

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

-----X  
ATOMIC SAFETY AND LICENSING BOARD  
BEFORE ADMINISTRATIVE JUDGES:

JAMES P. GLEASON, CHAIRMAN  
FREDERICK J. SHON  
DR. OSCAR H. PARIS

In the Matter of:

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
(Indian Point, Unit No. 3)

POWER AUTHORITY OF THE STATE OF NEW YORK  
(Indian Point, Unit No. 3)

-----X  
Ossining Public Library  
Croton Avenue  
Ossining, N.Y.

March 10, 1983  
6:00 p.m.

DEPOSITION OF JUDITH GLASS, taken pursuant  
to Stipulation by and between counsel for the  
respective parties herein.

Reporter: Leslie M.  
Arzoomanian

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## A P P E A R A N C E S :

SHEA & GOULD, ESQS.  
Attorneys for Consolidated Edison  
Company of New York, Inc.  
330 Madison Avenue  
New York, New York 10017  
BY: DAVID H. PIKUS, ESQ.,  
of Counsel

AMANDA POTTERFIELD, ESQ.  
Attorney for Intervenors Jointly,  
NYPIRG/UCS  
New York Public Interest Research  
Group, Inc.  
9 Murray Street  
New York, New York 10007

Also Present: Pat Posner, PCAIP  
Joan Holt, NYPIRG

oOo

MS. POTTERFIELD: This deposition is  
taken by agreement of counsel for the Power Authority,  
Con Edison and the Nuclear Regulatory Staff.

This deposition is taken on the condition  
that the testimony that is given by Miss Glass during  
this deposition will be stipulated into evidence as  
testimony as though it were given before the Atomic  
Safety and Licensing Board in this proceeding.

Otherwise, the deposition is taken for  
the purpose of determining whether a stipulation can

1  
2 be reached among the parties to eliminate the  
3 testimony of the following witnesses: Loretta  
4 Brundage, Lynn Gunzenhauser, Michael Robinson,  
5 Joan Livingston, Phyllis Mendelsohn and Katherine  
6 Feit, with the stipulation that the cross-examination  
7 of these witnesses will be the same as the cross-  
8 examination of Miss Glass.

9  
10 oOo

11 J U D I T H G L A S S, 44 Coachlight Square,  
12 Montrose, New York, having been first duly sworn  
13 by Leslie M. Arzoomanian, a Notary Public of the  
14 State of New York, was examined and testified as  
15 follows:

16 MS. POTTERFIELD: You have been sworn  
17 and you have given us your name and address?

18 THE WITNESS: Yes.

19 MS. POTTERFIELD: Do you have before you  
20 the testimony that you wish to submit before the  
21 Atomic Safety and Licensing Board in this proceeding?

22 THE WITNESS: Yes.

23 MS. POTTERFIELD: Did you prepare that  
24 testimony yourself?

25 THE WITNESS: Yes, I did.

MS. POTTERFIELD: Do you have any additions or corrections to that testimony?

THE WITNESS: No.

MS. POTTERFIELD: Is it true and correct to the best of your information and belief?

THE WITNESS: Yes, it is.

MS. POTTERFIELD: I move that this testimony be marked as an exhibit, Glass Exhibit 1, for this deposition at this time.

MR. PIKUS: I have no objection and would stipulate to the admissibility of the exhibit marked as Glass Exhibit 1 at the hearing, in the event that we are unable to agree on a stipulation that would involve other witnesses, and provided that the deposition transcript could be read into the record in lieu of cross-examination.

(Testimony of Judith Glass, dated June 1, 1982, consisting of two pages, with Judith Glass' signature appearing thereon, received and marked as Glass Exhibit 1 for identification.)

EXAMINATION BY

MR. PIKUS:

Q Ms. Glass, turning your attention to what was just marked as Glass Exhibit 1. Do you have any changes

1  
2 that you could make to the testimony as a result of the  
3 interval of approximately eight months since the time  
4 it was filed?

5 A No.

6 Q Are you aware of any changes in the Emergency  
7 Planning for Westchester County that might make some of  
8 the material contained in your testimony outmoded or  
9 irrelevant?

