

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

A's Liquor,

Appellant,

v.

Retailer Operations Division,

Respondent.

Case Number: C0213086

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 A's Liquor (A's Liquor or 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 October 18, 2018, 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 March 2018 through August 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).

Appellant replied to the charges on October 16, 2018. 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 December 11, 2018. 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 14, 2018, Appellant, through its previous counsel, appealed the Retailer Operations Division's determination and requested an administrative review. The appeal was granted. On February 21, 2019, Appellant's current counsel provided information in support of its administrative review request.

STANDARD OF REVIEW

In appeals of adverse actions, the Appellant bears the burden of proving by a clear 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 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), (c) 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 states that the definition of "coupon" includes:

... an electronic benefit transfer card or personal identification number issued pursuant to the provisions of the Food and Nutrition Act of 2008, as amended, for the purchase of eligible food.

7 CFR § 271.2 states, in part, that, eligible foods means:

Any food or food product intended for human consumption except alcoholic beverages, tobacco and hot food and hot food products prepared for immediate consumption.

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.

7 CFR § 278.6(b)(2) states, in part:

(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 a penalty. [Emphasis added.]

SUMMARY OF THE CHARGES

Appellant was charged and determined to be trafficking based on an analysis of EBT transaction data from March 2018 through August 2018. This involved the following SNAP transaction pattern which is indicative of trafficking:

- There were excessively large purchase transactions made from recipient accounts.

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 14, 2018, administrative review request, and subsequent correspondence submitted on February 21, 2019, Appellant, through counsel, provided the following summarized contentions, in relevant part:

- Appellant carries a variety of staple food items, including canned and packaged goods, bread, pasta, eggs, dairy items, fresh produce, frozen foods, cheese, and deli meats.
- Appellant is not aware of any other store in the geographical area that carries a comparable amount of both in quantity and quality.
- Behind Appellant is over 300 Section 8 apartment housing residents who receive government assistance and who walk to Appellant for groceries.
- Appellant is the only retail store in the surrounding area that provides such an expansive and diverse selection of grocery products
- Appellant carries a substantial inventory.
- It is likely that the presence of a Confirmation Bias exists, as it does in many cases handled by FNS. As used for purposes of this brief, a Confirmation Bias is a tendency to search for or interpret information in a way that confirms one's preconceptions, leading to statistical errors.
- Ambiguous or contradictory evidence has been disregarded or interpreted in such a way that unreasonably favors the Department's hypothesis that trafficking is occurring at the Appellants' Store.
- It is important to consider the limitations of ALERT.
- There are no case studies indicating that the transaction types are indicative of any particular type of wrongdoing within the SNAP regulations.
- Decisions have been made under the errant belief that ALERT has been proven to be accurate in finding fraud.

- Another issue that exists with respect to the data analysis is whether or not appropriate comparison stores have been selected to provide a baseline set of data against which to compare the Appellants' transactions.
- Appellant has submitted the Store's grocery product invoices for the subject review period – March 2018 through August 2018.
- Appellant had the following amount of inventory stocked at the Store:
5 U.S.C. § 552 (b)(6) & (b)(7)(C)
- Appellant hired IBIT Technologies to analyze the Store's transactions between October 2016 through October 2018.
- The IBIT report shows that 56% of the Store's EBT orders
5 U.S.C. § 552 (b)(6) & (b)(7)(C), which can hardly be categorized as "excessively large". The IBIT report did not identify the transaction pattern flagged by the Department, i.e. excessively large transactions.
- Appellant submitted the itemized register receipts for all of the transactions flagged as suspicious.
- Appellant provided its 2018 Sales and Use Tax form, reflecting
5 U.S.C. § 552 (b)(6) & (b)(7)(C) worth of eligible SNAP sales during the subject review period.
- The District Courts have cautioned the Department in relying too heavily upon numbers generated by the ALERT System:
- Brooklyn Mini Market vs. U.S., Federal Western District of New York, 12-CV-6708 ;
- Skyson USA, LLC vs. U.S., 2010 WL 651032 (D. Hawaii 2010).
- Appellant refers to two administrative review cases that should be considered in this case: Howard's Quick Mart vs. Retailer Operations Division and Gloesis Group vs. Retailer Operations Division.
- The innocence of such transactions are supported by the itemized register receipts. For example, the largest transaction cited by the Department for
5 U.S.C. § 552 (b)(6) & (b)(7)(C) consisted of cooked vegetables, lamb chops, lobster tails, and condiments.
- That the Department segregated these transactions from the remainder is of little consequence as most other grocers in the Store's specific geographical area are likely to have the same number (or greater) of similar transactions.
- Appellant was provided no evidence that a store comparison was even conducted in the matter.
- Comparing this store to county averages would be flawed as the average county store does not have a 300 unit, low income apartment complex sitting within 500 feet of their door and no meaningful local competition. Accordingly, those averages are irrelevant as they don't address the store's circumstances.
- The local EBT stores are much smaller than the Appellants, or carry a limited amount of food (the Family Dollar store), or are poorly maintained (Vick's), or otherwise too far away from the local clientele to be competitive.

