



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
JUN 30 2011

REPLY TO THE ATTENTION OF:

LC-8J

CERTIFIED MAIL

Receipt No. 7009 1680 0000 7665 8409

Mr. Arthur Hiler
ASI Packaging Company
3019 Airpark Drive N.
Flint, Michigan 48507

Consent Agreement and Final Order **FIFRA-05-2011-0016**

Dear Mr. Hiler:

Enclosed please find two copies of a fully executed Consent Agreement and Final Order, in resolution of the above case. This document was filed on June 30, 2011 with the Regional Hearing Clerk.

The civil penalty in the amount of \$5,400.00 is to be paid in the manner described in paragraphs 70 and 71. Please be certain that the number **BD 2751145P016** and the docket number are written on both the transmittal letter and on the check. Payment is due by July 30, 2011, (within 30 calendar days of the filing date).

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink that reads "Joseph G. Lukascyk".

Joseph Lukascyk
Pesticides and Toxics Compliance Section

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)
)
ASI Packaging Company)
Flint, Michigan)
Respondent.)
_____)

Docket No. FIFRA-05-2011-0016
Proceeding to Assess a Civil Penalty
Under Section 14(a) of the Federal
Insecticide, Fungicide, and Rodenticide
Act, 7 U.S.C. § 136l(a)

RECEIVED
JUN 30 2011

Consent Agreement and Final Order
Preliminary Statement

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

1. This is an administrative action commenced and concluded under Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136l(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22.
2. The Complainant is, by lawful delegation, the Director, Land and Chemicals Division, U.S. Environmental Protection Agency (EPA), Region 5.
3. The Respondent is ASI Packaging Company, a corporation doing business in the state of Michigan.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a Consent Agreement and Final Order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.
6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

9. Respondent certifies that it is complying with FIFRA, 7 U.S.C. §§ 136 to 136y.

Statutory And Regulatory Background

10. The term “person” as defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s), means: “any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.”

11. The term “producer” is defined at Section 2(w) of FIFRA, 7 U.S.C. § 136(w), and means: “the person who manufactures, prepares, compounds, propagates, or processes any pesticide or device or active ingredient used in producing a pesticide.”

12. The term “produce” is defined at Section 2(w) of FIFRA, 7 U.S.C. § 136(w), and 40 C.F.R. § 167.3, and means: “to manufacture, prepare, compound, propagate, or process any pesticide, including any pesticide produced pursuant to section 5 of the Act, any active ingredient or device, or to package, repackage, label, relabel, or otherwise change the container of any pesticide or device.”

13. The term “establishment” is defined at Section 2(dd) of FIFRA, 7 U.S.C. § 136(dd), and means: “any place where a pesticide or device or active ingredient used in producing a pesticide is produced, or held, for distribution or sale.”

14. The term “pesticide” is defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u), and 40 C.F.R. § 152.3 and means:, *inter alia*, “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.”

15. The term “distribute or sell” is defined, in Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), and means: “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, or receive and (having so received) deliver or offer to deliver.”

16. The term “misbranded” is defined in Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), which states that a pesticide is misbranded if, “its labeling bears any statement, design, or graphic representation relative thereto or to its ingredients which is false or misleading in any particular.”

17. The term “misbranded” is further defined in Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), which states a pesticide is misbranded if “the labeling accompanying it does not contain directions for use which are necessary for effecting the purpose for which the product is intended and if complied with, together with any requirements imposed under section 136a(d) of this title, is adequate to protect health and the environment;”

18. The term “misbranded” is further defined in Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), which states that a pesticide is misbranded if “the label does not contain a warning or caution statement which may be necessary and if complied with, together with any requirements imposed under section 136a(d) of this title, is adequate to protect health and the environment.”

19. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), states that it shall be unlawful for any person in any state to distribute or sell to any person any pesticide which is adulterated or misbranded.

20. Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), states that “it shall be unlawful for any person in any State to distribute or sell to any person any pesticide that is not registered under section 136a of this title.”

21. According to the Regulations at 40 C.F.R. § 152.132, supplemental distribution is permitted upon written notification to EPA by both the registrant and the distributor, provided that all of the conditions in 40 C.F.R. § 152.132 are met by both the registrant and the distributor. Supplemental distribution allows the registrant to distribute or sell the registered product under another person’s name and address, and such distribution and sale is termed “supplemental distribution,” and the product is referred to as “distributor product.”

22. According to the Regulations at 40 C.F.R. § 152.132(d)(3), “the registration number of the registered product must be followed by a dash, followed by the distributor’s company number (obtainable from the agency upon request).”

23. According to 40 C.F.R. 152.132, “the distributor is considered an agent of the registrant for all intents and purposes under the Act, and both the registrant and the distributor may be held liable for violations pertaining to the distributor product.”

24. According to 40 C.F.R. § 152.132(d), the label of the distributor product must be the same as that of the registered product, except that: 1) the product name of the distributor product may be different (but may not be misleading); 2) the name and address of the distributor may appear instead of that of the registrant; 3) the registration number of the registered product

must be followed by a dash, followed by the distributor's company number (obtainable from the Agency upon request); 4) the establishment number must be that of the final establishment at which the product was produced; and 5) specific claims may be deleted, provided that no other changes are necessary.

25. Section 7(c)(1) of FIFRA, 7 U.S.C. § 136e(c)(1), and 40 C.F.R. § 167.85, require any producer operating an establishment registered with the EPA under Section 7 of FIFRA, 7 U.S.C. § 136e, and 40 C.F.R. Part 167 to inform the Administrator within 30 days after it is registered, and annually thereafter, of the types and amounts of pesticides and, if applicable, active ingredients used in producing pesticides:

- (A) which the producer is currently producing;
- (B) which the producer has produced during the past year, and;
- (C) which the producer has sold or distributed during the past year.

26. 40 C.F.R. § 167.85(c), provides that the report required by Section 7(c)(1) of FIFRA, 7 U.S.C. § 136e(c)(1), and 40 C.F.R. § 167.85 (a/k/a the "Annual Pesticide Production Report") must be made on forms supplied by the EPA.

27. 40 C.F.R. § 167.85(c), further specifies that it is the ultimate responsibility of companies to obtain, complete, and submit the forms each year. (EPA's form is known as the "Pesticide Report for Pesticide-Producing and Device-Producing Establishments" form, or EPA Form 3540-16.)

28. 40 C.F.R. § 167.85(d), requires producers to submit the Annual Pesticide Production Report for the preceding year to the EPA on or before March 1 of each year, even if the producer has produced no pesticidal product for that reporting year.

29. Section 12(a)(2)(L) of FIFRA, 7 U.S.C. § 136j(a)(2)(L), states that it shall be unlawful for any person who is a producer to violate any of the provisions of Section 7 of FIFRA.

30. According to the regulations at 40 C.F.R. § 169.2(a), all producers of pesticides shall maintain the following records: Records showing the product name, EPA Registration Number, amounts per batch and batch identification of all pesticides produced.

31. The Administrator of EPA may assess a civil penalty against any registrant, commercial applicator, wholesaler, dealer, retailer, other distributor who violates any provision of FIFRA of up to \$7,500 for each offense, pursuant to Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), and 40 C.F.R. Part 19.

Factual and Alleged Violations

32. Respondent was, at all times relevant to this Complaint, a “person” as that term is defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s).

33. At all times relevant to this Complaint, Respondent owned or operated a place of business located at 3019 Airpark Drive North, Flint, Michigan 48507.

34. Respondent’s place of business located at 3019 Airpark Drive North, Flint, Michigan 48507 has been an “establishment” as defined at Section 2(dd) of FIFRA, 7 U.S.C. § 136(dd), and 40 C.F.R. § 167.3 at all times relevant to this CAFO.

