

**U.S. Department of Agriculture
Food and Nutrition Service
Administrative Review Branch**

Ray Convenience Store,

Appellant,

v.

Retailer Operations Division,

Respondent.

Case Number: C0247189

FINAL AGENCY DECISION

It is the decision of the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), that there is insufficient evidence to support a finding that a permanent disqualification from participation as an authorized retailer in the Supplemental Nutrition Assistance Program (SNAP) was properly imposed against Ray Convenience Store (hereinafter “Ray Convenience Store” or “Appellant”) by the Retailer Operations Division of FNS. However, the evidence supports a one-year disqualification from the SNAP for the extension of credit to SNAP customers.

ISSUE

The issue accepted for review is whether the Retailer Operations Division took appropriate action, consistent with 7 CFR § 278.6(e)(1)(i) in its administration of the SNAP, when it imposed a permanent disqualification against Ray Convenience Store.

AUTHORITY

7 U.S.C. 2023 and its implementing regulations at 7 CFR § 279.1 provide that “[A] food retailer or wholesale food concern aggrieved by administrative action under § 278.1, § 278.6 or § 278.7 . . . may file a written request for review of the administrative action with FNS.

CASE CHRONOLOGY

In a letter dated February 15, 2022, the Retailer Operations Division informed the Appellant that Ray Convenience Store was in violation of the terms and conditions of the SNAP regulations, 7 CFR § 270 –282, based on EBT SNAP benefit transactions that "establish clear and repetitive patterns of unusual, irregular, and inexplicable SNAP activity for your type of firm." The letter also noted that the Appellant could request a trafficking civil money penalty (CMP) in lieu of a permanent disqualification within 10 days of receipt under the conditions specified in 7 CFR § 278.6(i). Per UPS confirmation of delivery, the charge letter was delivered to the Appellant at the store address of record on February 16, 2022.

In responses to the Retailer Operations Division of February 24, 2022 and February 25, 2022, the Appellant, through counsel, replied to the letter of charges. The record reflects that the Retailer Operations Division received and considered the information provided prior to making a determination.

The record reflects that in the Appellant's response of February 25, 2022, counsel requested information and documents from FNS with regard to the agency's case against Ray Convenience Store pursuant to the Freedom of Information Act (FOIA). The Retailer Operations Division contacted counsel via email of March 1, 2022, stating that the FOIA request would have to be submitted to the FNS FOIA office in order for it to be considered. The contact information for the FNS FOIA office was provided to counsel. As of the date of this Final Agency Decision, FNS has not received a FOIA request from counsel.

After considering the Appellant's responses and the evidence in the case, the Retailer Operations Division issued a determination letter dated April 29, 2022, informing the Appellant that Ray Convenience Store was being permanently disqualified from participation in the SNAP in accordance with 7 CFR § 278.6(e)(1) for trafficking violations. The letter also stated that the Appellant was not eligible for a trafficking civil money penalty (CMP) in accordance with 7 CFR § 278.6(i) as the Appellant did not submit sufficient evidence to demonstrate that the firm had established and implemented an effective compliance policy and program to prevent violations of the SNAP.

In a letter postmarked May 5, 2022, the Appellant, through counsel, requested an administrative review of the Retailer Operations Division's determination. FNS granted the Appellant's request for administrative review by letter dated May 11, 2022. In email correspondences of May 27, 2022, June 7, 2022, and June 17, 2022, the Appellant, through counsel, submitted additional information in support of the request for administrative review.

STANDARD OF REVIEW

In appeals of adverse actions, the Appellant bears the burden of proving by a preponderance of the evidence, that the administrative actions should be reversed. That means the Appellant has the burden of providing relevant evidence which a reasonable mind, considering the record as a whole, would accept as sufficient to support a conclusion that the matter asserted is more likely to be true than not true.

CONTROLLING LAW

The controlling statute in this matter is covered in the Food and Nutrition Act of 2008, as amended, 7 U.S.C. § 2021, and promulgated through regulation under Title 7 CFR Part 278. In particular, 7 CFR § 278.6(a) and (e)(1)(i) establish the authority upon which a permanent disqualification may be imposed against a retail food store or wholesale food concern. There also exist FNS policy memoranda and clarification letters which further explain the conditions necessary in order to permanently disqualify retail stores.