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

- IBIT Transaction Breakdown Report;

- Six Customer Affidavits; Report;
- 2018 Summary of Sales/Use/Withholding Tax for NNNKI, Inc.;
- 327 Register Receipts;
- 389 Invoices; and
- Profile of SNAP Households Michigan Congressional District 13.

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 A's Liquor as a convenience store on January 12, 2016. The case file indicates that in reaching a disqualification determination, the Retailer Operations Division considered information obtained during a February 21, 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:

- A's Liquor is approximately 5,000 square feet, with additional storage outside of public view for some beverages.
- The checkout area was small and cluttered and occurred through a turnstile window.
- There were some shopping baskets but no shopping carts for customer use.
- There was one point-of-sale device.
- There was pre-packaged deli meat, hot dogs, and kielbasa.
- The only fresh produce appeared to be used for the sale of the hot and prepared food including tomatoes, lettuce, and one cucumber located in a refrigerator.
- Dairy included milk, cheese, butter, sour cream, and infant formula.
- Frozen food included dinners, vegetables, and sandwiches.
- Other staple foods available for purchase were juice, rice, bread, beans, cereal, pasta, and canned goods.
- Much of the remaining stock consisted of accessory foods such as candy, spices, and carbonated and uncarbonated drinks.
- There was an extensive menu for hot prepared food items.
- Ineligible items included health and beauty products, cleaning products, and paper products.

The available food was primarily of a low-dollar value. The four most expensive food items were infant formula (\$20.99); Folgers Coffee (\$6.99); Maxwell House Coffee (\$5.99); and Pistachios (\$5.49). 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. 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.

Charge Letter Attachment

The attachment furnished with the charge letter represents the questionable and unusual pattern of SNAP transactions indicative of trafficking which were conducted at the Appellant firm during the review period.

Charge Letter Attachment 1: Excessively large purchase transactions were made from recipient accounts. This attachment lists 327 transactions **5 U.S.C. § 552 (b)(6) & (b)(7)(C)**. There is no evidence that the firm would be likely to have SNAP redemption patterns that differ considerably from similar-sized competitors. These large transaction amounts are also not consistent with the store's inventory. Most of the food products in the store consisted of accessory food items such as snack foods, candy, and soda and inexpensive staple foods such as canned and packaged goods. Of the 327 transaction on this Attachment, 112 exceeded the average Wayne County super store transaction for the same time period. Considering Appellant is a convenience store offering a significantly more limited eligible food stock and infrastructure this is highly unlikely and likely indicative of trafficking.

Counsel contends that an issue that exists is whether or not appropriate comparison stores have been selected to provide a baseline set of data against which to compare the Appellant's transactions. Counsel further contends that there is no evidence that Appellant was even compared to other stores. The Retailer Operations Division compared Appellant to four nearby convenience stores all located within 0.6 miles of Appellant. Appellant's total SNAP dollar volume during the review period was between 45% and 100% greater than the other four convenience stores. Appellant's average SNAP transaction amount was between 45% and 86% greater than the other four authorized convenience stores.

Counsel states most other grocers in the Appellant's specific geographical area are likely to have the same number (or greater) of similar transactions. However, this is not accurate. The Retailer Operations Division determined that the transaction pattern of Appellant exceed the nearby convenience stores, as seen on the table herein. The data from these nearby stores provided adequate evidence to demonstrate that the transaction patterns at the Appellant firm were highly unusual and indicative of possible trafficking violations.

5 U.S.C. § 552 (b)(7)(E)

Counsel explains that behind Appellant is over 300 Section 8 apartment housing residents who receive government assistance and who walk to Appellant for groceries. The Retailer Operations Division determined that Appellant has a similar number of SNAP transactions as the nearby comparator stores. Therefore, there is no evidence to support that local participants rely more significantly on Appellant than nearby stores.

The Retailer Operations Division determined that there are 23 other authorized stores within a one mile radius of Appellant, including 20 other convenience stores, and one small grocery. Appellant compared the stock of Appellant one of the nearest convenience stores and it appears

to have similar stock. In addition, the Retailer Operations Division determined that 117 of the 186 unique households in the charge letter conducted a transaction at a large grocery store, supermarket, or super store within one day of completing a flagged transaction at Appellant. It does not appear lack of transportation to larger, better stocked stores explains the unusual transactions in the charge letter.

The Retailer Operations Division examined four households identified in the charge letter to analyze their shopping patterns at A's Liquor compared to their shopping patterns at other SNAP authorized stores. However, despite this access to better stocked stores, each of the four households conducted excessively large transactions at A's Liquor 5 U.S.C. § 552 (b)(7)(E) of shopping at a supermarket or super store. 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.

Transaction Receipts

With its original reply to the charges, Appellant provided 265 receipts for the questionable transactions. Each of the receipts were for the sale of hot food. The original attorney explained that they were operating a "you buy, we fry" operation. There is no signage in the store advertising a "you buy, we fry" promotion or practice. The store employee, during the March 2018 store visit, did not mention any "you buy, we fry" activity. Assertions that the firm is running a "you buy, we fry" business model rather than selling hot foods, by themselves and without supporting evidence are not credible.