35. Pursuant to Section 7 of FIFRA, 7 U.S.C. § 136e, Respondent registered its establishment with EPA on or about July 1997.

36. At all times relevant to this CAFO, Respondent’s establishment was registered with EPA under Section 7 of FIFRA, 7 U.S.C. § 136(e).

37. Respondent was, at all times relevant to this Complaint, a “producer” as that term is defined at Section 2(w) of FIFRA, 7 U.S.C. § 136(w).

38. At all times relevant to this Complaint, Respondent was either a registrant, commercial applicator, wholesaler, dealer, retailer and/or other distributor of pesticides within the meaning of those terms as used in Section 14(a)(1) of FIFRA, 7 U.S.C. § 136(a)(1).

39. At all times relevant to this Complaint, Respondent “distributed” or “sold” pesticides, as those terms are defined in Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).

40. On August 8, 2006 and June 5, 2007, an inspector employed by the Michigan Department of Agriculture (MDA) and duly authorized to conduct inspections under FIFRA, conducted inspections under Sections 8 and 9 of FIFRA, 7 U.S.C. §§ 136f and 136g, at Respondent’s establishment located at 3019 Airpark Drive North, Flint, Michigan 48507, to examine and collect samples of any pesticides packaged, labeled, and released for shipment.

41. During the August 8, 2006 and June 5, 2007 inspections, the MDA inspector observed the pesticide products “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2, and “Vine-X Vine & Brush Control,” EPA Reg. No. 72680-1 being offered for distribution or sale.

42. During the August 8, 2006 and June 5, 2007 inspections, the MDA inspector collected documentary samples of letters, pesticide product labels, production records, and shipping invoices.

43. Upon collection of the samples, the inspector issued a “Receipt for Samples” to an authorized representative of Respondent, who acknowledged, by signature on the document, that the samples were obtained from pesticides that were packaged, labeled, and released for shipment or sale.

44. "Scott Multi-Wash Mini," EPA Reg. No. 61181-2 is a "pesticide" as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

45. The pesticide product label of "Scott Multi-Wash Mini," EPA Reg. No. 61181-2, that was collected during the August 8, 2006 and June 5, 2007 inspections, contained the statement "E.P.A. Dist. No. 70661," indicating that this pesticide product was being supplementally distributed by Scott Aviation (Scott), located in Monroe, North Carolina.

46. The registrant of the legitimate pesticide product "Multi-Wash Mini," EPA Reg. No. 61181-2 is Multi-Wash Medical Ltd., located in Ada, Michigan.

47. A search of EPA records, and an inquiry to the Antimicrobials Division, Office of Pesticide Programs, indicates that no Notice of Supplemental Distribution of a Registered Pesticide Product (EPA Form 8570-5) had been filed with the EPA, allowing Scott to distribute Multi-Wash Medical Ltd.'s registered pesticide product under Scott's brand name.

48. The pesticide product label of "Scott Multi-Wash Mini," EPA Reg. No. 61181-2, that was collected during the August 8, 2006 and June 5, 2007 inspections, also contained the EPA Est. No. 61181-MI-1, which indicates that the product was produced by Multi-Wash Medical Ltd.

49. According to evidence obtained by the MDA inspector, the product "Scott Multi-Wash Mini," EPA Reg. No. 61181-2 was actually produced by Respondent (EPA Est. No. 71026-MI-001).

50. On or about March 27, 2006, Respondent distributed or sold the pesticide product "Scott Multi-Wash Mini," EPA Reg. No. 61181-2-70661, to Tyco-Scott Technologies, located at 4320 Goldmine Road, Monroe, North Carolina 28110.

51. On or about April 18, 2006, Respondent distributed or sold the pesticide product “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2-70661, to Tyco-Scott Technologies, located at 4320 Goldmine Road, Monroe, North Carolina 28110.