7 U.S.C. § 2021(b)(3)(B) states, *inter alia*:

... a disqualification under subsection (a) shall be ... permanent upon ... the first occasion or any subsequent occasion of a disqualification based on the purchase of coupons or trafficking in coupons or authorization cards by a retail food store or wholesale food concern or a

finding of the unauthorized redemption, use, transfer, acquisition, alteration, or possession of EBT cards ...

7 CFR § 278.6(a) states, inter alia:

FNS may disqualify any authorized retail food store ... if the firm fails to comply with the Food and Nutrition Act of 2008, as amended, or this part. Such disqualification shall result from a finding of a violation on the basis of evidence that may include facts established through on-site investigations, inconsistent redemption data, evidence obtained through a transaction report under an electronic benefit transfer system ... [Emphasis added].

7 CFR § 278.6(e)(1)(i) states:

Disqualify a firm permanently if: Personnel of the firm have trafficked as defined in § 271.2.

7 CFR § 271.2 states, inter alia:

Trafficking means...The buying, selling, stealing, or otherwise effecting an exchange of SNAP benefits issued and accessed via Electronic Benefit Transfer (EBT) cards, card numbers and personal identification numbers (PINs), or by manual voucher and signature, for cash or consideration other than eligible food, either directly, indirectly, in complicity or collusion with others, or acting alone...

7 CFR § 278.6(f)(1) states, inter alia:

A civil money penalty for hardship to SNAP households may not be imposed in lieu of a permanent disqualification.

7 CFR § 278.6(i) states, inter alia:

FNS may impose a civil money penalty in lieu of a permanent disqualification for trafficking as defined in § 271.2 if the firm timely submits to FNS substantial evidence which demonstrates that the firm had established and implemented an effective compliance policy and program to prevent violations ...

7 CFR § 278.6(b)(2) states, inter alia:

(ii) Firms that request consideration of a civil money penalty in lieu of a permanent disqualification for trafficking shall have the opportunity to submit to FNS information and evidence as specified in § 278.6(i), that establishes the firm's eligibility for a civil money penalty in lieu of a permanent disqualification in accordance with the criteria included in § 278.6(i). This information and evidence shall be submitted within 10 days, as specified in § 278.6(b)(1). [Emphasis added].

(iii) If a firm fails to request consideration for a civil money penalty in lieu of a permanent disqualification for trafficking and submit documentation and evidence of its eligibility within the 10 days specified in § 278.6(b)(1), the firm shall not be eligible for such penalty. [Emphasis added].

SUMMARY OF CHARGES

The Appellant was charged and determined to be trafficking based on an analysis of EBT transaction data from December 2020 through April 2021. This involved the following SNAP transactions patterns which are indicative of trafficking:

- There were multiple transactions made from the accounts of individual households within a set time period; and
- There were EBT transactions conducted that are large based on the observed store characteristics and recorded food stock.

The issue in this review is whether, through a preponderance of evidence, it is more likely true than not true that questionable transactions were the result of trafficking.

APPELLANT'S CONTENTIONS

The following represents a brief summary of the Appellant's contentions in this matter. Please be assured, however, that in reaching a decision, full attention and consideration was given to all contentions presented, including any not specifically recapitulated or specifically referenced herein.

In the replies to the charge letter, in the administrative review request, and in subsequent correspondence, the Appellant, through counsel, stated the following summarized contentions, in relevant part:

- The Appellant denies the trafficking charges. The Appellant has never violated any laws related to Section 271.2 and 278.6(e)(1).
- The Appellant's transactions are based on the sale of qualified merchandise.
- The Appellant has been authorized to participate in the SNAP since 2011 without prior allegations of violations.
- The charge letter does not allege any specific facts suggesting that any of the transactions involved trafficking. Instead, one of USDA's central assumptions seems to be that customers would not choose to do most of their shopping at the Appellant.
- The Appellant is not a traditional convenience store. The Appellant holds itself as a fully functioning grocery store. Most of the Appellant's customers buy groceries for their entire household as would a customer at a grocery store.
- The Appellant stocks a lot of nutritious inventory into a small footprint, is closer to customers, and is open more hours than stores in the area.
- The store is important to the neighborhood, particularly SNAP beneficiaries. It is located not too far from Section 8 housing.
- SNAP sales are a small percentage of the store's sales (14.5%) and the transactions alleged to be trafficking are even a smaller percentage (2.2%). The fact that customers who are not SNAP beneficiaries choose to spend \$150,000.00 per month at the Appellant is compelling evidence that the store is an important resource to all of its neighbors, particularly those who rely on SNAP benefits. In support thereof, the Appellant provided charts noting total store sales, credit sales, SNAP sales, number of flagged transactions and percentages for each month of the review period.
- Eligible food items sales were over \$400,000.00 during the review period which is a reflection of the store's grocery sales.

- Page 8 of the USDA SNAP manual titled “Respect Your SNAP Customers” states that store owners are not allowed to restrict the time or purchase amount of customers.
- By adhering to the rules of the SNAP manual, the Appellant is abiding by the law by not questioning the large and/or frequent purchases.
- With regard to the transactions documented in Attachment 1, the Appellant has no way of knowing how frequently an EBT card is being used.
- Most of the transactions in Attachment 1 are hours apart and about half of them are on separate days.
- There is no way for the Appellant to know whether an EBT card is being used by a person who is not a member of the household.
- The Appellant’s cash registers are behind a security barrier, the EBT POS device is on the customer side of that barrier and the cashiers never touch the EBT card. If the customer enters the store with the EBT card, knows the PIN, and is purchasing eligible food, they will be able to complete the sale.
- All of the store’s cashiers attest that only eligible food is allowed to be purchased and the submitted Clover system sales records show that individual food items are rung up for each of the sales in Attachment 1. Unfortunately, the receipts do not give a detailed description of each item purchased. Because of the high crime area and as a safety measure, there is a barricade between cashiers and customers. This prevents each item to be scanned individually.
- If it is USDA’s policy that SNAP beneficiaries should not be allowed to use EBT cards more than once in a set period, it should be able to impose the rule universally in advance, rather than an after-the-fact, ad hoc basis.
- Transactions 1 and 2 appear to be duplicative transactions, which rarely but occasionally happens when a transaction does not go through the first time. Per the Clover system records submitted, that transactions appears only once on the Appellant’s sales records. These transactions were conducted by accident by a new cashier. The mistake was not caught until the submission of proof. The customer never came back to refute the transaction otherwise the store would have refunded the funds back on the SNAP card. The Appellant has taken measures to make sure this type of accident does not occur. The store’s new installed cashier portals warn the cashier of duplicate transactions.
- The Appellant has invested a significant amount of time into the community by making sure the store has a large variety and stock of inventory to accommodate all customers.
- The Appellant relies on repeat customers. The target market is the residents who sometimes shop at the store multiple times during a day because they are just a few minutes away from their homes.
- A traditional convenience store only carries snacks and drinks, but the Appellant carries these items in addition to a full line of grocery products. A big grocery store franchise like Save-A-Lot has 10-door freezers for frozen items. The Appellant also has the same square footage dedicated to its frozen section which includes ready-to-go meals, uncooked poultry, and other meat products. The Appellant has a 14-door cooler which carries a full line of dairy products. The store is the number one retailer for Pepsi products in the 5 U.S.C. § 552 (b)(6) & (b)(7)(C) area.
- The store is open all hours of the day unlike nearby local stores. In fact, the Appellant is the only store located within 4 miles of any other grocery store which causes customers to come back and forth at various times of the day.
- Most families use public transportation, bike, or walk to their destinations so they are mindful of how much they can carry when purchasing their goods. They often ration their purchases

per visit and return to purchase more goods since they are limited on how much they can carry.