10 A Not to my knowledge.

11 Q Do you have any children of your own?

12 A Yes; one daughter.

13 Q How old is she?

14 A Nine.

15 Q Where do you live?

16 A I live in Montrose, New York.

17 Q I take it your testimony is limited to the  
18 students for whom you are responsible?

19 A Well, it wrote it as a teacher. However, a  
20 lot of what I feel has to do with being a parent as well  
21 in this given situation.

22 Q Nothing in your testimony, marked as Glass  
23 Exhibit 1, however directly addresses the problem that  
24 your own child might face in an emergency; is that correct?

25 A That's correct.

1  
2 Q Ms. Glass, I am going to show you a copy  
3 of a document entitled "Indian Point, Emergency Planning,  
4 And You."

5 MR. PIKUS: I would ask the Reporter  
6 to mark this as Glass Exhibit 2.

7 (Booklet entitled "Indian Point,  
8 Emergency Planning And You," received and marked  
9 Glass Exhibit 2 for identification.)

10 Q Ms. Glass, have you ever seen the document  
11 marked Glass Exhibit 2 before this evening?

12 A No.

13 Q Do you recall ever having received an  
14 emergency planning brochure in the mail?

15 A No.

16 Q Have you ever discussed the subject of  
17 emergency planning for Indian Point with your students?

18 A No.

19 Q Have any of your students ever expressed  
20 concern to you about the operation of the Indian Point  
21 Power Plants?

22 A No. They're very young. They're in nursery  
23 school. They're three-year olds.

24 Q Approximately how many students are you  
25 responsible for?

1  
2 A Thirteen.

3 Q I take it that they all have parents?

4 A Yes.

5 Q How do they generally arrive at school in  
6 the morning?

7 A Generally, by individual parents or car pool.

8 Q I take it that the persons who drive in the  
9 car pool are other parents?

10 A Yes.

11 Q Are they picked up to leave school in the  
12 same manner?

13 A Not necessarily. Sometimes they are picked up  
14 by babysitters.

15 Q These are all people who have automobiles?

16 A Yes.

17 Q Have you made any attempt to obtain any  
18 information that you believe is necessary to be better  
19 prepared to respond to a possible radiological emergency  
20 at Indian Point?

21 A Not outside of my testimony, which I hoped  
22 would be the source of my receiving some information.

23 Q I take it then by filing your testimony, you  
24 believed somebody would read your testimony and then contact  
25 you in order to address your concerns?

1  
2 A If not personally, then generally. But, no,  
3 I haven't otherwise.

4 Q Could you tell us what your understanding is  
5 of the proceeding for which you filed this particular  
6 piece of testimony, marked Glass Exhibit 1?

7 A How it came about?

8 Q Yes; how you came to file this particular  
9 piece of testimony and in what connection you believe  
10 this testimony is going to be used.

11 Q As a nursery school teacher, I was approached,  
12 as were the other teachers in my school, and we were asked  
13 to prepare testimonies. First we were asked how we felt  
14 about the drill last year and then we were asked to prepare  
15 testimonies according to how we felt as teachers.

16 Q Who asked you to prepare this testimony?

17 A A woman from Croton who was a parent at the  
18 nursery school as well.

19 Q Would you be able to identify this woman?

20 A Agata Craig.

21 Q Did you know Ms. Craig before she approached  
22 you in connection with the testimony?

23 A Yes, because her son was one of my students.

24 Q Did Ms. Craig indicate to you that she  
25 represented any particular organization?



1  
2 A Parents Concerned About Indian Point.

3 Q Did you understand at that time that they  
4 had a particular position on the operation of the Indian  
5 Point Plant?

6 A Yes.

7 Q What did you understand that position to be?

8 A A negative one.

9 Q In fact, their position was that the Plant  
10 should be shut down; is that correct?

11 A Yes; I understood that.

12 Q Did they make any effort to educate you as  
13 to what the content of the Emergency Planning for the Indian  
14 Point area was?

15 A Would you rephrase that?

16 Q At the time that Ms. Craig approached you  
17 to prepare your testimony, did she give you any information  
18 concerning what was the content of the Emergency Planning  
19 for the Indian Point area?

20 A No, she didn't. She gave me no other  
21 information other than what I had read or been prepared  
22 for by the Local.

23 Q Did Ms. Craig advise you in any way as to  
24 the source of the risk posed by the Indian Point Power  
25 Plants, more specifically, how a radiological emergency

1  
2 might occur there?

