

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF EDUCATION



In Re: [REDACTED] } Findings of Fact
Due Process Hearing } and
} Decision

— REDACTED VERSION —

Counsel for the Parents
and John Doe:

Counsel for Public
Schools:

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[REDACTED]
[REDACTED]

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[REDACTED]
[REDACTED]
[REDACTED]

This matter came to be heard upon the request of _____ Public Schools ("LEA") for an Impartial Due Process hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400 et seq., and the Regulations Governing Special Education Programs for Children with Disabilities in Virginia (the "Virginia Regulations" or "Va. Regs."). LEA seeks approval to implement the 2001-2002 Individualized Education Program ("IEP") it proposed for [REDACTED] at an IEP team meeting on [REDACTED] 2001. [REDACTED] parents, _____, withheld their consent for the 2001-2002 IEP because it did not include a non-fluorescent lighting accommodation which had been included in [REDACTED] 2000-2001 IEP.

Request for the due process hearing was made by LEA on [REDACTED] 2001. On [REDACTED] 2001, LEA gave notice of the request to the parents, and included information on

their procedural rights, low cost legal assistance and voluntary mediation.

The due process hearing was held before the undersigned hearing officer over four days, [REDACTED] 2002, [REDACTED] 2002 and [REDACTED] 2002 in _____, Virginia. In addition, the testimony of an expert for LEA was taken by telephone on [REDACTED] 2002. All sessions were opened to the public and were transcribed by a court reporter. The parents appeared in person at the hearing and were represented by counsel. The parents elected not to have [REDACTED] present. The school system was represented by _____, Director of Special Education and Student Services, and by counsel. Both parties made closing arguments and submitted post hearing legal authority.

FINDINGS OF FACT

[REDACTED] was born on _____. [REDACTED] is currently a first grader at _____ Elementary School in the _____ public schools system. [REDACTED] resides in _____ with [REDACTED] parents and an older sister. In 1996, when [REDACTED] was a pre-schooler at the _____ Preschool in _____, [REDACTED] parents observed that [REDACTED] speech was regressing. [REDACTED] was referred to a speech therapist for evaluation. She found indications of autism and, ultimately, in November 1996, [REDACTED] pediatrician, _____, M.D., diagnosed [REDACTED] with autism.¹

[REDACTED] autistic behaviors have included self head hitting, hand licking, spinning, focusing on certain toys, repeating lines from scripts, hand flapping, oppositional behavior, difficulty with

¹ For the purposes of the IDEA, autism is a developmental disability significantly affecting verbal and nonverbal communication and social interaction, generally evident before age 3, that adversely affects a child's educational performance. Other characteristics often associated with autism are engagement in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences. 34 C.F.R. § 300.7(c)(1)(i).

transitions, separation anxiety, sleeplessness and other hyperactive behaviors. All of these behaviors have been present in [REDACTED] at least since [REDACTED] preschool years, however the intensity and frequency of the behaviors has varied.

[REDACTED] was initially determined eligible for special education services by LEA in [REDACTED] 1997 as developmentally delayed and speech/language impaired. In [REDACTED] 1999, [REDACTED] special education eligibility committee changed [REDACTED] special education designation to autism with speech language impairment, which the parents and LEA agree remains the correct designation. [REDACTED] has received special education services through LEA since [REDACTED] 1997, focusing on one-on-one Applied Behavior Analysis ("ABA") instruction.²

In early 1997, the parents began to suspect that as a result of [REDACTED] autism, [REDACTED] was sensitive to fluorescent lighting. According to [REDACTED] father, a physician specializing in _____, autistic children have a central nervous system dysfunction. There are theories that autistic children are not able to process normally the flickering or humming of fluorescent lights, resulting in abnormal behavior and abnormal perceptions in some autistic children. [REDACTED] father has observed that when [REDACTED] is exposed to fluorescent lighting, [REDACTED] typical autistic behaviors become magnified: "So if [REDACTED] is hyperactive, [REDACTED] becomes more hyperactive. If [REDACTED] not focused, [REDACTED] becomes even less focused. If [REDACTED] has repetitive behaviors, [REDACTED] has more repetitive behaviors. If [REDACTED] does a little bit of spinning, now [REDACTED] does lots of spinning. If [REDACTED] had some tantrums, now [REDACTED]

² ABA therapy is a form of treatment for autistic preschoolers that was developed by Dr. Ivar Lovaas at the Princeton Child Development Institute and consists of breaking down activities into discrete individual tasks and rewarding the child's accomplishment. The child eventually learns to integrate the information and associate instruction with a given activity. See *Malkentzos v. DeBuono*, 923 F. Supp. 505, 509 (S.D.N.Y. 1996), remanded on other grounds, 102 F.3d 50 (2d Cir. 1996).

has more tantrums. If [REDACTED] had oppositional behavior, that increases as well.”

