

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
WASHINGTON FIELD OFFICE**

[REDACTED])	
)	
Complainant,)	
)	
vs.)	Docket Number
)	EEOC No. [REDACTED]
Department of Homeland Security,)	
)	
Agency.)	
)	

AGENCY’S RESPONSES TO COMPLAINANT’S REQUESTS FOR DISCOVERY

GENERAL OBJECTIONS

- A. The United States Secret Service (“Secret Service” or “Agency”) objects to these discovery requests insofar as they seek to impose requirements beyond those established under the Acknowledgement and Order, Equal Employment Opportunity Commission (EEOC) Regulations, and Fed. R. Civ. P. 26, 33, 34 and 36. The Secret Service will provide responses and objections in compliance with the EEOC regulations and the Federal Rules of Civil Procedure.
- B. The Agency objects to these discovery requests insofar as they seek information (1) pertaining to any periods of time that are irrelevant to the issues or claims in this appeal; (2) relating to matters that are not raised in the appeal; (3) that is obtainable from some other source that is more convenient, less burdensome, less expensive, and as easily accessible and available to the Complainant as to the Agency; or (4) that is otherwise beyond the scope of discovery under the EEOC regulations or the Federal Rules of Civil Procedure.
- C. The Agency objects to Complainant’s discovery requests to the extent that they seek information not within the Agency’s possession, custody, control, or knowledge, seek production of any and all responsive information that may exist or otherwise seek to impose requirements beyond those established under EEOC regulations and Fed. R. Civ. P. 33, which extends only to information available to the Agency that can be found by means of a reasonably diligent search. The Agency will provide responses to these discovery requests that are relevant and that can be found by means of a reasonably diligent search of information available to the Secret Service that the Agency has been reasonably able to gather to date.
- D. The Agency objects to Complainant’s discovery requests to the extent that they are vague or

ambiguous, or fail to describe the information sought with sufficient particularity to allow a meaningful response by the Agency.

- E. The Agency does not waive and hereby reserves its right to assert any and all objections to the admissibility into evidence at the hearing of this action, or in any other proceeding, any document or record produced in response to these document requests, on any and all grounds, including, but not limited to, competency, authenticity, relevance, materiality, privilege and admissibility.
- F. The Agency's response contained herein is made subject to the foregoing General Objections. The specific objections in response to any document request are not intended to constitute a waiver of the foregoing General Objections.

DEFINITIONS

ATSAIC – Assistant to the Special Agent in Charge
FSD – Forensics Services Division
SCD – Security Clearance Division
EEOD – Office of Equal Employment Opportunity and Diversity
SA – Special Agent
SR – Significant Response
NSR – No Significant Response
INC - Inconclusive
QC – Quality Control

Unless otherwise indicated, the business address for all employees identified below is: United States Secret Service
950 H St., NW
Washington, DC 20223

INTERROGATORIES

- 1. Identify each and every person who participated in the decision to withdraw the conditional offer of employment sent in an email dated July 17, 2014. As to each person, describe in detail his/her role in the decision and/or process.**

Response: Robin DeProspero-Philpot, Policy Chief, SCD decided that Complainant was no longer a best qualified applicant (BQA) for the position for which he applied. Deputy Assistant Director Carrie Hunnicutt, Office of Technical Development and Mission Support, concurred with this decision

- 2. Please set forth any and all facts that constitute a legitimate, nondiscriminatory reason for the withdrawal of the conditional offer of employment that support any defense asserted by the Agency.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file dispositive motions.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. On September 18, 2014, Complainant took a polygraph examination that indicated a significant response (SR). On September 19, 2014, the FSD Quality Control review concurred with the evaluation of Complainant's examination. A report of the Complainant's examination was provided by the Forensic Services Division to the Security Clearance Division for background adjudication. Because he did not successfully complete his background check, Complainant was no longer qualified for employment in the position for which he applied.

- 3. Identify each person, other than a person intended to be called as an expert witness at trial, having discoverable information that tends to support a position that the Agency has taken or intends to take in this action, and state the subject matter of the information possessed by that person.**

Objections: The Agency objects to this request as premature, as it asks the Agency to identify witnesses before such deadline has been established by a Hearing Order.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows.

Policy Chief Robin DeProspero-Philpot, SCD – made the determination that Complainant did not successfully complete his background check and was not qualified for the position for which he applied.

SA Ellen Ripperger, FSD – conducted Complainant's polygraph examination.

SA Edward Alston, III, FSD – conducted the quality control review of Complainant's polygraph examination.

ATSAIC Daniel Ciatti, FSD – currently serves as a polygraph program supervisor.

- 4. Identify each person whom the Agency expects to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the findings and opinions to which the expert is expected to testify and a summary of the grounds for each opinion, and, with respect to an expert whose findings and opinions were acquired in anticipation of litigation or for trial, summarize the qualifications of the expert, state the terms of the expert's compensation, and attach to your answers any available list of publications written by the expert and any written report made by the expert concerning the expert's findings and opinions.**

Objections: The Agency objects to this request as premature, as it asks the Agency to identify expert witnesses before such deadline has been established by a Hearing Order.

Response: Subject to and without waiving the above general and specific objections, the Agency does not have any anticipated expert testimony to disclose at this time.

- 5. Identify each and every person from whom the Agency or anyone acting on its behalf has obtained a statement in any form (including, but not limited to, written,**

oral or digital) regarding facts relating to the allegations in the Complaint and describe the substance of each such statement.

Objections: The Agency objects to this request as overbroad and unduly burdensome, to the extent that it seeks information regarding every statement in any form regarding any facts relating to the Complaint. The Agency further objects to this request as seeking information protected by the attorney-client privilege.