3 A No. The conversation leading up to my  
4 testimony only had to do with how I felt about the  
5 evacuation.

6 Q Do you recall exactly what Ms. Craig said  
7 to you?

8 A She was asking all the teachers to write  
9 testimonies because all the general feelings seemed to  
10 be the same, that we couldn't hear the sirens, first of  
11 all, and second of all and more importantly, the fact  
12 that it was so terribly confusing, as was stated. The  
13 plans were confusing, both as a teacher and as a parent.

14 Q I'm a little confused, Ms. Glass. You have  
15 indicated that you didn't know the content of the Plan,  
16 but you're telling me that the Plan was confusing. Could  
17 you explain that to me?

18 A You mean did I know they were supposed to go  
19 to specific areas in White Plains, to be at this particular  
20 school if you were from that district?

21 Q Yes.

22 A Yes; I had a vague idea. That was the most I  
23 had. I knew that there was a lot of content, but I would  
24 not be specific about it. I didn't understand it.

25 Q From where did you get the information?

1  
2 A I can't exactly remember. I think there was  
3 a leaflet or was it in the newspaper? I don't know.  
4 I know we had a meeting at the nursery school and we  
5 were given material, the information, through this and  
6 there was something printed, which I no longer have.

7 Q Do you recall who met with you?

8 A It was mostly teachers and parents in the  
9 nursery school. It was not any kind of group.

10 Q Who explained the content of the Plan to you?

11 A The director of my nursery school at the time,  
12 from what her understanding was.

13 Q Would you tell us your best recollection of  
14 what the director told you?

15 A Just that these were the supposed plans.  
16 This is what we were supposed to do in case of an accident,  
17 and everybody was thoroughly confused.

18 Q What did she tell you to do?

19 A We were supposed to go to some specific school  
20 in White Plains.

21 Q Do you recall what the name of the school was?

22 A No; I really don't know.

23 Q Were you to accompany your children there?

24 A This was a tremendous issue. Nobody got that  
25 far because we began discussing the fact that we had other

1  
2 children someplace else and were we really prepared to  
3 take these tiny little children to a place so completely  
4 unknown to them. We didn't discuss it as if we were  
5 really going to do it.

6 Q Did you express your desire for further  
7 information to the director?

8 A Yes.

9 Q What was the director's response?

10 A She agreed.

11 Q Do you know whether the director attempted  
12 to obtain further information?

13 A I don't know exactly. She was on the verge  
14 of resigning. She may be for her own information at  
15 that point; but I don't really know.

16 Q Is she still the director?

17 A No.

18 Q You have a new director?

19 A Yes.

20 Q Has the new director provided you with any  
21 additional information about the Emergency Plan?

22 A She hasn't provided us with any further  
23 information. She has received some sort of radio.

24 Q If I called it a tone alert, would it be  
25 accurate?

1  
2           A       That name doesn't ring a bell. It also gives  
3 storm warnings.

4           Q       Is it fair to say that it is a radio that  
5 activates itself in the event that there is some sort  
6 of emergency?

7           A       All I know is that when she knew that  
8 yesterday there was going to be another--that the sirens  
9 were going off, she did not plug it in because she said  
10 that it was too loud. So, I guess if it's not plugged  
11 in, it's not self-activated. I don't know. I really  
12 don't know.

13          Q       Do you know whether it was the operators  
14 of the Indian Point Power Plant who provided this device  
15 for you?

16          A       As a matter of fact, I just want to say that  
17 I'm not positive of this. I think that an employee who  
18 might be a parent or a parent who might be an employee at  
19 Con Edison gave the radio to the present director.

20          Q       Do you know what the original source of your  
21 former director's information concerning the Emergency  
22 Plan was?

23          A       I guess the same as all of us; the news and  
24 just what was made available to the public.

25          Q       It is your testimony that the director either

1  
2 read about this in the newspaper or heard it on the radio  
3 and then decided to hold a meeting with the teachers--

4 A Yes.

5 Q --and then instructed you about the Plan?

6 A Yes.

7 Q Did the director tell you this or are you  
8 simply inferring that this is what happened?

9 A I'm inferring, only because I know she is  
10 not associated with any particular group and she was  
11 simply very concerned for the welfare of the people in  
12 her school.

