

**FOREIGN CLAIMS SETTLEMENT COMMISSION
OF THE UNITED STATES
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20579**

In the Matter of the Claim of	}	
	}	
	}	
5 U.S.C. §552(b)(6)	}	Claim No. IRQ-II-301
5 U.S.C. §552(b)(6)	}	
	}	
Against the Republic of Iraq	}	Decision No. IRQ-II-284
	}	

Counsel for Claimant: Daniel Wolf, Esq.
Law Offices of Daniel Wolf

PROPOSED DECISION

Claimant Estate brings this claim against the Republic of Iraq (“Iraq”) alleging that Iraq held its decedent, Nancy Hollingsworth, hostage in violation of international law in August 1990. Because it has established that Iraq held its decedent hostage for 26 days, it is entitled to an award of \$280,000.

BACKGROUND AND BASIS OF THE PRESENT CLAIM

Claimant Estate alleges that its decedent was a United States citizen living with her husband in Kuwait when Iraq invaded the country on August 2, 1990. At the time, her husband was a U.S. citizen working for the U.S. State Department in Kuwait. Claimant Estate asserts that, beginning with the invasion and for approximately four weeks thereafter, Iraq prohibited its decedent from leaving Kuwait and Iraq. It further maintains that she eventually crossed the Turkish-Iraqi border on August 27, 1990, as part of a convoy of vehicles carrying dependents of U.S. diplomatic personnel from Kuwait.

Although Claimant Estate was not among them, many of the U.S. nationals in Iraq and Kuwait at the time of the 1990-91 Iraqi occupation of Kuwait sued Iraq (and others) in federal court for, among other things, hostage-taking.¹ Those cases were pending when, in September 2010, the United States and Iraq concluded an *en bloc* (lump-sum) settlement agreement.² The Agreement, which entered into force in May 2011, covered a number of personal injury claims of U.S. nationals arising from acts of the former Iraqi regime occurring prior to October 7, 2004, including claims of personal injury caused by hostage-taking.³ Exercising its authority to distribute money from the settlement funds, the U.S. Department of State provided compensation to numerous individuals whose claims were covered by the Agreement, including some whom Iraq had allegedly taken hostage or unlawfully detained following Iraq's 1990 invasion of Kuwait.

Under the International Claims Settlement Act of 1949 ("ICSA"), the Secretary of State has statutory authority to refer "a category of claims against a foreign government" to this Commission.⁴ The Secretary has delegated that authority to the State Department's Legal Adviser, who, by letter dated October 7, 2014, referred three categories of claims to this Commission for adjudication and certification.⁵ This was the State Department's second referral of claims to the Commission under the Claims Settlement Agreement, the

¹ See, e.g., *Hill v. Republic of Iraq*, 175 F. Supp. 2d 36 (D.D.C. 2001); *Vine v. Republic of Iraq*, 459 F. Supp. 2d 10 (D.D.C. 2006).

² See *Claims Settlement Agreement Between the Government of the United States of America and the Government of the Republic of Iraq*, Sept. 2, 2010, T.I.A.S. No. 11-522 ("Claims Settlement Agreement" or "Agreement").

³ See *id.* Art. III(1)(a)(ii).

⁴ See 22 U.S.C. § 1623(a)(1)(C) (2012).

⁵ See *Letter dated October 7, 2014, from the Honorable Mary E. McLeod, Acting Legal Adviser, Department of State, to the Honorable Anuj C. Desai and Sylvia M. Becker, Foreign Claims Settlement Commission* ("2014 Referral" or "October 2014 Referral").

first having been by letter dated November 14, 2012 (“2012 Referral” or “November 2012 Referral”).⁶

One category of claims from the 2014 Referral is applicable here. That category, known as Category A, consists of

claims by U.S. nationals for hostage-taking¹ by Iraq² in violation of international law prior to October 7, 2004, provided that the claimant was not a plaintiff in pending litigation against Iraq for hostage taking³ at the time of the entry into force of the Claims Settlement Agreement and has not received compensation under the Claims Settlement Agreement from the U.S. Department of State. . . .

¹ For purposes of this referral, hostage-taking would include unlawful detention by Iraq that resulted in an inability to leave Iraq or Kuwait after Iraq invaded Kuwait on August 2, 1990.