Response: The Agency does not possess any non-privileged responsive information at this time that was not already provided in the ROI.

- 6. If the Agency contends that Complainant has made any statement that supports or substantiates any of the Agency's claims or defenses in this case, describe fully that statement and identify all documents that reflect that statement.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file dispositive motions.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. All statements by the Complainant possessed by the Agency at this time are reflected in the ROI or provided in attached documents.

- 7. If the Agency contends that Complainant has made any statement that constitutes a party admission or statement against interest, describe fully that statement and identify all documents that reflect that statement.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file dispositive motions.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. All statements by the Complainant possessed by the Agency are reflected in the ROI or provided in attached documents.

- 8. If the Agency intends to rely upon any documents, electronically stored information (including, but not limited to email and video or audio recordings), or tangible things to support a position that the Agency has taken or intends to take in the action, provide a brief description, by category and location, of all such documents, electronically stored information, and tangible things, and identify all persons having possession, custody, or control of them.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file dispositive motions.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. All relevant, non-privileged documents have been provided in the ROI or produced in the attached documents.

- 9. If the Agency contends that the Complainant does not meet the statutory definition of disabled, please set forth all facts which support such a contention.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file dispositive motions.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. The Agency is not aware of any information at this time, prior to the close of discovery, that would support a contention that Complainant does not meet the statutory definition of “disabled.”

- 10. On a yearly basis for the last five years, please provide the total number of employees the USSS employs, the number of disabled employees the USSS employs, the number of disabled applicants for USSS positions, and the number of disabled applicants hired by the USSS.**

Objections: The Agency objects to this request as compound, irrelevant to the Complaint, overbroad, and unduly burdensome, to the extent that it seeks information regarding every employee and applicant to the Agency over the last five years. This question, for example, seeks information about Agency law enforcement employees who are not similarly situated to the Complainant, as they are required to pass physical fitness, firearms, and medical qualifications for which certain disabilities can be disqualifying. Furthermore, this question seeks information about applicants and employees who may have physical disabilities that are entirely unrelated to the disability(ies) that form the basis of this Complaint.

The Agency further notes that it does not maintain information regarding disabilities of all employees and all applicants for employment – some employees and applicants voluntarily provide this information and some do not.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows.

FY 2011: 7,043 employees; 90 employees who identified disabilities; 3,004 applicants who identified disabilities; 5 applicants who identified disabilities hired

FY 2012: 6,773 employees; 99 employees who identified disabilities; 469 applicants who identified disabilities; 2 applicants who identified disabilities hired

FY 2013: 6,501 employees; 102 employees who identified disabilities; 2 applicants who identified disabilities; 2 applicants who identified disabilities hired

FY 2014: 6,354 employees; 107 employees who identified disabilities; 5,044 applicants who identified disabilities; 6 applicants who identified disabilities hired

FY 2015: 6,320 employees; 116 employees who identified disabilities; 1,143 applicants who identified disabilities; 7 applicants who identified disabilities hired

- 11. If the Agency contends that Complainant could not perform any essential functions of the offered position, please set forth those essential functions which he could not perform; and set forth all observations, studies, reports or any other facts that support your conclusion that he could not do so.**

Objections: The Agency objects to this request as premature, as it asks the Agency to proffer a legal argument before discovery has closed and prior to the deadline to file

dispositive motions. The Agency further objects to the term “offered position” as vague and misleading.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. Obtaining eligibility for a TSSC after a successful background check was an essential function of the position for which Complainant applied and which he could not perform. All documents and facts supporting this position have been provided in the ROI, in response to another Discovery Request, or have been withheld due to a stated objection.

12. Please provide a list of all USSS polygraph exams in which Special Agent Ellen Ripperger’s determinations either resulted in reexaminations or had Quality Control Issues, and the outcomes of any reexaminations.

Objections: The Agency objects to this request as overbroad, unduly burdensome, irrelevant, and vague. The Agency objects to this request as irrelevant, because SA Ripperger’s examination of Complainant neither had quality control issues nor resulted in reexamination. The Agency objects to this request as vague to the extent that “Quality Control Issues” is undefined and unclear and to the extent that re-examinations are not necessarily the “result” of a polygraph examiner’s “determinations.”

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows.

SA Ripperger has administered 28 polygraph examinations that she evaluated as INC, and 7 examinations for which she rendered No Opinion. Reexamination outcomes for those individuals are provided in the Agency’s production of documents.

FSD Quality Control non-concurred with seven of SA Ripperger’s evaluations of polygraph examinations during her tenure as a certified polygraph examiner. In each case a re-examination was conducted by an examiner other than SA Ripperger and the re-exam evaluation was consistent with SA Ripperger’s initial evaluation.

- 1) File No. 20140864: SA Ripperger evaluation of SR, QC evaluation of INC, re-exam evaluation of SR, numerous post-test admissions on re-exam
- 2) File No. 20150096: SA Ripperger evaluation of NSR, QC evaluation of INC, re-exam evaluation of NSR
- 3) File No. 20150104: SA Ripperger evaluation of SR, QC evaluation of INC, applicant withdrew before re-exam
- 4) File No. 20150783: SA Ripperger evaluation of SR, QC evaluation of INC, re-exam evaluation of SR
- 5) File No. 20151885: SA Ripperger evaluation of SR, QC evaluation of INC, re-exam not administered due to applicant admissions
- 6) File No. 20160264: SA Ripperger evaluation of SR, QC evaluation of INC, re-exam evaluation of SR
- 7) File No. 20151677: SA Ripperger evaluation of SR, QC evaluation of INC, no re-exam was authorized by SCD due to admissions gained during the exam.

