

Court did not address the sort of speech at issue in this proceeding. It concerned a reasonable access request on behalf of a responsible candidate for President of the United States, Jimmy Carter, not a Michael Bailey or a Daniel Becker who only wanted to force a broadcaster to air material they would otherwise reject as not in the public interest.

34. The case-by-case approach to reasonable access is appropriate. Becker or Bailey could present their abortion message on radio with no difficulty. It is the pictures that pose the problem, and it is only a problem on television. But, another candidate, seeking to force a racist or bigoted message on the air needs no pictures. Words alone might, in the reasonable good faith judgment of a radio licensee, disserve the public interest.

35. Attempts will be made in the course of this proceeding to muddy the waters with extraneous issues. It is essential, however, that the Commission not lose sight of the central goal of §312(a)(7) - reaching voters. Unreasonable speech and reasonable access are mutually exclusive. Unreasonable speech does not serve the public interest. Allowing a candidate to force unreasonable speech on a broadcaster is not what the framers of §312(a)(7) envisioned. It strains the construction of §312(a)(7) far beyond the breaking point to suggest that Congress had in mind that the public interest would be served by the presentation of graphic, racist, bigoted and shocking material on radio and television.

V. CONCLUSION

36. A tiny, but vocal, minority of candidates has subverted and abused the lofty goals of §§ 312(a)(7) and 315 for their own narrow purposes. They have forced upon an unwilling and unsuspecting viewing audience unspeakable images. They have placed responsible licensees in the uncomfortable and untenable position of being required to air material the licensee would not otherwise broadcast. Gillett respects the First Amendment rights of political speakers and has never attempted to silence Becker or any other candidate. Following the Gillett Decision, WAGA-TV offered to air the half-hour Becker spot in the "safe harbor," but Becker refused the offer. Balancing the rights of viewers against even the First Amendment rights of politicians and broadcasters, the rights of viewers are paramount. Red Lion, supra.

37. Broadcasters, as the Supreme Court has observed, "are engaged in a vital and independent form of communicative activity." FCC v. League of Women Voters of California, supra, at 378. Broadcasters are "entitled under the First Amendment to exercise the 'widest journalistic freedom consistent with their public [duties].'" " CBS, Inc. v. FCC, 458 U.S. 367, 395 (1981), quoting Columbia Broadcasting System, Inc. v. Democratic National Committee, 412 U.S. 94, 110 (1973). Broadcasters cannot be faithful to their public trust if they must sacrifice that trust to the whim of a candidate who seeks only to shock or titillate. Permitting licensees to make reasonable, good faith judgments on the acceptability and placement of political advertising in the same manner

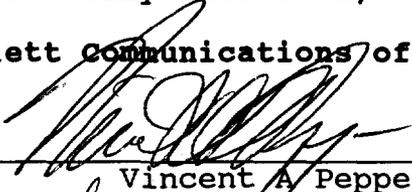
as they do with all other material that goes out over the air and for which they bear ultimate responsibility will protect the public interest without doing violence to the rights of political speakers.

For the forgoing reasons, Gillett Communications of Atlanta, Inc. respectfully requests that the Commission adopt a rule permitting licensees to make reasonable good faith judgments on the acceptability of political advertising, in carrying out their obligation to serve the public interest, that would allow the licensee to either reject all or part of a proffered political advertisement or channel it to a daypart in which children would not be likely to be in the audience.

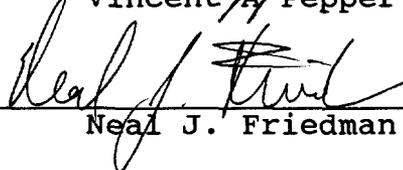
Respectfully Submitted,

Gillett Communications of Atlanta, Inc.

By



Vincent A. Pepper



Neal J. Friedman

Its Attorneys

PEPPER & CORAZZINI
200 Montgomery Building
1776 K Street, N.W.
Washington, D.C. 20006
(202) 296-0600

January 22, 1993

APPENDIX A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GILLETT COMMUNICATIONS OF
ATLANTA, INC., d/b/a WAGA-TV5,

Plaintiff,

v.

DANIEL BECKER, DANIEL BECKER
FOR CONGRESS COMMITTEE, and
THE FEDERAL COMMUNICATIONS
COMMISSION,

Defendants.

