

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

Shabad Deli & Grocery Corp.,

Appellant,

v.

Retailer Operations Division,

Respondent.

Case Number: C0213667

FINAL AGENCY DECISION

It is the decision of the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) that there is sufficient evidence to support a finding that the permanent disqualification of Shabad Deli & Grocery Corp. (Appellant) from participation as an authorized retailer in the Supplemental Nutrition Assistance Program (SNAP), as initially imposed by the Retailer Operations Division, was appropriate.

ISSUE

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

AUTHORITY

7 USC § 2021 and the 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 13, 2019, the Retailer Operations Division charged Appellant with trafficking, as defined in Section 271.2 of the SNAP regulations, based on a series of irregular SNAP transaction patterns that occurred during the months of July 2018 through December 2018. The letter noted that the penalty for trafficking is permanent disqualification as provided by 7 CFR § 278.6(e)(1). The letter also noted that Appellant could request a trafficking civil money penalty (CMP) in lieu of a permanent disqualification within ten days of receipt under the conditions specified in 7 CFR § 278.6(i).

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In response to the charge letter, on February 26, 2019, Appellant, through counsel, requested documents under the Freedom of Information Act (FOIA). The FOIA Office responded to the request on April 5, 2019. Counsel then appealed the FOIA response by letter dated July 3, 2019. The FOIA Office issued its response to counsel's appeal on February 17, 2021. On February 5, 2021, the Retailer Operations Division provided counsel with ten days to provide its final response to the letter of charges. Appellant responded on February 15, 2021. Appellant denied trafficking and explained that the transactions were normal based on the unique circumstances of the store.

After considering the evidence and the retailer's reply, the Retailer Operations Division issued a determination letter dated November 30, 2021. The determination letter informed Appellant that it was permanently disqualified from the SNAP in accordance with 7 CFR § 278.6(c) and § 278.6(e)(1). The determination letter also stated that Appellant was not eligible for a trafficking CMP because Appellant failed to 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 dated December 2, 2021, Appellant, through counsel, appealed the Retailer Operations Division's determination and requested an administrative review. The appeal was granted.

STANDARD OF REVIEW

In appeals of adverse actions, the Appellant bears the burden of proving by a preponderance of the evidence, that the administrative action 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 contained in the Food and Nutrition Act of 2008, as amended, 7 USC § 2021 and § 278 of Title 7 of the Code of Federal Regulations (CFR). Part 278.6(a) and (e)(1) establish the authority upon which a permanent disqualification may be imposed against a retail food store or wholesale food concern in the event that personnel of the firm have engaged in trafficking SNAP benefits.

7 USC § 2021(b)(3)(B) states, in part:

... 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 § 271.2 defines trafficking, in part, as:

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(a) states:

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(b)(2)(ii) states, inter alia:

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 . . . 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).

7 CFR § 278.6(e)(1) reads, in part:

FNS shall disqualify a firm permanently if personnel of the firm have trafficked as defined in § 271.2.

7 CFR § 278.6(i) states, inter alia:

FNS may impose a civil money penalty in lieu of a permanent disqualification for trafficking . . . 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 of the Program.

SUMMARY OF THE CHARGES

Appellant was charged and determined to be trafficking based on an analysis of EBT transaction data from July 2018 through December 2018. This involved the following SNAP transaction patterns which are indicative of trafficking:

- Multiple transactions were made from the accounts of individual SNAP households within a set time period.

- The store conducted EBT transactions that were large based on the observed store characteristic 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 the questionable transactions were the result of trafficking.

APPELLANT'S CONTENTIONS

In its December 2, 2021, administrative review request, and subsequent correspondence submitted on December 23, 2021, Appellant, through counsel, provided the following summarized contentions, in relevant part:

- Appellant is local Middle Eastern grocer and meat market that sells a variety and quantity of staple food items to the surrounding community such as: Halal meats, beef, chicken, veal, lamb, seafood, turkey, duck, rabbit, pigeon, quail, fruits, vegetables, eggs, milk, butter, pasta, cereal, canned meats, cookies, muffins, candy, and additional food items.
- Appellant is in an economically depressed area, located across from a Metro station and high school and walking distance from other schools which draws a significant number of SNAP participants.
- Appellant has sufficient variety and quantity to meet the needs of several households.
- Counsel provided the list of higher priced items: beef shoulder, \$7.49 per lb; beef leg, \$7.49 per lb; beef ribs, \$7.49 per lb; T-Bone steak, \$7.49 per lb; ox tail, \$11.99 per lb; beef liver, \$6.99 per lb; whole chicken, \$4.49 per lb; skinless chicken, \$4.69 per lb; chicken breast, \$4.89 per lb; chicken Leg, \$2.69 per lb; chicken thigh, \$4.79 per lb; chicken wings, \$6.99 per lb; chicken feet, \$1.99 per lb; veal shoulder, \$8.79 per lb; veal leg, \$8.79 per lb; veal ribs, \$8.79 per lb; veal neck, \$8.79 per lb; veal t-bone steak, \$8.79 per lb; veal liver, \$6.99 per lb; whole lamb, \$10.99 per lb; lamb shoulder, \$11.99 per lb; lamb leg, \$12.99 per lb; lamb neck, \$11.99 per lb; lamb ribs, \$11.99 per lb ; lamb Chops, \$11.99 per lb; lamb t-bone steak, \$11.99 per lb ; lamb kidney/liver, \$9.99 per lb; lamb brain, \$3.00 (each); lamb feet, \$5.99 per lb; Mazola Oil, \$11.49/ \$16.99/\$37.99; olive oil, \$14.99; Pomaco Oil, \$15.99; Wasson Oil - \$13.99; Swarna Durmatta, \$14.99; Sujata Gold Atta, \$15.99; Chappati Flour, \$11.99; Zebra basmati rice, \$65.00; Preemas XLong Rice, \$49.99; royal Basmati Rice, \$54.99; Koinoor Basmati Rice, \$22.99; and Domino Sugar, \$22.99.
- The inspectors' notes show the store to be sufficiently stocked.
- It is likely that a confirmation bias exists, and ambiguous and contradictory evidence has been disregarded or interpreted in such a way that favors the hypothesis that trafficking is occurring at Appellant.
- FNS bears the burden of proof not the retailer.
- FNS does not know what the correlation coefficient is between any of the ALERT Scans and trafficking in SNAP benefits.
- The link between the ALERT scan categories and the actual act of trafficking in SNAP benefits is weak and the presence of trafficking in stores identified to have ALERT hits is the exception to the rule.
- Co-shopping is on the rise, where both adults are responsible for the groceries.
- This is manifested in the SNAP participants that shop at Appellant in the following ways: different household members will shop separately (using the same account) to pick up different needs, and personal needs, on top of the household's list; and different household

participants will travel to the Store together to make purchases, and then separate their purchases to track what amount each party has used from their benefits account.

- Households shop multiple times a day because of convenience often sending their children on separate shopping trip to pick up items from time to time.
- Households make purchases for friends, for large gatherings, or to satisfy needs.
- Appellant's inventory greatly exceeds those around it, and it has a greater quality and variety than your average convenience store.
- Transportation inconsistency is another reason why Appellant's transactions appear the way they do if the transportation to another store it is not dependable.
- To satiate boredom, unemployed household member will regularly shop to find something to do.
- The inventory offered by the store is of such a variety that it's difficult to imagine any of the other stores offering things like beef, chicken, Guinea chicken, veal, lamb, seafood, turkey, duck, rabbit, pigeon, quail, roster fowl, and other bulk Halal meats.
- A household could satisfy all of their needs on a single shopping trip, and that given the specialty items contained within the store's inventory, they would travel a distance or return regularly if they needed.
- The transactions listed in Attachment 1 consisted of innocent transaction explained by either (1) the participant forgetting an item in his/her prior transaction; (2) co-shopping; (3) the participant making a purchase, returning home, and then returning to the Store to make a second purchase; or (4) a reflection of the normal shopping habits of SNAP participants.
- The households conducting the large transactions likely have a larger amount of SNAP household members.
- Given the higher priced halal meat items in the store, it's not difficult to imagine this number of groceries (including meat purchases) being purchased in a single trip for a large, multi-generational family.
- Appellant's specialty items are conducted without requiring the customer to bring the items to the counter.
- Appellant's expensive items are more than enough to account for the large purchases.
- The transactions are not trafficking and are supported by the substantial inventory and are reasonably explained by co-shopping, Appellant's pricing structure, and the reliance on Appellant as a primary grocery.
- It is more likely that legitimate transactions have been misidentified because of an errant assumption about the store's inventory and clientele.
- Appellant is categorized as a convenience store but based on the inventory, it's more properly identified as a specialty grocery. As it stands, it's being compared to stores which do not have halal meat, bulk purchase foods, or other eligible items that result in larger and more frequent purchases.
- The store was investigated by the USDA during the ALERT review period and was found not to be trafficking.

