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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,	)	
<i>ex rel.</i> IRA GREEN, INC.	)	
	)	
	)	
Plaintiffs	)	FILED IN CAMERA
	)	AND UNDER SEAL
	)	
v.	)	Civil Action No. <u>04-2507 (JAP)</u>
	)	
	)	
HILBORN-HAMBURGER, INC.;	)	COMPLAINT
WILLIAM H. GRIFFIN; and	)	(False Claim Act)
PAUL GOULIAN	)	
	)	JURY TRIAL DEMANDED
Defendants	)	

PRELIMINARY STATEMENT

1) This case involves allegations that Defendants Hilborn-Hamburger, Inc. ("Hilborn-Hamburger"), its owner and President, William H. Griffin ("Griffin"), and its Vice President, Paul M. Goulian ("Goulian"), have defrauded the United States of

America by knowingly supplying the federal Government with a multitude of metal and non-metal military insignia, including but not limited to medals, decoration sets, qualification badges, rank insignia, and unit insignia (hereinafter collectively referred to as "military insignia") that do not conform to the Government's mandated specifications. By falsely certifying the quality and conformance of these items, the Defendants were able to reap excessive profits at the expense of the Government and, ultimately, the men and women servicing in the U.S. Armed Forces.

2) Plaintiff Ira Green, Inc. ("IGI"), by the undersigned counsel and acting on behalf of and in the name of the United States of America, hereby brings this civil action under the *qui tam* provisions of the federal False Claims Act, 31 U.S.C. §§ 3729-3733, and alleges:

JURISDICTION AND VENUE

3) Counts I through III of this Complaint are civil actions by Plaintiff IGI acting on behalf of and in the name of the United States of America, against (a) Hilborn-Hamburger, (b) its owner and President, William H. Griffin, and (c) its Vice President, Paul M. Goulian, under the federal False Claims Act, 31 U.S.C. §§ 3729-3733.

4) This Honorable Court has jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331 and 1345 and 31 U.S.C. § 3732(a).

5) Defendant Hilborn-Hamburger's principal place of business is located at 122 Dayton Avenue, Passaic, New Jersey 07055. Hilborn-Hamburger transacts business in this (and numerous other) judicial Districts.

6) Defendant Griffin is the owner of Hilborn-Hamburger and serves as the company's President. Defendant Griffin primarily conducts business from Defendant

Hilborn-Hamburger's corporate office at 122 Dayton Avenue, Passaic, New Jersey 07055.

7) Defendant Gouliau is employed by Hilborn-Hamburger as its Vice President. Defendant Gouliau primarily conducts business at Defendant Hilborn-Hamburger's corporate office at 122 Dayton Avenue, Passaic, New Jersey 07055. Among other things, Defendant Gouliau is responsible for overseeing and ensuring the quality of all military insignia supplied by Defendant Hilborn-Hamburger to the federal Government.

8) Many, if not all, of the Defendants' actions which form the basis of this Complaint and which are proscribed by 31 U.S.C. § 3729 occurred within this judicial District. This Court has personal jurisdiction over all three Defendants.

9) Venue is appropriate in this District under 31 U.S.C. § 3732(a) because the conduct that gives rise to this complaint occurred in substantial part in this District.

10) Plaintiff IGI has direct and independent knowledge, within the meaning of 31 U.S.C. § 3730(e)(4)(B), of the information on which the allegations set forth in this Complaint are based. On several occasions prior to filing this Complaint, beginning on or about May 15, 2002, IGI voluntarily has provided information regarding the Defendants' fraudulent conduct and false claims to the United States Government.

11) None of the allegations set forth in this Complaint are based on a public disclosure of allegations or transactions in a criminal, civil, or administrative hearing, in a congressional, administrative, or General Accounting Office report, hearing, audit, or investigation, or from the news media.

THE PARTIES

12) Plaintiff IGI is now, and at all times mentioned in this Complaint has been, a corporation organized and existing under the laws of the State of New York with its principal place of business at 177 Georgia Avenue, Providence, Rhode Island 02905. Plaintiff IGI is a manufacturer and distributor of military insignia, decoration, and uniform accessories and is suing in the name of and on behalf of the United States of America.

13) Defendant Hilborn-Hamburger is now, and at all times mentioned in this Complaint has been, a corporation organized and existing under the laws of the State of New York. Defendant Hilborn-Hamburger's principal place of business is at 122 Dayton Avenue, Passaic, New Jersey 07055.

14) Defendant Griffin is now, and at all times mentioned in this Complaint has been, the President of Hilborn-Hamburger, and, on information and belief, is the company's sole owner. On information and belief, Defendant Griffin resides at 15 Doretta Street, Rivervale, New Jersey 07675-6212.

15) Defendant Gouliau is now, and at all times mentioned in this Complaint has been, the Vice President of Hilborn-Hamburger. On information and belief, Defendant Gouliau resides at 445 East Glen Avenue, Ridgewood, New Jersey 07450.

GENERAL ALLEGATIONS

A. The Department Of Defense's Certification Program for Military Insignia

16) Companies wishing to manufacture insignia items to be worn by members of the United States Armed Forces first must undergo a rigorous certification process. During that process, pre-production samples of each military insignia item are inspected

and/or tested to ensure that they conform to relevant Military Specifications ("MIL-SPEC"), Purchase Descriptions, and Certification Program Bulletins for each product (hereinafter collectively referred to as "Specifications").

17) These Specifications describe the designs, dimensions, tolerances, material compositions, and testing for each metal and non-metal military insignia item.

18) The relevant Specification requirements have remained materially the same during all times relevant to the allegations contained in this Complaint.