- The Appellant also has some sale items by the register which occasionally causes customers to ask that another transaction to be rung up for the sale items nearby and they take the item on the way out.
- The Appellant has been offering a line of credit to SNAP customers whose SNAP benefits run out and customers come back to the store once they have received their SNAP benefit allotments, pay off their credit, and purchase more food for their household.
- The Appellant has been involved in working with the 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Neighborhood Association Inc. by donating to families who are facing severe hardship. It is also involved in the community's local police to ensure the local population's safety and provide a safe location for customers to shop.
- The description of the transactions in Attachment 2 as being large based on the observed characteristics and recorded food stock is a subjective conclusion and is incorrect in this instance.
- The transactions range from \$176.91 to a minimum of \$34.99. Only 6 of the transactions exceed \$90.00, and most of them are less than \$50.00.
- The store visit report states that the store does not have storage coolers or freezers, but another section of the report identifies inventory that could be kept only in coolers or freezers. Likewise, the sketch attached to the report clearly shows that two walls of the store are lined with coolers and freezers full of nutritious food. The Appellant's submitted photos show those coolers and freezers and show that they contain a variety of nutritious, SNAP-eligible foods.
- The store visit form indicates that the Appellant does not have any shopping baskets, but the Appellant's submitted photos show a rack of shopping baskets for customers to use.
- The store visit report states that the form was "completed in collaboration with store personnel" but the survey was obviously prepared on a computer and printed after the inspection and store personnel would not have signed off on the inaccurate statements.
- The Appellant has approximately 3,000 square feet of retail space and stocks a variety of SNAP-eligible foods including, but not limited to: milk, eggs, cheese, butter, and other dairy products; beef, poultry, bacon, several varieties of sausage, deli meat, seafood, and other meat products; cereal, oatmeal, and family-sized packaged of breakfast bars; ground coffee; sandwich bread, rolls, and other baked goods; baking ingredients; a wide variety of condiments in family-sized containers; a wide variety of canned and dried soups; fresh onions, peppers, tomatoes, potatoes, oranges, lemons, apples, and bananas; canned fruits and vegetables; frozen foods (peas and other vegetables, pizzas, Hot Pockets, chicken wings, and a wide variety of prepared meals, etc.); and family-size packages of beans, rice, and pasta.
- The submitted inventory purchase receipts and vendor inventory purchase lists demonstrate that there was adequate eligible food items to account for the transactions during the review period.
- The Appellant has submitted only major vendor receipts. There are many other small vendors like Tastykake, UTZ, Frito Lay, beverage companies, and ice cream companies to which items were purchase but receipts were not submitted for.
- In support of its contentions regarding the store's inventory purchases, the Appellant submitted a table which includes a list of 11 vendors and the cost of eligible grocery items purchased during the review period. Total noted as \$142,483.00 in eligible grocery purchases.

- The submitted Clover system records for the transactions in Attachment 2 indicate that customers purchased a wide variety of items.
- With the Appellant helping the local community by giving lines of credit, their transactions may seem large, but they are only paying off a credit accumulated over time.
- In addition, the pandemic has affected the supply chain and increased inflation. The Appellant has had to increase the price of all items since it is purchasing goods at a higher rate as shipments have become rarer and pricier.
- The Appellant is the only food store in the area that is open 24 hours a day, 7 days a week. For households whose work, family, or other obligations prevent them from shopping during regular hours, the Appellant is the only place to buy groceries.
- Although the transactions may appear to be large, they are sufficient for area large, generational families who patronize the store.
- The Appellant is located in the 5 U.S.C. § 552 (b)(6) & (b)(7)(C) neighborhood of 5 U.S.C. § 552 (b)(6) & (b)(7)(C). The area where the Appellant is located is an approximate square, two miles by two miles, bounded on the north by 5 U.S.C. § 552 (b)(6) & (b)(7)(C), on the west by 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Highway, on the south by 5 U.S.C. § 552 (b)(6) & (b)(7)(C), and on the east by 5 U.S.C. § 552 (b)(6) & (b)(7)(C).
- Most of the development within that area is residential, with a mix of single-family homes, row houses, and apartments. Commercial development is concentrated along the boundaries of 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Highway and 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Avenue, with the exception of the Appellant which is centrally located in close proximity to the residential area. The Appellant's location is in the center of that square.
- For more than half of the households, the Appellant is the closest store where they can buy groceries. There are other food stores located along 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Highway and 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Avenue, but all of them are located more than a mile west or north of the Appellant. For households without a car, the difference between walking a 4-mile round trip to Save-A-Lot on 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Highway and a 1-mile round trip to the Appellant is substantial.
- Similarly, some of the Appellant's customers are elderly and/or disabled, are not able to walk long distances, and use a powered wheelchair. Average household incomes in 5 U.S.C. § 552 (b)(6) & (b)(7)(C) are low compared to the County as a whole and it is probable that the elderly/disabled households are disproportionately dependent on SNAP benefits.
- A SNAP disqualification would impose a hardship on area SNAP customers, especially during the COVID-19 pandemic.
- A SNAP disqualification would impose a financial hardship on the Appellant.
- If violations are found to have occurred as alleged, the Appellant requests consideration for a civil money penalty in lieu of disqualification as the store has established policies and procedures to prevent trafficking.
- The store's training program should be evaluated with consideration of the fact that it typically has only one employee on duty, and is a small store in an economically depressed area. See *Ghattas v. United States* (elaborate requirements that may be appropriate to measure the compliance efforts of a 200-store supermarket chain are unsuitable for a one-clerk store in a low income trade area). See also *Ahmed v. United States*. Measured against that standard, the store meets all of the requirements for a CMP.
- With regard to Criterion 1, since being authorized as a SNAP retailer in 2011, the owner has been active in ensuring full compliance with his employees and their obligations to FNS. A photocopied booklet is provided to each employee and issues and concerns regarding EBT processing are addressed as questions and issues arise. The Appellant's compliance policy