[REDACTED] has never been formally tested for sensitivity to fluorescent lighting. According to testimony from experts for both the parents and the school system, no medical test currently exists to determine whether a child is sensitive to fluorescent lighting. While, it might be possible to set up a single child case study (functional analysis) to conclude whether fluorescent lights have a negative effect on [REDACTED], there was no evidence of an established protocol. Neither LEA nor the parents has requested a functional analysis. [REDACTED] is currently receiving long term DMSA chelation therapy to remove mercury from [REDACTED] body, which may continue for 6 to 18 months. The parents would be willing for [REDACTED] to have a functional analysis for fluorescent light sensitivity after the chelation therapy is over.

[REDACTED] IEP for [REDACTED] 2000-2001 kindergarten school year, signed in [REDACTED] 2000, notes in the Present Level of Educational Performance (“PLEP”) section that “Environmental and dietary sensitivities reported to affect [REDACTED] behavior include reactions to casein and gluten, and fluorescent lights.” “No fluorescent lights” was included as an IEP accommodation. Both the PLEP note and the accommodation on fluorescent lights were put in the IEP because the parents requested it. The LEA special education staff had not observed that [REDACTED] had any sensitivity to fluorescent lights and, at that time, LEA had not received confirmation from [REDACTED] health care providers that [REDACTED] should not be exposed to fluorescent lights.

For the 2000-2001 school year, [REDACTED] was to matriculate from _____ Preschool to LEA’s _____ Elementary School. At the time the [REDACTED] 2000 IEP was prepared, LEA had planned to place [REDACTED] in a self-contained classroom with less than 10 children. In order to provide the no fluorescent lights accommodation, LEA intended to turn off the overhead lights

and use halogen lamps. In [REDACTED] 2000, the parents requested that [REDACTED] be placed in a regular kindergarten classroom and [REDACTED] IEP was revised. An accommodation in the revised IEP provided there would be no fluorescent lights in [REDACTED] classroom. LEA was unable to change the lights in the regular classroom by the beginning of the school year. [REDACTED] parents agreed that [REDACTED] could be temporarily placed in the regular classroom with fluorescent lights. The fluorescent lights remained in [REDACTED] classroom until [REDACTED] 2000.

When [REDACTED] started kindergarten at _____ School in September 2000, [REDACTED] mother observed immediate changes in [REDACTED] behavior at home which she attributed to classroom exposure to fluorescent lighting. According to [REDACTED] mother, [REDACTED] became hyperactive every evening. Beginning on Wednesdays, sleep disorders started along with hand licking and other "major activities." Concerned by these changes, the parents took [REDACTED] out of school on [REDACTED] 2000 and did not send [REDACTED] back until [REDACTED], 2000, when the fluorescent lights in [REDACTED] classroom had been replaced with incandescent lights. [REDACTED] mother testified that [REDACTED] increased hyperactive behaviors at home diminished after [REDACTED] stopped going to school on [REDACTED] 2000 and they did not return.

[REDACTED] aides at _____ School also observed that [REDACTED] autistic behaviors increased after [REDACTED] started kindergarten in September 2000, including atypical aggressive behaviors. For example, on [REDACTED] 2000, [REDACTED] ABA provider, _____, reported in [REDACTED] ABA journal that [REDACTED] hit and bit her, something [REDACTED] had never done before. LEA, however, attributed those changes to the transition from _____ Preschool to kindergarten at _____ School. According to _____, LEA's contract autism specialist, children with autism typically have problems with transitions.