19) The military insignia manufacturer certification program for the Department of the Navy is administered by the Navy Clothing and Textile Research Facility ("NCTRF"), which is located in Natick, Massachusetts. NCTRF's quality control and certification procedures for military insignia items are set forth in the U.S. Navy Uniform Certification Program By-Laws.

20) The manufacturer certification program for military insignia used by the United States Army and Air Force is administered by the Department of the Army's The Institute of Heraldry ("TIOH"), which is located at Fort Belvoir, Virginia. TIOH's quality control and certification procedures for military insignia are set forth in Army Regulation ("AR") 672-8, entitled "Manufacture, Sale, Wear, and Quality Control for Heraldic Items," and at 32 C.F.R. §§ 507.1 through 507.18.

21) The purpose of these procedures is to ensure that all military insignia items to be worn by U.S. servicemen and servicewomen are manufactured in accordance with Specifications provided by NCTRF and TIOH.

22) After submission of the pre-production samples, if NCTRF or TIOH determines that a specific military insignia item complies with the material, shade,

design, fit, construction, quality, workmanship, and durability of the relevant Specification(s), the applicant firm is issued a certification letter authorizing it to manufacture and supply that military insignia item and to display that firm's unique certification number (commonly referred to as that firm's "hallmark") on the item. See, e.g., U.S. Navy Uniform Certification Program By-Laws, AR 672-8, and 32 C.F.R. §§ 507.1 through 507.18.

23) Paragraph IV.A.4 of the U.S. Navy Uniform Certification Program By-Laws states that "[b]y applying the certification number to the item, the manufacturer guarantees the item has been produced in accordance with the applicable requirements." In addition, Paragraph IV.A.5 requires the approved manufacturer to display the following legend on the packaging in which each certified military insignia item is contained:

"U.S. Navy Certification No. xxxN
This Item is warranted by the manufacturer to meet
the applicable requirements."

24) The Army/Air Force regulations contain similar provisions. For example, Paragraph 2-1(a)(1) of AR 672-8 provides that a certificate of authority is to be issued to only those manufacturers who have sufficient manufacturing capability and who have agreed to manufacture military insignia items in accordance with the applicable government Specifications. AR 672-8, Paragraph 2-1(a)(3) and 32 C.F.R. § 507.6(a)(3), in turn, state that a hallmark will be assigned to each certified manufacturer, and that all military insignia items manufactured by that firm for sale to the Federal Government will bear that distinct hallmark.

25) Suppliers of military insignia to the federal Government are responsible for ensuring that all such items (a) have been manufactured in accordance with all applicable government Specifications, (b) have been manufactured with government-furnished tools, (c) have been manufactured by a firm that has received a certificate of authority from TIOH and/or NCTRF, and (d) bears the manufacturer's distinctive hallmark. *See, e.g., AR 672-8, Paragraph 2-2.*

B. The Sale of Military Insignia to Members of the Armed Forces

26) The Navy Exchange Service Command ("NEXCOM"), which is headquartered at 3280 Virginia Beach Boulevard, Virginia Beach, VA 23542-5724, is a non-appropriated fund ("NAF") activity of the U.S. Department of Defense. NEXCOM is a division of the U.S. Department of the Navy, Naval Supply Systems Command.

27) NEXCOM's mission is to provide active-duty Navy personnel, Naval Reserve members, military retirees, and family members with quality merchandise and services through Navy Exchanges located throughout the United States and the world.

28) The Army & Air Force Exchange Service ("AAFES"), which is headquartered at 3911 S. Walton Walker Boulevard, Dallas, TX 75236-1598, is also a NAF activity within the U.S. Department of Defense.

29) AAFES' mission is to provide quality merchandise and services to active duty Army, Air Force, Army National Guard, Air National Guard, Army Reserve, and Air Force Reserve members, military retirees, and family members, regardless of where they are stationed.

30) AAFES operates thousands of facilities worldwide. These include 1,423 retail facilities -- 160 are main stores or shopping centers -- and nearly 200 military

clothing stores on Army and Air Force installations around the world. A handful of those facilities are “joint service” stores that serve the needs of Army, Air Force, Navy, and/or Marine Corps personnel alike. One such AAFES joint service store is located at the Naval Air Station – Atlanta.

31) To accomplish their missions, NEXCOM and AAFES purchase wholesale merchandise, supplies, equipment, and services from a variety of vendors. These purchases involve many forms of purchasing and item selection. Although purchases may be made from other governmental sources, most of NEXCOM’s and AAFES’ purchases are made directly from private businesses.

32) Both NEXCOM and AAFES have published purchasing procedures and contract forms/clauses that vendors, including sellers of military insignia, must agree to follow in order to conduct business with NEXCOM and AAFES. Both NEXCOM and AAFES require the vendor to tender for acceptance only items that conform to the Specification requirements and place the responsibility for performing or having performed all inspections and tests necessary to substantiate that the supplies or services furnished under the contract conform to the stated requirements. *See* NEXCOM Publication No. 61, at ¶ 19, AAFES Agreement No. 03-01, at ¶ 2.

33) Among the products that NEXCOM and AAFES purchase from private vendors for resale are various metal and non-metal military insignia items worn by members of the U.S. Armed Forces. Such military insignia items include medals, decoration sets, qualification badges, rank insignia, and unit insignia.

34) Both AAFES and NEXCOM purchase military insignia items only from private vendors that are certified by TIOH and/or NCTRF. AAFES and NEXCOM then resell those items to members of the U.S. Armed Forces and their families.

