

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

Corner Groceries,

Appellant,

v.

Case Number: C0145758

Retailer Operations Division,

Respondent.

FINAL AGENCY DECISION

It is the decision of the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), that a permanent disqualification was properly imposed by the Retailer Operations Division against Corner Groceries from participation as an authorized retailer in the Supplemental Nutrition Assistance Program (SNAP).

ISSUE

The issue accepted for review is whether or not the Retailer Operations Division took appropriate action, consistent with Title 7 Code of Federal Regulations (CFR) Part 278, in its administration of SNAP when it imposed a permanent disqualification against the Appellant.

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

Corner Groceries was initially authorized to participate in SNAP as a convenience store on January 7, 2010. Between July 12, 2011, and July 19, 2011, FNS conducted an undercover investigation of Corner Groceries to ascertain the firm’s compliance with federal SNAP law and regulations. Subsequently, the USDA Office of Inspector General (OIG), jointly with the Federal Bureau of Investigations (FBI) conducted a similar investigation between September 11, 2012, and August 3, 2016. During the investigations, the Appellant firm reportedly violated SNAP rules by trafficking SNAP benefits: Appellant accepted a total of 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in cash on nine

occasions. The firm also reportedly committed the violation of selling ineligible non-food items for SNAP benefits on at least three occasions.

In a letter dated October 1, 2018, and re-sent to an updated address for the Appellant in a letter dated November 8, 2018, the Retailer Operations Division charged the Appellant with trafficking, as defined in Section 271.2 of SNAP regulations. It also charged the Appellant with accepting SNAP benefits in exchange for ineligible non-food merchandise. The charge letter informed the Appellant that the violations warranted permanent disqualification from SNAP, as provided in 7 CFR § 278.6(e)(1). The letter also stated that the Appellant could request a civil money penalty (CMP) in lieu of permanent disqualification for trafficking, noting that such a request must be made within 10 days of receipt of the letter under the conditions specified in 7 CFR § 278.6(i).

In response, the Appellant, through counsel, submitted a letter dated November 19, 2018, acknowledging the charges, including one instance of trafficking committed by the owner himself, and requesting a civil money penalty (CMP) in lieu of permanent disqualification. The Appellant claimed to have met the criteria for a CMP, saying the firm had an effective compliance policy as the only people who worked at the store were two owners/partners and the son of one of the partners, and the two partners were familiar with SNAP policy and procedures, including the SNAP Training Guide for Retailers issued by FNS. The Appellant claimed this compliance policy was in effect from the inception of the business in 2010 through during the time of the violations, which was early in the firm's existence. The Appellant claimed that FNS had issued only a single warning letter, which was not received by owner 5 U.S.C. § 552 (b)(6) & (b)(7)(C), so that he had no knowledge that a remedial training program might be necessary. And finally, the Appellant said that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) was only involved in one violative transaction, on August 3, 2016, which was conducted by an aggressive and menacing cooperating witness.

It should be noted that the OIG/ FBI investigation revealed that in addition to 5 U.S.C. § 552 (b)(6) & (b)(7)(C) co-owned and partially operated the store, though he was not listed on the SNAP application. The Appellant's response also said 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had a partner that co-owned and manned the store. On August 25, 2016, a Federal grand jury in the District of Maryland charged 5 U.S.C. § 552 (b)(6) & (b)(7)(C) with SNAP fraud, wire fraud, and aiding and abetting; 5 U.S.C. § 552 (b)(6) & (b)(7)(C) was likewise charged with wire fraud and aiding and abetting. As to these charges, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) subsequently pled guilty, while 5 U.S.C. § 552 (b)(6) & (b)(7)(C) was convicted on all counts in a jury trial on February 12, 2018.