SA Ripperger also administered one polygraph examination (File No. 20130186) that she evaluated as SR and which was concurred by QC. This applicant was administered a subsequent examination that was evaluated as NSR, though this re-examination was not the “result” of SA Ripperger’s evaluation nor was it the result of any “Quality Control issues.”

- 13. Please provide for calendar years 2012 – 2015 a list of the total number of applicants Special Agent Ripperger has polygraphed, the number of those who failed her polygraph exam, the number of those who failed her polygraph exam and who had any type of psychiatric condition, and the number of those who failed her polygraph exam and who had any type of disability other than a psychiatric condition.**

Objections: The Agency objects to this request as vague, compound, irrelevant to the Complaint, overbroad, and unduly burdensome. This Request is vague to the extent that it does not define the word “failed,” which is not among the potential evaluation results (SR, NSR, INC, No Opinion). Furthermore, the use of the term “her polygraph exam” in the Request is vague and inaccurate, to the extent that it suggests that SA Ripperger formulates and administers applicant examinations at her own discretion.

This Request is unduly burdensome to the extent that the Agency does not retain information on individual applicants’ disability status. Only aggregate disability data are maintained for applicants. The Agency has requested documents from the National Records Center on all applicants from FY 2014 whose polygraph examinations SA Ripperger evaluated as SR. The Agency reserves the right to supplement this response and objections to this response upon receipt of these documents, which must be searched and reviewed by hand.

Furthermore, this Request is not relevant to the Complaint to the extent that applicants with disabilities other than psychiatric conditions are not similarly situated to Complainant.

Response: Subject to and without waiving the above general and specific objections, the Agency responds as follows. SA Ripperger has conducted 253 polygraph examinations as a certified polygraph examiner (2013-present). 117 individuals from that group indicated a significant response during their polygraph examinations.

- 14. Identify each individual who assisted in answering these Interrogatories, stating with respect to each person the Interrogatory or Interrogatories they assisted with and how they assisted.**

SA Ellen Ripperger – compiled data and information for interrogatories 12 and 13.

ATSAIC Daniel Ciatti – compiled data and information in response to interrogatories 12 and 13.

Chief Robin DeProspero-Philpot – provided information in response to interrogatories 1 and 2.

Deputy Director, EEOD, Jessie Lane – compiled data in response to interrogatory 10.

15. For each individual identified in Answer 14, set forth his/her authority to answer these Interrogatories on behalf of the Agency and to bind the Agency to the answers given.

Response: Chief Robin DeProspero-Philpot made the determination at issue in this Complaint and has personal knowledge of the decision.

SA Ripperger conducted the polygraph evaluation at issue in this Complaint and has personal knowledge of that issue and also has access to data on the examinations she has given and the results of those examinations.

ATSAIC Daniel Ciatti is a supervisor in FSD and has access to records of the polygraph operations program.

Deputy Director Jessie Lane is a supervisor in EEOD and has access to records of that office.

REQUEST FOR PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS

1. **Any and all documents referred to or relied upon in answering Complainant's Interrogatories.**

Response: See attached documents used in response to Interrogatories 10 and 12.

2. **Any and all documents between the Agency and Complainant regarding withdrawal of the conditional offer of employment set forth in the ROI.**

Objection: The Agency objects to this request as seeking documents already available to Complainant.

Response: Responsive documents were provided in the ROI. See additional attached correspondence between Complainant and former Agency employee Scott Cragg.

3. **Any written documents between the Complainant and the Agency with regard to an offer or conditional of employment [sic], including, but not limited to, the Agency's offer letter dated 7/17/2014 and Complainant's acceptance of same dated 7/17/2014.**

Objection: The Agency objects to this request as seeking documents already available to Complainant.

Response: Responsive documents were provided in the ROI. See additional attached e-mail correspondence

4. **Any and all documents, between and/or among any person acting for or on behalf of the Agency regarding the polygraph examination of Complainant and any other matter leading to the decision to withdraw the conditional offer of employment that had been made to Complainant.**

Objections: The Agency objects to this Request to the extent that it seeks information that is not relevant to the Complaint and is protected by law enforcement investigatory privilege.

Response: Subject to and without waiving the above general and specific objections, see the attached responsive non-privileged documents.

5. **The audio and/or video recording made of the Complainant's polygraph exam.**

Objection: The Agency objects to this Request to the extent that it seeks information that is not relevant to the Complaint and is protected by law enforcement investigatory privilege and national security privilege. The content of the Complainant's polygraph exam consists of sensitive investigative information that is not relevant to the aspect of the Complaint over which the EEOC maintains jurisdiction. See *Department of Navy v. Egan*, 484 U.S. 518 (1988) and *Foote v. Moniz*, 751 F.3d 656 (D.C. Cir 2014) (the merits of agency decisions "based on a similar kind of predictive national security judgment as that which underlines the denial or revocation of a security clearance" are not reviewable).

6. **Please produce all documents related to the Complainant's polygraph examination including, but not limited to polygraph charts, polygraph scoring charts, quality control (QC) documents, and quality control notes.**

Objection: The Agency objects to this Request to the extent that it seeks information that is not relevant to the Complaint and is protected by law enforcement investigatory privilege and national security privilege. The content of the Complainant's polygraph exam consists of sensitive investigative information that is not relevant to the aspect of the Complaint over which the EEOC maintains jurisdiction. *See Department of Navy v. Egan*, 484 U.S. 518 (1988) and *Foote v. Moniz*, 751 F.3d 656 (D.C. Cir 2014) (the merits of agency decisions "based on a similar kind of predictive national security judgment as that which underlines the denial or revocation of a security clearance" are not reviewable).