35) Both NEXCOM and AAFES require that each military insignia item sold to them by a private vendor conform to the detailed Specifications described above.

THE FRAUDULENT SCHEMES

36) Defendant Hilborn-Hamburger has been a supplier of military insignia to all branches of the U.S. Armed Forces since its founding in 1926. Defendant Hilborn-Hamburger's main manufacturing and distribution center is located at the Passaic Industrial Center, Passaic, New Jersey.

37) Defendant Hilborn-Hamburger applied for and was granted Hallmark Number "H24" by TIOH.

38) Defendant Hilborn-Hamburger applied for and was granted Hallmark Number "H24N" by NCTRF.

39) Beginning at some time prior to October 1, 1999, Defendant Hilborn-Hamburger entered into various contracts, purchase orders, and/or otherwise responded to purchase requests or automated internet orders issued by representatives of NEXCOM and AAFES for both metal and non-metal military insignia items, a partial list of which is attached as Exhibit 1 hereto.

40) Each of those orders required that the military insignia items being sold by Defendant Hilborn-Hamburger conform to the relevant Specifications for each product.

41) On information and belief, between October 1, 1999 (Fiscal Year ("FY") 2000) and the present, Defendant Hilborn-Hamburger has sold in excess of

\$12,000,000.00 worth of military insignia items to NEXCOM and AAFES for resale to members of the U.S. Armed Forces and their families.

42) Defendant Hilborn-Hamburger affixed its "hallmark" to each of those military insignia items delivered to NEXCOM and AAFES as required by U.S. Navy Uniform Certification Program By-Laws, AR 672-8, Paragraph 2-1(a)(3) and 32 C.F.R. § 507.6(a)(3).

43) In addition, Defendant Hilborn-Hamburger packaged its military insignia items sold to NEXCOM and AAFES in boxes which read, "This Trademark is your guarantee of the finest uniform accessories obtainable anywhere in the world. This item is warranted by the manufacturer to meet the applicable Government requirements."

44) Between October 1, 1999, and the present, Defendant Hilborn-Hamburger has submitted thousands of invoices to the United States Government, seeking payment for the sale and delivery of these military insignia items to NEXCOM and AAFES. Based on those invoices, Defendant Hilborn-Hamburger has received millions of dollars in payment by the U.S. Government for those products.

45) On or about May 13 or 14, 2002, Michael W. McAllister, President of Plaintiff IGI, visited the military clothing service store at the Naval Air Station – Atlanta in Atlanta, Georgia. At that time, military insignia items from both Plaintiff IGI and Defendant Hilborn-Hamburger were being sold in that store.

46) During that visit, Mr. McAllister discovered that several military insignia items bearing Defendant Hilborn-Hamburger's hallmark did not conform to the required military specification requirements for those items.

47) Specifically, the nonconforming items discovered at that time were:

(a) Marine Corps Organized Reserve Miniature Medals bearing the Defendant Hilborn-Hamburger's hallmark. In accordance with MIL-DTL-3943/211, the metal portion of this item must be made of red brass. The metal portion of Defendant Hilborn-Hamburger's items were made of a white metal or zinc casting substrate that had been electroplated to make it appear as though it conformed to the required Specification;

(b) various U.S. Marine Corps enlisted personnel bright "eagle and globe" collar devices bearing Hilborn-Hamburger's hallmark. These insignia must be die-stamped from red brass pursuant to MIL-DTL-15665/12G. Defendant Hilborn-Hamburger's bright collar devices items were made of a white metal or zinc casting substrate that had been electroplated to deceive the buyer;

(c) Navy Combat Ashore/Project Manager's Badges bearing Hilborn-Hamburger's hallmark. These badges must be manufactured of solid brass pursuant to MIL-D-16475/52A (NU). Defendant Hilborn-Hamburger's badges were made of a white metal or zinc casting substrate and electroplated to deceive the buyer.

48) On May 15, 2002, Plaintiff IGI promptly reported these discrepancies to Ray Howard, AAFES' chief buyer for military insignia items. Subsequently, on June 20, 2002, Plaintiff IGI reported these discrepancies to Ashley Citron, NEXCOM's chief buyer for military insignia items.

49) Since May 2002, Plaintiff IGI has visited other AAFES and NEXCOM military clothing service stores where Defendant Hilborn-Hamburger's military insignia items are offered for sale. In each case, Plaintiff IGI discovered similar non-

conformances with respect to the vast majority of Defendant Hilborn-Hamburger's products.

50) Such nonconforming products included, but were not limited to, the following: (a) Navy Captain and Army/Air Force/Marine Corps Colonel Metal Insignia, which are to be made of red brass or nickel silver pursuant to MIL-DTL-14639/33. Defendant Hilborn-Hamburger's insignia were made of a cheaper, significantly less durable white metal or zinc substrate and electroplated in an effort to deceive the buyer; (b) Navy Commander and Marine Corps Lieutenant Colonel and Major Metal Insignia, which are to be made of red brass or nickel silver pursuant to MIL-DTL-14639/45. Defendant Hilborn-Hamburger's insignia were composed of a cheaper, significantly less durable white metal or zinc substrate and electroplated in an effort to deceive the buyer; (c) Medical Service/Dental Service Metal Insignia, which are to be made of brass pursuant to MIL-D-16475/36A(NU). Defendant Hilborn-Hamburger's insignia were composed of a cheaper, significantly less durable white metal or zinc substrate and electroplated in an effort to deceive the buyer; (d) U.S. Navy Submarine Breast and Collar Insignia, which are to be made of brass or nickel silver pursuant to MIL-D-16475/8B (NU). Defendant Hilborn-Hamburger's insignia were made of a cheaper, significantly less durable white metal or zinc substrate and electroplated in an effort to deceive the buyer.

