

**COMPLAINT OF POSSIBLE PROHIBITED POLITICAL ACTIVITY
(VIOLATION OF THE HATCH ACT)**

INFORMATION ABOUT FILING A COMPLAINT WITH OSC

This complaint form can be used to file complaints alleging violations of the Hatch Act by federal, District of Columbia, state and local and nonprofit organization employees. While it is not required that this complaint form be used, use of this form will be helpful to OSC in expediting the processing and investigating of complaints. Please complete the information requested below as fully and accurately as possible.

SEND COMPLETED COMPLAINT FORMS TO OSC -

By Mail:

Hatch Act Unit
Office of Special Counsel
1730 M Street, N.W. (Suite 218)
Washington, DC 20036-4505

By Fax:

(202)254-3700

Electronically:

WWW.OSC.GOV (AT "FILE COMPLAINTS ONLINE")

PLEASE KEEP A COPY OF YOUR COMPLAINT, ANY SUPPORTING DOCUMENTATION, AND ANY ADDITIONAL ALLEGATIONS SENT IN WRITING TO OSC NOW, OR AT ANY TIME WHILE YOUR COMPLAINT IS PENDING. REPRODUCTION CHARGES UNDER THE FREEDOM OF INFORMATION ACT MAY APPLY TO ANY REQUEST YOU MAKE FOR COPIES OF MATERIALS THAT YOU PROVIDED TO OSC.

INFORMATION ABOUT THE HATCH ACT

The Hatch Act prohibits federal, District of Columbia, some state and local and nonprofit organization employees from engaging in certain types of political activities. See 5 U.S.C. §§ 7321- 7326 and 5 U.S.C. §§ 1501-1508.

Federal Employees are generally prohibited from:

1. Using their official authority or influence for the purpose of interfering with or affecting the result of an election.
2. Soliciting, accepting, or receiving political contributions (with some exceptions).
3. Running for nomination or as candidates for partisan political office.
4. Soliciting or discouraging the participation in political activity of any person who has business before their employing agency.
5. Engaging in political activity while on duty, in any room or building occupied in the discharge of official duties, while wearing a uniform or official insignia, or while using a vehicle owned or leased by the United States government.

State and Local Employees are prohibited from*:

1. Using their official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office.
2. Coercing, attempting to coerce, commanding, or advising a State or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes.
3. Being a candidate for partisan political office.

* Employees of some private, nonprofit organizations are subject to the same restrictions on political activity that apply to covered state and local employees.

**VISIT WWW.OSC.GOV
FOR MORE INFORMATION ABOUT THE HATCH ACT**

COMPLAINT OF POSSIBLE PROHIBITED POLITICAL ACTIVITY (HATCH ACT VIOLATION)

COMPLAINT OF POSSIBLE PROHIBITED POLITICAL ACTIVITY (VIOLATION OF THE HATCH ACT)

(Please print legibly or type and complete all pertinent items. Enter "N/A" (Not Applicable) or "Unknown" where appropriate. (If more space is needed, use Continuation Sheet at page 4.)

PART 1: COMPLAINANT'S INFORMATION

1. Name of person filing complaint: Mr. (X) Ms. () Mrs. () Miss. ()
Cause of Action
2. Agency name (if referring complaint):
3. Agency Address (if referring complaint):
4. Home or mailing address (if filing complaint): 1919 Pennsylvania Avenue, NW, Suite 650, Washington, D.C. 20006
5. Contact information: Telephone number(s): () () (Home) () 202 499-4232 (Office) Ext. ()
Fax number: ()
E-mail address: Daniel.Epstein@causeofaction.org
6. How did you first become aware that you could file a complaint with OSC?
() OSC Web site () OSC speaker () OSC brochure () OSC poster
() news story () agency personnel office () union () co-worker
(X) other (please describe): Review of laws pertaining to OSC
Date (approximate): 8.5.2011

