DEPARTMENT OF STATE

BOARD OF APPELLATE REVIEW

IN THE MATTER OF: J[redacted] K[redacted]

This case comes before the Board of Appellate Review on the appeal of J[redacted] K[redacted] from an administrative determination of the Department of State that he expatriated himself on October 2, 1957 under the provisions of section 349(a)(1) of the Immigration and Nationality Act by obtaining naturalization in the Philippines upon his own application. 1/

The Department determined on February 10, 1976 that appellant expatriated himself. The appeal was entered on September 21, 1984. Since it is our conclusion that the appeal was not entered within the limitation prescribed by the applicable federal regulations, we dismiss it for lack of jurisdiction.

I

Appellant was born at [redacted], [redacted]. His father was an American citizen; his mother, a citizen of the Philippines. Appellant thus acquired United States citizenship under section 1993 of the revised statutes of the United States.

1/ Section 349(a)(1) of the Immigration and Nationality Act, 8 U.S.C. 1481(a)(1), reads:

> Sec. 349. (a) From and after the effective date of this Act a person who is a national of the United States whether by birth or naturalization, shall lose his nationality by --
>
> (1) obtaining naturalization in a foreign state upon his own application, . . .

On October 2, 1957 appellant elected Philippine citizenship at the place of his birth. 2/ He executed an instrument of election in which he stated that having reached the age of 21, "I do hereby elect Philippine citizenship...." He declared that his father was a citizen of the United States and his mother a citizen of the Philippines. He also executed an oath of allegiance which read as follows:

> I, J[redacted] K[redacted], solemnly swear that I renounce absolutely and forever all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty, and particularly to the United States of America, of which my father is a citizen; that I will support and defend the Constitution of the Philippines; that I will obey the laws, legal orders and decrees promulgated by the duly constituted authorities of the Republic of the Philippines; that I recognize and accept the supreme authority of the Philippines and will maintain true faith and allegiance thereto; and that I impose this obligation upon myself voluntarily without mental reservation or purpose of evasion.

2/ Section 1(4) of Article 4 of the Philippines Constitution of February 8, 1935, as amended, provides that:

> Section 1. The following are citizens of the Philippines:
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> - - -
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> (4) Those whose mothers are citizens of the Philippines and, upon reaching the age of majority, elect Philippine citizenship.

Appellant was a university student at the time. In the following years he was employed by a number of American companies operating in the Philippines. He was Public Relations Officer, Office of the Mayor, Caloocan City from 1968 to 1969, and from 1969 to 1971 a Municipal Councillor in Caloocan City. Since 1971 he has held positions with various American companies, and for the past eight years has been Industrial Relations Director, Wyeth-Suaco Laboratories in the Philippines.

In June 1974 K[redacted] applied at the United States Embassy, Manila for registration as a United States citizen and issuance of a passport. He established to the satisfaction of the Embassy a claim to United States citizenship through his father, who was naturalized in 1913 and, appellant states, went to the Philippines with the United States Army Corps of Engineer during World War I. K[redacted] also submitted certified true copies (dated July 16, 1962) of the instrument of his 1957 election of Philippine citizenship and oath of allegiance.

He completed a questionnaire to facilitate determination of his citizenship status and submitted an affidavit. In the questionnaire he stated that he elected Philippine citizenship in order to please his mother. In the affidavit he stated in part as follows:

> 2. That on September 23, 1973 I wrote the U.S. Embassy to inquire into my citizenship status informing them that my father A[redacted] K[redacted] was a naturalized U.S. citizen and that in answer to this letter they have asked me to inquire from the U.S. Department of Justice Immigration and Naturalization Service, Washington, D.C. which I complied with immediately.
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> 3. That sometime in May 1974, I received a reply from the U.S. Immigration and Naturalization Service indicating clearly and conclusively that my late father A[redacted] K[redacted] was an American citizen.
>
> 4. That as a result of this, I filed an application for registration in the U.S. E[redacted], M[redacted], as an American citizen.
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> 5. That in October 1957, I, together, with my other brothers and sisters, made an election of Philippine citizenship for the reason that we did not want to be stateless at that time since we were not

in possession of any document conclusively showing the citizenship of my father.