CIVIL ACTION

FILE NO. _____

**PLAINTIFFS APPLICATION FOR TEMPORARY RESTRAINING
ORDER AND PETITION FOR DECLARATORY JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 65(b) and 57, Plaintiff Gillett Communications of Atlanta, Inc. d/b/a WAGA-TV5 ("WAGA-TV") applies to this Court for an Order temporarily restraining and enjoining Defendants Daniel Becker and The Daniel Becker for Congress Committee from airing the videotape attached as Exhibit "A" to the Affidavit of Jack Sander, between the hours of 4:00 p.m. and 5:00 p.m. on Sunday, November 1, 1992, or during any other part of the broadcast day when children represent a significant part of the viewing audience. WAGA-TV further petitions this Court for a declaratory ruling that WAGA-TV may "channel" the videotape to the "safe harbor" hours between 12:00 midnight and 6:00 a.m., when children do not constitute a significant part of the viewing audience, without violating the "reasonable access" and "no censorship" provisions of the Federal Communications Act. Cf. 47 U.S.C. § 312(a)(7) of 315(a).

This application is based on the immediate and irreparable injury and damage WAGA-TV and the children in its viewing audience will suffer unless the Court grants the declaratory relief sought and restrains Mr. Becker, his Campaign and the FCC, all as more fully shown by WAGA-TV's verified Complaint filed in this action and in the Affidavits of Messrs. Jack Sander and Vincent Pepper, Esq. attached hereto.

WAGA-TV shows that through its attorney it has notified Defendants of this Application and Petition by calling them at approximately 9:00 a.m. on Wednesday, October 28, 1992 and telling them that WAGA-TV would file this Application and Petition with this Court at 10:00 a.m. on the 28th day of October, 1992. Through its attorneys, WAGA-TV has given Defendants further notice by causing a copy of this Application and Petition and WAGA-TV's verified Complaint to be delivered by hand to all Defendants.

In support of this Application and Petition, WAGA-TV submits herewith its Memorandum of Law containing argument and citation of authorities.

WHEREFORE, WAGA-TV prays that its Application be granted and that Defendant Becker be temporarily restrained and enjoined from airing the videotape attached as Exhibit "A" to the Affidavit of Jack Sander between the hours of 4:00 p.m. and 5:00 p.m. on Sunday, November 1, 1992, or during any other part of the broadcast day when children represent a significant part of the audience, and that the Court enter a declaratory ruling that WAGA-TV may "channel" (move the airing time of) the Becker

videotape to the "safe harbor" hours between 12:00 midnight and 6:00 a.m., when children do not constitute a significant part of the viewing audience, without violating the "reasonable access" and "no censorship" provisions of the Communications Act, 47 U.S.C. §§ 312(a)(7) and 315(a).

Respectfully submitted, this 28th day of October, 1992.

ALSTON & BIRD

By: 

JUDSON GRAVES
Georgia Bar No. 305700
RICHARD R. HAYS
Georgia Bar No. 340920
DANIEL A. KENT
Georgia Bar No. 415110

Attorneys for Gillett
Communications of Atlanta,
Inc., d/b/a WAGA-TV 5

One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
(404) 881-7000

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GILLETT COMMUNICATIONS OF
ATLANTA, INC., d/b/a WAGA-TV5,

Plaintiff,

v.

DANIEL BECKER, DANIEL BECKER
FOR CONGRESS COMMITTEE, and
THE FEDERAL COMMUNICATIONS
COMMISSION,

Defendants.

CIVIL ACTION

FILE NO. _____

STATE OF GEORGIA

COUNTY OF DEKALB

AFFIDAVIT OF JACK SANDER

Personally appeared before me, an officer duly authorized by law to administer oaths, Jack Sander, who after first being duly sworn, states as follows:

1.

My name is Jack Sander, I am over 18 years of age, competent to testify and have personal knowledge of the matters set forth herein.

2.

I am President and General Manager of WAGA-TV, Atlanta, Georgia. Daniel Becker, a candidate for the United States Congress, had asked to purchase time on WAGA-TV between 4:00 p.m. and 5:00 p.m. on Sunday, November 1, 1992, immediately following

the broadcast of the National Football League game between the Atlanta Falcons and the Los Angeles Rams. I was informed that Mr. Becker intended to air a half-hour paid political advertisement that included graphic, bloody depictions of female sexual organs aborted fetuses, body parts and an actual abortion being performed. Consequently, I asked Mr. Becker's Campaign to provide me with a copy of the complete program. On Monday, October 26, 1992, I received a 30-minute videotape from Mr. Becker's representatives, and it is this videotape which they want to air. A true and correct copy of this videotape is attached to this affidavit as Exhibit "A".