PART 2: SUBJECT'S INFORMATION

7. Name of person who violated the Hatch Act ("Subject"): A.J. Pearlman
8. Agency: Department of Health and Human Services
9. Position/Title: currently Policy Advisor, formerly External Relations Specialist
10. Federal, District of Columbia (DC), State/Local or Nonprofit employee (check one):
(X) Federal employee
() DC employee.
() State or Local employee
() Nonprofit organization employee
11. Contact information: Telephone number(s): () () (Home) () 301 443-2216 (Office) Ext. ()
Fax number: ()
E-mail address: AJ.Pearlman@hrsa.hhs.gov

COMPLAINT OF POSSIBLE PROHIBITED POLITICAL ACTIVITY (HATCH ACT VIOLATION)

12. Subject's Supervisor's Name: Secretary Kathleen Sebelius
13. Subject's Supervisor's Contact Information:
Telephone number(s): () () (Home) () () (Office) Ext. ()
Fax number: ()
E-mail address:
14. Does Subject have knowledge of the Hatch Act? (check one) :

- Yes
- No
- Not sure

15. If you answered Yes to question 14, plea explain how Subject knows about the Hatch Act (e.g. agency training, agency's distribution of brochures, flyers, e-mails, etc.) :

Agency training.

PLEASE COMPLETE THE FOLLOWING ONLY IF THE SUBJECT IS A STATE OR LOCAL OR NONPROFIT ORGANIZATION EMPLOYEE. IF NOT, SKIP TO PART 3:

16. Does Subject's employing agency receive federal funds? (check one) :

- Yes
- No
- Not sure

17. If you answered Yes to question 16, please provide the following:

a) Nature and source of federal funds

b) Name of individual (s) at agency responsible for federal funds:

c) Contact information for individual (s) responsible for federal funds:

Telephone number(s): () (Home)
() (Office) Ext.
Fax number: ()
E-mail address:

18. Does the Subject perform duties in connection with federal funds? (check one) :

- Yes
- No
- Not sure

19. If you answered yes to question 18, please provide the type of duties Subject performs in connection with Federal funds:

Salaried employee of Department of Health and Human Services (HHS)

PART 3: DETAILS OF COMPLAINT

20. What are the actions that you are reporting to OSC? Please attach all supporting documentation to the complaint form. **IF YOU ARE ALLEGING CANDIDACY IN A PARTISAN ELECTION, PLEASE PROVIDE THE DATE OF THE ELECTION AND/OR THE DATE NOMINATING PETITIONS ARE DUE. IF YOU ARE ALLEGING POLITICAL ACTIVITY WHILE ON DUTY OR IN A FEDERAL BUILDING FOR FEDERAL EMPLOYEES, PLEASE PROVIDE THE TIME AND/OR PLACE THE ACTIVITY OCCURRED.**

On February 25, 2012, between the hours of 1:00 and 9:00 P.M. EST, in Charlotte, North Carolina, AJ Pearlman, while on duty as a federal employee at the Office of Intergovernmental and External Affairs at HHS, traveled to and attended the Human Rights Campaign (HRC) Gala along with HHS Secretary Kathleen Sebelius, which was reclassified by HHS as a political event. HHS sought and received reimbursement from the Democratic National Committee (DNC) for AJ Pearlman's costs associated with travel and participation at the HRC Gala while on duty. Enclosed with this complaint are documents released by HHS to Cause of Action pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (2012) that reveal Pearlman's participation in the political event while on duty. A.J. Pearlman therefore violated 5 U.S.C. § 7324(a), which states "An employee may not engage in political activity . . . while the employee is on duty." 5 U.S.C. § 7326 states, "An employee or individual who violates section 7323 or 7324 shall be subject to removal, reduction in grade, debarment from Federal employment for a period not to exceed 5 years, suspension, reprimand, or an assessment of a civil penalty not to exceed \$1,000."

PART 4: CONSENT TO CERTAIN DISCLOSURES OF INFORMATION

OSC asks everyone who files a complaint alleging a possible prohibited personnel practice or other prohibited activity to select one of three Consent Statements shown below. **IF YOU DO NOT SELECT ONE OF THE THREE CONSENT STATEMENTS BELOW, OSC WILL ASSUME THAT YOU HAVE SELECTED CONSENT STATEMENT 1.** Please: (a) select and sign (or check, if filing electronically) one of the Consent Statements below; and (b) keep a copy of the Consent Statement you select (as well as a copy of all documents that you send to OSC) for your own records.