² For purposes of this referral, “Iraq” shall mean the Republic of Iraq, the Government of the Republic of Iraq, any agency or instrumentality of the Republic of Iraq, and any official, employee or agent of the Republic of Iraq acting within the scope of his or her office, employment or agency.

³ For purposes of this category, pending litigation against Iraq for hostage taking refers to the following matters: *Acree v. Iraq*, D.D.C. 02-cv-00632 and 06-cv-00723, *Hill v. Iraq*, D.D.C. 99-cv-03346, *Vine v. Iraq*, D.D.C. 01-cv-02674; *Seyam (Islamic Society of Wichita) v. Iraq*, D.D.C. 03-cv-00888; *Simon v. Iraq*, D.D.C. 03-cv-00691.

2014 Referral at ¶ 3.

⁶ Although the November 2012 Referral involved claims of U.S. nationals who were held hostage or unlawfully detained by Iraq, it did not involve hostage-taking claims *per se*. Rather, it consisted of certain claimants who had *already received* compensation under the Claims Settlement Agreement from the State Department for their hostage-taking claims, and it authorized the Commission to award additional compensation to those claimants, provided they could show, among other things, that they suffered a “serious personal injury” during their detention. The 2012 Referral expressly noted that the “payment already received by the claimant under the Claims Settlement Agreement compensated the claimant for his or her experience for the entire duration of the period in which the claimant was held hostage or was subject to unlawful detention and encompassed physical, mental, and emotional injuries generally associated with such captivity or detention.” *Letter dated November 14, 2012, from the Honorable Harold Hongju Koh, Legal Adviser, Department of State, to the Honorable Timothy J. Feighery, Chairman, Foreign Claims Settlement Commission*, at ¶3 n.3.

On October 23, 2014, the Commission published notice in the *Federal Register* announcing the commencement of the second Iraq Claims Program pursuant to the ICSA and the 2014 Referral.⁷

On October 26, 2015, the Commission received from Claimant Estate a completed Statement of Claim seeking compensation under Category A of the 2014 Referral, together with exhibits supporting elements of her claim. By letters dated August 17, 2016, June 19, 2017, and April 27, 2018, Claimant Estate submitted additional evidence in support of its claim.

DISCUSSION

Standing

Claimant Estate has submitted a copy of Letters of Administration, issued on September 29, 2010, by the Probate Court of Madison, Alabama, stating that Peggy J. Kahlenbeck had been appointed Personal Representative for the estate of Nancy Hollingsworth. Accordingly, the Commission concludes that Estate Of Nancy Hollingsworth, Deceased; Peggy J. Kahlenbeck, Personal Representative, is the proper claimant in this claim.

Jurisdiction

This Commission's authority to hear claims is limited to the category of claims referred to it by the United States Department of State.⁸ The Commission's jurisdiction under the "Category A" paragraph of the 2014 Referral is limited to claims for hostage-taking of (1) "U.S. nationals," provided that the claimant (2) was not a plaintiff in any litigation against Iraq for hostage taking pending on May 22, 2011 (the "Pending

⁷ *Program for Adjudication: Commencement of Claims Program*, 79 Fed. Reg. 63,439 (Oct. 23, 2014).

⁸ See 22 U.S.C. § 1623(a)(1)(C) (2012).

Litigation”), and (3) has not received compensation under the Claims Settlement Agreement from the Department of State. 2014 Referral at ¶ 3.

Nationality

This claims program is limited to claims of “U.S. nationals.” Here, that means the claim must have been held by a national of the United States when the claim arose and continuously thereafter until May 22, 2011, the date the Agreement entered into force.⁹ Because the decedent, Ms. Hollingsworth, died before May 22, 2011, this claim passed from her to her estate prior to May 22, 2011. In such circumstances, the estate must also be a U.S. national. For an estate to be viewed as a U.S. national requires that the estate’s beneficiaries also be U.S. nationals. Thus, to satisfy the U.S. nationality requirement, Claimant Estate must show that Ms. Hollingsworth was a U.S. national from the time of the alleged hostage-taking until she died and that the Estate’s beneficiaries were U.S. nationals from Ms. Hollingsworth’s death until May 22, 2011.¹⁰

Claimant Estate satisfies the nationality requirement. It has provided evidence sufficient to show that the claim was held continuously by a U.S. national from August 2, 1990, which is the date that the alleged hostage-taking began, through the effective date of the Claims Settlement Agreement. From August 2, 1990, to December 24, 2009, the claim was held by the decedent. Claimant Estate has submitted copies of the decedent’s 1988 Alabama voter registration card and her Georgia death certificate which states that the decedent was born in Georgia on August 13, 1928, and died in Georgia on December 24, 2009. These documents substantiate the Claimant Estate’s assertion that the decedent was

⁹ See Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 4-5.