51) In each case, Plaintiff IGI promptly reported the non-conformances to representatives of AAFES and NEXCOM.

52) Numerous other Specifications for metal military insignia items, many of which appear in Exhibit 1 hereto, contain similar material requirements to those items

described in Paragraphs 45 and 48 of the Complaint. The requirement that each of these military insignia items be made of red brass or nickel silver increases the costs of manufacturing, but is critical to ensuring that these items are able to endure stress and prolonged wear.

53) Non-metal military insignia items also must be made of specified materials from approved sources. For example, all poly/cotton white poplin items must be made of material from Springfield LLC, Miliken, or Galey & Lord. There are no other certified sources for these items. Defendant Hilborn-Hamburger, however, sold and received payment for thousands of poly/cotton white poplin military insignia items that were not made of cloth from any of these approved sources. Instead, on information and belief, Defendant Hilborn-Hamburger used non-certified materials from foreign countries for these items, and then falsely certified to NEXCOM that certified materials were used.

54) Defendant Hilborn-Hamburger engaged in the same fraudulent scheme with respect to poly/wool gabardine items. There currently are two approved sources for the material used to make these items: Klyn & Tinker and Burlington. Defendant Hilborn-Hamburger sold and received payment for thousands of poly/wool gabardine military insignia items that were not made of cloth from either of these approved sources. Instead, on information and belief, Defendant Hilborn-Hamburger used non-certified materials from foreign countries for these items, and then falsely certified to NEXCOM that certified materials were used.

55) Numerous other Specifications for non-metal military insignia items, many of which are identified in Exhibit 1 hereto, contain similar material requirements to those items described in Paragraphs 51 and 52 of the Complaint. While the requirement that

each of these military insignia items be made of certified material increases the costs of manufacturing, it is necessary to ensure that these items are able to endure stress and prolonged wear.

56) Defendant Hilborn-Hamburger has committed numerous instances of fraud against the United States of America by knowingly supplying a plethora of metal and non-metal military insignia items, a partial list of which appears in Exhibit 1 hereto, made of unapproved, inexpensive, and far less durable material while simultaneously charging the Government for those items as if they were made with the required, far more durable material.

57) These fraudulent schemes enabled Defendant Hilborn-Hamburger to maximize its profit by avoiding significant manufacturing/material costs while simultaneously deceiving AAFES and NEXCOM into accepting and paying inflated prices for defective merchandise.

58) More importantly, these fraudulent schemes by Defendant Hilborn-Hamburger deceived thousand of U.S. soldiers, sailors, airmen, and marines, who spent their pay to acquire and wear what they believed to be military insignia items that conformed to the required Specifications.

59) Upon information and belief, Defendant Hilborn-Hamburger has continued to produce and/or supply numerous nonconforming military insignia items for resale to members of the U.S. Armed Forces and their families that do not conform to the applicable government Specifications.

60) Furthermore, upon information and belief, Defendant Hilborn-Hamburger has continued to receive payment from both AAFES and NEXCOM based on false certifications that these products conform to all applicable Specifications.

61) Specifically, by affixing its hallmarks to affected products sold to NEXCOM and AAFES and by placing a representation that "[t]his item is warranted by the manufacturer to meet the applicable Government requirements," on packaging of these military insignia items, Defendant Hilborn-Hamburger certified and otherwise represented to NEXCOM and AAFES that those items sold to the United States Government conformed to each applicable Specification.

62) These certifications and representations are false and fraudulent records and statements because the vast majority of Defendant Hilborn-Hamburger's military insignia items were not, in fact, produced in accordance with the requirements set forth in the relevant government Specifications.

63) During all relevant times to the allegations in this Complaint, Defendants Hilborn-Hamburger, Griffin, and Goulian knew, as that term is defined in 31 U.S.C. § 3729(b), that Hilborn-Hamburger was supplying nonconforming military insignia items to NEXCOM and AAFES for resale to members of the U.S. Armed Forces and their families. Defendants Hilborn-Hamburger, Griffin, and Goulian never notified representatives of NEXCOM or AAFES that these items were nonconforming in any manner. In fact, the Defendants falsely certified to the contrary on repeated occasions during the past several years and, on information and belief, continue to do so today.

64) During all relevant times to the allegations in this Complaint, the Defendants Hilborn-Hamburger, Griffin, and Goulian further knew, as that term is

defined in 31 U.S.C. § 3729(b), that AAFES and NEXCOM would rely on the Defendants' representations concerning the quality and conformance of their military insignia items to all applicable government Specifications for those items.

65) As a result of the above-referenced information provided by Plaintiff IGI, NEXCOM removed from its military exchange stores all metal and non-metal military insignia items provided by Defendant Hilborn-Hamburger.

66) On information and belief, NEXCOM has examined and performed testing on those items at a facility in Pensacola, Florida, and found that approximately 90% of those items from Defendant Hilborn-Hamburger were nonconforming.

67) As a result, on information and belief, NCTRF presently is in the process of revoking Defendant Hilborn-Hamburger's hallmark to manufacture military insignia items. Upon the completion of that process, AAFES and TIOH will be taking similar action against Defendant Hilborn-Hamburger.

COUNT I
(Federal False Claims Act – 31 U.S.C. § 3729(a)(1))

68) Plaintiff realleges and incorporates by reference Paragraphs 1 through 67 of this Complaint as though fully set forth herein.