Response: Subject to and without waiving the above general and specific objections, see the documents provided in response to Document Request 4.

7. Any and all documents that pertain to or contain information concerning Complainant's polygraph exam.

Objection: The Agency objects to this Request to the extent that it seeks information that is not relevant to the Complaint and is protected by law enforcement investigatory privilege and national security privilege. The content of the Complainant's polygraph exam consists of sensitive investigative information that is not relevant to the aspect of the Complaint over which the EEOC maintains jurisdiction. *See Department of Navy v. Egan*, 484 U.S. 518 (1988) and *Foote v. Moniz*, 751 F.3d 656 (D.C. Cir 2014) (the merits of agency decisions "based on a similar kind of predictive national security judgment as that which underlines the denial or revocation of a security clearance" are not reviewable).

Response: Subject to and without waiving the above general and specific objections, see the documents provided in response to Document Request 4.

8. Any and all documents that pertain to or contain information questioning, criticizing, or disagreeing with any polygraph examination administered by Special Agent Ellen Ripperger or redirecting her to re-administer polygraph examinations, including, but not limited to any document to or from the Agency's Quality Control Department or the Forensic Services Division.

Objection: The Agency objects to this Request as overbroad, unduly burdensome, and protected by the law enforcement investigatory privilege. The Agency also objects to this Request as irrelevant, because SA Ripperger's examination of the Complainant was not questioned, criticized or disagreed with by QC or FSD, nor was she directed to re-administer it. The Agency further objects to the implication that a QC non-concur, or a reexamination, is synonymous with "questioning, criticizing, or disagreeing" with a polygraph examination.

Response: Subject to and without waiving the above general and specific objections, the Agency does not possess any non-privileged responsive documents.

9. Any and all documents that pertain to or contain information concerning polygraph examinations administered by Special Agent Ellen Ripperger of examinees who had a disability at the time the examination was administered and about whom she concluded there were indications of deception.

Objection: The Agency objects to this request as overbroad, unduly burdensome, and not relevant to this individual Complaint. The Agency does not retain information on individual applicants' disability status.

The Agency further objects to this Request to the extent that the content of applicants' polygraph exams consists of sensitive national security information that is not relevant to any aspect of the Complaint over which the EEOC maintains jurisdiction. Pursuant to *Department of Navy v. Egan*, 484 U.S. 518 (1988) and *Footte v. Moniz*, 751 F.3d 656 (D.C. Cir 2014), the merits of agency decisions "based on a similar kind of predictive national security judgment as that which underlines the denial or revocation of a security clearance" are not reviewable.

Response: The Agency has requested application documents from the National Records Center on all applicants from FY 2014 whom SA Ripperger evaluated as SR in their polygraph examinations. The Agency reserves the right to supplement this response and objections to this response upon receipt of these documents.

10. Any and all documents pertaining to or containing information concerning problems, irregularities, inquiries, or complaints about polygraph examinations administered by Special Agent Ellen Ripperger.

Objection: The Agency objects to this request as overbroad and irrelevant to the instant Complaint, to the extent that it seeks documents about examinations other than Complainant's and about complaints that were found to be without merit. The Agency further objects to this Request as seeking documents protected by the law enforcement investigatory privilege.

Response: Subject to the above general and specific objections, there are no non-privileged, relevant documents to produce.

11. Please provide any and all documents and explain every instance either formally or informally where issues have arisen regarding Special Agent Ellen Ripperger work products and for what reasons?

Objections: The Agency objects to this Request as vague to the extent that the phrase "issues have arisen" is unclear and unlimited in regard to the possible source of "issues." The Agency further objects to this Request as overbroad to the extent that it is not limited by time or subject matter to SA Ripperger's work product as a polygraph examiner.

Response: Subject to and without waiving the above general and specific objections, the Agency does not have any records of supervisory issues with SA Ripperger's work product as a polygraph examiner.

12. Please provide any and all documents for every instance either formally or informally where Special Agent Ellen Ripperger had job performance problems brought to her attention.

13. Objections: The Agency objects to this Request as vague to the extent that the phrases "problems brought to her attention" and "job performance problems" are unclear and unlimited in regard to the possible source of "problems." The Agency further objects to this

Request as overbroad to the extent that it is not limited by time or subject matter to SA Ripperger's job performance as a polygraph examiner.

Response: Subject to and without waiving the above general and specific objections, the Agency does not have any records of supervisory problems with SA Ripperger's job performance as a polygraph examiner.

- 14. Please provide any and all documents and explain every instance either formally or informally where either the Quality Control Department or the Forensic Services Division disagreed with Special Agent Ellen Ripperger's determinations made with regard to (a) her polygraph examinations or (b) any element of a polygraph examination she administered?**

Objections: The Agency objects to this request as overbroad and unduly burdensome, to the extent that it seeks documents and information regarding any difference between the way SA Ripperger and QC scored any data point on every polygraph examination given by SA Ripperger. The Agency further objects to this Request as irrelevant to the extent that it seeks documents about examinations other than Complainant's.

Response: Records regarding examinations in which QC non-concurred with initial evaluations of SA Ripperger were provided in response to Document Request 8.

- 15. Please provide any and all documents and explain every instance of formal or informal Quality Control (QC) issues or concerns regarding the Complainant's (██████████) polygraph exam either verbally or in writing from the USSS Polygraph Quality Control Office or Forensic Services Division.**

Objection: The Agency objects to this request as compound and vague to the extent that the phrase "issues or concerns" is unclear and undefined. QC concurred with the SR evaluation of Complainant's exam. The Agency further objects to this Request to the extent that the content of applicants' polygraph exams consists of sensitive national security information that is not relevant to any aspect of the Complaint over which the EEOC maintains jurisdiction.