If you initially select a Consent Statement that restricts OSC's use of information, you may later select a less restrictive Consent Statement. If your selection of Consent Statement 2 or 3 prevents OSC from being able to conduct an investigation, an OSC representative will contact you, explain the circumstances, and provide you with an opportunity to select a less restrictive Consent Statement.

You should be aware that the Privacy Act allows information in OSC case files to be used or disclosed for certain purposes, regardless of which Consent Statement you sign. See 5 U.S.C. § 552a(b). Information about certain circumstances under which OSC can use or disclose information under the Privacy Act appears on the next page.

(Please sign one)

Consent Statement 1

I *consent* to OSC's communication with the pertinent individuals involved in my complaint. I agree to allow OSC to disclose my identity as the complainant, and information from or about me, if OSC decides that such disclosure is needed to investigate the allegation(s) in my complaint. I understand that regardless of the Consent Statement I choose, OSC may disclose information from my complaint file when permitted by the Privacy Act (including circumstances summarized in Part 6, below).

Complainant's Signature for Consent Statement 1

Date Signed

Consent Statement 2

I *consent* to OSC's communication with the pertinent individuals involved in my complaint, but I *do not agree* to allow OSC to disclose my identity as the complainant. I agree to allow OSC to disclose only information from or about me, without disclosing my name or other identifying information, if OSC decides that such disclosure is needed to investigate the allegation(s) in my complaint. I understand that in some circumstances OSC could not maintain my anonymity while communicating with the pertinent individuals. In such cases, I understand that this request for confidentiality might prevent OSC from taking further action on my complaint. I also understand that regardless of the Consent Statement I choose, OSC may disclose information from my complaint file when permitted by the Privacy Act (including circumstances summarized in Part 6, below).

Complainant's Signature for Consent Statement 2

Date Signed

Consent Statement 3

I *do not consent* to OSC's communication with the pertinent individuals involved in my complaint. I understand that if OSC decides that it cannot investigate the allegation(s) in my complaint without communicating with this individuals, my lack of consent will probably prevent OSC from taking further action on the complaint. I understand that regardless of the Consent Statement I choose, OSC may disclose information from my complaint file when permitted by the Privacy Act (including circumstances summarized in Part 6, below).

Complainant's Signature for Consent Statement 3

Date Signed

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PART 5: CERTIFICATION AND SIGNATURE

I certify that all of the statements made in this complaint (including any continuation pages) are true, complete, and correct to the best of my knowledge and belief. I understand that a false statement or concealment of a material fact is a criminal offense punishable by a fine of up to \$250,000, imprisonment for up to five years, or both. 18 U.S.C. § 1001.

Signature

Date Signed

PART 6: PRIVACY ACT / PAPERWORK REDUCTION ACT STATEMENTS

Routine Uses. Limited disclosure of information from OSC files is needed to fulfill OSC's investigative, prosecutorial, and related responsibilities. OSC has described 18 routine uses for information in its files in the *Federal Register* (F.R.), at 66 F.R. 36611 (July 12, 2001), and 66 F.R. 51095 (October 5, 2001). A copy of the routine uses is available from OSC upon request. A summary of the routine uses appears below.

OSC may disclose information from its files in the following circumstances:

1. to disclose that an allegation of prohibited personnel practices or other prohibited activity has been filed;
2. to disclose information to the Office of Personnel Management (OPM) as needed for inquiries involving civil service laws, rules or regulations, or to obtain an advisory opinion;
3. to disclose information about allegations or complaints of discrimination to entities concerned with enforcement of antidiscrimination laws;
4. to the MSPB or the President, when seeking disciplinary action;
5. to the involved agency, MSPB, OPM, or the President when OSC has reason to believe that a prohibited personnel practice has occurred, exists, or is to be taken;
6. to disclose information to Congress in OSC's annual report;
7. to disclose information to third parties (without identifying the complainant unless OSC has the complainant's consent) as needed to conduct an investigation; obtain an agency investigation and report on information disclosed to OSC's whistleblower disclosure channel; or to give notice of the status or outcome of an investigation;