6. That it was for this reason why I made the election, as was my elder brothers and sisters did.

7. That as far as I know it was only when I made the inquiry from the U.S. Immigration and Naturalization Service and, after they responded to me that I came to fully know that my father was in fact an American citizen.

8. That at the time I elected Philippine citizenship in October 1957 I do not know whether I have claim to American citizenship since I have no evidence to show that I am one, and that I would like to state clearly without the least reservation that if only I was sure of my father's citizenship at that time I would not have made the election.

In submitting the appellant's case to the Department on July 23, 1974, the Embassy reported in part as follows:

The Embassy does not believe the allegation that J[redacted] K[redacted] was not aware of his claim to United States citizenship. The instrument he executed electing Philippine citizenship on October 2, 1957 shows he knew his father was a United States citizen in 1957, and contains a renunciation on Jacob K[redacted]'s part not only general in nature with regard to other allegiances but also a specific renunciation of any allegiance to the United States. This, therefore, and despite his claim that he and his brothers and sisters were not previously in possession of any document showing their father was a U.S. citizen tends to negate his allegation that he was not aware of his possible claim to United States citizenship.

> Since it is believed that J[redacted] K[redacted] would not willingly execute an affidavit of expatriated person, a Certificate of Loss of Nationality has been prepared and is transmitted herewith.

The Department informed the Embassy in September **1974** that it agreed with the Embassy's opinion that K[redacted] contention he was unaware in **1957** of his claim to United States citizenship was unfounded. The Department stated that the file of appellant's father showed that his children were included in a passport issued to him in **1941,** and that it was unlikely appellant would have had no knowledge of his citizenship until he received evidence of his father's naturalization in **1974.**

The Department was not, however, prepared at that time to act on the certificate of loss of nationality the Embassy had prepared, and it instructed the Embassy in November **1974** to obtain official confirmation that K[redacted] had elected Philippine citizenship.

On January 10, **1975** the Office of the Local Civil Registrar of the Muncipality of Plaridel, Province of Bulacan informed the Embassy as follows:

> In reply to your request letter relative to the claim to United States citizenship of Mr. J[redacted] K[redacted], I regret to inform you that this Office has no record as to whether the subject person had ever elected Philippine citizenship or had acquired so, through such election. Mr. Romeo E. Adriano, the former Assistant Local Civil Registrar in the year **1957** informed us that Mr. [redacted] K[redacted] filed with him the papers f r e of Philippine citizenship at that time when he reached the age of 21 years and such records may have been lost or destroyed by white ants.
>
> I can further mention that Mr. [redacted] is an American by birth as shown in the Register of BIRTHS filed in this Office.

On December 12, 1975 the Department sent the following communication to the Embassy:

> It is the Department's understanding that under the provisions of the Commonwealth Act No. 625, (providing for the manner in which the option to elect Philippine citizenship shall be declared by a person whose mother is a Filipino citizen), the option "Shall be expressed in a statement to be signed and sworn by the party concerned before any officer authorized to administer oaths and shall be filed with the nearest civil registry." Mr. K[redacted] has presented documentary evidence of his act of election of Philippine citizenship on October 2, 1957 in the form of certified true copies issued on July 16, 1962 under the raised seal of the office of Romeo M. Del Rosario, the Assistant Local Civil Registrar at Plaridel, Bulacan. The documents were issued "for all legal intents and purposes." The Department considers that they constitute official confirmation of the act of election done by Mr. K[redacted] in accordance with Philippine laws.

As instructed by the Department and in accordance with the provisions of section 358 of the Immigration and Nationality Act, the Embassy executed a new certificate of loss of nationality in K[redacted]'s name on January 5, 1976. 3/

3/ Section 358 of the Immigration and Nationality Act, 8 U.S.C. 1501, reads:

Sec. 358. Whenever a diplomatic or consular officer of the United States has reason to believe that a person while in a foreign state has lost his United States nationality under any provision of chapter 3 of this title, or under any provision of chapter IV of the Nationality Act of 1940, as amended, he shall certify the facts upon which such belief is based to the Department of State, in writing, under regulations prescribed by the Secretary of State. If the report of the diplomatic or consular officer is approved by the Secretary of State, a copy of the certificate shall be forwarded to the Attorney General, for his information, and the diplomatic or consular office in which the report was made shall be directed to forward a copy of the certificate to the person to whom it relates.

