

**UNITED STATES OF AMERICA  
DEPARTMENT OF HOMELAND SECURITY  
UNITED STATES COAST GUARD**

UNITED STATES COAST GUARD,	)	
Complainant,	)	
	)	Docket Number: 2023-0451
vs.	)	
	)	Enforcement Activity Number: 7825509
CHRISTOPHER P. DHANOOALAL,	)	
Respondent.	)	

**DEFAULT ORDER**

**Issued:** April 5, 2024

**By Order of Chief Administrative Law Judge: Hon. Walter J. Brudzinski**

**Appearances:**

**For the Coast Guard**

CWO Gilbert W. Page  
USCG Sector Houston-Galveston

**For the Respondent**

Christopher P. Dhanooolal, *Pro se*

## **ORDER GRANTING COAST GUARD'S MOTION FOR DEFAULT ORDER**

On December 7, 2023, the United States Coast Guard Sector Houston-Galveston (Coast Guard) issued a Complaint against Christopher P. Dhanoolal (Respondent) seeking to revoke his Merchant Mariner Credential (MMC) for drug use, in violation of 46 U.S.C. § 7704(b) and 46 C.F.R. § 5.35. Specifically, the Coast Guard alleges Respondent took a pre-employment drug test pursuant to 46 C.F.R. Part 16 on August 10, 2022, in which his specimen tested positive for cocaine metabolites.

The Coast Guard further states, in aggravation, the August 10, 2022 test was performed under direct observation. This was due to the initial testing administered on July 14, 2022, being determined by the Medical Review Officer and the laboratory as a canceled-invalid specimen, PH out of range and creatinine less than 2mg/dl, as specifically noted on the MRO Final Report dated July 28, 2022.

The Coast Guard filed its Return of Service for Complaint on January 10, 2024, indicating it served a copy of said Complaint to Respondent at his residence by express courier service. Respondent signed for the document on January 9, 2024. As set forth in the Complaint, Respondent's Answer is due within 20 days of receipt in accordance with 33 C.F.R. § 20.308. Respondent's Answer was due no later than January 29, 2024.

To date, Respondent has neither filed an Answer nor requested an extension of time to file an Answer; therefore, the Coast Guard filed its Motion for Default Order (Default Motion) on February 27, 2024, requesting the Administrative Law Judge (ALJ) issue a Default Order against Respondent imposing the sanction asked for in the Complaint. The Coast Guard subsequently filed a Return of Service for the Default Motion showing it served a copy of said

Default Motion to Respondent at his residence by express courier. Respondent signed for the document on March 5, 2024.

Title 33 C.F.R. § 20.310 provides “the respondent alleged to be in default shall file a reply to the motion 20 days or less after service of the motion.” Respondent’s reply was due no later than March 25, 2024. To date, Respondent has not filed his reply.

On April 3, 2024, the ALJ Docketing Center assigned this matter to the undersigned for review and adjudication. After careful review of this file, I find the applicable provisions of 33 C.F.R. §§ 20.310 and 20.304(d) and (h) have been complied with and Respondent is in **DEFAULT**. Under 33 C.F.R. § 20.310(c) a default constitutes an admission of all facts alleged in the Complaint and a waiver of Respondent’s right to a hearing.

Accordingly, I find the violations alleged in the Complaint are **PROVED**. I have carefully reviewed the Complaint and the Default Motion and further find the proposed sanction of revocation is appropriate under the provisions of 46 C.F.R. § 5.569.

**SANCTION**

**IT IS HEREBY ORDERED** that Respondent Christopher P. Dhanoolal's Merchant Mariner Credential is **REVOKED**.

**IT IS FURTHER ORDERED** that Respondent immediately surrender his MMC to the Investigating Officer at the United States Coast Guard Sector Houston-Galveston, 13411 Hillard Street, Houston, TX 77034-5635. If Respondent knowingly continues to use his credentials, he may be subject to criminal prosecution.

**PLEASE TAKE NOTICE** that under 33 C.F.R. § 20.310(e), for good cause shown, an Administrative Law Judge may set aside this finding of Default. Respondent may file a motion to set aside the finding with the ALJ Docketing Center, Baltimore, MD.

**PLEASE TAKE FURTHER NOTICE** that service of this Order upon Respondent serves to notify Respondent of his right to appeal as set forth in 33 C.F.R. §§ 20.1001 – 20.1004. (Attachment A).

Done and dated April 5, 2024  
New York, NY



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HON. WALTER J. BRUDZINSKI  
CHIEF ADMINISTRATIVE LAW JUDGE  
UNITED STATES COAST GUARD