In support of its contentions, counsel submitted the following documents:

- Know your Core, Protect Your Core, Convenience Store News for the Single Store Owner April 2016.

- U.S. Grocery Shopping Trends, 2016 by Food Marketing Institute.
- ALERT Correlations Coefficient Calculation.
- Profile of SNAP Households in 2018 for New York.
- Benefit Redemption Patterns in the Supplemental Nutrition Assistance Program in Fiscal Year 2017 Final Report by Insight Policy Research issued in September 2020.
- Article from Special Science & Medicine by Jerry Shannon: *What does SNAP benefits usage tell us about food access in low-income neighborhoods?*
- Preventative Medicine Reports article by Alison Gustafson: *Shopping pattern and food purchase differences among Supplemental Nutrition Assistance Program (SNAP) households and non-supplemental Nutrition Assistance Program households in the United States.*
- Twenty-six photos.

The preceding may represent only a brief summary of the Appellant's contentions presented in this matter. However, in reaching a decision, full attention and consideration has been given to all contentions presented, including any not specifically recapitulated or specifically referenced.

ANALYSIS AND FINDINGS

Store Visit

FNS authorized Shabad Deli & Grocery Corp. as a convenience store on December 6, 2017. The case file indicates that in reaching a disqualification determination, the Retailer Operations Division considered information obtained during an October 16, 2018, store visit conducted by a FNS contractor to observe the nature and scope of the firm's operation, stock, and facilities. This information was then used to ascertain if there were justifiable explanations for the firm's irregular SNAP transactions. The store visit report and photographs documented the following store size, description, and characteristics:

- Appellant is approximately 720 square feet.
- There were no shopping baskets and no shopping carts for customer use.
- There was one cash register and one point of sale (POS) device.
- There was no optical scanner.
- The checkout area was small with limited space to place items and occurred through a small space/window in a Plexiglas wall.
- Dairy included milk and butter.
- The only fresh produce was a box of apples.
- There was no fresh unprocessed meat.
- Other staple foods available for purchase were juice, eggs, bread, cereal, pasta, and a limited selection of canned goods.
- Much of the remaining stock consisted of accessory foods such as candy and carbonated and uncarbonated drinks.
- Ineligible items included lottery, tobacco, alcohol, paper goods, cleaning products, and health and beauty aids.

- The contractor noted dusty cans and packages, empty shelves, empty or broken coolers, and ice crystals on the food.

The SNAP eligible food stocked by the store was generally of a low dollar value consisting mainly of inexpensive canned and packaged goods, snack foods, single-serving food items and accessory food items. The highest priced items noted included case of water - \$10.99; a gallon of cooking oil - \$8.99; coffee - \$6.99; and ice cream - \$5.99. Given the available inventory, there was very little sign that the firm would be likely to have SNAP redemption patterns that differed significantly from those of similar-sized competitors, especially competitors that sell similar or identical food items. In fact, on the day of the store visit Appellant did not meet SNAP eligibility criteria as it carried too few items in the dairy staple food category. To meet eligibility criteria for authorization a firm must have at least three stocking units of three different varieties if each of the four staple food categories. Appellant only carried milk and butter on the day of the store visit and was missing one qualifying variety of dairy.

Charge Letter Attachment

Each attachment furnished with the charge letter represents the questionable and unusual patterns of SNAP transactions indicative of trafficking which were conducted at the Appellant firm during the review period. As there is more than one pattern of irregular transactions, the case of trafficking becomes more convincing.

Charge Letter Attachment 1. Multiple transactions were made from individual benefit accounts in a set timeframe. This attachment documents 43 sets of transactions conducted by 29 households that total \$5,238.15 in SNAP benefits that meet the parameters of this scan. One household conducted four larger than average SNAP transactions within a short period that total \$190.77 in SNAP benefits (transactions #100-103). Another household transacted a total of \$421.89 at Appellant. Multiple transactions conducted by the same household account within a short period of time is a method which violating stores use to avoid single high dollar transactions that cannot be supported by a retailer's inventory and structure.

Although it is not uncommon for customers to have more than one transaction per day, it is not common that such multiple transactions are for large dollar amounts. The SNAP transactions noted in the charge letter are questionable not because they exceed any limits for use, but rather because they display characteristics of use inconsistent with the nature and extent of Appellant's stock and facilities and are therefore indicative of trafficking. The photographs from the store visit offer no explanation as to why SNAP customers would routinely shop at Appellant multiple times during a short period or purchase such a large volume of items, there being no great variety of products, price advantage, profusion of large packages, or significant bulk items for sale. The second and third transactions in each set are too large to consist of forgotten items.