Response: Subject to and without waiving the above general and specific objections, Complainant's polygraph examination report was provided in response to Document Request 4.

- 16. The polygraph exam questions from the Complainant's (██████████) polygraph exam.**

Objection: The Agency objects to this Request to the extent that it seeks information that is not relevant to the Complaint and is protected by law enforcement investigatory privilege and national security privilege. The content of the Complainant's polygraph exam consists of sensitive investigative information that is not relevant to the aspect of the Complaint over which the EEOC maintains jurisdiction. *See Department of Navy v. Egan*, 484 U.S. 518 (1988) and *Foote v. Moniz*, 751 F.3d 656 (D.C. Cir 2014) (the merits of agency decisions "based on a similar kind of predictive national security judgment as that which underlines the denial or revocation of a security clearance" are not reviewable).

- 17. Please provide any and all performance evaluations for Special Agent Ellen Ripperger.**

Objection: The Agency objects to this request as overbroad, unduly burdensome, and irrelevant, to the extent that it does not include time limits and seeks performance evaluations for SA Ripperger's entire career, including years prior to her work as a polygraph examiner.

Response: Subject to and without waiving the above general and specific objections, the Agency will provide performance evaluations for SA Ripperger's tenure as a polygraph examiner upon entry of a Protective Order for personnel records.

18. Please provide a copy of the statement Special Agent George Stakias had the Complainant write explaining why he had seen a psychiatrist for several years during a review of the Complainant's security clearance paperwork (Form OF-306), in relation to disclosures made in Question 21 (mental health).

Response: The Agency does not possess any responsive document.

REQUEST FOR ADMISSIONS

1. **Special Agent Ellen Ripperger told the Complainant he failed his polygraph examination with respect to questions on drug use and past serious undetected crimes.**

Response: Admit.

2. **Special Agent Ripperger has had the Quality Control department at USSS overturn her polygraph examination results.**

Objection: The Agency objects to the words “overturn” and “results” as vague and undefined by Complainant and objects to this Request as not relevant to the instant Complaint.

Response: Subject to and without waiving the above general and specific objections, the Agency denies that any of SA Ripperger’s polygraph examination evaluations were “overturned” by Quality Control, considering that in every instance where QC non-concurred with one of SA Ripperger’s evaluations and a retest was conducted, SA Ripperger’s initial evaluation was confirmed rather than the QC evaluation. The Agency admits that QC non-concurred with seven of SA Ripperger’s evaluations.

In addition, the Agency denies that Quality Control non-concurred with SA Ripperger’s evaluation of Complainant’s polygraph examination.

3. **Special Agent Ripperger’s polygraph results have been overturned (have not been concurred) by the USSS Quality Control (QC) department more frequently than the average USSS polygraph examiner’s polygraph results.**

Objections: The Agency objects to this Request as vague and not relevant to the instant Complaint. QC does not “overturn” evaluations; it does non-concur. This Request is not relevant to this Complaint to the extent that QC concurred with SA Ripperger’s evaluation of Complainant’s examination.

Response: Subject to and without waiving the above general and specific objections, the Agency denies that there is an “average USSS polygraph examiner.” There is significant variation in the number of exams conducted by USSS certified polygraph examiners in a calendar year and the number of non-concurred evaluations. Additionally, in every instance where QC non-concurred with one of SA Ripperger’s evaluations and a retest was conducted, SA Ripperger’s initial evaluation was confirmed rather than the QC evaluation. Accordingly, none of SA Ripperger’s evaluations has ever been “overturned” by QC.

4. **Individuals who have failed a USSS polygraph exam and subsequently have been retested and passed another USSS polygraph examination have been hired by the USSS.**

Objection: The Agency objects to the word “failed” as vague and objects to this Request as compound, not relevant to the instant Complaint, and unduly burdensome.

This Request is unduly burdensome, to the extent that it would require the Agency to compile a list of every applicant who received a SR evaluation for any stage of a polygraph examination, which would include thousands of individuals per year, and then cross reference each individual on this list with personnel records to determine whether or not they received an appointment with the Agency.

Furthermore, this Request is overbroad and not relevant to this Complaint, to the extent that it seeks information about applicant background adjudications that were made by officials other than Robin DeProspero-Philpot, who made the applicant background adjudication relevant to this Complaint.

Response: Subject to and without waiving the above general and specific objections, the Agency admits that some individuals have been evaluated as SR in an examination, been evaluated as NSR in a later examination, and ultimately been hired by the Agency.

- 5. USSS CIO Scott Cragg contacted the Complainant by email late on or about the evening of Friday October 24, 2014 and asked if he had been retested (polygraphed).**

Response: Admit.

- 6. Complainant’s application for a Top Secret Security Clearance was halted by the USSS based solely on the results of his polygraph examination.**

Response: Deny. Complainant did not successfully pass his background check on the basis of his polygraph examination, at which time he was no longer qualified for the position for which he had applied. Accordingly there was no need to make a determination concerning his ability to attain a TSSC.

- 7. Individuals who have failed a polygraph exam have obtained Top Secret Security Clearances when the totality of evidence is weighed and is favorable regarding the applicant’s character.**

Objection: The Agency objects to the word “failed” as vague. Furthermore, this Request is overbroad and not relevant to this Complaint, to the extent that it seeks information about background adjudications that were made by officials other than Robin DeProspero-Philpot, who made the background adjudication relevant to this Complaint.