The Embassy certified that appellant acquired United States nationality by birth in the Philippines to a naturalized American citizen father; that he acquired the nationality of the Philippines by virtue of his election of that citizenship; that he obtained naturalization in the Philippines on October 2, **1957** upon his **own** application; and thereby expatriated himself under the provisions of section 349(a)(1) of the Immigration and Nationality Act.

The Department approved the certificate of loss of nationality on February 10, **1976.** 4/ Approval **of** the certificate constitutes an administrative determination of loss of nationality from which a timely and properly filed appeal may be taken to the Board of Appellate Review. A copy of the approved certificate was sent to the Embassy to be forwarded to appellant who concedes that he duly received it.

On August **7, 1978** appellant addressed a letter to the consular officer at the Embassy who processed his citizenship case **1974-1976.** The letter read as follows:

4/ The record contains no evidence that either the Embassy or the Department specifically examined the issue of appellant's intent when he elected Philippine citizenship or the voluntariness of his action. However, in its memorandum of January 28, **1985** the Department stated that based on the evidence, it had concluded that K[redacted] intended to relinquish his claim to United States citizenship.

The Department added that it saw nothing in the record that would cause it to question that conclusion.

It is over 2 years now since you sent me the Certificate of Loss of my American Citizenship (copy of your letter and the Certificate attached). You have perhaps concluded that I have given up my desire to regain it/to appeal the decision. The truth of the matter is that I have spent sometime researching for my new evidence which you mentioned in your last letter as a possible ground for appeal. My efforts to find further evidences were all fruitless, however, due to the fact that records have been either burned or destroyed during the last war. My late mother, for instance (I was told) had to burn/burry /sic/ underground any piece of communication/document, pictures, books, letters, etc. connected/that has anything to do with my father for fear of the Japanese. Even public records were not spared.

On the other hand, I feel that the Certificate of Loss, made on January 5, 1976, was based on very narrow/limited grounds; having been anchored purely on my having elected Filipino Citizenship, the surrounding circumstances of which I have already described in my earlier letter as one wherein I had very little choice or no possibility at all to do otherwise. I consider myself as one who had been trapped into it; and in the eyes of the law, situations such as this should not be made binding forever should the party involve /sic/ later on realize that he was not exactly free at the time of its execution.

I have spent considerable amount of time thinking about this and the more I am convinced I was cheated. I believe that a mere technical mistake on a very delicate and serious matter such as citizenship, should not be made to prevail over justice itself. To do justice is to have more flexibility rather than to stick to technicality.

Having *so* much faith in you, and in the American Government, I am hoping that my case will be reviewed/reconsidered not anymore in the light of newly discovered evidence, but in the name and for the sake of justice. To give me the freedom now that should have been mine then.

Hope to hear from you soonest.

K[redacted] states that he never received a reply to his letter. The Department's administrative record does not contain appellant's original letter of August 7, **1978**, or a copy of a reply, if any.

The appeal was initiated on September 21, **1984** by letter addressed to "the Board of Review on the Loss of Nationality." 5/

Appellant requested oral argument which was heard on July 2, **1985**, appellant appearing ~~pro se~~. He contends that he elected Philippine citizenship involuntarily under pressure from his eldest brother who, following his father's death in **1945**, became head of the K[redacted] household. He further maintains that it was not his intention to relinquish his United States citizenship, and suggests that he was denied due process of law by the Embassy in **1974-1976.**

II

The Department of State determined in February **1976** that appellant expatriated himself. Eight years later K[redacted] entered an appeal. These facts raise an initial question that must be resolved affirmatively if we are to hear the cause on the merits: whether an appeal *so* long delayed may, in the particular circumstances of this case, be deemed to have been entered within the limitation prescribed by the applicable regulations.

5/ The Board of Review on the Loss of Nationality was abolished in 1967 when the Board of Appellate Review was established.

Timely filing is mandatory and jurisdictional. States v. Robinson, 361 U.S. 220 (1960). If an appellant fails to comply with a condition precedent to the Board's going forward to determine the merits of his claim, i.e., does not bring the appeal within the applicable limitation and adduces no legally sufficient excuse therefor, the appeal must be dismissed for want of jurisdiction. See Costello v. United States, 365 U.S. 265 (1961).