Counsel explains that co-shopping results in a higher number of transactions that occur in a shorter period than expected. Co-shopping may occur, but it is unlikely the reason that Appellant has more frequent large transactions by the same household than other similar stores during the review period. This would manifest itself in these households conducting similar transaction patterns at other retailers. Yet, the Retailer Operations Division found that the three-comparator store only conducted

three, two, and one similar transaction sets while Appellant conducted 43 transaction sets. This begs the question why households would be more likely to co-shop at Appellant than at other similar nearby stores.

Appellant has not offered sufficient evidence to show that the transactions listed in Attachment 1 were legitimate purchases of eligible food.

Charge Letter Attachment 2: Excessively large purchase transactions were made from recipient accounts. This attachment lists 242 transactions as large as \$100.14, and that total \$13,679.89. These flagged transactions comprised approximately 18.24 percent of all purchase transactions at Appellant during the review period. There is no evidence that the firm would be likely to have SNAP redemption patterns that differ considerably from similar-sized competitors.

Counsel reports that the notes from the store visit show the store to be sufficiently stocked. This is not true. As indicated previously, on the day of the store visit Appellant did not even meet SNAP eligibility criteria as it carried too few items in the dairy staple food category with only stocking milk and butter and was missing a third variety of dairy staple food items. Considering Appellant's offering of eligible food stock, these large dollar transactions are questionable and likely indicative of trafficking.

Counsel contends that Appellant is a local Middle Eastern grocer and meat market that sells a variety and quantity of staple food items to the surrounding community such as: Halal meats, beef, chicken, veal, lamb, seafood, turkey, duck, rabbit, pigeon, and quail. It is important to note that counsel did not mention any of these items in its February 15, 2021, reply to the Retailer Operations Division. In this original reply, counsel reports that that the firm simply store sells a variety and quantity of staple food items such as: fruits, vegetables, eggs, milk, butter, pasta, cereal, canned meats, cookies, muffins, candy and additional food items. Counsel only acknowledged the firm selling canned meats and this is evidenced by the store visit report and photographs. In addition, none of these higher priced meat and Halal items were visible or noted on the day of the store visit or any of the previous store visits that were conducted on December 4, 2017, and October 10, 2017.

The Retailer Operations Division compared Appellant to a three nearby similarly stocked convenience stores. Appellant conducted the least amount of SNAP transactions compared to the other three stores. Appellant conducted the least amount of SNAP transactions compared to the other three stores however had the highest redemption SNAP dollar volume during the review period. The Retailer Operations Division determined that the transaction pattern of Appellant exceeded the other store, as seen on the table herein. The data from this nearby store shows that the transaction patterns at the Appellant firm were unusual.

Store	Attachment 1 Pattern	Attachment 2 Pattern
Appellant	43	242
Store #1	3	16
Store #2	2	39
Store #3	1	14

To explain why Appellant's transactions stand out when compared to similar store types, counsel contends that it is incorrectly categorized as a convenience store and its inventory is more properly identified as a specialty grocery. Again, there was no evidence to support that Appellant specialized in Halal products or carried any fresh or frozen meat items. Even the photographs submitted by Appellant do not show any of these higher priced meat items. The evidenced supports that Appellant is a convenience store.

The Retailer Operations Division also compared Appellant to the average for convenience stores in the State. Appellant conducted 44% less SNAP transactions than the average for convenience store during the review period; yet Appellant's average SNAP transaction amount was 97% greater than the average for convenience stores in the State. Appellant also conducted more larger dollar SNAP transactions between \$50.00 and \$89.99 than the average. For example, Appellant conducted 59 SNAP transactions in the \$50.00 - \$59.99 range whereas the average for convenience stores during the review period was nine SNAP transactions. Similarly, Appellant conducted 61 SNAP transactions in the \$60.00 - \$69.99 range, whereas the average for convenience store was 5.49 transactions.

Counsel contends that transportation inconsistency is another reason why the store's transactions appear the way they do if transportation to other stores is not dependable. Sometimes a firm may have higher than average SNAP transaction amounts due to the lack of access to other SNAP authorized stores. Within a one-mile radius, there are least 114 other authorized firms, including 30 small groceries, 13 medium groceries, two large groceries, five super stores, and seven supermarkets. The Retailer Operations Division reviewed the transaction activity of three households that conducted some of the flagged transactions. Each of these households conducted SNAP transactions at a super store or supermarket within one day of its flagged transaction at Appellant. The evidence supports that these households had access to transportation within a short time frame of their unusual large transactions at Appellant. It is questionable as to why households would conduct large transactions at Appellant, when these households had just visited or planned to visit larger stores with a better selection of fresh meat and produce and likely better prices.