69) Defendants Hilborn-Hamburger, Griffin, and Goulian knowingly have submitted false or fraudulent claims for payment, or caused false or fraudulent claims for payment to be submitted, to officials of the United States Government in violation of 31 U.S.C. § 3729(a)(1).

70) Absent the false representations described in this Complaint, the United States would not have paid Defendant Hilborn-Hamburger for the defective and non-conforming military insignia items furnished to NEXCOM and AAFES.

71) Because of the false representations made by Defendants, the United States has suffered actual damages in the amount of millions of dollars, the precise amount of which is to be determined at trial.

COUNT II
(Federal False Claims Act – 31 U.S.C. § 3729(a)(2))

72) Plaintiff realleges and incorporates by reference Paragraphs 1 through 71 of this Complaint as though fully set forth herein.

73) In violation of 31 U.S.C. § 3729(a)(2), Defendants Hilborn-Hamburger, Griffin, and Goulian knowingly have made or used, or caused to be made or used, false records or statements to the United States Government in order to receive payments based on false or fraudulent claims.

74) Because of the false representations made by Defendants, the United States has suffered actual damages in the amount of millions of dollars, the precise amount of which is to be determined at trial.

COUNT III
(Federal False Claims Act – 31 U.S.C. § 3729(a)(3))

75) Plaintiff realleges and incorporates by reference Paragraphs 1 through 74 of this Complaint as though fully set forth herein.

76) Defendants Hilborn-Hamburger, Griffin, and Goulian knowingly conspired with one another to defraud the United States Government by receiving payments based on false or fraudulent claims in violation of 31 U.S.C. § 3729(a)(3).

77) Because of the acts and omissions of the Defendants Hilborn-Hamburger, Griffin, and Goulian, the United States Government has suffered actual damages in the amount of millions of dollars, the precise amount of which is to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Ira Green, Inc., prays for the following relief:

- 1) On Counts I through III, judgment for the United States against the Defendants in an amount equal to three (3) times the damages the United States Government has sustained because of the Defendants' actions, in an amount to be proven at trial, plus a civil penalty of not less than Five Thousand Dollars (\$5,000) and not more than Ten Thousand Dollars (\$10,000) for each violation of 31 U.S.C. § 3729;
- 2) On Counts I through III, an award to Ira Green, Inc., the Relator in this action, of the maximum allowed under 31 U.S.C. § 3730(d) and/or any other applicable provision of law;
- 3) On Counts I through III, attorneys' fees, expenses, and costs of suit herein incurred; and
- 4) Such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands that this matter be tried before a jury.

UNITED STATES OF AMERICA,
ex rel. IRA GREEN, INC.

By Counsel



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DATED: May 27, 2004

EXHIBIT

1

Hilborn Hamburger Item List

01/15/04

<u>Item #</u>	<u>Description</u>
00123	DENTAL CAD F/FEMALE COLLAR DEV
00130	HOSPITAL CADEUCES SILVER
00190	DENTAL CADEUCE BLK COLLAR DEV
00192	PUBLIC HEALTH COLLAR DEV
00198	PUBLIC HEALTH COLLAR DEV BLK
00316	COMMAND ASHORE BREAST BDG -REG
00317	CRAFTMASTER BREAST BADGE -REG.
00319	AV WARFARE SPEC BADGE REG BLK
00320	DIVER OFFICE BRST BDG. - REG.
00322	DIVER MED. OFFCR BRST BDG -REG
00323	DIVER MED TECH BRST BDG. -REG.
00324	DIVER 1ST CL REG BRST BDG
00325	DIVER 2ND CL REG BRST BDG
00326	SCUBA DIVER BRST BADGE REG
00329	E.O.D. MASTER BRST BDG -REG.
00332	PARA REG HAMIL FIN BREAST DEV
00333	NAV OBSERV/FLT METEOR REG BDG
00335	DIVER 2ND CL BADGE BLACK REG
00340	SMALL CRAFT ENL BRST BDG -REG.
00343	SUBMARINE OFFICER REG BDGS
00345	SUBMARINE MEDICAL REG BDGS
00347	SUB COMBAT PATROL REG BDGS
00351	SURF WARFARE SILVER BADGE REG
00356	SURFACE WARFARE ENL. BLK REG
00359	AVIATOR SWEETHEART 3/4" PIN BK
00361	AVIATOR MINI BADGE
00362	AVIATION WARFARE SPEC MINI BDG
00363	COMBAT AIRCREW MINI BADGE
00365	COMMAND ASHORE MINI BADGE
00366	DIVER OFFICER MINI BADGE
00367	DIVER MASTER MINI BADGE
00368	DIVER MED. OFFICE MINI BADGE
00369	DIVER MEDICAL TECH. MINI BADGE
00370	DIVER 1ST CLASS MINI BADGE
00371	DIVER 2ND CLASS MINI BADGE
00372	SCUBA DIVER MINI BADGE
00373	E.O.D. BASIC MINI BADGE
00374	E.O.D. SENIOR MINI BADGE
00375	E.O.D. MASTER MINI BADGE
00378	ASTRONAUT MINI BADGE
00379	NAV OBSERV/FLT METEOR MINI BDG
00380	PARACHUTIST BASIC MINI BDGS
00381	PARACHUTIST NVY/MC OFF M/BADGE
00386	SMALL CRAFT ENLISTED MINI BDGS
00387	SPECIAL WARFARE MINI BADGE
00389	SUBMARINE OFFICER MINI BDGS
00390	SUBMARINE PEWTER ENL MINI BDGS
00393	SUB COMBAT PATROL MINI BDGS
00394	SSBN DETERRENT PATROL MINI BDG
00395	SURFACE WARFARE OFF MINI BDGS
00396	SURFACE WARFARE ENL MINI BDGS
00402	SSBN BADGE GOLD MINI
00406	PARA WNG SPRD BLK BRST BADGE