After considering the Appellant's responses and further analyzing the evidence in the case, the Retailer Operations Division issued a determination letter, dated November 28, 2018. The determination letter informed the Appellant that the firm was permanently disqualified from SNAP participation upon receipt of the letter, in accordance with 7 CFR § 278.6(c) and § 278.6(e)(1). The determination letter also stated that the Appellant firm was not eligible for a trafficking CMP under Section 278.6(i) of SNAP regulations because it failed to submit sufficient evidence to demonstrate that the firm had established and implemented an effective compliance policy and program to prevent SNAP violations.

In a letter postmarked December 19, 2018, Appellant, through counsel, appealed the Retailer Operations Division's determination by requesting an administrative review. The appeal was granted.

STANDARD OF REVIEW

In an appeal of adverse action, such as disqualification from SNAP participation, the Appellant bears the burden of proving by a preponderance of the evidence that the administrative action should be reversed. This means that an 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 & REGULATIONS

The controlling law in this matter is found 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 § 278.6(e)(1)(i) establish the authority upon which a permanent disqualification may be imposed against a retail food store or wholesale food concern for trafficking SNAP benefits.

7 U.S.C. § 2021(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 [SNAP benefits] or trafficking in [SNAP benefits] 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, in part:

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...

Trafficking means:

(1) 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 § 278.2(a) states, in part:

[SNAP benefits] may be accepted by an authorized retail food store only from eligible households...only in exchange for eligible food. [SNAP benefits] may not be accepted in exchange for cash...[and] may not be accepted in payment of interest on loans or for any other nonfood use.

7 CFR § 278.6(a) states, in part:

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.... Disqualification shall be for a period of 6 months to 5 years for the firm's first sanction; for [a] period of 12 months to 10 years for a firm's second sanction; and **disqualification shall be permanent for a disqualification based on paragraph (e)(1) of this section.**[Emphasis added.]

7 CFR § 278.6(b)(2)(ii) states, in part:

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(b)(2)(iii) states:

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.

7 CFR § 278.6(c) states, in part:

The letter of charges, the response, and any other information available to FNS shall be reviewed and considered by the appropriate FNS regional office, which shall then issue the determination. In the case of a firm subject to permanent disqualification under paragraph (e)(1) of this section, the determination shall inform such a firm that action to permanently disqualify the firm shall be effective immediately upon the date of receipt of the notice of determination from FNS, regardless of whether a request for review is filed in accordance with part 279 of this chapter.

7 CFR § 278.6(e) states, in part:

The FNS regional office shall:

(1) Disqualify a firm permanently if:

(i) Personnel of the firm have trafficked as defined in § 271.2.

7 CFR § 278.6(f)(1) states, in part:

FNS may impose a civil money penalty as a sanction in lieu of disqualification when the firm is selling a substantial variety of staple food items, and the firm's disqualification would cause hardship to SNAP households. **A civil money penalty for hardship to SNAP households may not be imposed in lieu of a permanent disqualification.** [Emphasis added.]

7 CFR § 278.6(i) states, in part:

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 INVESTIGATION

During undercover investigations conducted between July 12, 2011, and August 3, 2016, 11 compliance visits were made to Corner Groceries. The violations committed during these visits, and described by the Retailer Operations Division in the November 8, 2018, charge letter are as follows:

- On July 12, 2011, a store clerk accepted SNAP benefits in exchange for eligible food, as well as ineligible items, including hair gel, bathroom tissue, and sandwich bags.
- On July 13, 2011, a store clerk accepted SNAP benefits in exchange for eligible food, as well as ineligible items, including trash bags, cleaning wipes, and bar soap.
- On July 14, 2011, a store clerk accepted SNAP benefits in exchange for eligible food, as well as ineligible items, including laundry detergent, fabric softener sheets, and bleach. Additionally, the clerk accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On July 19, 2011, a store clerk accepted SNAP benefits in exchange for eligible food. Additionally, the clerk accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On September 11, 2012, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted SNAP benefits in exchange for eligible food. Additionally, he accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On February 10, 2015, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On March 13, 2015, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On May 15, 2015, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On July 9, 2015, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On October 19, 2015, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.
- On August 3, 2016, 5 U.S.C. § 552 (b)(6) & (b)(7)(C) accepted 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in SNAP benefits in exchange for 5 U.S.C. § 552 (b)(6) & (b)(7)(C) cash.