The Agency further objects to this Request to the extent that it implies that a polygraph examination is considered among a “totality of evidence” in the adjudications of individuals’ eligibility to access classified information. The polygraph examination is part of the applicant background check process, successful completion of which is a prerequisite for consideration of a TSSC, which is a separate adjudication.

Response: Subject to and without waiving the above general and specific objections, the Agency admits that some individuals have been evaluated as SR on a polygraph examination, have been evaluated as NSR in a later examination, and have ultimately obtained a TSSC from the Agency.

- 8. The USSS sometimes asks applicants to write statements explaining psychiatric treatment when an applicant makes a mental health disclosure on Question 21 (mental health) of Form OF-306 [sic].**

Objections: The Agency objects to this request to the extent that Form OF-306 does not include mental health disclosures.

Response: The Agency admits that applicants have been asked to write statements explaining psychiatric treatment when an applicant makes a mental health disclosure on Question 21 of the Standard Form 86.

- 9. USSS polygraph examiners will on average have one or possibly two non-concurred polygraph examinations in a calendar year.**

Objection: The Agency objects to this request as compound, overbroad and unduly burdensome, to the extent that it does not include any time limits, and to the extent that the Agency does not compile data on the yearly number of polygraph examiners' non-concurred evaluations. There is significant variation in the number of exams conducted by USSS certified polygraph examiners in a calendar year. Accordingly, there is significant variation in the number of non-concurred evaluations for USSS certified polygraph examiners in a calendar year.

The Agency further objects to this request as irrelevant, to the extent that QC concurred with the examination at issue in this Complaint, and the frequency with which QC non-concurs with other polygraph examinations of applicants other than the Complainant is not relevant to this Complaint.

Response: Subject to and without waiving the above general and specific objections, the Agency does not possess sufficient information to admit or deny.

- 10. Special Agent Ripperger has exceeded the average number of non-concurred polygraph examinations in most years.**

Objection: See above objections to Request for Admission 9.

- 11. If a polygraph examiner does not administer an ethical polygraph examination, the results of the polygraph examination may not be correct.**

Objections: The Agency objects to the term "ethical polygraph examination" as vague.

Response: Subject to and without waiving the above general and specific objections, the Agency admits that if a polygraph examiner does not administer a polygraph examination consistent with the professional standards of the National Center for Credibility Assessment (NCCA) and the Agency, the results of the polygraph examination may not be correct.

- 12. Special Agent Ellen Ripperger reviewed the Complainant's paperwork, including his Top Secret Clearance paperwork, prior to the administration of his polygraph examination.**

Objection: The Agency objects to the word "paperwork" as vague.

Response: Subject to and without waiving the above general and specific objections, the Agency admits that SA Ripperger reviewed Complainant's SF-86 prior to the administration of his polygraph examination.

- 13. Special Agent Ripperger shared her interpretation of the Complainant's polygraph examination results with Robin Despero [sic].**

Response: Deny. SA Ripperger did not personally communicate any information about Complainant's polygraph examination with Robin DeProspero-Philpot. Chief DeProspero-Philpot independently reviewed the Complainant's polygraph examination report.

- 14. Robin Despero [sic] reviewed the results of the Complainant's polygraph exam.**

Response: The Agency admits that Chief DeProspero-Philpot independently reviewed the Complainant's polygraph examination report.

Document Request 1

Table B1: TOTAL WORKFORCE - Distribution by Disability [OPM Form 256 Self-Identification Codes]

Employment Tenure	TOTAL	Total by Disability Status				Detail for Targeted Disabilities									
		[05] No Disability	[01] Not Identified	[06-94] Disability	Targeted Disability	[16, 17] Deafness	[23, 25] Blindness	[28, 32-38] Missing Limbs	[64-68] Partial Paralysis	[71-78] Total Paralysis	[82] Convulsive Disorder	[90] Mental Retardation	[91] Mental Illness	[92] Distortion of Limb/Spine	
TOTAL FY2011															
FY 2010	#	6926	6829	14	83	21	5	0	1	5	1	4	1	3	1
	%	100%	98.60%	0.20%	1.20%	0.30%	0.07%	0.00%	0.01%	0.07%	0.01%	0.06%	0.01%	0.04%	0.01%
FY 2011	#	7043	6936	17	90	27	7	1	1	4	1	4	1	2	1
	%	100%	98.48%	0.24%	1.28%	0.31%	0.10%	0.01%	0.01%	0.06%	0.01%	0.06%	0.01%	0.03%	0.01%
Difference	#	117	107	3	7	1	2	1	0	-1	0	0	0	-1	0
Ratio Change	%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Net Change	%	1.69%	1.57%	21.43%	8.43%	4.76%	40.00%	0.00%	0.00%	-20.00%	0.00%	0.00%	0.00%	-33.33%	0.00%
EEOC STD	%					2.00%									
PERMANENT															
FY 2010	#	5668	5588	14	66	15	4	0	1	3	1	2	1	2	1
	%	100%	98.59%	0.25%	1.16%	0.26%	0.07%	0.00%	0.02%	0.05%	0.02%	0.04%	0.02%	0.04%	0.02%
FY 2011	#	5764	5669	15	80	17	5	1	1	3	1	2	1	2	1
	%	100%	98.35%	0.26%	1.39%	0.29%	0.09%	0.02%	0.02%	0.05%	0.02%	0.03%	0.02%	0.03%	0.02%
Difference	#	96	81	1	14	2	1	1	0	0	0	0	0	0	0
Ratio Change	%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Net Change	%	1.69%	1.45%	7.14%	21.21%	13.33%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TEMPORARY															
FY 2010	#	1258	1241	0	17	6	1	0	0	2	0	2	0	1	0
	%	100%	98.65%	0.00%	1.35%	0.48%	0.08%	0.00%	0.00%	0.16%	0.00%	0.16%	0.00%	0.08%	0.00%
FY 2011	#	1279	1267	2	10	5	2	0	0	1	0	2	0	0	0
	%	100%	99.06%	0.16%	0.78%	0.39%	0.16%	0.00%	0.00%	0.08%	0.00%	0.16%	0.00%	0.00%	0.00%
Difference	#	21	26	2	-7	-1	1	0	0	-1	0	0	0	-1	0
Ratio Change	%	0%	0%	0%	-1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Net Change	%	1.67%	2.10%	0.00%	-41.18%	-16.67%	100.00%	0.00%	0.00%	-50.00%	0.00%	0.00%	0.00%	-100.00%	0.00%
NON-APPROPRIATED															
FY 2010	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
FY 2011	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Difference	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ratio Change	%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Net Change	%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 88: NEW HIRES By Type of Appointment - Distribution by Disability