00407	PARA BASIC(ENL) BLK BRST BDG
00408	SPECIAL WARFARE BADGE REG BLK
00409	SUBMARINE ENGR DUTY REG BLACK
00410	SUBMARINE DOLPHIN BADGE BLK
00415	AIR CREWMAN BADGE REG BLACK
00416	AVIATOR BREAST BADGE REG BLK
00417	FLIGHT OFF BADGE REG BLACK
00420	AVIA PHY MINI BADGE
00422	AVIATOR 1" LAPEL PIN
00423	FLT OFF MINI SWEETHEART WINGS
00424	SUBMARINE HI POL MINI BDGS
00425	SSBN-BADGE MINI HI-POLISHED
00426	SURFACE WARF.ENL MINI HI-POLIS
00427	SURFACE WARFARE OFF. REG BLK
00428	NAVY ASTRONAUT REG BADGE
00429	DIVER MED. OFF MINI BADGE ANNO
00430	CEC BLACK COLLAR/DEV
00431	CHAPLIN COLLAR DEV/BLACK
00432	MEDICAL COLLAR DEV/BLACK
00433	MEDICAL SERV COLLAR DEV/BLACK
00434	NURSE COLLAR DEV/BLACK
00435	SUPPLY COLLAR DEV/BLACK
00436	DENTAL BLACK COLLAR
00438	CHAPLIN CROSS SILVER
00440	COMBAT INFINT 1ST AWARD MINI
00445	E.O.D. SR MINI BADGE HI-POLISH
00446	PARACHUTIST GOLD ANTIQ REG
00450	SEABEE BADGE REG SIZE ENL
00451	SEABEE BADGE REG SIZE OFFICER
00452	SEABEE BADGE ENL MINI
00453	SEABEE BADGE OFFICER MINI
00455	OMBUDSMAN PIN
00457	DIVER MED. OFFCR BRST -REG BLK
00461	COMBAT INFINT 2ND AWARD MINI
00473	DIVER OFFICE BADGE REG BLK
00474	DIVER 1ST CL REG BRST BDG BLK
00679	W.O.UNDER WTR TORPEDO COLLAR
00680	W.O.QUARTERMASTER COLLAR DEV
01001	NAVY ENLISTED CAP DEVICE
01002	NAVY OFF STRETCH BAND W/MOUNT
01003	NAVY OFF CAP DEV W/BAND&MOUNT
01004	CPO E-7 W/BAND & MOUNT CAP DEV
01005	CPO E8 W/BAND & MOUNT CAP DEV
01006	CPO E-9 W/BAND & MOUNT CAP DEV
01007	C/G OFF STRETCH BAND W/MOUNT
01008	CPO STRETCH BAND W/MOUNT CAP
01012	CPO E-8 UNMOUNTED CAP DEV
01013	CPO E-9 UNMOUNTED CAP DEV
01014	CPO E-10 UNMOUNTED CAP DEV
01017	CPO E-8 GARRISON CAP DEV
01018	CPO E-9 GARRISON CAP DEV
01019	CIVIL ENGINEER COLLAR DEVICE
01020	CHAPLAIN (CHRISTIAN) COLLAR
01021	DENTAL COLLAR DEV
01022	MEDICAL COLLAR DEV
01023	MEDICAL SERVICE COLLAR
01024	NAVY NURSE COLLAR DEV

1025	SUPPLY COLLAR DEV
1026	JUDGE ADVOCATE COLLAR
1028	NAVY 3 STAR V/ADM /MC L/GEN COL
1033	NAVY CMDR/MC LT/COL COLLAR
1039	CPO E-8 CLUTCH BK COLLAR NAVY
1040	CPO E-9 CLUTCH BK COLLAR NAVY
1041	WO-2 COLLAR NAVY
1042	WO-3 COLLAR NAVY
1043	WO-4 COLLAR NAVY
1044	WO-1 COLLAR NAVY
1045	WO AIR TRAFF CONTROL COLL NAVY
1046	WO AVI. BOATSWAIN SHIRT NAVY
1047	WO AVI. ELECT. TECH COLLAR NAVY
1048	NAVY OFF BLK GARR CAP DEVICE
1049	NAVY ADM/MC GEN'L GARR CAP
1050	WO AVIA ORDNANCE TECH NAVY COLL
1051	NAVY BANDMSTR COLLAR DEVICE
1052	WO DATA PROC. SHIRT COLLAR NAVY
1055	W.O.AVIA OPERA. TECH COLLAR DEV
1056	WO AVIA MACH MATE NAVY COLL DEV
1057	4-STR ADM/MC GEN'L BLK COLLAR
1058	5 STAR (GEN'L) COLLAR DEV.
1059	W.O. SHIPS CLERK COLLAR NAVY
1060	NAVY LT JR/MC 1ST LT GAR CAP
1061	NAVY LT/MC CAPT GAR CAP DEV
1062	NAVY CMDR/MC LT COL GAR CAP DV
1063	NAVY CAPT/MC COL GARR CAP DEV
1064	NAVY LT CDR/MC MAJ GARR CAP DV
1066	NAVY ENSIGN/MC 2ND LT GARR CAP
1067	NAVY COM/MC BRIG GEN'L CAP DEV
1068	WARRANT OFF AERO COLLAR NAVY
1072	NAVY V/ADM MC LT/GEN GARR CAP
1073	NAVY R ADM UPP/MC MAJ GEN GARR
1078	CPO E-7 PIN BACK COLLAR NAVY
1079	CPO E-8 PIN BK COLL DEV NAVY
1080	CPO E-9 PIN BK COLL DEV NAVY
1081	CPO E-7 BLK COLL DEV
1082	CPO E-8 BLK COLL DEV
1083	CPO E-9 BLK COLL DEV
1086	E-4 3RD CL SILVER DESIGNATOR
1087	E-6 MUSICIAN GOLD CAP DEVICE
1089	E-5 2ND CL. 12YR GOOD CONDUCT
1090	E-4 12YR 3RD CL. GOOD CONDUCT
1093	NAVY/CG VICE ADM-MC LT/GEN SHL
1096	NAVY CAPT/MC COLONEL SHLDR DEV
1097	NAVY CMDR/MC LT COL SHLDR DEV
01105	E-2 FAT. SEABEE BLK COLLAR NAVY
01106	E-3 FAT. SEABEE BLK COLLAR NAVY
01107	E-4 FATIGUE SEABEE BLK COLLAR
01108	E-5 FATIGUE SEABEE BL COLL DEV
01109	E-6 FATIGUE SEABEE BL COLL DEV
01110	E-7 FATIGUE SEABEE BL COLL DEV
01111	E-8 FATIGUE SEABEE BL COLL DEV
01112	E-9 FATIGUE SEABEE BL COLL DEV
01113	HOSP CORP. BLK SHIELD COLL DEV
01114	DENT. CORP BLK SHIELD COLL DEV
01115	REL. PROG SPEC BLK MTL COL DEV