In 1976 when the Department approved the certificate of loss of nationality that was executed in this case, the limitation on appeal was "within a reasonable time" after the affected person received notice of the Department's holding of loss of nationality. 6/ Consistently with the Board's practice in cases

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6/ Section 50.60 of Title 22, Code of Federal Regulations, 22 CFR 50.60 (1967-1979) read as follows:

> A person who contends that the Department's administrative holding of loss of nationality or expatriation in his case is contrary to law or fact shall be entitled, upon written request made within a reasonable time after receipt of notice of such holding, to appeal to the Board of Appellate Review.

similar to the one now before us, we will apply the standard of "reasonable time" in this case rather than the present limitation of one year after approval of the certificate of loss of nationality. 7/

A succint definition of reasonable time is set out in Ashford v. Steuart, 657 F. 2d 1053, 1055 (9th Cir. 1981).

> What constitutes "reasonable time" depends upon the facts of each case, taking into consideration the interest in finality, the reason for delay, the practical ability of the litigant to learn earlier of the grounds relied upon, and prejudice to other parties. See Lairsey v. Advance Abrasives Co., 542 F. 2d 928, 930-31 (5th Cir. 1976); Security Mutual Casualty Co. v. Century Casualty Co., 621 F. 2d 1062, 1967-68 (10th Cir. 1980).

Appellant in his letter of November 29, 1984, to this Board, submits that we should deem his appeal timely on the following grounds:

> With respect to your requirement that I fully describe why it has taken me eight (8) years to appeal the Certificate of Loss of U.S. Nationality, I submit that:

7/ Section 7.5(b) of Title 22, Code of Federal Regulations, 22 CFR 7.5(b) (effective November 30, 1979) reads as follows:

> (b) Time Limit on Appeal.
>
> A person who contends that the Department's administrative determination of loss of nationality or expatriation under subpart C of Part 50 of this Chapter is contrary to law or fact, shall be entitled to appeal such determination to the Board upon written request made within one year after approval by the Department of the certificate of loss of nationality or a certificate of expatriation.

1. It is not accurate that it took me 8 years to make my appeal. Actually, on August 7, 1978, I wrote to the American Consul in Manila asking for a review/ reconsideration of my case. In my letter, I indicated the continuing efforts I was exerting to find further evidences in support of my cause. A copy of my said letter is enclosed herewith.

2. From August 7, 1978 to September 21, 1984, I did not stop utilizing every time and effort that I can spare to look for any piece of evidence for my case. In fact, it was this continuing effort and search on my part that I came upon the circumstance of the duress that attended my election of Filipino Citizenship, the subject matter of the sworn statement of my eldest brother, S[redacted] C. K[redacted], dated September 20, 1984.

3. I have not been officially advised by any appropriate agency of the U.S. Government, until I received your letter of October 4, 1984, that there is a time limitation for the filing of an appeal-- from receipt of loss of my American Citizenship.

During oral argument on July 2, 1985 appellant argued that he did pursue the matter of an appeal after he received no reply to his letter of August 7, 1978. 8/

Asked by the Board why he waited so long to appeal appellant replied:

8/ Transcript of hearing in the Matter of [redacted] C. [redacted] Board of Appellate Review, July 2, 1985 (hereafter referred to as "TR.") p. 21.

> Because when I started my appeal, I was made to understand by the procedure that had been sent to me that I can appeal based on newly discovered evidence or if I have something new or different to present. . And it really took me a long time to gather. I had to make researches, I had to inquire from people; and at one point of time, I thought I was running out of evidence until my eldest brother told me the details and the exact situation that I underwent when I elected my citizenship. And he told me that it was himself precisely who prodded me and pushed me into electing Filipino citizenship, together with my mother. And I thought that "This is it." I thought that "This time I have something solely on the matter of my appeal."
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> And so with that affidavit that he executed, I sent it over; and this is the reason why it took me such a long time. TR 28, 29.

Appellant said that not having had a reply to his 1978 letter, he asked his company for assistance in being relocated to the United States so that he could pursue his claim to United States citizenship there. TR 38. The company was unable to accede to his request. In 1980 he wrote to the Immigration and Naturalization Service, asking whether he might receive a special immigrant visa. "This was again another approach, another alternative, in the hope that if I am here, I can follow this more effectively." TR. 39. This, too, proved unavailing. "So I mean I just want to point out it was not really that I was not doing anything any more about it. I was doing other things that could have possibly led to this or that could have perhaps accelerated my appeal." Id.