Type of Appointment		Total	Total by Disability Status				Detail for Targeted Disabilities								
			(05) No Disability	(01) Not Identified	(06-94) Disability	Targeted Disability	(16, 17) Deafness	(23, 25) Blindness	(28, 32-38) Missing Limbs	(64-68) Partial Paralysis	(71-78) Total Paralysis	(82) Convulsive Disorder	(90) Mental Retardation	(91) Mental Illness	(92) Distortion of Limb/Spine
Permanent	#	129	123	2	4	1	1	0	0	0	0	0	0	0	0
	%	100%	95.35%	1.55%	3.10%	0.78%	0.78%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Temporary	#	281	278	2	1	1	1	0	0	0	0	0	0	0	0
	%	100%	98.93%	0.71%	0.36%	0.36%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Non-Appropriated	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Hired	#	410	401	4	5	2	2	0	0	0	0	0	0	0	0
	%	100%	97.80%	0.98%	1.22%	0.49%	0.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Prior Year	%	100%	98.51%	0.00%	1.48%	0.55%	0.18%	0.00%	0.00%	0.37%	0.00%	0.00%	0.00%	0.00%	0.00%
Applications Received	#	73495	69224	1267	3004	1117	125	48	37	85	1	79	11	305	426

FY2011

Table B8: NEW HIRES By Type of Appointment - Distribution by Disability

Type of Appointment	Total	Total by Disability Status				Detail for Targeted Disabilities									
		(05) No Disability	(01) Not Identified	(06-94) Disability	Targeted Disability	(18) Deafness	(21) Blindness	(30) Missing Limbs	(69) Partial Paralysis	(79) Total Paralysis	(82) Convulsive Disorder	(90) Mental Retardation	(91) Mental Illness	(92) Distortion of Limb/Spine	
Permanent	#	37	35	0	2	0	0	0	0	0	0	0	0	0	0
	%	100%	94.59%	0.00%	5.41%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Temporary	#	25	25	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Non-Appropriated	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Hired	#	62	60	0	2	0	0	0	0	0	0	0	0	0	0
	%	100%	96.77%	0.00%	3.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Prior Year	%	100%	96.77%	0.00%	3.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Applications Received	#	9033	8241	323	469	119	11	6	4	13	0	11	4	40	32

FY2012

Table B8: NEW HIRES By Type of Appointment - Distribution by Disability

Type of Appointment		Total	Total by Disability Status				Detail for Targeted Disabilities								
			(05) No Disability	(01) Not Identified	(06-04) Disability	Targeted Disability	(16, 17) Deafness	(23, 25) Blindness	(28, 32-38) Missing Limbs	(64-68) Partial Paralysis	(71-78) Total Paralysis	(81) Convulsive Disorder	(90) Mental Retardation	(93) Mental Illness	(92) Distortion of Limb/Spine
Permanent	#	25	21	3	1	0	0	0	0	0	0	0	0	0	0
	%	100%	84.00%	12.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Temporary	#	53	52	0	1	0	0	0	0	0	0	0	0	0	0
	%	100%	98.11%	0.00%	1.89%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Non-Appropriated	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Hired	#	78	73	3	2	0	0	0	0	0	0	0	0	0	0
	%	100%	93.59%	3.85%	2.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Prior Year	%	100%	95.77%	0.00%	3.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Applications Received	#	55	53	0	2	0	0	0	0	0	0	0	0	0	0

FY 2013

Table 88: NEW HIRES By Type of Appointment - Distribution by Disability

Type of Appointment	Total	Total by Disability Status				Detail for Targeted Disabilities									
		(05) No Disability	(01) Not Identified	(06-94) Disability	Targeted Disability	(18) Hearing	(21) Vision	(30) Missing Extremities	(69) Partial Paralysis	(79) Complete Paralysis	(82) Epilepsy	(90) Severe Intellectual disability	(91) Psychiatric disability	(92) Dwarfism	
Permanent	#	31	26	3	2	0	0	0	0	0	0	0	0	0	0
	%	100%	83.87%	9.68%	6.45%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Temporary	#	182	172	6	4	0	0	0	0	0	0	0	0	0	0
	%	100%	94.51%	3.30%	2.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Non-Appropriated	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Hired	#	213	198	9	6	0	0	0	0	0	0	0	0	0	0
	%	100%	92.96%	4.23%	2.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Prior Year	%	100%	93.59%	3.85%	2.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Applications Received	#	116079	109987	3048	5044	0	0	0	0	0	0	0	0	0	0

