 87502  
4337 NM 14, Santa Fe  
(505) 827-8690

---

**From:** FOIA General Mailbox <FOIA@humanrightsdefensecenter.org>

**Sent:** Wednesday, August 12, 2020 11:05 AM

**To:** NMCD-IPRA <NMCD-IPRA@state.nm.us>

**Cc:** Dan Marshall <dmarshall@humanrightsdefensecenter.org>; Paul Wright <pwright@prisonlegalnews.org>; Eric Taylor <etaylor@humanrightsdefensecenter.org>

**Subject:** [EXT] Public records request from the Human Rights Defense Center

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HRDC is a non-profit organization. These records are not for any profit-related or commercial purpose. Should there be any fees incurred related to the production of the public records I am requesting, I request a waiver of such fees.

Please respond to this records request within fifteen (15) days of receipt of same. Note that failure to respond to this records request within fifteen (15) days will be considered a denial of my public records request, and I will duly take appropriate action. If you need additional time in which to produce the requested records, please advise in writing so I may consider your request for an extension of time.

Please contact me if this request does not describe all of the above-requested documents with sufficient specificity for you to make a reasonable response, and I will attempt to reformulate the request in a manner that meets your requirements. If you are not the custodian of the records I am requesting,

please promptly forward this request to the custodian of the requested records and notify me accordingly. Please contact me via email, [foia@humanrightsdefensecenter.org](mailto:foia@humanrightsdefensecenter.org), should you require any additional information.

Thank you for your time and attention in this matter.

**Kathrine Browne**

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Development Coordinator*

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