3.

I am aware that as a federal candidate, Mr. Becker has a right of reasonable access to broadcast time. It is not now my intent to deny him the reasonable access to WAGA-TV's facilities, to which he is entitled under the law, nor is it my intent to censor the program he wishes to bring to the voters of Georgia. I do, however, have serious reservations about the effect Mr. Becker's message might have on significant portions of our audience, specifically children, if aired during the time period requested by Mr. Becker's Campaign. According to WAGA-TV's November, 1991 Arbitron market research, there are approximately 178,000 children between the ages of 2 and 17 watching television between the hours of 4:00 p.m. and 5:00 p.m. on Sunday afternoons at this time of the year, and we expect an estimated 65,000

children of that age to be watching WAGA-TV during the Atlanta Falcons football game immediately preceding the time Mr. Becker has requested to air his paid political program.

4.

The videotape contains a graphic depiction of female sexual organs, a second or third trimester abortion and other shocking material that WAGA-TV would not normally broadcast, especially at the time requested by Mr. Becker, in the absence of the "reasonable access" and "no censorship" requirements of Sections 312(a)(7) and 315(a) of the Communications Act.

5.

Mr. Becker has previously aired political advertisements on WAGA-TV. My concern about the effect that the present advertisement will have on children in the audience stems from the strong viewer reaction to his previous, less graphic advertisements. Specifically, Mr. Becker purchased time on WAGA-TV between 6:58 p.m. and 8:00 p.m. on Sunday, July 19, 1992. The spot that Mr. Becker aired at that time contained pictures of aborted fetuses. I scheduled the spot at 7:58 p.m., as late as possible during the day part requested, in an effort to reduce the number of children likely to be in the viewing audience.

6.

I anticipated that we might have strong viewer reaction to the airing of Mr. Becker's spot. I therefore made arrangements to keep our switchboard open Sunday evening (when it is normally

closed) to accommodate calls from viewers. I was in the station that Sunday evening to assist our switchboard operator and other station personnel in handling the calls. Callers were read a statement which explained that the Federal Communication's rules required that WAGA-TV broadcast Mr. Becker's ad and prohibited us from exercising censorship of any kind with respect to it.

7.

In the forty minutes following the airing of Mr. Becker's political spot, WAGA-TV received approximately eighty telephone calls. Most of the callers did not object to the issue that the spot addressed. Rather, the callers expressed their opposition to the airing of such graphic material at an early evening hour, without warning, when there are children in the audience. Many of the callers blamed WAGA-TV for airing the broadcast even after we attempted to explain to them that we were required by the FCC to air the spot without alteration. I am confident that we would have heard from many more viewers had there been more telephone lines and operators. In the forty-eight hours following the broadcast, we heard from a total of 160 viewers. Again, all of the callers reacted unfavorably to the graphic material in the spot and many blamed the station, not the candidate.

8.

A common theme running through many of the calls was the fact that parents watching television with their children during family viewing hours were unprepared for the graphic material

that followed. Callers told me that the spot upset them and their children. They said their children asked them questions they could not answer or did not plan to discuss with them at this stage of their lives. It was, in their view, an unexpected intrusion into a very personal matter.

9.

WAGA-TV believes strongly in the recognition and preservation of First Amendment rights. We have a very active news department and I am at times called upon to defend their reporting as it is not always pleasant to all viewers. My response to those who criticize our news coverage is that we are exercising our First Amendment rights. Yet, we know that the exercise of our First Amendment rights carries with it significant responsibility. We are sensitive to our audience and very careful to ensure that materials suitable only for mature audiences are aired at those hours of the broadcast day when our research tells us that we are likely to reach only a mature audience.

10.

For these reasons, WAGA-TV does not wish to be required to air the Becker political advertisement at a time when substantial numbers of children can be expected to be in the audience. Instead, we are asking the Court for a ruling that would permit us to channel Mr. Becker's videotape to that part of the broadcast day when there are few, if any, children in the

audience. This time period, between 12:00 midnight and 6:00 a.m., is called in the industry a "safe harbor" period.

11.