¹⁰ See, e.g., Claim No. IRQ-II-286, Decision No. IRQ-II- 257 (2018); Claim No. ALB-338, Decision No. ALB-321 (2008); Claim No. G-2154, Decision No. G-1955 (1981); Claim No. W-9801, Decision No. W-2107 (1965); and Claim No. Y-0660, Decision No. Y-1171 (1954).

a U.S. national at the time of the alleged hostage-taking (August 1990) and remained a U.S. national through the date of her death in 2009.

From December 24, 2009, to May 22, 2011, the claim was held by the decedent's children, Peggy Kahlenbeck, William H. Hollingsworth, III, and Ronald L. Hollingsworth, who are identified as the sole heirs of the decedent's estate in the Decree of Final Settlement that was issued on July 27, 2016, by the Probate Court of Madison, Alabama. Claimant Estate has submitted copies of Peggy Kahlenbeck's U.S. passport valid from December 8, 2011, to December 7, 2021, which states she was born in Georgia; William H. Hollingsworth, III's U. S. Passport valid from April 15, 2013, to April 14, 2023, which states he was born in Georgia; and Ronald L. Hollingsworth's Alabama birth certificate and 2016 Mississippi voter registration card. These documents establish that Peggy Kahlenbeck, William H. Hollingsworth, III, and Ronald L. Hollingsworth were U.S. nationals from December 24, 2009, the date of the decedent's death, through May 22, 2011, the effective date of the Claims Settlement Agreement. Thus, Claimant Estate has satisfied this element of its claim.

No Pending Litigation

Additionally, Category A states that the claimant may not have been a plaintiff in any of the so-called Pending Litigation cases at the time of the entry into force of the Claims Settlement Agreement.¹¹ Footnote 3 of the 2014 Referral specifically lists the Pending Litigation cases for purposes of the Referral. Claimant Estate has averred, and the pleadings in the cases cited in footnote 3 confirm, that neither it nor its decedent was a plaintiff in any of those Pending Litigation cases. The Commission thus finds that

¹¹ The Agreement entered into force on May 22, 2011. *See* Claims Settlement Agreement, art. IX.

Claimant Estate has also satisfied this element of its claim.

*No Compensation under the Claims Settlement Agreement
from the Department of State*

The Claimant Estate also satisfies the final jurisdictional requirement. Claimant Estate has stated that neither it nor its decedent received any compensation under the Claims Settlement Agreement from the Department of State. Further, we have no evidence that the State Department has provided either the Claimant Estate or its decedent any compensation under the Claims Settlement Agreement. Therefore, Claimant Estate meets this element of its claim.

In summary, this claim is within the Commission's jurisdiction pursuant to the 2014 Referral and is entitled to adjudication on the merits.

Merits

Factual Allegations

Claimant Estate states that Iraq held its decedent hostage from August 2, 1990, until August 27, 1990, a total of 26 days. Claimant Estate alleges that its decedent was living with her husband in Kuwait, when Iraq invaded the country on August 2, 1990. At the time, her husband was a U.S. citizen working for the U.S. State Department in Kuwait.¹² Claimant Estate asserts that immediately after the invasion, its decedent and her husband went to the Japanese Embassy, where they remained for approximately the next ten days. Then, on or about August 12, 1990, they relocated to the U.S. Embassy in Kuwait, where they remained for the next two weeks.

¹² For further factual background regarding the Iraqi government's treatment of Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents after the August 2, 1990 invasion, see Claim No. IRQ-II-081, Decision No. IRQ-II-238, at 5-10.