states the following: (1) There is no exchange for cash for EBT card swipes; and (2) and only sell qualified EBT grocery items to your customers. Any employee who does not follow the SNAP rules and guidelines will be immediately terminated.

- With regard to Criterion 2, the firm shall establish that both its compliance policy and program were in operation at the location where the violation(s) occurred prior to the occurrence of the violations cited in the charge letter.
- With regard to Criterion 3, the firm developed and instituted an effective training program as specified in Section 271.2. The training program implemented by the Appellant includes: A review of the FNS handbook with each new employee and instructions to call USDA or the store owner if employees have any questions.
- With regard to Criterion 4, firm ownership was not aware of, did not approve of, did not benefit from or was not in any way involved in the conduct or approval of the trafficking violations; or it is only the first occasion in which a member of firm management was aware of, approved, benefited from, or was involved in the conduct of any trafficking violations by the firm.
- The Appellant has a training policy in place for its employees. Using the url: http://www.fns.usda.gov/sites/default/files/Retailer_Training_Guide.pdf, the Appellant has provided in-store training and a copy of the manual to all employees and store operators. The contents of the manual are discussed and reviewed with employees and partners of the business on a semi-annual basis. Each employee is reminded by the Appellant to never engage in the following: (a) Giving back cash in return for EBT purchases; (b) Disallowing sales to known friends of the card user if it appears as though the card user is outright paying for the groceries of a person that is not part of their household; and (c) Disallow sales on unqualified EBT items.
- Moving forward, the Appellant will conduct random inspections testing knowledge of its employees and send “mystery shoppers” to ensure employees are following the SNAP rules.
- Appellant’s counsel submits a FOIA request for documents pursuant to 5 U.S.C. 552.
- The Appellant requests an evidentiary hearing regarding the allegations in the charge letter.
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) and 5 U.S.C. § 552 (b)(6) & (b)(7)(C) should be excluded from any judgment as they were partners only up until 2020. The Articles of Incorporation and lease are submitted as proof (Note: No Articles of Incorporation and/or lease were provided to FNS).

In support of these contentions, the Appellant, through counsel, submitted the following information for review:

- A letter of support from the 5 U.S.C. § 552 (b)(6) & (b)(7)(C) Neighborhoods Association Inc;
- A Google map of the area surrounding the Appellant;
- Sales Overview printed from the Clover System by month for each month of the five-month review period;
- 2020 and 2021 Form 1099 K Payment Card and Third Party Network Transactions;
- 98 register receipts printed from the Appellant’s Clover System;
- Affidavit of store owner;
- National Accounting Services Inc Payer Worksheet Detail by Employee, List of Employees, Employee Training Sign-In sheets, and SNAP Training Acknowledgments for the years 2017 - 2022;
- Affidavits of 9 customers attesting to shopping habits at Appellant;

- Numerous food stock photos;
- Numerous inventory purchase invoices;
- Listing of review period purchases from Frito Lay;
- Listing of review period purchases from Swartz & Sons Distributors, Inc;
- Listing of review period purchases from Sam's Club;
- Listing of review period purchases from Hershey Creamery Co.;
- 13 pages from a credit ledger/notebook;
- 2020 and 2021 Corporation tax returns; and
- A photo showing 2 hand-held baskets in store.