01116	E-2 MED. TECH F/FEMALE COL DEV
01117	E-3 MED. TECH F/FEMALE COL DEV
01149	WARR.ELECT MATE COLLAR DEV GP
01120	BLACK CADUCES COLLAR DEV
01124	CPO BLACK CHIN STRAP
01125	NAVY OFF CHIN STRAP GOLD
01297	CPO E-7 SHOULDER DEVICE
01298	CPO E-8 SHOULDER DEV
01299	CPO E-9 SHOULDER DEV
01300	USN BAND CAP DEV REG SZ 2 TONE
02003	E-7 BLACK GARR CAP DEV
02004	CPO E-8 BLACK GARR. CAP
02005	CPO E-9 BLACK GARR. CAP
02010	ENS SABDUED CAP DEV
02011	LT/JG SABDUED CAP DEV
02012	LT SABDUED CAP DEV
02013	LT/CDR SABDUED CAP DEV
02014	CDR SABDUED CAP DEV
02015	CAPT SABDUED CAP DEV
02016	WO-2 SABDUED CAP DEV NAVY
02017	WO-3 SABDUED CAP DEV NAVY
02018	WO-4 SABDUED CAP DEV NAVY
10046	LAW COMMUNITY COLLAR DEV
10047	W.O. AVIA. MAINT TECH COLL DEV
10048	W.O. BOATSWAIN COLLAR DEV
10049	W.O. CRYPTOLOGIC TECH COLL DEV
10050	W.O.COMM/RADIOMAN TECH COL DEV
10051	W.O. ELECTRONIC TECH COLL DEV
10052	W.O. ENG/NUC PWR TECH COL DEV
10053	W.O. E.O.D. TECH COLL DEV
10054	W.O. INTELL. TECH COLL DEV
10055	W.O. OPERATIONS TECH COL DEV
10056	W.O. ORDNANCE TECH COL DEV
10057	W.O. PHOTOGRAPHER COLL DEV
10058	W.O. REPAIR TECH COLL DEV
10059	W.O. PHYS SECURITY COLL DEV
10095	AVIA W/FARE SPEC REG SILVER
10410	W.O. E.O.D. TECH COLL DEV BLK
10677	W.O. DIVER GOLD COLLAR
10678	CHAPLAIN (JEWISH) COLLAR DEV
10679	W.O. MASTER AT ARMS COLLAR DEV
10680	W.O. PHYSICIAN ASST COLL DEV
10850	NVY 1 7/16 MID PLAIN ANC. GARR
10852	1 7/16" PLAIN ANCH LPL SCRBACK
10869	1-1/16" FOULED BLK GARR CAP
10871	MIDSHIPMEN GOLD CHIN STRAP
10872	OSC MIDSHIP CAP BAND W/DEV
10873	SMALL EAGLE & ANCHOR COLL BLK
10875	1 1/16" FOULED ANCHOR GARR CAP
10876	1 7/16" PLAIN ANCH LAPEL CLTCH
10877	5/8" FOULED ANCHOR COLLAR BLK
10878	1 13/16" FOULED ANCH CLTCHBK
10879	5/8" FOULED ANCHOR GOLD COLLAR
10880	SM EAGLE & ANCHOR COLL 1ST CL
10881	1/2" KNURLED STARS CLUTCH/BK
10882	1 1/16 FOULED ANCHOR COLL DEV
10884	MID ENSIGN 1-BAR "LADDER BAR"