On the foregoing facts, two questions are raised: whether appellant's letter of August 1978 may be deemed a proper appeal, and, if not, were his actions after 1978 in trying to come to the United States to pursue a claim to United States citizenship legally sufficient to toll the limitation on appeal?

We are unable to consider apppellant's 1978 letter, without more, as an appeal. Apart from the fact that the letter was not addressed to the Board, it did not assert that the Department's holding of loss of nationality was contrary to law or fact. As we have seen, appellant's letter informed the Embassy that appellant's efforts to discover new or additional evidence that

would support an appeal "were all fruitless," and alleged that the Department's determination of loss of citizenship was based on the narrow ground of having elected Filipino citizenship, that he had been "trapped into it," and that he was "cheated" by the Department's adverse decision. He also expressed the hope that his case would be reviewed or reconsidered "in the name and for the sake of justice."

We do not dispute that he wrote the letter and at that time that he desired to regain United States citizenship, but after receiving no reply he appears to have abandoned any effort to pursue an appeal with this Board. The reverse of the certificate of loss of nationality informed appellant that an appeal might be taken to the Board of Appellate Review and stated the grounds on which an appeal might be based. Although the information did state that unless he had new or additional evidence it was unlikely that an appeal would be successful, the information also stated that grounds for an appeal might be the contention that the Department's determination was contrary to fact or law.

Appellant wrote one letter and let the matter of a proper appeal drop. With appeal information in his possession he should either have followed the matter up with the Embassy or written directly to the Board as the appeal instructions invited him to do. He did neither, but rather sought to enter the United States in hope of pursuing an appeal here.

We cannot accept appellant's contention that he was not officially informed that there was a time limit on appeal. The reverse of the certificate of loss of nationality cited the applicable federal regulations which set out the limit on appeal and other relevant facts about the appellate process. He could have obtained a copy of those regulations either from the Embassy or by writing to the Board. In a legal sense he was on notice in 1976 when he received the certificate of loss of citizenship that there was a limit on appeal.

We do not question appellant's sincerity or his evident wish to recover his United States citizenship. But he has adduced no legally sufficient justification for waiting eight years to come before this Board, a delay that presents some genuine evidentiary difficulties. He elected Philippine citizenship over twenty-seven years ago. His mother is now dead. His brother Solomon executed an affidavit only in 1984, stating that he forced appellant to elect Philippine citizenship. Getting at the facts surrounding appelant's choosing Philippine citizenship twenty-seven years later would be a formidable task. He has made an argument that he was

forced to perform an expatriating act. How can the Department fairly address that contention at this distance from the events of many years ago? How likely is it that tne consular officer concerned would, if available, be able to remember appellant's case? The Department must under the Supreme Court's holding in Afroyim v. Rusk, 387 U.S. 253 (1967) and Vance v. Terrazas, 444 U.S. 252 (1980) carry the burden of proving that appellant intended to relinquish his United States citizenship when he elected Philippine citizenship. Although the Department can point to the renunciatory oath he swore in 1957, there are now no other facts on which the Department can attempt to carry its statutory burden of proof.

Appellant argued at the hearing that the timeliness of his appeal should not hinge on technicalities but rather on justice. In principle, of course, we agree. But what is involved here is not a mere technicality. Loss of nationality proceedings must be conducted in a way fair to both parties. The Department carries a legal responsibility to enforce the statute on loss of nationality. It must not be unreasonably hindered in discharging that responsibility. It is our view that appellant has slept on his rights to the detriment of the interests of the Department.

The rationale of a limitation on appeal is two fold: to ensure that a person will have a fair period of time to prepare a case challenging the Department's decision, and to require an aggrieved person to exercise the right of redress within a circumscribed period of time so that the appeal may be fairly and impartially adjudicated while recollection of the events that gave rise to the adverse administrative decision is still fresh in the minds of the parties concerned. There is little that is fresh in the meager evidence presented to the Board.

Appellant has submitted no legally sufficient justification for his delay in taking an appeal. He knew the grounds upon which the Department had determined he had expatriated himself. There is prejudice to the Department. In these circumstances, the interest in finality and stability of administrative determinations is entitled to great weight. Thus, we are unable to conclude that appellant's delay in seeking relief from this Board was reasonable. We find that the appeal was not taken within a reasonable time after he had notice of the Department's holding of loss of United States nationality. The appeal is time-barred.