On [REDACTED], 2000, [REDACTED] mother asked _____, a LEA Special Education Coordinator, about the status of providing non-fluorescent lights in [REDACTED] _____ School classroom. _____ told [REDACTED] mother that there was no medical prescription for the accommodation. [REDACTED] mother immediately obtained a prescription from [REDACTED] developmental pediatrician, _____, M.D. Dr. _____'s [REDACTED] 2000 prescription stated, "It is medically necessary for [REDACTED] to not be exposed to any fluorescent lighting. The duration of the medical treatment is indefinite."

Over the 2000-2001 school year, the LEA staff responsible for [REDACTED] special education program became convinced that there was no correlation between [REDACTED] autistic behaviors and the presence or absence of fluorescent lighting. In March 2001, Special Education Coordinator _____ wrote Dr. _____ to ask for a clarification of [REDACTED] no fluorescent lighting prescription. Dr. _____ responded that [REDACTED] could not make an accurate clinical recommendation on [REDACTED] condition. After further inquiry from LEA, Dr. _____ wrote in [REDACTED] 2001 that "Children with autism, such as [REDACTED], have many problems and fluorescent lighting can affect them adversely." [REDACTED] provided no further details on how fluorescent lighting effected [REDACTED]. In a [REDACTED] 2001 pre-IEP meeting, the LEA staff told [REDACTED] mother that LEA would not agree to a no fluorescent lighting accommodation in [REDACTED] 2001-2002 IEP. In [REDACTED] 2001, _____, LEA's Special Education Director provided an IEP Prior Notice form to [REDACTED] parents that LEA would refuse to include a classroom accommodation of no fluorescent lights in [REDACTED] 2001-2002 IEP. Notwithstanding, LEA agreed to continue to provide non

fluorescent lighting in [REDACTED] classroom for the 2001-2002 school year.³

In the 2001-2002 IEP proposed by LEA, there was no accommodation for no fluorescent lights and no statement of [REDACTED] environmental sensibilities in the PLEP section. The IEP team, including [REDACTED] mother and the parents' attorney, discussed the no fluorescent lights accommodation at a 3½ hour IEP meeting on [REDACTED], 2001, but no agreement was reached. [REDACTED] mother consented to the proposed IEP "except the refusal of the School District to acknowledge the deleterious effects of fluorescent lighting on [REDACTED] and provide appropriate accommodations excluding exposure to fluorescent lighting in [REDACTED] IEP." There was a follow-up IEP meeting on [REDACTED] 2001 which [REDACTED] mother and the parents' attorney also attended. Changes were made to the IEP accommodations, but LEA still refused to include a no fluorescent lighting accommodation and the parents did not consent to the IEP.

On [REDACTED] 2001, the parents submitted a letter of complaint to the Virginia Department of Education ("VDOE") that LEA had changed [REDACTED] IEP to remove the no fluorescent lighting accommodation without parental consent. VDOE held in a letter of finding dated [REDACTED] 2001 (the "LOF") that LEA had inappropriately removed the no fluorescent lighting accommodation from [REDACTED] 2001-2002 IEP and that to resolve the dispute, LEA had to either obtain parent consent, or "challenge the appropriateness of this accommodation through mediation or a due process hearing." After the LOF was upheld on appeal, LEA requested a due process hearing under the Individuals with Disabilities Education Act (IDEA").

³ [REDACTED] School regular classroom for 2001-2002 is the same classroom from which the fluorescent lighting was removed in November 2000. Except for a 26 day period at the beginning of the 2000-2001 school year, [REDACTED] has not been exposed to fluorescent lighting in [REDACTED] School classroom.

dispute, [REDACTED] had to either obtain parent consent, or “challenge the appropriateness of this accommodation through mediation or a due process hearing.” After the LOF was upheld on appeal, [REDACTED] requested a due process hearing under the Individuals with Disabilities Education Act (IDEA”).

DECISION

In order to qualify for federal financial assistance under IDEA, a State must demonstrate that it “has in effect a policy that assures all children with disabilities the right to a free appropriate public education.” 20 U.S.C. § 1412(1). The parents contend that [REDACTED] could not receive a free appropriate public education “FAPE” under [REDACTED] proposed [REDACTED] IEP that did not include an accommodation to limit fluorescent light exposure. In addition, the parents object to the IEP because it omits acknowledgment of [REDACTED] alleged environmental sensitivities in the PLEP section and because they allege that [REDACTED] did not comply with required IDEA procedures in drafting the IEP. [REDACTED] maintains that its proposed IEP met the requirements of IDEA and the Virginia Regulations and that [REDACTED] can receive FAPE without the lighting accommodation.