ANALYSIS AND FINDINGS

A review of the evidence in this case does not support the Retailer Operations Division's determination of permanent disqualification. Accordingly, it is unnecessary to address the Appellant's contentions in this matter regarding trafficking.

The Appellant admitted to accepting SNAP benefits in payment for items sold on credit. Accepting SNAP benefits in payment for items sold on credit is a violation of the SNAP regulations and carries a penalty of a one-year SNAP disqualification. Accordingly, the determination is modified to a one-year disqualification in accordance with 7 CFR § 278.2(f) and § 278.6(e)(4)(ii).

This administrative review decision is based on the specific circumstances of this case as documented by materials provided by Appellant and the Retailer Operations Division. In addition, this administrative review decision does not establish policy or supersede federal law or regulations.

FOIA Request

The record reflects that in the Appellant's response of February 25, 2022, counsel requested information and documents from FNS with regard to the agency's case against Ray Convenience Store pursuant to the Freedom of Information Act (FOIA). The Retailer Operations Division contacted counsel via email of March 1, 2022, stating that the FOIA request would have to be submitted to the FNS FOIA office in order for it to be considered. The contact information for the FNS FOIA office was provided to counsel. As of the date of this Final Agency Decision, FNS has not received a FOIA request from counsel.

Hearing Request

With regard to the Appellant's request for an immediate hearing, this disqualification is an administrative action and the SNAP regulations do not provide for a hearing, but rather for an administrative review of the action. The Act and regulations provide that any firm aggrieved by an administrative review determination may seek judicial review of the determination in Federal court or a State court of record having competent jurisdiction. In such event, trial de novo proceedings ensure the firm of a full evidentiary hearing on the agency action at issue.

Change in Store Ownership

The Appellant contends that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) and 5 U.S.C. § 552 (b)(6) & (b)(7)(C) should be excluded from any judgment as they were partners only up until 2020. However, no

Articles of Incorporation and/or lease were provided to FNS as evidence of such store ownership change. If there was a change in ownership prior to the review period (i.e. prior to December 2020), the Appellant may contact and provide such evidence to the Retailer Service Center at 1-877-823-4369 or the Retailer Operations Division at Charles.Hardin@usda.gov.

CONCLUSION

Based on a review of all available information in this case, the permanent disqualification against Ray Convenience Store is modified to a one-year disqualification due to the Appellant's violations of SNAP regulations pertaining to credit extension to SNAP customers.

The record shows that the permanent disqualification action took effect on May 2, 2022. As of the date of this Final Agency Decision, the disqualification sanction remains in effect. Accordingly, the firm may not reapply for SNAP authorization until one year after May 2, 2022, the implementation date of the disqualification decision.

In accordance with 7 CFR § 278.1(b)(4), at the time of any new application for participation in SNAP, the firm will be required to submit a collateral bond or irrevocable letter of credit as a condition for again being authorized to participate in the Program. This bond requirement is due to the firm's disqualification of a period longer than six months.

RIGHTS AND REMEDIES

Your attention is called to Section 14 of the Food and Nutrition Act of 2008 (7 U.S.C. 2023) and to Section 279.7 of the Regulations (7 CFR § 279.7) with respect to your right to a judicial review of this determination. Please note that if a judicial review is desired, the Complaint, naming the United States as the defendant, must be filed in the U.S. District Court for the district in which you reside or are engaged in business, or in any court of record of the State having competent jurisdiction. If any Complaint is filed, it must be filed within thirty (30) days of receipt of this Decision.

Under the Freedom of Information Act, FNS is releasing this information in a redacted format as appropriate. FNS will protect, to the extent provided by law, personal information that could constitute an unwarranted invasion of privacy.

LORIE L. CONNEEN
ADMINISTRATIVE REVIEW OFFICER

August 2, 2022