8. to disclose information as needed to obtain information about hiring or retention of an employee; issuance of a security clearance; conduct of a security or suitability investigation; award of a contract; or issuance of a license, grant, or other benefit;
9. to the Office of Management and Budget (OMB) for certain legislative coordination and clearance purposes;

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10. to provide information from an individual's record to a congressional office acting pursuant to the individual's request;
11. to furnish information to the National Archives and Records Administration for records management purposes;
12. to produce summary statistics and work force or other studies;
13. to provide information to the Department of Justice as needed for certain litigation purposes;
14. to provide information to courts or adjudicative bodies as needed for certain litigation purposes;
15. to disclose information to the MSPB as needed in special studies authorized by law;
16. for coordination with an agency's Office of Inspector General or comparable entity, to facilitate the coordination and conduct of investigations and review of allegations;
17. to news media or the public in certain circumstances (except when the Special Counsel determines that disclosure in a particular case would be an unwarranted invasion of personal privacy); and
18. to the Department of Labor and others as needed to implement the Uniformed Services Employment and Reemployment Rights Act of 1994, and the Veterans' Employment Opportunities Act of 1998.

If OSC officials believe that disclosure may be appropriate in a situation not covered by one of OSC's routine uses, or one of the 11 other exceptions to the Privacy Act's general prohibition on disclosure, OSC will seek written authorization from the complainant permitting the disclosure.

Purposes, Burdens, and Other Information. An agency may not conduct or sponsor a collection of information, and persons may not be required to respond to a collection of information, unless it: (a) has been approved by OMB; and (b) displays a currently valid OMB control number. The information in this form is collected pursuant to OSC's legal responsibility to investigate: (a) allegations of prohibited political activity (5 U.S.C. § 1216). The information will be reviewed by OSC to determine whether the facts establish its jurisdiction over the subject of the complaint, and whether further investigation and disciplinary action is warranted. The reporting burden for this collection of information is estimated to be an average of 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the form. Please send any comments about this burden estimate, and suggestions for reducing the burden, to the Office of Special Counsel, Legal Counsel and Policy Division, 1730 M Street, N.W. (Suite 218), Washington, DC 20036-4505.

ENCLOSURES

Wolff, Kate (HHS/OS)

From: Chris Canning [CanningC@dnc.org]
Sent: Monday, July 23, 2012 12:12 PM
To: Wolff, Kate (HHS/OS)
Subject: RE: Request for reimbursement

On it. Thanks.

From: Wolff, Kate (HHS/OS) [mailto:Kate.Wolff@hhs.gov]
Sent: Monday, July 23, 2012 12:05 PM
To: Chris Canning
Subject: Request for reimbursement

Hi Chris,

Per additional guidance we have received from our ethics counsel, we are requesting reimbursement for staff travel costs related to Secretary Sebelius's February 25th travel to Charlotte, NC.

Traveler:	AJ Pearlman
Date:	February 25, 2012
Location:	Charlotte, NC
Commercial Carrier:	\$1,438.10
Mileage:	\$14.28
Ground transportation:	\$32.75
Reservation fee:	\$19.60
TMC fee:	\$6.08
Total:	\$1,510.81

Please make the check out to the Department of Health and Human Services, and send it to my attention at 200 Independence Ave., SW, Room 615F, Washington, DC 20009.

Please let me know if you have any questions!
Kate

Kate Wolff
Director, Scheduling and Advance
Office of the Secretary
Department of Health and Human Services
Desk: 202-690-1058
kate.wolff@hhs.gov

Cincinnati, OH → Charlotte, NC → Washington, DC

Cincinnati Weather: Partly Cloudy, High 39, Low 28
Charlotte Weather: Mostly Sunny, High 51, Low 30