I. Eligibility for Special Education Services ✓

The parents and [REDACTED] agree that [REDACTED] is a child with a disability as defined by IDEA and the Virginia Regulations. The identification of [REDACTED] disabling condition in the proposed [REDACTED] is Autism/Speech Language Impaired. I find that this identification of [REDACTED] disability, with which the parents agree, is supported by the record, including [REDACTED] [REDACTED] Special Education Eligibility Committee Summary.

II. Notice Requirements ✓

accommodation for no fluorescent lighting in the classroom. I find that the burden of proof rests with the school system to show that its proposed 2001-2002 IEP for [REDACTED], without any lighting accommodation, is adequate under IDEA and the Virginia Regulations. *See, e.g., Brian S. v. Vance*, 86 F.Supp. 2d 538, 142 Ed. Law Rep. 828 (D.Md. 2000) (Holding that when a change is sought in an existing IEP, the party seeking the change should have the burden of proof); *Board of Educ. of County of Kanawha v. Michael M.*, 95 F.Supp.2d 600 (S.D.W.Va.2000). The parents argue, incorrectly, that LEA must also prove that the parents' proposed IEP, with an accommodation limiting fluorescent lighting exposure, is not appropriate. LEA's burden is only to show by a preponderance of the evidence that its proposed IEP was reasonably calculated to confer some educational benefit on [REDACTED]. *See Board of Educ. of County of Kanawha v. Michael M.*, 95 F.Supp.2d 600, 144 Ed. Law Rep. 187 (S.D.W.Va. 2000).

B. Appropriateness of the 2001-2002 IEP

In determining whether an IEP is appropriate and whether the school system has fulfilled its obligations to provide a student with FAPE, the proper inquiry is twofold. *See Board of Educ. v. Rowley*, 458 U.S. 176, 206, 102 S.Ct. 3034, 73 L.Ed.2d 690 (1982). (1) whether LEA has complied with the IDEA's procedural requirements in developing and implementing the IEP and (2) whether LEA's proposed 2001-2002 IEP is "reasonably calculated" to enable [REDACTED] to receive educational benefits. *See id.* at 206-07. The failure to meet the procedural requirements of the Act itself is an "adequate ground" ... for holding that a school failed to provide ... a FAPE." *Hall v. Vance County Bd. of Educ.*, 774 F.2d 629, 635 (4th Cir.1985).

1. Procedural Requirements

The parents contend that LEA violated IDEA's procedural requirements by not consulting

the parents before removing the no fluorescent lights accommodation from the proposed 2001-2002 IEP. The evidence is clearly to the contrary. The parents, especially ██████ mother, have always been active members of ██████ IEP team and they were fully involved in the process of developing the 2001-2002 IEP. ██████ mother learned at the pre-IEP meeting in ██████ 2001 that LEA did not believe that ██████ needed a no fluorescent lighting accommodation. The issue was also discussed during lengthy IEP meetings attended by ██████ mother and the parents' attorney on ██████ and ██████ 2001. In some cases, the parents, although involved in the process of developing the IEP, will ultimately disagree with the substantive content of the IEP. That is not a procedural violation. See *Board of Educ. of Montgomery County v. Brett Y*, 155 F.3d 557 (Table, Text in WESTLAW), Unpublished Disposition, 1998 WL 390553 (4th Cir. 1998). I find that LEA complied with IDEA's procedural requirements in developing the 2001-2002 IEP.

2. Substance of IEP

The second prong of the *Rowley* inquiry is whether LEA's proposed 2001-2002 IEP was "reasonably calculated" to enable ██████ to receive educational benefits. See *Rowley*, 458 U.S. at 206-07. IDEA does not require the furnishing of every special service necessary to ██████ each disabled child's potential. Instead, school districts are merely required to provide a "basic floor of opportunity to every child with a disability. However, a school district cannot discharge its duty under IDEA by providing a program that provides only *de minimis* or trivial academic advancement." See *Carter v. Florence County Sch. Dist. Four*, 950 F.2d 156, 160 (4th Cir. 1991). "IDEA does not promise perfect solutions . . . The Act sets more modest goals: it emphasizes an appropriate, rather than an ideal, education; it requires an adequate, rather than an optimal, IEP." *Board of Educ. of Montgomery County v. Brett Y*, *supra*, 1998 WL 390553.