The Retailer Operations Division reviewed each of the receipts and also determined that the transactions times varied from the EBT transaction times 5 U.S.C. § 552 (b)(6) & (b)(7)(C). There were also several receipts where the transaction total was off by a cent when compared to the EBT transaction total.

With its administrative review request, Appellant submitted a total of 327 receipts for each of the transactions. However, there were some discrepancies noted below between the receipts previously submitted by the retailer and the new receipts provided for this administrative review. For example, the original receipt submitted for the June 5, 2018, 5 U.S.C. § 552 (b)(6) & (b)(7)(C). The itemized receipt with that same order number, date, and time had a new total 5 U.S.C. § 552 (b)(6) & (b)(7)(C), and the items were listed in review order with the new receipt provided with its supporting information. Although the total changed between the two receipts provided for the same transaction, the prices of the items purchased did not change. 5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(6) & (b)(7)(C). The inconsistencies in Appellant's receipts are such that they cannot be considered reliable depictions of transaction activities taking place at the store during the review period.

Customer Statements

Counsel provided six statements from customers. The statements were in template form with some areas for the customers to complete. 5 U.S.C. § 552 (b)(6) & (b)(7)(C). The Retailer Operations Division researched the State system to review the transaction history of these SNAP

households. Five of the six households could not be located. One of the households was located; however, it did not conduct any SNAP transactions at Appellant during the review period.

Each of the statements listed the foods that these customers allege to purchase from Appellant: frozen food, lunch meat, chips, candy, milk, eggs, sugar, flour, rice, cereal, and bacon. None of the transactions receipts submitted contained any of these items. One of the customers did list items from the kitchen which is presumed to be the hot food items that are ineligible for purchase with SNAP benefits.

The customer statements are not sufficient evidence that any of the transactions listed on the Charge Letter were for eligible food items only.

Invoice Analysis

During the initial determination, the original attorney submitted a total of 239 inventory invoices/receipts. The Retailer Operations Division analyzed the invoices submitted by the firm and determined that they did not cover Appellant's SNAP redemptions for the review period. However, the Retailer Operations Division also determined that it was likely that the firm had additional invoices that were not submitted.

With its administrative review request, counsel submitted 389 pages of invoices. Each of the 389 pages appeared to be different from the inventory invoices originally submitted to the Retailer Operations Division with the firm's original reply to the charges. Many of the 389 pages included invoices that were illegible. The Retailer Operations Division reviewed all of the invoices for August 2018 and determined that based on the inventory invoices submitted by the retailer, the firm likely purchased sufficient inventory to support their SNAP redemptions during the review period.

With its original submittal and subsequent submittal of invoices, Appellant submitted eight receipts showing the purchase of store inventory with SNAP benefits. These transactions were conducted by five different SNAP households. It is more likely than not that the firm either purchased the card from SNAP recipients and used it to purchase store inventory or knowingly purchased eligible food items previously purchased with SNAP by the household for cash. This is considered trafficking. Thus, although Appellant submitted invoices to show it purchased sufficient inventory to justify its SNAP redemptions, the inventory invoices actually was further evidence of the firm's trafficking in SNAP benefits.

ALERT

Appellant makes multiple contentions regarding the agency's ALERT system. Counsel argues that FNS's reliance on ALERT leads to confirmation bias and causes the agency to disregard or interpret evidence in such a way that unreasonably favors the agency's hypothesis that trafficking is occurring. 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. Lastly, Appellant is always given a chance to explain the specific transaction patterns before the determination letter is issued and during the administrative review.

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 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.]

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’s implication that the Retailer Operations Division simply charged a store with trafficking violations simply because it was listed on some computerized reports is unfounded.

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 little credible 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.

Case Law

Appellant cites some case law which it claims supports its position on the ALERT system as well as multiple transactions. It should be noted that considerations of legal precedent through case law is beyond the scope of this review. Instead this administrative review is limited to whether the Retailer Operations Division appropriately followed the Food and Nutrition Act of 2008, as amended, and the regulations promulgated under the Act, and whether the action taken is sustainable by a preponderance of the evidence. Therefore, any application of a supposed judicial precedent would best be addressed in a judicial review in a court of law.

Earlier Administrative Review Decisions

Appellant refers to two administrative review cases that discuss the precedent that should be considered in this case: *Howard’s Quick Mart vs. Retailer Operations Division* and *Gloesis*

Group vs. Retailer Operations Division. The sentence quoted by Appellant in *Howard's Quick Mart* regarding trafficking being the “only plausible explanation” was an inadvertent misstating of the standard of evidence required in administrative review cases. As stated elsewhere in that decision, as well as earlier in this decision, in an appeal of an adverse action, Appellant bears the burden of proving by a preponderance of evidence that the administrative action should be reversed. Appellant mischaracterizes the findings of *Gloesis Group* as that decision clearly states that the determination was based on the preponderance of the evidence. The evidence in both cases differs significantly from the evidence in this 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. In conclusion, 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 of 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 also determined 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. Under review, the denial of a trafficking CMP was deemed correct and proper.

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 17, 2019