- 11:00-11:30am DEPART EN ROUTE TO AIRPORT
- 12:10-1:32pm WHEELS UP CINCINNATI EN ROUTE TO CHARLOTTE, NC
US Airways Flight 2226
Flight time: 1h 22m
- 1:40-2:00pm DEPART EN ROUTE TO WESTIN CHARLOTTE HOTEL
601 South College Street
Charlotte, NC
- 2:00-4:50pm HOLD/DOWNTIME: WESTIN CHARLOTTE HOTEL
- 5:00-TBDpm RECEPTION FOR 2012 DEMOCRATIC CONVENTION HOST COMMITTEE
Location TBD
Advance: Eli Fleet
Participants: Mayor Anthony Foxx
- 6:00-9:00pm HUMAN RIGHTS CAMPAIGN ANNUAL NORTH CAROLINA GALA DINNER
Charlotte Convention Center
Staff: AJ Pearlman
Advance: Eli Fleet
Press: Open – limited attendance
Participants: Charlotte Mayor Anthony Foxx
Senator Kay Hagan (D – NC)
Joe Solmonese, HRC President
Don Lemon, CNN Anchor, receiving the HRC Visibility Award
Format: 5:00 - Small Reception begins
5:30 - General reception begins
6:30 - Transition to ballroom
6:45 - Speaking program begins
- Dinner co-chairs
- Joe Solmonese remarks
7:32 - YOU give remarks
8:00 - Dinner is served
9:00 - YOU depart
- 9:00-9:30pm DEPART CONVENTION CENTER EN ROUTE TO AIRPORT
- 10:11-11:23pm WHEELS UP CHARLOTTE EN ROUTE TO DCA
US Airways Flight 1780
Flight time: 1h 12m

~~Sunday, February 26~~ (F)

Security Detail:



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary
Washington, D.C. 20201

To: Secretary Sebelius

From: AJ Pearlman, Office of Intergovernmental and External Affairs

Subject: Remarks at North Carolina Human Rights Campaign Dinner

Date: Saturday, February 25, 2012

Event Details

Location: Charlotte Convention Center
501 South College Street
Charlotte, NC 28202

Time: 6:00pm – 9:00pm
(Remarks from 7:30pm – 7:45pm)

Staff: AJ Pearlman, Office of Intergovernmental and External Affairs

Overview

You will be providing the keynote remarks at the annual North Carolina Human Rights Campaign Dinner (HRC) in Charlotte. The North Carolina Gala Dinner is HRC's premier event of the year in the Carolinas and is attended by more than 1,000 of HRC's influential leaders and supporters in the region, as well as policymakers and leaders from the business community. When you arrive, you will be greeted by Joe Solmonese, the President of HRC. Mr. Solmonese will also introduce you before your remarks. You will not be taking any questions from the audience. The dinner is open press, but you will not be doing a media availability.

Participants

Upon your arrival, you will be greeted by Joe Solmonese.

In addition to Mr. Solmonese, the following people will be attending the dinner:

- Senator Kay Hagan (D-NC)
- Anthony Foxx, Mayor of Charlotte, NC
- Don Lemon, CNN Anchor, who is receiving the HRC Visibility Award

The following people will be seated at your table:

- Joe Solmonese and his husband, Jed Hastings
- Don Lemon and his guest Benjamin Tinker

At the time of the memo deadline, the final seating list was not yet available. However, there will be additional people at your table who are either major donors or Board Members for HRC.

OGC061

Also, please note that you may be introduced to the three co-chairs of the event: Dan Mauney, Cherie Green and Rich Hurley.

Agenda

- 6:00 pm** YOU arrive and are greeted by Joe Solmonese, HRC President. A general reception will be taking place during this time and you will be escorted in by Mr. Solmonese.
- 6:45 pm** The Speaking Program begins. YOU will be seated at a table during the Program.
- 7:30 pm** YOU are introduced by Joe Solmonese
- 7:32 pm** YOU give remarks
- 7:45 pm** YOU conclude and return to your table
- 9:00 pm** YOU depart

Background

The Human Rights Campaign (HRC) is the largest civil rights organization working to achieve equality for lesbian, gay, bisexual and transgender Americans. HRC represents more than one million members and supporters nationwide. Founded in 1980, HRC advocates on behalf of LGBT Americans, mobilizes grassroots actions in diverse communities, invests strategically to elect fair-minded individuals to office and educates the public about LGBT issues.

The Annual North Carolina HRC Dinner brings together a wide range of individuals from across the region who support LGBT equality. This year's theme is Flight 2012: Non-Stop to Equality.