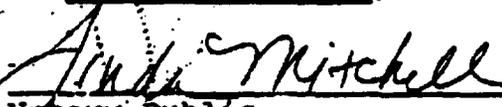
If Mr. Becker is not temporarily restrained from airing the proposed political advertisement at the requested hours on November 1, 1992, I believe that WAGA-TV and its standing in the community it serves will be irreparably harmed. Moreover, WAGA-TV faces the genuine, conflicting threat of criminal or regulatory prosecution and sanctions under 18 U.S.C. § 1464 for broadcasting shocking and indecent material on the one hand, or for denying reasonable access to Mr. Becker and his Campaign on the other. This threat places WAGA-TV in an untenable situation and in desperate need of assistance, intervention and direction from the Court.

The foregoing is true to the best of my knowledge and belief.



Jack Sander

Sworn to and subscribed
before me this 27th day
of October, 1992.



Notary Public

My Commission Expires:

Notary Public, DeKalb County, Georgia
My Commission Expires March 11, 1996



WAGA-TV/Gillett Communications of Atlanta, Inc.
1551 Briarcliff Road, N.E.
Atlanta, Georgia 30306
404 875 5555

Jack Sander
President and General Manager

October 26, 1992

Mr. Daniel Becker
Becker for Congress
Tri-County Plaza
Suite 36
Cumming, Georgia 30130

Dear Mr. Becker:

I have reviewed very carefully the tape of the political broadcast you have supplied to us, "Abortion in America: The Real Story." WAGA-TV recognizes your rights as a candidate for federal office under Section 312 and 315 of the Communications Act of 1934 for "reasonable access" to our facilities during a political campaign. After consultation with our attorneys, I have determined that material in the tape is "indecent" as defined by the FCC and affirmed by the United States Supreme Court in Federal Communications Commission v. Pacifica Foundation. Additionally, broadcast of indecent material would subject the station to criminal sanctions for violation of 18 U.S.C. 1464 which provides:

Whoever utters any obscene, indecent or profane language by means of radio communication shall be fined not more than \$10,000 or imprisoned not more than two (2) years, or both.

Additionally, the violation of 18 U.S.C. 1464 could subject WAGA-TV to FCC forfeitures and possible license revocation, risks we cannot accept. Our obligation to program so as to serve the public interest, convenience and necessity cannot be fulfilled without our protecting innocent children in the audience from exposure to such material. I assume you are as concerned as we with regard to the protection of children. They also are not of voting age and, therefore, presumably would not be the desired target of a political presentation.

The 1992 session of Congress enacted legislation directing the FCC to establish regulations banning the broadcast of indecent material at all hours of the day except between midnight and 6:00 a.m. The FCC is now in the midst of

a rule making proceeding to establish such rules. Accordingly, WAGA-TV would only be willing to carry your political broadcast within those "safe harbor" hours of midnight to 6:00 a.m. If you are interested in broadcasting this tape during those hours, our sales department would be able to provide you with availabilities and prices.

Sincerely,

A handwritten signature in black ink, appearing to be "Jack S.", with a long horizontal line extending to the right.

JS:bp

cc: Tim Echols
Richard Walker
John Taylor
Frank Savini/WAGA-TV

STATE OF GEORGIA

COUNTY OF FULTON

AFFIDAVIT OF VINCENT A PEPPER

Personally appeared before the undersigned officer, duly authorized to administer oaths, Vincent A Pepper, who after first being duly sworn, states as follows:

1.

I am Vincent A Pepper, a resident of Potomac, Maryland, over the age of eighteen (18) and competent to testify. All of the facts stated herein are true and correct based on my personal knowledge.

2.

I am a partner in the law firm of Pepper & Corazzini in Washington, D.C. I have been practicing law for more than forty-one (41) years, and a member of the District of Columbia Bar. I have specialized in representing clients before the Federal Communications Commission ("FCC") for that entire period, and am competent to testify as to the matters set forth below. I have counseled clients extensively on compliance with the FCC's political broadcasting rules along with others in my firm. Pepper & Corazzini has produced a manual on political broadcast regulation that is in use by broadcasters and candidates nationwide. We are presently involved in several major cases concerning political broadcasting.

3.

I am special FCC counsel to Gillett Communications of Atlanta, Inc., licensee of WAGA-TV, Atlanta, Georgia, which is a party to this action.

4.

I have had extensive involvement in the controversy surrounding the television broadcast of political advertisements and programs, which graphically show actual abortions and aborted fetuses, many of which apparently involve late-term and third trimester abortions.

5.