On August 23, 1990, Claimant Estate's decedent and her husband departed for Baghdad in a convoy made up of Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents. Claimant Estate further alleges that its decedent was held in Iraq until August 26, 1990, when she left Baghdad in a vehicle that was part of a convoy carrying dependents of U.S. diplomatic personnel from Kuwait who sought to leave Iraq.¹³ Claimant Estate states that the convoy arrived at the Iraqi border station prior to midnight. At that time, the Iraqi authorities collected the convoy members' passports and stamped them with Iraqi exit stamps bearing the date August 26, 1990. However, according to Claimant Estate, the Iraqi authorities did not return the passports until approximately 2:00 a.m. on August 27, 1990, when they instructed the convoy members to pull their vehicles into a customs bay. The convoy waited there and was eventually informed that the Iraqi authorities would not allow three young men from the convoy to leave Iraq because Iraq considered them of military age. Thereafter, the remaining members of the convoy were permitted to proceed towards the border with Turkey. According to Claimant Estate, as they approached the bridge that would take them across the border, armed Iraqi guards again stopped the convoy, ordered everyone to exit their vehicles, and lined them all up along the roadside. Only after counting the members of the convoy did the armed guards allow them to get back into their vehicles and to cross the border out of Iraq and into Turkey.

Supporting Evidence

Claimant Estate has supported its claim with, among other things, the declarations of the estate's personal representative, the decedent's daughter, as well as the declaration

¹³ Claimant Estate alleges that Iraqi officials required its decedent's husband to remain in Baghdad.

of one of the decedent's sons. It has also submitted two regional newspapers, one from August 1990, and one from September 1990, both of which identify the decedent by name and describe her experience in Kuwait. The September 1990 article also describes her as the dependent of an embassy employee who hid for 10 days after the invasion at a "safe haven," then went to the U.S. Embassy in Kuwait, then was transported to the U.S. Embassy in Baghdad, before finally being able to leave Iraq in late August as part of a group of women and minors who were diplomatic dependents. It has also submitted a *New York Times* article from August 19, 1990, which states the decedent was being held in Kuwait. Additionally it has submitted a *USA Today* article from August 30, 1990, which states that the decedent was part of a group of dependents of U.S. Embassy workers in Kuwait who had returned to the United States on August 28, 1990.

Claimant Estate has also provided three contemporaneous newspaper articles that specifically state that the convoy of Embassy dependents that left Baghdad on August 26, 1990, entered Turkey on August 27, 1990, and a declaration and contemporaneous journal entries of one of the other hostages who left Iraq as part of the same convoy.

Claimant Estate has also submitted a number of documents that provide background about the broader geopolitical situation during the First Gulf War in 1990-91, including some that relate specifically to the circumstances faced by U.S. nationals in Iraq and Kuwait at the time. These documents include statements from U.S. and Iraqi officials, resolutions of the United Nations Security Council, newspaper articles, a report from Amnesty International on human rights violations committed by Iraq in 1990, unclassified cables and a memorandum from the U.S. Department of State, and affidavits submitted in two lawsuits brought by other U.S. nationals who were also in Kuwait or Iraq during the First Gulf War.

Additionally, the Commission takes notice of Federal News Service transcriptions of press briefings by U.S. government officials, news articles, and publically available unclassified State Department documents that provide further information about Iraq's treatment of Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents after the August 2, 1990, invasion.

Legal Standard

To make out a substantive claim under Category A of the 2014 Referral, a claimant must show that (1) Iraq was engaged in an armed conflict and (2) during that conflict, Iraq took the claimant hostage.¹⁴ The Commission has previously held that, to establish a hostage-taking claim under international law in this program, a claimant must show that Iraq (a) seized or detained the claimant and (b) threatened the claimant with death, injury, or continued detention (c) in order to compel a third party, such as the United States government, to do or abstain from doing any act as an explicit or implicit condition for the claimant's release.¹⁵ A claimant can establish the first element of this standard by showing that the Iraqi government confined the claimant to a particular location or locations within Iraq or Kuwait, or prohibited the claimant from leaving Iraq and/or Kuwait.¹⁶ The legal standard we apply in this program applies equally to diplomatic personnel and their families.¹⁷

¹⁴ See Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 16.

¹⁵ See *id.* at 17-20.

¹⁶ See *id.* at 17.

¹⁷ See Claim No. IRQ-II-081, Decision No. IRQ-II-238, at 12.

Application of Standard to this Claim

Claimant Estate satisfies this standard for the period between August 2, 1990, and August 27, 1990. The evidence in the record establishes that Claimant Estate's decedent was in Kuwait on August 2, 1990, and that she left Iraq on August 27, 1990.¹⁸ Since the evidence substantiates Claimant Estate's factual assertions, we now apply the legal standard to its claim.