Previous RIB Investigation

Counsel contends that Appellant was investigated by the USDA during the review period and was found not to be trafficking. The available evidence does **not** show that there was a previous undercover investigation. However, even if there was a previous undercover investigation and Appellant refused to traffic to an unknown undercover investigator does not evidence that Appellant always enforces the SNAP rules and regulations. The refusal might simply evidence that Appellant personnel do not commit SNAP violations with unknown personnel; or that the unidentified clerk did not wish to commit SNAP violations at the given time.

Photographs

Appellant submitted 26 photographs to show that it had sufficient inventory. It is important to note that these photographs appear to have been taken well after the review. The store has much more stock likely in a direct response to the charges. There were bulk items visible including

sugar, different types of rice, oil, and flour. However, the evidence is not sufficient to show that the firm sold these items during the review period. It is also difficult to determine if the photographs are all from Appellant because there are different floorings in the photographs. There is also a sign for Hai Brothers Halal Meat Shop. This is an authorized firm located at a different location than the Appellant firm. It is likely that some of the photographs come from this firm and not the Appellant firm. The evidence is not credible.

Evidence

The ALERT system is a computerized fraud detection tool to identify SNAP transactions that form patterns having characteristics indicative of trafficking. However, this tool does not by itself determine or conclude that trafficking has occurred. The Retailer Operations Division must still conduct an extensive analysis of the transaction data and patterns, often with other factors such as, in this case, observations from store visits, an analysis of customer shopping behavior and a comparison of stores in the area, and render a determination whether the questionable transactions were, more likely than not, the result of trafficking.

The legality of this method is supported by 7 CFR §278.6(a) which 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 based on 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.]

The documentation and evidence provided by the Retailer Operations Division was thoroughly examined. From all indications, the Retailer Operations Division obtained the EBT data (provided by ALERT), found it to be suspicious in comparison to other area stores of similar size, and then undertook a thorough investigation before concluding that trafficking was likely occurring.

Appellant bears the burden of demonstrating by a preponderance of the evidence that the administrative actions should be reversed and that the transactions detailed in the charge letter were more likely than not due to the legitimate sale of eligible food in exchange for SNAP benefits. Appellant offered insufficient evidence to prove that the transactions listed in the charge letter were legitimate purchases of eligible food. In the absence of compelling information or documentation weighed in comparison to the evidence provided by the Retailer Operations Division, the evidence weighs in favor of the Retailer Operations Division’s determination that SNAP-benefit trafficking substantially produced the transaction activity at issue in the present case.

CIVIL MONEY PENALTY

Appellant did not timely request consideration for a trafficking CMP in lieu of a permanent disqualification under 7 CFR 278.6(i) even though it was informed of the right to do so in the charge letter. SNAP regulations at 7 CFR § 278.6(b)(2)(iii) states that “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 a penalty.” [Emphasis added.] Even if a timely request had

been submitted, the Appellant would likely not have been eligible for a trafficking CMP in lieu of disqualification because there is insufficient evidence to demonstrate that the firm had established and implemented an effective SNAP compliance policy and program prior to the violations. The Retailer Operations Division's decision not to impose a trafficking CMP in lieu of disqualification is sustained as appropriate pursuant to 7 CFR § 278.6(i).

CONCLUSION

The Retailer Operations Division's analysis of Appellant's EBT transaction record was the primary basis for its determination to permanently disqualify Appellant. This data provided substantial evidence that the questionable transactions during the review period had characteristics that are consistent with trafficking violations in SNAP benefits. Therefore, based on a review of all the evidence in this case, it is more likely true than not true that program violations did occur as charged by the Retailer Operations Division. The determination to impose a permanent disqualification against Appellant is sustained. The Retailer Operations Division's determination that Appellant was not eligible for a trafficking civil money penalty according to the terms of 7 CFR Section 278.6(i) of the SNAP regulations is also sustained.

RIGHTS AND REMEDIES

Applicable rights to a judicial review of this decision are set forth in 7 USC § 2023 and 7 CFR § 279.7. 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 the Appellant's owner resides or is 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, we are 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.

MARY KATE KARAGIORGOS
Administrative Review Officer

June 2, 2022