13 Q Did the director tell you that she had met  
14 with anyone from the firm Parsons, Brinckerhoff, Quade &  
15 Douglas?

16 A No.

17 Q Did she indicate to you that there was a  
18 consulting firm that was in the process of preparing  
19 emergency plans for the four counties surrounding Indian  
20 Point?

21 A It sounds familiar, but this is a year ago.  
22 I knew that there were further investigations being made  
23 to find out, but I'm not really that clear.

24 Q Did your former director ever mention anyone  
25 by the name of Harvey Harth?

1  
2 A No, not to my knowledge. I've never heard  
3 of him.

4 Q Have you ever heard of any organization known  
5 as the Four County Nuclear Safety Committee?

6 A No.

7 Q Have you ever heard of a consulting firm by  
8 the name of E.D.S. Nuclear?

9 A No.

10 Q Have you ever heard of a gentleman by the  
11 name of Dennis Behr?

12 A No.

13 Q Have you ever heard of a woman by the name  
14 of Peggy Rosenblatt?

15 A No.

16 Q Subsequent to your conversation with Ms. Craig,  
17 did you make any further attempts to obtain information  
18 about emergency planning for Indian Point?

19 A No, I didn't.

20 Q Are you aware that there is a toll-free  
21 number for people who desire further information about  
22 Indian Point to call in order to obtain further information?

23 A No.

24 Q Did you ever learn that there were various  
25 groups, such as Parents Concerned About Indian Point, who



1  
2 were conducting activities in the Indian Point area  
3 concerning emergency planning for the Indian Point Plant?

4 A Did I know that they were conducting activities?

5 Q Yes.

6 A No. I know of the existence of the group,  
7 but I don't keep up with what they're doing all the time.

8 Q I take it then that you did not ask anyone  
9 associated with any of these groups that were supporting  
10 the closing of Indian Point where you might be able to  
11 obtain further information?

12 MS. POTTERFIELD: I have to object to  
13 the characterization of "these groups." We have  
14 only talked about Parents Concerned About Indian  
15 Point.

16 MR. PIKUS: The objection is well-taken.  
17 Let me see if I can cure the objection.

18 Q Are you aware that there are other groups  
19 besides Parents Concerned About Indian Point who have  
20 been conducting activities in the Indian Point area to  
21 the end of obtaining the closing of the Indian Point  
22 Plants?

23 A Well, I know about it because it's always on  
24 the news, or at least often.

25 Q Can you identify any other groups, other than



## Parents Concerned About Indian Point?

A By name?

Q Yes.

A No.

Q Have you made any attempt to obtain information from Parents Concerned About Indian Point or anyone associated with any of the other groups about the Emergency Plan for Indian Point?

A Not really.

Q Have you attempted to contact the Power Authority of the State of New York for further information?

A No, I haven't. I suppose that I'm waiting to hear about what's going to happen after next week. You know, everything is sort of on hold. So I haven't.

Q Would it be fair to say that you filed your testimony and are now waiting for the results of the hearings being conducted by the Atomic Safety and Licensing Board before further pursuing your quest for information?

A I don't know if that would be a fair statement. I'm not just waiting to see what the results will be. It is just that I'm not terribly active in the situation. Yes, I want to know, but I guess like most people, my daily life takes up the time and I haven't taken the time to find out, which makes me feel guilty.

1  
2 Q Ms. Glass, you referred a few minutes ago  
3 to a parent of one of your students who was an employee  
4 of Con Edison, did you not?

5 A Yes.

6 Q Have you attempted to obtain any information  
7 about Indian Point or the emergency planning for Indian  
8 Point from that particular parent?

9 A No.

10 Q Very early on in the deposition you referred  
11 to an emergency drill. Were you referring to the  
12 emergency exercise that was conducted in March of 1982?

13 A Yes.

14 Q Are you aware that there was another exercise  
15 held on March 9th, 1983, which would be yesterday, for  
16 the Indian Point Plants?

17 A Yes.

18 Q Did you hear the sirens at that time?

19 A Yes, I did.

20 Q Did your children hear the sirens?

21 A They were too noisy to hear them. They  
22 really didn't notice them.

23 Q What type of information would you like to  
24 have concerning the Emergency Plan for Indian Point?

25 A It's hard to say, because I feel very, very

1  
2 conflicted as far as my position as a teacher and a  
3 parent is concerned. Despite what they might say to do,  
4 I'm not sure that I would, in all good faith, be able to  
5 do it.