FY 2014

Table 88: NEW HIRES By Type of Appointment - Distribution by Disability

Type of Appointment	Total	Total by Disability Status				Detail for Targeted Disabilities									
		(05) No Disability	(01) Not Identified	(06-94) Disability	Targeted Disability	(18) Hearing	(21) Vision	(30) Missing Extremities	(69) Partial Paralysis	(79) Complete Paralysis	(82) Epilepsy	(90) Severe Intellectual disability	(91) Psychiatric disability	(92) Dwarfism	
Permanent	#	93	87	2	4	0	0	0	0	0	0	0	0	0	
	%	100%	93.55%	2.15%	4.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Temporary	#	342	335	4	3	1	0	0	0	0	0	0	1	0	
	%	100%	97.95%	1.17%	0.88%	0.29%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.29%	0.00%	
Non-Appropriated	#	0	0	0	0	0	0	0	0	0	0	0	0	0	
	%	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Total Hired	#	435	422	6	7	1	0	0	0	0	0	0	1	0	
	%	100%	92.96%	1.38%	1.61%	0.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	
Prior Year	%	100%	92.96%	4.23%	2.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Applications Received	#	70593	26194	43256	1143	0	0	0	0	0	0	0	0	0	

FY2015

Interrogatory 12

Auth or Test Date	Partial File Number	Result	Outcome
9/17/2013	20130265	INC	No Significant Response in subsequent test
2014			
11/12/2013	2014-0015	INC	No Significant Response in subsequent test
12/13/2013	2014-0076	INC	No Significant Response in subsequent test
1/7/2014	2014-0010-2	INC	Inconclusive in subsequent test
2/20/2014	2014-0229	INC	No Significant Response in subsequent test
2/25/2014	2014-0309	INC	No Significant Response in subsequent test
3/12/2014	2014-0402	INC	No Significant Response in subsequent test
3/21/2014	2014-0492	INC	No Significant Response in subsequent test
5/8/2014	2014-0655	INC	No Significant Response in subsequent test
5/14/2014	2014-0678	INC	No Significant Response in subsequent test
6/2/2014	2014-0734	INC	Significant Response in subsequent test
6/13/2014	2014-0764	INC	Significant Response in subsequent test
6/27/2014	2014-0830	INC	No Significant Response in subsequent test
8/26/2014	2014-984	INC	No Significant Response in subsequent test
9/8/2014	2014-1360	INC	No Significant Response in subsequent test
9/26/2014	2014-1262	INC	No Significant Response in subsequent test
2015			
11/3/2014	2015-0083	INC	Significant Response in subsequent test
10/29/2014	2015-0096	INC	No Significant Response in subsequent test
11/4/2014	2015-0112	No Opinion	No Significant Response in subsequent test
11/12/2014	2015-0239	INC	Significant Response in subsequent test
12/2/2014	2015-0348	INC	No Significant Response in subsequent test
12/4/2014	2015-332-2	INC	No Significant Response in subsequent test
12/15/2014	2015-0472	INC	No Opinion in subsequent test
2/14/2015	2015-0640-2	No Opinion	No Significant Response in subsequent test
4/3/2015	2015-0965	No Opinion	No Opinion in subsequent test
6/23/2015	2015-1379	INC	SR in subsequent test
9/10/2015	2015-1857	No Opinion	No Significant Response in subsequent test
9/1/2015	2015-1885	INC	No Opinion in subsequent test
10/15/2015	2015-1702-2	INC	Inconclusive in subsequent test
2016			
10/28/2015	2016-0090	INC	Re-test pending

Interrogatory 12

10/30/2015	2016-0131	INC	No Significant Response in subsequent test
11/12/2015	2016-0213	No Opinion	Significant Response in subsequent test
12/7/2015	2016-0297	INC	No Significant Response in subsequent test
12/8/2015	2016-0335	No Opinion	No Significant Response in subsequent test
1/6/2016	2016-0277	No Opinion	Re-test pending

Document Request 2

[REDACTED]

From: [REDACTED] <[REDACTED]@outlook.com>
Sent: Tuesday, October 28, 2014 4:56 PM
To: SCOTT CRAGG (TEC)
Subject: FW: Application Status

Hi Scott,

I wanted to share this with you as I know that you were looking into my status after emailing and calling me on Monday after the Investigators did not follow up and schedule a second polygraph test. It appears that my status was not in fact still active. Did anyone even have the courtesy to inform you this was being sent to me?

I want you to know I have a great deal of respect for you, and the way you have treated me through this whole process.

If the opportunity should ever arise for me to work for you in another organization, I would do so in a heart beat.

I cannot however say that I have any respect for the Secret Service at this point, especially after being told I was a former drug user and had committed past serious undetected crimes by their polygrapher, both of which are ridiculous and untrue.

I shared my experience with a mentor of mine at SSA and he told me based on my experience he would never take a lie detector test, or apply to any position in DHS based on what I shared with him. I felt Agent Ripinger who gave me the lie detector test did not have a favorable opinion of me, beginning with the first phone call.

Best of luck to you, and thank you for selecting me.

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

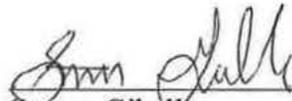
The attached document entitled *Agency's Responses to Complainant's Request for Discovery* was sent to the following on this 29th day of February 2016, by e-mail:

Tom Gagliardo
Tomgagliardo@gmail.com

██████████
██████████@outlook.com

And by mail to:

Thomas Gagliardo
AFGE General Counsel
c/o AFGE Local 1923 Legal Defense Fund
Room 1720 Operations Building
Mailstop 1-G-15 Operations Building
6401 Security Blvd.
Baltimore, MD 21235



Steven Giballa
Agency Attorney
U.S. Secret Service