The speaking program will begin with Charlotte Mayor Anthony Foxx, followed by the Co-Chairs of the Dinner and the Presenting Sponsors (Bank of America, Wells Fargo, and Time Warner). After they speak, you'll be introduced by Joe Solmonese and will give your remarks.

Later in the evening, Don Lemon, CNN Anchor, will receive the HRC Visibility Award, which recognizes LGBT individuals who are living open and honest lives at home, at work, in the media and in their greater community. Also being honored are local awardees, including:

- LGBT Center of Raleigh: HRC North Carolina Trailblazer Award
- Rev. Debbie Warren, Regional AIDS Interfaith Network: HRC NC Legacy Award
- Scott Bishop: HRC Volunteer of the Year
- The Farewell to Summer Foundation (The White Party): HRC NC Equality Award

Issues To Be Aware Of

Marriage Amendment

- This is the major issue in North Carolina now. North Carolina is the only southern state that has not amended its state constitution to ban same-sex marriages. However,

Amendment One, which, if passed, would ban same-sex marriage and any other form of relationship recognition for same-sex couples, will be on the ballot on May 8th. The vote is scheduled for the same day as the Republican primary. If you are asked about the Amendment, it would be best if you refer generally to ballot initiatives and not to the specific amendment in North Carolina. You may choose to respond:

- "While the President does not weigh in on every single ballot measure in our country, the record is clear that the President has long opposed divisive and discriminatory efforts to deny rights and benefits to same sex couples. He believes strongly we should not take protections away from committed gay and lesbian couples who want to take care of their families."
- If you are asked about your personal views, here is a suggested talking point:
 - "I'm here to represent the President and the Obama Administration, not in my personal capacity. As you know, the President has long believed that gay and lesbian couples deserve the same rights and legal protections as straight couples, including the ability to take care of their families. That's why he supports the Respect for Marriage Act, which would repeal the so-called Defense of Marriage Act and has determined that Section 3 of DOMA is unconstitutional and that his Administration would no longer defend it in the courts." (The Attorney General's statement on defending DOMA is included as an attachment to this briefing memo.)

Please note: The Administration is trying to talk about marriage in terms of a commitment-based framework instead of a rights-based framework. In other words, marriage is about couples who are committed and trying to take care of their families, not about trying to access a perceived special set of rights.

Hospital Visitation Rules

- The hospital visitation regulation is the HHS accomplishment that this audience probably will have previously heard about. HRC was engaged with CMS throughout the regulation process and provided comments on the proposed regulations. Following the release of the rule, HRC has worked to raise awareness about hospital visitation rights. In addition, each year HRC releases the Healthcare Equality Index, which rates healthcare facilities on their policies and practices affecting LGBT patients and families, including hospital visitation policies, staff trainings, and nondiscrimination provisions.

Mayor Foxx as Potential Gubernatorial Candidate

- Following NC Governor Perdue's announcement that she wasn't going to run for reelection in 2012, Foxx's name was thrown out as a potential candidate. On January 31st, he decided against a run and put out the following statement: "Over the past few days I have given serious consideration to a run for Governor of North Carolina. Given the unusual circumstances and short time, such a run would have required more focus on a statewide campaign than on my young family and many local issues of importance to me and so many Charlotte residents. Therefore, I have decided to forgo a statewide race this election cycle, and will continue my efforts to build a brighter future for our city."

Wolff, Kate (HHS/OS)

Subject: Remarks: North Carolina Human Rights Campaign Dinner
Location: Charlotte, NC

Start: Sat 2/25/2012 6:00 PM
End: Sat 2/25/2012 9:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: OS Secretary's Schedule (HHS/IOS)
Required Attendees: Jackson, Nat; Lott, Robert (HHS/ASPA); Goldstein, Adam (HHS/ASPA); Pearlman, AJ (HHS/IOS/IEA); Fleet, Eli (HHS/IOS); Maley, Keith (HHS/ASPA); Sebelius, Kathleen (HHS/OS); 'hhssecretaryevents@cdc.gov'; IHS, Director (IHS/HQ); OS Scheduling (HHS/OS)
Optional Attendees: OS Oshhsexecsec2

Categories: Official Remarks

POC: AJ Pearlman
Staff: AJ Pearlman



Sec Sebelius at
HRC NC Gala - ...