III

Upon consideration of the foregoing, it is our view that the Board is without jurisdiction to hear the merits of the case. Accordingly, the appeal is dismissed.

Alan G. James, Chairman

Edward G. Misey, Member

DISSENTING OPINION

I cannot agree with the Board's conclusion that the appeal of [redacted] C. [redacted] was not entered within the limitation prescribed by the applicable federal regulations. The applicable regulation calls for the application of the standard of "reasonable time." I think that [redacted] did institute his appeal within a reasonable time.

The Certificate of Loss of Nationality was dated January 5, 1976 and apparently was forwarded to [redacted] in the Philippines by the American Consul of the Embassy of the United States of America in Manila under cover of a letter dated March 8, 1976. The case file which was before the Board contains a copy of the Certificate of Loss of Nationality, but unfortunately does not contain a copy of the American Consul's letter of March 8, 1976. The existence of this letter is established in [redacted] letter of August 7, 1978, the complete text of which is contained in the Board's opinion. In that letter [redacted] makes clear that he has not accepted the fact that the finding of his loss of nationality is final and that he was seeking new evidence as possible ground for appeal. In his letter [redacted] pleads for a review of his case and asks for a reply "soonest."

In his letter of August 7, 1978 [redacted] states that he "has spent some time researching for any new evidence which you mentioned in your last letter as a possible ground for appeal.'' Apparently [redacted] was relying on advice offered to him by the American Consul in his letter of March 8, 1976 in preparing for an appeal. [redacted] may be presumed to have been aware as well of [redacted] appeal procedures which were set forth on the reverse of the Certificate of Loss of Nationality.

In my view [redacted] letter of August 7, 1978 should have been regarded as the initial document instituting his appeal. The appeal procedures state that the appeal may be presented through an American Embassy. They do not specify any particular form for the document instituting an appeal. They further state that for additional information about appeals, the person concerned should consult the nearest American Embassy. The plain meaning

of Mr. K[redacted] letter of August 7, 1978 is that he was instituting the process of appealing the holding of loss of his United States nationality. His letter was written well within a reasonable time after receipt of notice of the loss of nationality. A reply to his letter would have set him on the right course, should his request for reconsideration have been turned down. The American Consul could either have referred [redacted] letter of August 7, 1978 to the Board of Appellate Review or should have replied to Mr. [redacted] advising him of such further steps to pursue his appeal he should take. What other meaning can reasonably be given to the statement in the appeal procedures that "the appeal may be presented through an American Embassy or Consulate"? Mr. [redacted] asserts that he received no reply, and the record presented by the Department of State contained no reply. This, in my view, indicates a serious failure on the part of the United States Embassy in Manila. The Board's conclusion denying jurisdiction throws all of the consequences of this failure upon Mr. [redacted]

The Board also faults Mr. [redacted] for having "let the matter of a proper appeal drop." This assertion, in my view, is contrary to the facts which appear in the record and which were further developed during the hearing which was held on July 2, 1985. Mr. [redacted] did not by any means abandon his effort to pursue an appeal. True he did not write a letter to the Board in the form to which the Board attaches seemingly overriding importance, but he reacted to the failure of the Embassy to reply to his letter in a manner which should not be surprising. He engaged in other activity which he apparently reasoned would enhance his capacity to pursue an appeal. Certainly, in the face of an unresponsive Embassy official, Mr. [redacted] should not be faulted for having explored other avenues in his quest for what he deemed to be justice. It is remarkable that the Board offers its own prescription as to what [redacted] snould have done in the face of the Embassy's seeming rebuff but accepts without question the performance of the Embassy in this case. Under the official appeal procedures the Embassy had a definite, key role to advise Mr. [redacted] and facilitate his efforts in pursuing his appeal. Failure of the Embassy to play its role led [redacted] to take other measures. Under the special circumstances the resulting delay until [redacted] wrote to the Board in September 1984 should be regarded as reasonable.

The Board asserts that there is prejudice to the Department resulting from the delay. I see more serious prejudice to Mr. [redacted] resulting from the failure of the Embassy to play its proper role.

Warren E. Hewitt

Warren E. Hewitt, Member

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