(1) Armed Conflict: Claimant Estate alleges that Iraq took its decedent hostage in Kuwait on August 2, 1990, and held her hostage for 26 days, until Iraqi officials allowed her to leave Iraq. In its first decision awarding compensation for hostage-taking under the 2014 Referral, the Commission held that during this entire period, Iraq was engaged in an armed conflict with Kuwait.¹⁹ Thus, Claimant Estate satisfies this element of the standard.

(2) Hostage-taking: To satisfy the hostage-taking requirement of Category A of the 2014 Referral, Claimant Estate must show that Iraq (a) seized or detained its decedent and (b) threatened her with death, injury, or continued detention (c) in order to compel a third party, such as the United States government, to do or abstain from doing any act as an explicit or implicit condition for her release. Claimant Estate satisfies this standard for the 26-day period from August 2, 1990, to August 27, 1990.

(a) Detention/deprivation of freedom: For purposes of analyzing Claimant Estate's allegations of its decedent having been detained, her time in Kuwait following the Iraqi invasion can be divided into three periods: (i) between the Iraqi invasion on August 2, 1990, and the State Department's August 7, 1990 announcement recognizing that those with U.S. diplomatic status in Kuwait were in the same position as

¹⁸ See Claim No. IRQ-II-129, Decision No. 260, at 9.

¹⁹ See Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 16-17.

“private American citizens”; (ii) between that August 7, 1990 announcement and August 25, 1990, when Iraq’s Ministry of Foreign Affairs informed State Department officials that the dependents of Americans who had diplomatic status in Kuwait could leave; (iii) from the August 25, 1990, Iraqi Ministry of Foreign Affairs undertaking until Ms. Hollingsworth exited Iraq on August 27, 1990.

From August 2, 1990, until August 7, 1990, Iraq prevented Ms. Hollingsworth from leaving Kuwait. During this period, Iraq made no formal distinction between the Ms. Hollingsworth and other U.S. nationals, who, as we have previously recognized, were threatened with immediate seizure and forcible detention during this period.²⁰ Although some foreign nationals did manage to leave Kuwait and/or Iraq during this period, Ms. Hollingsworth could not reasonably be expected to have escaped.²¹ Iraqi authorities were forcibly detaining foreign nationals (including U.S. nationals) in Kuwait, relocating many to Baghdad against their will.²² Ms. Hollingsworth understandably had, as the United Nations Compensation Commission has put it, a “manifestly well-founded fear” of being killed or forcibly detained if she had left, first, her home, or, subsequently, the U.S. embassy in Kuwait.²³ The Commission has previously recognized that for the purposes of the legal standard applicable here, putting Ms. Hollingsworth in this situation in effect amounts to detention.²⁴ Iraq thus detained Ms. Hollingsworth from August 2, 1990, to August 7, 1990.

²⁰ *See id.* at 21.

²¹ *See id.*

²² *See id.*

²³ Report and Recommendations Made by the Panel of Commissioners Concerning the First Instalment of Individual Claims for Damages up to US \$100,000 (Category “C” Claims), UN Doc. S/AC.26/1994/3 (1994), at 93.

²⁴ *See* Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 21.

Between August 7, 1990, and August 25, 1990, Iraqi authorities adopted various policies that prevented Embassy staff members, Americans with diplomatic status in Kuwait, and their dependents, such as Ms. Hollingsworth, from leaving Kuwait and Iraq.²⁵ As the Commission has previously recognized, Iraq did not extend assurances that the U.S. government believed to be sufficiently credible to allow Embassy staff members, Americans with diplomatic status in Kuwait, and their dependents to depart until August 22, 1990.²⁶ Iraqi authorities subsequently reneged on those commitments on or around August 24, 1990, before adopting a policy that prohibited the departure of Kuwait Embassy staff and their dependents from Iraq and Kuwait as long as the U.S. embassy in Kuwait remained open.²⁷

While the U.S. government was able to negotiate the release of some diplomatic dependents, including Ms. Hollingsworth, on or around August 25, 1990, her detention did not end on this date. As the Commission has previously recognized, a claimant's detention ends only on the date that she is released from the control of the person or entity that detained her.²⁸ Any attempt "[by the perpetrator] to restrict [the] movements" of a claimant establishes control,²⁹ whereas a claimant who has a reasonable opportunity to leave the site of his or her captivity is deemed no longer to be under the perpetrator's control.³⁰

²⁵ See Claim No. IRQ-II-081, Decision No. IRQ-II-238, at 14.