Violations were reported during all 11 compliance visits. Trafficking occurred during nine of the compliance visits, while ineligible items were sold during three of the visits. 5 U.S.C. § 552 (b)(6) & (b)(7)(C), listed as the store owner in the firm's SNAP application, conducted one of the violative transactions, which included trafficking. 5 U.S.C. § 552 (b)(6) & (b)(7)(C) conducted 6 of the violative transactions, all of which included trafficking. An unidentified store clerk conducted the 4 remaining violative transactions, with one including trafficking.

APPELLANT'S CONTENTIONS

The Appellant, together with counsel, made the following summarized contentions in the request for administrative review, postmarked December 6, 2018, and in subsequent correspondence, postmarked January 9, 2019, in relevant part:

- In previous correspondence, Appellant failed to mention that Corner Groceries had a sophisticated monitoring and surveillance system, as well as policies and procedures which comply with those specified in § 278.6(i)(1);
- At the time of the incidents, and at all times since commencement of operations, the firm had four color surveillance cameras throughout the store designed to not only deter crime, but to also record all sales transactions;
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) policy was to examine the video footage on a monthly basis, or as aberrations in sales appear, to insure other workers operating the cash register were doing so in a manner consistent with store policy and SNAP regulations;
- All cashiers were advised at impromptu, but regular meetings of the company policy not to exchange food for cash or of accepting SNAP Benefits in exchange for merchandise and any irregularities were brought to the attention of the implicated worker;
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had insured that all employees view the prevailing version of the Compliance Policy Video;
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) recorded all transactions via video allowing for comparison with records of abnormal purchases;
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had all employees undergo training on the EBT system before allowing solo shift work;
- 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had a single violative transaction, as compared to 10 other ones by others, which were unknown to him. The store is so small it needed only one cashier at a time; and
- Appellant requests a CMP because of the forgoing reasons and genuine efforts, as it is more in keeping with the interest of justice.

Appellant also submitted 4 undated photographs, apparently taken with the firm's surveillance camera system.

The preceding may represent only a brief summary of the Appellant's contentions presented in this matter. However, in reaching a decision, full attention was given to all contentions presented, including any not specifically summarized or explicitly referenced herein.

ANALYSIS AND FINDINGS

It is important to clarify for the record that the purpose of this review is to either validate or to invalidate the earlier decision of the Retailer Operations Division and is limited to what circumstances were at the basis of the Retailer Operations Division action at the time such action was made.

Both the FNS SNAP retailer application and retailer reauthorization application contain a certification page whereby applicants must confirm their understanding of, and agreement with,

SNAP retailer requirements in order to complete the application process. These requirements include the prohibition against trading cash for SNAP benefits (i.e., trafficking) as well as the requirement for owners to train themselves and their employees on SNAP rules and regulations upon authorization as a SNAP retailer. Store owner, 5 U.S.C. § 552 (b)(6) & (b)(7)(C), certified his understanding and agreement to abide by program rules and regulatory provisions when he applied for authorization as a SNAP retailer.

On administrative review, the Appellant has not offered any evidence to contradict the investigative report, nor has the Appellant denied that violative transactions, including the trafficking of SNAP benefits, took place as described in the charge letter. In fact, there is evidence, and Appellant has admitted, that the firm's owner was personally involved in trafficking during one of the violative transactions. Because the violations themselves do not appear to be in dispute, it is the determination of this review that program violations, including trafficking, did occur as charged by the Retailer Operations Division and warrant permanent disqualification from SNAP participation. The balance of this review will address the Appellant's request for a trafficking CMP in lieu of permanent disqualification.