In this case, the LEA's burden is not to disprove that fluorescent lighting affects █████ but rather, to establish that its proposed 2001-2002 IEP was adequate, without the lighting accommodation, to enable █████ to receive educational benefit. As explained below, I find that LEA has met that burden.

i.

Whether and to what degree fluorescent lighting affects autistic children was not well established at the hearing. There apparently is widespread belief in the autism community that fluorescent lighting could affect some children with autism, but aside from anecdotal observations, there is scant proof of this effect. In the only study cited by the parents, researchers studied six male autistic children. Five of the six subjects showed significantly increased repetitive autistic behaviors under fluorescent illumination compared to under incandescent illumination. As the authors noted however, no firm conclusions could be made from their findings without first observing "effects across many days and over a wider sample of autistic subjects." Colman, Frankel *et al.*, "The Effects of Fluorescent and Incandescent Illumination upon Repetitive Behaviors in Autistic Children," *Journal of Autism and Childhood Schizophrenia*, 6.2 (1976) : 157-162.

LEA's expert, _____, a licensed clinical psychologist who has worked with children with autism for over 25 years, testified that he was not aware of any scientific evidence that suggested that fluorescent lighting was a critical factor for people with autism. Dr. _____ discounted the Colman, Frankel study because, as its authors noted, it was too limited a study to draw conclusions, and also because the study was not double-blind. That is, the observers knew which lighting conditions the children were under when they made their

observations. Neither Dr. _____ nor the parents' witnesses could cite any other scientific literature or research which concluded that students with autism should not be under fluorescent lighting.

The parents introduced evidence that _____ developmental pediatrician, _____, M.D., wrote a prescription for _____ in _____ 2000 stating that it was medically necessary for _____ not to be exposed to any fluorescent lighting. When LEA later attempted to obtain clarification of the prescription, Dr. _____ wrote on _____ 2001 that she had not seen _____ in her office since _____ 2000 and could not make an accurate clinical recommendation on _____ condition. In another letter, dated _____ 2001, Dr. _____ wrote, without elaboration, that _____ has shown sensitivity to fluorescent lighting. _____ father testified that Dr. _____ drew her conclusions about _____ sensitivity from reports from _____ parents and she had not observed how _____ behaved in fluorescent lights and outside of fluorescent lights.

Another of _____ physicians, _____, M.D., a family practitioner and environmental medicine specialist, also issued a prescription in _____ stating, without elaboration, that _____ needs to be in an environment where no fluorescent lighting is used. Neither Dr. _____ nor Dr. _____ opined that _____ could not receive FAPE in a fluorescent light environment and neither physician testified at the hearing. The physicians' prescriptions, standing alone and without other substantiation, are unpersuasive.

The parents' other evidence about _____ alleged sensitivity to fluorescent lighting was mostly based upon their own observations. They testified that _____ exhibited significantly increased autistic behaviors when _____ was exposed to fluorescent lighting, principally in the fall of

2000, at _____ School. _____ father observed that when _____ was exposed to fluorescent lighting in _____ classroom, _____, who normally does not sleep much, slept even less. _____ was more hyperactive than usual, less focused, less responsive, and exhibited more spinning and more of the oppositional types of behavior. _____ mother testified that when _____ classroom had fluorescent lighting, _____ had sleep disorders, was hyperactive, and exhibited increased hand licking behavior. _____, one of _____ ABA therapists, also observed that _____ was "a little more hyperactive" and at times more aggressive during this period.

LEA agrees that _____ showed increased autistic behaviors when _____ began at _____ School in _____ 2000, but they attribute the behaviors to transition reactions in adjusting to a new school that are typical for _____ and other autistic children. LEA points out that Dr. _____, _____ pediatrician, reported in _____ 2000 that _____ had transition issues.