10885	MID LT/JG 2-BARS "LADDER BARS"
10886	MID LT. 3-BARS "LADDER BARS"
10887	MID LT/COMMDR 4-BARS"LADDER
10888	MID COMM. 5-BARS "LADDER BARS"
10889	MID CAPT. 6-ROWS "LADDER BARS"
10891	NAVY WO-2 SABDUED COLLAR DEV
10892	NAVY WO-3 SABDUED COLLAR DEV
10893	NAVY WO-4 SABDUED COLLAR DEV
10894	NAVY WO-2 SABDUED SHOULDER DEV
10895	NAVY WO-3 SABDUED SHOULDER DEV
10896	NAVY WO-4 SABDUED SHOULDER DEV
10897	NAVY ENS SABDUED SHOULDER DEV
10898	NAVY LT/JG SABDUED SHLDR DEV
10899	NAVY LT SABDUED SHOULDER DEV
10901	NAVY CDR SABDUED SHOULDER DEV
10902	NAVY CAPT SABDUED SHLDR DEV
10903	NAVY LT/CDR SABDUED SHLDR DEV
10969	NAVY OFF HI-RLF CAP DEV W/BAND
10982	ENSIGN BROWN COLLAR DEVICE
10983	LT/JG BLACK COLLAR DEVICE
10984	LT BLACK COLLAR DEVICE
10985	LT/COMMANDER BROWN COLLAR DEV
10986	COMMANDER BLACK COLLAR DEV
10987	CAPTAIN BLACK COLLAR DEV
11014	SURFACE WARFARE SUPPLY REG BDG
11015	AVIATION SUPPLY REGULAR BDGS
11017	CAREER COUNSELOR REG BDGS
11020	SPECIAL OPERATION OFF.REG BADG
11021	AVIATION PHY BADGE REG
11023	SPECIAL OPERATION OFF MINI BDG
11024	SURFACE SUPPLY MINI BDGS
11026	AVIATION SUPPLY MINI BDGS
11028	JOINT CHIEF OF STAFF MINI BDGS
11029	SCUBA DIVER REG BDGS HI-POLISH
11030	PARACHUT BASIC HI-POL MINI BDG
11031	JOINT CHIEF OF STAFF REG BDGS
11032	PARACHUTIST BASIC HI-POL REG-B
11033	SCUBA DIVER HI-POL MINI BADGE
11034	E-4 BLACK DESIGNATOR CAP DEV
11035	E-5 BLACK DESIGNATOR CAP DEV
11036	E-6 BLACK DESIGNATOR CAP DEV
11037	MERCHANT MARINE CAP DEV
11227	E-2 MEDICS BLACK COLLAR DEV
11228	E-3 MEDICS BLACK COLLAR DEVICE
11229	E-4 MEDICS BLACK COLLAR DEVICE
11230	E-5 MEDICS BLACK COLLAR DEVICE
11231	E-6 MEDICS BLACK COLLAR DEVICE
11232	E-7 MEDICS BLACK COLLAR DEVICE
11233	E-8 MEDICS BLACK COLLAR DEVICE
11234	E-9 MEDICS BLACK COLLAR DEVICE
11371	PUBLIC HEALTH W/BAND CAP DEV
11372	PUBLIC HEALTH UNMOUNTED CAP
11373	PUBLIC HEALTH CHIN STRAP CAP
11374	PUBLIC HEALTH GARRISON CAP
11381	CAP MOUNT CPO WMS
11382	CAP MOUNT ENLISTED WMS
11384	CAP MOUNT OFF WMS

11515	PRESIDENTIAL SERVICE BADGE
11600	E-8 (1 STAR) NROTC COLLAR DEV
11601	E-9 (2 STAR) NROTC COLLAR DEV
11650	LT BLACK CAP DEVICE
11700	JOINT CHIEF OF STAFF REG ANNOD
11701	JOINT CHIEF OF STAFF MINI ANNO
12001	SECY.OF DEFENSE BADGE REG
12003	SECRETARY OF DEFENSE MINI BDG
13100	DENTAL CAD F/FEM COL DEV H-POL
13101	HOSPITAL CADEUCES SILVER H-POL
13102	NAVY ENLISTED CAP DEVICE H-POL
13103	E-2 MED. TECH F/FEM COL DEV H-
13104	E-3 MED. TECH F/FEM COL DEV H-
13105	E-4 MED. TECH F/FEM COL DEV H-
13106	E-5 MED TECH F/FEM COLLAR H-PO
13107	E-4 WINDBR 3rd/CL COL DEV H-PO
13108	E-5 WINDBR 2nd/CL COL DEV H-PO
13109	E-6 WINDBR 1st/CL COL DEV H-PO
13110	E-6 MED. TECH F/FEM COL DEV H-
19079	INTEG UNDERSEA SURVEIL GLD MIN
20031	CMD AT SEA REG BRST DEV/CG BDG
20093	INTEG UNDERSEA SURVEIL GLD REG
20094	INTEGR UNDERSEA SURVEIL OX REG

Hilborn Hamburger Item List

<u>Item #</u>	<u>Description</u>
0502	LINE SHOULDER MARK BLANKS MENS
0503	SUPPLY SHLDR MARK BLANKS
0504	MEDICAL SHLDR MARK BLANKS MENS
0505	DENTAL SHLDR MARK BLANK MENS
0506	NURSE SHLDR MARK BLANK MENS
0507	MEDICAL SERV.SHLDR MARK MENS
10508	JAG SHOULDER BOARD BLANK MENS
10509	CEC SHLDR MARK BLANKS MEN
10510	CHRST/CHAPLIN SHLDR MARK MENS
10511	JEW/CHAPLIN SHLDR BLANK MENS
10512	LINE SHLDR MARK BLANK FEMALE
10513	SUPPLY SHLDR BLANKS FEMALE
10514	MEDICAL SHLDR BLANK FEMALE
10515	DENTAL SHLDR BLANK FEMALE
10516	NURSE SHLDR BLANK FEMALE
10517	MEDICAL SERV. SHLDR BLANK FEMA
10518	CHRS/CHAPLIN SHLDR BLANK FEMAL