Specially, I have been heavily involved in responding to the efforts of Mr. Daniel Becker, a candidate for the United States Congress for Georgia's 9th District to broadcast political advertisements on WAGA-TV graphically depicting aborted fetuses. Most recently, Mr. Becker requested time immediately after the broadcast of an Atlanta Falcons professional football game on Sunday, November 1, 1992, during which he plans to broadcast a thirty (30) minute program which includes video footage of actual abortions. I have viewed the program Mr. Becker plans to broadcast, and believe it to be indecent under 18 U.S.C. §1464.

6.

Very soon after Mr. Becker's initial request to air his ads, I discerned an irreconcilable conflict between two of WAGA-TV's legal obligations with respect to the ads. On the one hand, WAGA-TV is precluded under federal law from broadcasting indecent material, such as the explicit and graphic video tapes of actual abortions and

aborted fetuses that Mr. Becker seeks to broadcast. On the other hand, WAGA-TV must allow political candidates reasonable use of its facilities to broadcast political ads and programs and must not censor the material to be broadcast pursuant to 47 U.S.C. 312(a)(7). Violation of either of these legal obligations constitutes grounds for the FCC to revoke WAGA-TV's broadcast license.

7.

Mr. Becker first approached WAGA-TV on July 14, 1992 and requested time to purchase a one-minute political announcement to be broadcast between 6:58 P.M. and 8:00 P.M. on Sunday, July 19, 1992, in or during the breaks of "60 Minutes." After reviewing the spot, WAGA-TV decided to air it at 7:58 P.M., pursuant to its obligations under 47 U.S.C. 312(a)(7). Under FCC policy as it existed at that time, WAGA-TV was required to air Mr. Becker's political spot in its entirety, without any alteration, disclaimer or prior warning. The only action it could take was to schedule the spot as late as possible within the contract order in hope of reducing the number of children in the viewing audience. Anticipating strong viewer reaction, WAGA-TV kept its switchboard open for several hours past the normal closing hour on Sunday to explain to callers that it was legally obligated to air Mr. Becker's graphic commercial. Callers were read a statement which explained that the rules required that WAGA broadcast the political announcement and prohibited the station from exercising censorship of any kind. An expanded statement was also prepared for the news media and viewers who wished additional information. WAGA-TV received 160 telephone

calls within 48 hours of the broadcast of Mr. Becker's commercial. All of the calls were opposed to the broadcast and most blamed WAGA-TV rather than Mr. Becker for airing it. Callers reported that the spot upset their children. They said that their children asked them questions that they could not answer or that they had not planned to discuss with them at this stage of their lives. Viewers said they considered Mr. Becker's spot an unexpected intrusion into a very personal matter.

8.

Mr. Becker subsequently was one of two candidates involved in a runoff election scheduled for August 11, 1992, and WAGA-TV expected he would attempt to purchase additional television time. In anticipation of this request, I filed a petition for a declaratory ruling with the FCC on July 28, 1992, and requesting a ruling in advance of the August 11, 1992, runoff election. The petition for declaratory ruling requested that WAGA-TV be permitted to channel Mr. Becker's spot into hours of the day when children would be less likely to be in the audience. The FCC did not respond until August 21, 1992, ten days after the primary election runoff. In a letter ruling, the FCC determined that WAGA-TV could not restrict the times at which the spot could be broadcast, but could precede it with a warning as follows:

The following political advertisement contains scenes which may be disturbing to children. Viewer discretion is advised.

WAGA-TV elected not to appeal the staff ruling to the full Commission since, by this time, Mr. Becker has won the runoff and did not have a request for time pending at WAGA-TV.

9.

On October 22, 1992, Mr. Becker sought to purchase a half-hour of time immediately following the telecast of the Atlanta Falcons football game on WAGA-TV on November 1, 1992, as well as 15-second spots within the game itself promoting his half-hour broadcast. It is my professional opinion that bringing this matter to the FCC would be useless act as the result would be no different. Mr. Becker's proposed program is similar to the one-minute spot previously presented to the FCC. It took the FCC 24 days to issue a staff ruling. Another filing at the FCC would result in a staff ruling, which would have to be appealed to the full Commission and then to the Court of Appeals for either the District of Columbia Circuit or the 11th Circuit. Mr. Becker's broadcast is less than a week away and scheduled only two days before the election. Disposition by the United States District Court would be more expeditious and would allow any party that so chose to take an immediate appeal to the United States Court of Appeals for the 11th Circuit.

10.