6 Q By "they," who are you referring to?

7 A The people who make up the Plan.

8 Q Are you aware that the Plan is now maintained  
9 by the State of New York, the State Government?

10 A Yes.

11 Q Have you made any attempt to contact the  
12 State Government of New York concerning the Plan?

13 A No.

14 Q Have you made any attempt to contact anybody  
15 working for Westchester County concerning the Plan?

16 A No.

17 Q Would you like information concerning the  
18 operation of the Indian Point Plants, the actual manner  
19 in which it produces electricity and the probability of  
20 any kind of an accident occurring there?

21 A Well, I get that included in my bill every  
22 month, the little leaflet.

23 Q I take it there's nothing in the bill that  
24 refers to the Emergency Plan?

25 A No.

1  
2 Q Is there any specific information that  
3 would be helpful to you in terms of assisting yourself  
4 and your students to respond in the event that there  
5 were a radiological emergency, if you know?

6 A It's very hard to say. There are too many  
7 elements involved.

8 Q Do you believe that there are other types  
9 of emergencies that would require you or your students  
10 to make some sort of response?

11 A Sure.

12 Q Could you tell us what types of emergencies  
13 you might be referring to?

14 A Fire. That's the main one I can think of.

15 Q Does your school have a plan for responding  
16 to a fire?

17 A Yes.

18 Q Could you tell us briefly what that plan  
19 consists of?

20 A We don't do fire drills in nursery school,  
21 but we have a fire exit upstairs and three possible exits  
22 downstairs. So it's all taken care of. The teachers  
23 know what they would do.

24 Q I take it that you would lead the students  
25 out of the building by predesignated fire exits, if

1  
2 necessary?

3 A Yes.

4 Q Is it your belief that the children would  
5 respond to whatever instructions you would give them?

6 A It's my hope. I think they would respond  
7 to what I tell them.

8 Q Are you aware that a chemical spill would  
9 also require the evacuation of an area that might include  
10 your school?

11 A Do you mean a chemical spill from a factory?

12 Q Are you aware that there have been occasions  
13 in the past in which large areas have been evacuated in  
14 parts of the United States, Canada or elsewhere because  
15 of a spill involving toxic chemicals; for example, a  
16 railroad car derailment that resulted in leaking gas?

17 A Yes.

18 MS. POTTERFIELD: I think I have to  
19 note an objection to the extent that it assumed  
20 that there were large areas evacuated. I think it  
21 is a little bit vague. The witness has answered.  
22 I will just note my objection.

23 Q Let's say that the area might approximate  
24 a square mile or so and would require the evacuation of  
25 at least several hundred people.

1  
2 A Yes, I am aware that those possibilities  
3 exist and I often wonder when I hear about them what the  
4 people decided to do.

5 Q Your school has no plan other than for a  
6 fire; is that correct? That is in terms of responding  
7 to emergencies.

8 A I would have to say that's probably right.

9 Q You are not aware of any plan other than  
10 that for fire?

11 A No.

12 Q In the event that you were required to  
13 evacuate your school and move you and your students out  
14 of the distance of ten miles, how would you go about  
15 doing it?

16 A Well, I think that the very first thing we  
17 would do would be to call the parents or the emergency  
18 numbers because these are little people we are dealing  
19 with and my first concern would be that their parents  
20 would want to know where they are. It would be basically  
21 the same thing.

22 Q If you were given a set of instructions, either  
23 by written or oral briefing, from government officials  
24 or utility operators at Indian Point, would you attempt  
25 to follow that plan in the event that there were a radio-

1  
2 logical emergency?

3 A Personally? If I were one person alone,  
4 not responsible for thirteen little people?

5 Q Assuming that you are a teacher responsible  
6 for your children.

7 A I would try to follow the directions, assuming  
8 that they would be with the ultimate safety in mind.  
9 But if it meant taking all these people to different  
10 places away from their parents and not being near my  
11 daughter, I don't know how I could comfortably do it.  
12 I don't think that I would be able to do it. I would  
13 have to follow my own instincts and those of the other  
14 teachers with me.

15 Q If the plan also included provisions for the  
16 safety of your own child, and I am speaking of your  
17 daughter, would that affect your response?