52. On or about May 9, 2006, Respondent distributed or sold the pesticide product “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2-70661, to Tyco-Scott Technologies, located at 4320 Goldmine Road, Monroe, North Carolina 28110.

53. On or about May 23, 2006, Respondent distributed or sold the pesticide product “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2-70661, to Tyco-Scott Technologies, located at 4320 Goldmine Road, Monroe, North Carolina 28110.

54. On or about June 14, 2006, Respondent distributed or sold the pesticide product “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2-70661, to Tyco-Scott Technologies, located at 4320 Goldmine Road, Monroe, North Carolina 28110.

55. Respondent distributed or sold the unregistered and misbranded pesticide product “Scott Multi-Wash Mini,” EPA Reg. No. 61181-2-70661.

56. These distribution or sales constitute unlawful acts according to Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), and Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

57. “Vine-X Vine & Brush Control,” EPA Reg. No. 72680-1 is a “pesticide” as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

58. The registrant for the pesticide product “Vine-X Vine & Brush Control,” EPA Reg. No. 72680-1 is UPM Corporation of Rosemont, Pennsylvania.

59. In a letter from the EPA to the registrant UPM Corporation, dated September 2, 2003, the registrant was instructed to make the following label changes before releasing the product for shipment:

- (A) Add the following text to Environmental Hazards section: ***“This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.”*** Respondent’s product label from the August 8, 2006 inspection **does not** contain this statement.
- (B) Add the following text to Directions for Use: **“Do not allow people or pets to contact the treated area until applications have dried.”** Respondent’s product label from the August 8, 2006 inspection **does not** contain this statement.
- (C) Add the following text to Directions for Use, under the subheading “Application Restrictions”: **“Avoid contact with eyes, skin, or clothing during and after application.” “Do not apply this product in a way that will contact any person or pet. Keep people and pets out of the area during application.”** Respondent’s product label from the August 8, 2006 inspection **does not** contain this statement.
- (D) Add the following text under Application Restrictions, in a box:
“User Safety Recommendations”

- *“Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.”*
- *“Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.”*
- *“Users should remove protective clothing and equipment immediately after handling this product. Wash the outside of gloves before removing. Keep and wash protective clothing and equipment separately from other laundry.”*

Respondent’s product label from the August 8, 2006 inspection **does not** contain these statements.

- (E) Change skin sensitizer statement to *“This product may cause skin sensitization in some people”* under Precautionary Statements.

Respondent’s product label from the August 8, 2006 inspection **does not** contain this change.

- (F) Change “Storage” to *“Pesticide Storage”* under STORAGE AND DISPOSAL. Respondent’s product label from the August 8, 2006 inspection **does not** contain this change.

- (G) Add *“Non-porous rubber gloves* to “wear long-sleeved shirt and long pants, shoes and socks” under Precautionary Statements. Respondent’s product label from the August 8, 2006 inspection **does not** contain this statement.

60. According to evidence obtained by the EPA, Respondent distributed or sold the misbranded pesticide product "Vine-X Vine & Brush Control," EPA Reg. No. 72680-1, on or about August 8, 2006.

61. The distribution and sale of the misbranded pesticide "Vine-X Vine & Brush Control," EPA Reg. No. 72680-1 constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

62. On or about February 23, 2007, Respondent filed the Pesticides Report for Pesticide-Producing Establishments form for the calendar year 2006.

63. Respondent's 2006 Report failed to include production of the pesticide product "Scott Multi-Wash Mini," EPA Reg. No. 61181-2-70661.

64. Respondent's failure to submit a complete Annual Pesticide Production Report for the calendar year 2006 violated Section 7(c)(1) of FIFRA, 7 U.S.C. 136e(c)(1).