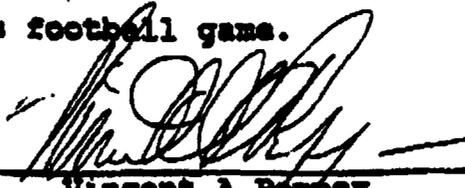
The 30-minute program Mr. Becker seeks to air depicts three separate abortions - one each identified as in the first, second and third trimesters of pregnancy. The tape depicts the abortion procedure in the most graphic terms including dismembered body

parts. It also shows the female sexual organ and a flood of excretory material as the fetus is removed. It is my professional opinion that this tape is legally indecent as the FCC has defined that term. Congress has directed the FCC to promulgate rules that indecent material may only be broadcast within the hours of midnight and 6:00 A.M. and the FCC is now in the process of seeking public comment on such rules. The FCC has repeatedly sanctioned licensees for broadcast of indecent material outside this "safe harbor," including the imposition of substantial fines. Broadcast of Mr. Becker's program at 4:00 P.M. on a Sunday afternoon would expose large numbers of children who would be in the audience following the football game to this indecent material without adequate warning.

11.

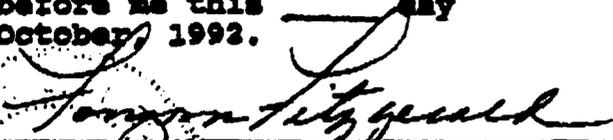
Based on my years of experience in dealing with the FCC, and the time constraints Mr. Becker's request has placed upon WAGA-TV, it is my professional opinion that there is no realistic chance that the FCC can or will resolve WAGA-TV's dilemma prior to Sunday

afternoon, November 1, 1992, the date Mr. Becker wants to run his program showing footage of actual abortions on television immediately after an Atlanta Falcons football game.



Vincent A Pepper

Sworn to and subscribed to before me this _____ day of October, 1992.



Notary Public

My Commission Expires August 20, 1993.

KJF/vb
c:\wp\9999\affidavit.vap

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GILLETT COMMUNICATIONS OF
ATLANTA, INC., d/b/a WAGA-TV5,

Plaintiff,

v.

DANIEL BECKER, DANIEL BECKER
FOR CONGRESS COMMITTEE, and
THE FEDERAL COMMUNICATIONS
COMMISSION,

Defendants.

CIVIL ACTION

FILE NO. _____

STATE OF GEORGIA

COUNT OF FULTON

AFFIDAVIT OF JUDSON GRAVES

Personally appeared before me, an officer duly authorized by law to administer oaths, Judson Graves, who after first being duly sworn, states as follows:

1.

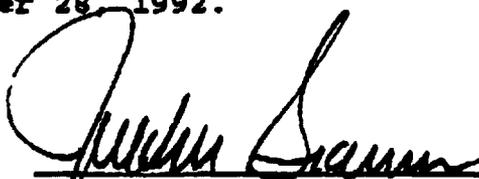
My name is Judson Graves, I am over the age of eighteen (18), and competent to testify. The facts stated herein are true and correct based on my personal knowledge.

2.

I am an attorney representing Gillett Communications of Atlanta, Inc. d/b/a WAGA-TV 5 in this action.

3.

I hereby certify that on Wednesday morning, October 28, 1992, at 8:45-8:55 a.m. I notified Defendants ^{COUNSEL} of the filing of this Application and Petition by calling them on the telephone and telling them that WAGA-TV would be filing this pleading by 10:00 a.m. I also caused to be hand-delivered to all Defendants copies of this Application and Petition, as well as WAGA-TV's verified Complaint on the morning of October 28, 1992. JH



Judson Graves

Sworn to and subscribed
before me this 28th day
of October, 1992.



Notary Public

My Commission Expires:
Notary Public, Douglas County, Georgia.
My Commission Expires July 31, 1994

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the within and foregoing PLAINTIFF'S APPLICATION FOR TEMPORARY RESTRAINING ORDER AND PETITION FOR DECLARATORY JUDGMENT upon all counsel of record by hand delivery ^{and/or telecopy} of same to the following:

DK

Daniel Becker
1862 Liberty Grove Road
Alpharetta, Georgia 30201

Daniel Becker for Congress Committee
1862 Liberty Grove Road
Alpharetta, Georgia 30201

Renee Licht, Esq.
General Counsel
Federal Communications Commission
1919 "M" Street, N.W., Room 614
Washington, D.C. 20554

This 28th day of October, 1992.

Daniel A. Kent

DANIEL A. KENT
Georgia Bar No. 415110