²⁶ See *id.*

²⁷ See *id.* at 14-15.

²⁸ See Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 22; see also Claim No. LIB-II-183, Decision No. LIB-II-178 (Proposed Decision), at 13 (2012).

²⁹ See Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 22 (citing Claim No. LIB-II-183, Decision No. LIB-II-178 (Proposed Decision), at 12 (2012)).

³⁰ See *id.*

Under this standard, Ms. Hollingsworth remained under Iraq's control until August 27, 1990, when Iraqi government officials eventually permitted her to leave Iraq. The available evidence indicates that Ms. Hollingsworth left Iraq at the first reasonable opportunity, on the convoy that left Iraq on August 27, 1990. Because there is no evidence that Ms. Hollingsworth remained voluntarily in Iraq at any time during this period, we conclude that she was under Iraq's control and thus detained from August 25, 1990, to August 27, 1990.

In sum, Iraq thus detained Claimant Estate's decedent from August 2, 1990, until August 27, 1990.

(b) Threat: The Iraqi government threatened Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents with continued detention. This included Ms. Hollingsworth. Iraqi authorities made clear that Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents would not be permitted to leave, notwithstanding Iraq's sporadic and unreliable statements to the contrary during Ms. Hollingsworth's period of detention.³¹ Claimant Estate has thus established that Iraq threatened to continue to detain its decedent.

(c) Third party coercion: The reason Iraq detained Ms. Hollingsworth and the other diplomatic dependents and threatened them with continued detention was to compel the United States government to act in a certain way as an explicit and/or implicit condition for their release. Iraqi authorities informed the U.S. that before it would release Embassy staff members, U.S. personnel with diplomatic status in Kuwait, and their dependents, it wanted the United States to close its embassy in Kuwait.³² Indeed, at the

³¹ See Claim No. IRQ-II-081, Decision No. IRQ-II-238, at 16.

³² See *id.*

time, the U.S. government itself understood Iraq's actions to be hostage-taking.³³

In sum, this claim meets the standard for hostage-taking within the meaning of the 2014 Referral. Iraq held Claimant Estate's decedent hostage in violation of international law for a period of 26 days, and Claimant Estate is thus entitled to compensation.

COMPENSATION

Having concluded that the present claim is compensable, the Commission must next determine the appropriate amount of compensation.

In its first decision awarding compensation for hostage-taking under the 2014 Referral, the Commission held that successful claimants should be awarded compensation in the amount of \$150,000 plus an additional \$5,000 for each day the claimant was in captivity.³⁴ Therefore, for the 26 days Iraq held Claimant Estate's decedent hostage, it is entitled to an award of \$280,000, which is \$150,000 plus (26 x \$5,000). This amount constitutes the entirety of the compensation to which Claimant Estate is entitled under the Claims Settlement Agreement.

The Commission hereby enters the following award, which will be certified to the Secretary of the Treasury for payment under sections 7 and 8 of the ICSA.³⁵

³³ *See id.* at 16-17.

³⁴ *See* Claim No. IRQ-II-161, Decision No. IRQ-II-003, at 24-26.

³⁵ 22 U.S.C. §§ 1626-1627 (2012).

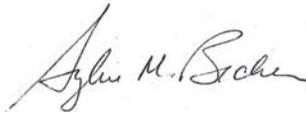
AWARD

Claimant Estate is entitled to an award in the amount of \$280,000.

Dated at Washington, DC, July 10, 2018
and entered as the Proposed Decision
of the Commission.

**This decision was entered as the
Commission's Final Decision
on**

August 13, 2018



Sylvia M. Becker, Commissioner



Patrick Hovakimian, Commissioner

NOTICE: Pursuant to the Regulations of the Commission, any objections must be filed within 15 days of delivery of this Proposed Decision. Absent objection, this decision will be entered as the Final Decision of the Commission upon the expiration of 30 days after delivery, unless the Commission otherwise orders. FCSC Regulations, 45 C.F.R. § 509.5 (e), (g) (2017).