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Federal Communications Commission  
Office of the Secretary

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

PR Docket No. 92-119

Revocation of License of )  
 SANDRA V. CRANE )  
 Amateur Radio Station )  
 N6TFO )  
 Marina Del Ray, California )  
 and )  
 Suspension of License of )  
 SANDRA V. CRANE )  
 Amateur Extra Class )  
 Radio Operator License )  
 and )  
 Revocation of License of )  
 CHARLES P. PASCAL )  
 Amateur Radio Station )  
 WB6CIY )  
 Carson City, Nevada )  
 and )  
 Suspension of License of )  
 CHARLES P. PASCAL )  
 Amateur Extra Class )  
 Radio Operator License )

To: Hon. Joseph Chachkin  
Administrative Law Judge

**SUPPLEMENT TO RESPONDENTS OUTLINE OF EVIDENCE AND WITNESS LIST**

Respondents Sandra V. Crane and Charles P. Pascal, by counsel and pursuant to the Administrative Law Judge's Order, FCC 92M-697 (June 22, 1992), supplement their outline of evidence and list of witnesses in this proceeding.

1. This supplement provides a list of additional witnesses whose testimony will be proffered at hearing. These additional witnesses result from the process of discovery and from

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investigation occurring since the submission of Respondents' outline of evidence and witness list on June 29, 1992. It was noted at that time without objection from the Private Radio Bureau that Respondents are unable to specify fully their witnesses because the Bureau had not yet responded to a Freedom of Information Request submitted by respondents, and the Bureau had not otherwise voluntarily made available to respondents documentary evidence in its possession. Moreover, it was noted that the respondents reserved the right to add to this list after examining facts arising from discovery. The additional witnesses from whom the respondents will present testimony are as follows:

2. Jeffrey M. Reinhardt will testify concerning his experiences at classes taught by the respondents and the propriety of the events occurring at such classes.

3. Norman M. Goodin will testify concerning his observations of Charles Pascal's teaching of amateur classes.

4. Thomas J. Cavey will testify concerning the class and testing session held September 14, 1991.

5. Raymond P. Bailey will testify concerning the class and testing session held September 14, 1991.

6. Valerie F. Cumming will testify concerning the class and testing session held September 14, 1991.

7. Nelson E. Jones will testify concerning the class and testing session held September 14, 1991.

8. Robin Burt will testify concerning the class and testing session held September 14, 1991.

9. Rick Stenlake will testify concerning the class and testing session held August 24, 1991.

10. Sandra Moore will testify concerning the class and testing session held August 24, 1991.

11. Christopher D. Imlay will testify with respect to the authority and role of the Official Observer program.

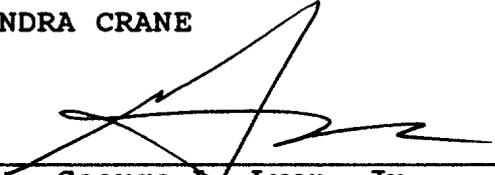
12. David Morse will be called as an adverse witness to testify concerning genesis of the investigation which led to this proceeding. It will be shown the investigation was compromised because the parties who initiated it and who conducted it are biased against Mr. Pascal and Ms. Crane. It will be shown that Mr. Morse had a personal interest and bias against the respondents and that the credibility of the investigation is therefore suspect. Since he selected Ms. McElwain to participate in the investigation and since he briefed her and prepared her prior to the investigation, it will be shown that Ms. McElwain's credibility is suspect as a result of his bias. It will be shown that as a result of his bias the investigation he conducted was designed to discredit Ms. Crane and Mr. Pascal because Mr. Pascal had rejected Mr. Morse's request that Mr. Pascal join with him in a radio school. It will also be shown that he is biased because he and Fred Ordway, who Ms. Crane had fired as an instructor from

her school, had received in their capacity as Official Observers complaints from Ms. Crane concerning interference from George Sfair and that they have declined to investigate the interference complaints because Mr. Sfair is their friend. It will thus be shown the investigation which was initiated was a result of ill-will and retribution by these parties against Ms. Crane and Mr. Pascal and that this casts doubt on the credibility of the person they used to conduct their investigation.

Respectfully submitted,

CHARLES P. PASCAL

SANDRA CRANE

By 

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September 3, 1992

**CERTIFICATE OF SERVICE**

I, Lydia N. Hicks, Secretary, at the law firm of Lukas, McGowan, Nace & Gutierrez, Chartered, certify that true copies of the foregoing document were sent this 3rd day of September 1992, via first class mail, postage prepaid to the following:

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Lydia N. Hicks