65. Respondent failed to maintain proper production records as required at 40 C.F.R. § 169.2(a).

66. Respondent's failure to maintain proper production records violated Section 8(a) of FIFRA, 7 U.S.C. 136f(a).

Civil Penalty

67. Pursuant to Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), Complainant determined that an appropriate civil penalty to settle this action is \$59,564.00. In determining the penalty amount, Complainant considered the appropriateness of the penalty to the size of Respondent's business, the effect on Respondent's ability to continue in business, and the gravity of the violation. Complainant also considered EPA's "*Enforcement Response Policy for the*

Federal Insecticide, Fungicide, and Rodenticide Act,” dated December 2009, and the “*FIFRA Section 7(c) Enforcement Response Policy,*” dated May 2010.

68. Respondent asserted an inability to pay claim and submitted to EPA income tax statements and financial documents. Based on EPA’s ability to pay analysis, EPA has determined that Respondent does not have an ability to pay a \$59,564.00 penalty amount, but does have the ability to pay a partial penalty of \$6,000.00.

69. In consideration of Respondent’s attitude and good faith efforts to comply with FIFRA, Complainant agrees to mitigate the proposed penalty of \$6,000.00 to \$5,400.00.

70. Within 30 days after the effective date of this CAFO, Respondent must pay a \$5,400.00 civil penalty for the FIFRA violations. Respondent must pay the penalty by sending a cashier’s or certified check, payable to the “Treasurer, United States of America,” to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197

for checks sent by express mail:

U.S. Bank
Government Lockbox 979077 U.S. EPA Fines and Penalties
Contact: Natalie Pearson
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, Missouri 63101

The check must note the following: the case name, the docket number of this CAFO and the billing document number (BD number).

71. A transmittal letter stating, Respondent's name, the case title, Respondent's complete address, the case docket number and the billing document number, must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Joseph G. Lukascyk (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Thomas Nash (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

72. This civil penalty is not deductible for federal tax purposes.

73. If Respondent does not pay the civil penalty timely, EPA may refer the matter to the Attorney General who will recover such amount by action in the appropriate United States district court under Section 14(a)(5) of FIFRA, 7 U.S.C. § 136l(a)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

74. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due.

In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

75. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

76. This CAFO does not affect the right of the EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

77. This CAFO does not affect Respondent's responsibility to comply with FIFRA and other applicable federal, state, and local laws, and regulations.

78. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for FIFRA.

79. The terms of this CAFO bind Respondent and its successors, and assigns.

80. Each person signing this agreement certifies that he or she has the authority to sign this agreement for the party whom he or she represents and to bind that party to its terms.

81. Each party agrees to bear its own costs and attorney's fees, in this action.

82. This CAFO constitutes the entire agreement between the parties.

83. The effective date of this CAFO is the date the Complainant files it with the Regional Hearing Clerk.

ASI Packaging Company, Respondent

6/6/11
Date

Arthur Hiler
Arthur Hiler
President
ASI Packaging Company

United States Environmental Protection Agency, Complainant

6/24/11
Date

Margaret M. Guerriero
Margaret M. Guerriero
Director
Land and Chemicals Division

In the Matter of:
ASI Packaging Company
Docket No. FIFRA-05-2011-0016

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

6-27-11
Date



Susan Hedman
Regional Administrator
United States Environmental Protection Agency
Region 5

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PROTECTION AGENCY

CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in the resolution of the civil administrative action involving ASI Packaging Company, was filed on June 30, 2011 with the Regional Hearing Clerk (E-19J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois, 60604, and that I mailed by Certified Mail, Receipt No. 7009 1680 0000 7665 8409, a copy of the original to the Respondent:

Mr. Arthur Hiler
ASI Packaging Company
3019 Airpark Drive N.
Flint, Michigan 48507

and forwarded copies (intra-Agency) to:

Marcy Toney, Regional Judicial Officer, ORC/C-14J
Thomas Nash, Regional Judicial Officer, ORC/C-14J
Eric Volck, Cincinnati Finance/MWD



Frederick Brown
Pesticides and Toxics Compliance Section
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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