Whatever effect fluorescent lighting may have had on _____ autistic behaviors in _____ 2000 when _____ was exposed to fluorescent lights in _____ classroom, the evidence establishes that _____ exhibited the same behaviors, at varying frequency and intensity, both before _____ enrolled at _____ School and after the fluorescent lights in _____ classroom were removed. For example, _____ long term ABA instructor, _____, a witness for the parents, testified that _____ observed _____ head hitting, hand licking, spinning and other autistic behaviors long before _____ started at _____. _____ ABA journal, shows that these behaviors continued after incandescent lighting was installed in _____ classroom and _____ returned to school in _____ 2000. In sum, from the evidence presented at the hearing in this matter, I find that any conclusion about the effect of fluorescent lighting on _____ would be speculative.

ii.

As I have written, LEA's burden is not to disprove that fluorescent lighting affects [REDACTED]. LEA only has to show that its proposed 2001-2002 IEP was reasonably calculated to enable [REDACTED] to receive educational benefit. It is undisputed that [REDACTED] received substantial educational benefit in kindergarten under the 2000-2001 IEP at _____ School. During the first part of that year, before incandescent lights were installed in [REDACTED] classroom, I find that [REDACTED] did receive educational benefit when exposed to fluorescent lighting. For example, [REDACTED] ABA log which begins on [REDACTED], 2000, contains entries indicating satisfactory progress on [REDACTED] [REDACTED] 2000. [REDACTED] mother testified that [REDACTED] did make progress in [REDACTED] ABA program during this period.

LEA's proposed 2001-2002 IEP continued an equivalent or higher level of special education and related services for [REDACTED] except for the lighting accommodation. The LEA special education staff witnesses, all of whom had observed [REDACTED] and are very knowledgeable about [REDACTED] disability, stated their opinions that [REDACTED] did not need the no fluorescent lighting accommodation to continue to receive educational benefit under [REDACTED] IEP. Based upon their testimony and the evidence of [REDACTED] receiving educational benefit during the 2000-2001 school year, as well as the lack of persuasive evidence that exposing [REDACTED] to fluorescent lighting at school would prevent [REDACTED] from receiving educational benefit, I find that LEA has established that its proposed 2001-2002 IEP was reasonably calculated to enable [REDACTED] to receive educational benefit.

iii.

The parents also allege that LEA's proposed 2001-2002 IEP was inadequate because it omitted describing [REDACTED] environmental sensitivities in the section on Present Level of

Educational Performance ("PLEP"). The PLEP section in █████ 2000-2001 IEP stated that "Environmental and dietary sensitivities reported to affect █████ behavior include reactions to casein and gluten, and fluorescent lights. █████ does not eat anything at school not provided by █████ parents." The parents evidently contend that similar language should be included in the PLEP section of the 2001-2002 IEP.

Under the regulations issued by the U.S. Department of Education and the Virginia Department of Education, the PLEP must contain a statement of the child's present levels of educational performance, including how the child's disability affects the child's involvement and progress in the general curriculum. *See* 34 CFR § 300 Appendix A, Question 1. Since I have found that █████ can receive educational benefit without a fluorescent light limitation, this alleged sensitivity does not need to be included in the PLEP section. LEA does not contest █████ dietary sensitivities, however there was no evidence that the dietary sensitivities affect █████ involvement and progress in the general curriculum. Therefore I find that LEA is not required to include a statement of environmental and dietary sensibilities in the PLEP section of █████ IEP⁴.

ORDER

For the reasons set forth above, it is hereby ordered as follows:

1. LEA may adopt and implement its proposed 2001-2002 IEP for █████ in conformity with this decision. If there are reasons for additional changes to the IEP that have arisen since the █████ 2001 team meeting, LEA shall

⁴ The evidence during the hearing of █████ dietary sensibilities was uncontested. Whether or not these sensibilities are listed in the PLEP section of █████ IEP, LEA should continue to take appropriate measures to assist the parents to prevent █████ from ingesting foods to which █████ has known allergies.

promptly convene [REDACTED] IEP team to address any such issues.

2. The parents' request for relief in this due process hearing is denied.
3. LEA shall develop an implementation plan within 45 calendar days of the date of this decision which must state how and when this decision will be put into operation. The implementation plan shall include the name and position of a case manager charged with implementing the decision. Copies of the plan shall be forwarded to the parties to the hearing, the hearing officer and the Virginia Department of Education.

[REDACTED]

[REDACTED] 2002