18 A I would like to have her with me when I go  
19 with these other children, as I'm sure their parents  
20 would like to be with them.

21 Q If there were a provision in the plan that  
22 provided for some response that would assure the safety  
23 of your child and a response that would involve you  
24 leading your students to safety, would you follow that  
25 plan?



MS. POTTERFIELD: I object. That question has been answered as best she can. I think it might be too vague for another answer, since the hypothetical we are dealing with is an assurance of safety. I think it has to be more specific.

A I find that's what the problem is, because I'm sure ultimately we would all be safe, hopefully. But there are too many sacrifices that the Plan involves as it presently stands.

Q Is your daughter in school?

A Yes.

Q How old is she?

A Nine.

Q Is she in public school?

A Yes.

Q Is it your belief that the public school that she attends has a fire plan?

A Yes.

Q Along the lines of the plan that we discussed for your own school?

A Yes.

Q Do you believe that that plan adequately protects your daughter in the event that there would be a



1  
2 fire at the school?

3 A Yes.

4 MR. PIKUS: I have no further questions.

5 MS. POTTERFIELD: I have a few questions.

6 EXAMINATION BY

7 MS. POTTERFIELD:

8 Q You were asked by Mr. Pikus about any changes  
9 in the Plan that you had become aware of since you first  
10 wrote your testimony. Do you have any present knowledge  
11 of any potential changes in the Plan?

12 A About the possibility of a change?

13 Q Yes.

14 A I've heard, but I don't know what it is.

15 Q Where did you hear of this?

16 A I don't read the local newspaper. I'm not  
17 sure if I saw it. Sometimes I see the articles and  
18 sometimes I hear. I'm not that sure.

19 Q You haven't received any information about  
20 the change, have you?

21 A No, not to my mailbox.

22 Q Have you received any information at school?

23 A No.

24 Q You were asked and you testified about your  
25 inability to hear the sirens very well last year during

1  
2 the drill. Were you in the same location last year in  
3 March during the drill as you were yesterday during  
4 yesterday's drill?

5 A No. But last year I was in a location that  
6 was actually closer to the source of the siren.

7 Q Where were you this year?

8 A This year I was at Croton Community Nursery  
9 School.

10 Q Last year where were you?

11 A Holy Name of Mary in Croton.

12 Q You testified that your director of the  
13 Croton Community Nursery School was aware that a drill  
14 was to take place yesterday; is that right?

15 A Yes.

16 Q Did she instruct the teachers about that drill  
17 or did she inform you that it would take place?

18 A She informed us.

19 Q Did she give you any instructions?

20 A No.

21 Q Do you know where she learned or how she  
22 learned that a drill was to take place yesterday?

23 A I don't know where she learned it. I heard  
24 it on the radio.

25 Q You testified that you had not ever received

a booklet such as the one that was shown to you that has been marked as Glass Exhibit 2; is that correct?

A Yes.

Q You never received that at home?

A No.

Q Your home address is where in relation to your working address?

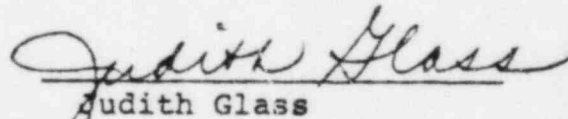
A A few minutes north.

Q Is it closer or farther away from the Indian Point Nuclear Plant?

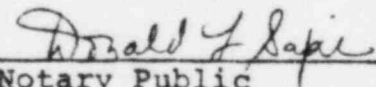
A It's much closer.

MS. POTTERFIELD: I have no further questions.

(At which time the deposition of Judith Glass was concluded. Time noted: 7:00 p.m.)

  
Judith Glass

Sworn and subscribed to before me  
this 21st day of March, 1983.

  
Notary Public

DONALD L. SAPIR  
Notary Public, State of New York  
No. 60-4629849 (476693)  
Qualified in Westchester County  
Commission Expires March 30, 1984

## C E R T I F I C A T I O N :

I, Leslie M. Arzoomanian, a Stenotype Reporter and Notary Public within and for the State of New York, do hereby certify that the witness whose testimony is hereinbefore set forth is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

Leslie M. Arzoomanian  
Leslie M. Arzoomanian

Dated: March 14, 1983