TRAFFICKING CIVIL MONEY PENALTY

The Retailer Operations Division determined that the Appellant was not eligible for a trafficking CMP in lieu of a permanent disqualification under 7 CFR § 278.6(i) because Appellant failed submit sufficient evidence to demonstrate that the firm had established and implemented an effective compliance policy and program to prevent SNAP violations within the specified timeframe.

The primary issue regarding the imposition of a civil money penalty in lieu of permanent disqualification for trafficking is whether or not the Appellant meets each of the four established eligibility criterion under § 278.6(i):

- Criterion 1: The firm shall have developed an effective compliance policy as specified in § 278.6(i)(1). § 278.6(i)(1) provides that in determining if an effective compliance policy was in place, FNS will consider written and dated statements of firm policy which reflect a commitment to ensure that the firm operated in consistence with program regulations and policy on the proper acceptance and handling of SNAP benefits; the statements must be provided to violating employee(s) prior to commission of the violation.
- 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 sent to the firm;
- Criterion 3: The firm had developed and instituted an effective personnel training program as specified in § 278.6(i)(2). § 278.6(i)(2) requires that the firm document its training activity by submitting to FNS its dated training curricula and records of dates training sessions were conducted; a record of dates of employment of firm personnel; and contemporaneous documentation of the participation of the violating employee(s) in initial and any follow-up training held prior to the violation(s); and

- Criterion 4: Firm ownership was not aware of, did not approve, did not benefit from, or was not in any way involved in the conduct or approval of trafficking violations

Below is an analysis of the Appellant's contentions and evidence with regard to these four criterion:

Criterion 1 – Effective Compliance Policy

In response to the charge letter, the Appellant stated to the Retailer Operations Division that the store was owned and manned two partners, and that the son of one of the partners also worked at the store. Because of the limited number of employees, the Appellant contended that the firm had no separate compliance policy other than the policy it received when authorized, which included the Training Guide for Retailers from FNS. The Appellant said that while both partners were familiar with this, it would not be practical to have a separate internal written policy.

On administrative review, however, Appellant now completely reverses course and claims to have had a sophisticated monitoring and surveillance system, as well as policies and procedures which comply with those specified in § 278.6(i)(1). Appellant submitted undated photographs from the firm's surveillance system, but provided no signed statements from the owners or employees indicating that they would follow SNAP rules. Appellant's new contentions are completely inconsistent with their prior statements to the Retailer Operations Division, and regardless, are not supported by any relevant evidence. Additionally, any compliance policy in place, whether written or unwritten, could not have been very effective if every person working in the store, which include two partners/owners, committed trafficking violations repeatedly over the course of five years. For these reasons, Appellant has failed to meet Criterion 1.

Criterion 2 – Compliance Policy and Program in Operation

Appellant, responding to the Retailer Operations Division charge letter, stated that the same compliance policy was in place at the beginning of the firm's existence and through the time period covered by the investigations in the charge letter, and that both partners viewed the retailer training video by FNS. Appellant alleges that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) did not receive a warning letter, dated July 26, 2013, from FNS prior to receiving the November 2018 charge letter and that this was insufficient notice for the owner to amend the ways of the firm.

As previously noted, store ownership certified his understanding and agreement to abide by program rules and regulatory provisions, including the prohibition against trafficking, when he signed and submitted the FNS SNAP retailer application. The Appellant also claims that both partners viewed the retailer training video by FNS. This is considered sufficient notice to any retailer that trafficking is prohibited. The only documentary evidence Appellant submitted to the Retailer Operations Division to show its compliance policy included a copy of the Training Guide for Retailers, revised in January 2018. Obviously this training guide is not contemporaneous with the dates of the trafficking violations, which occurred between July 2011 and August 2016. For these reasons, Appellant has failed to meet Criterion 2.

Criterion 3 – Effective Personnel Training Program

In response to the charge letter, Appellant argued that the firm had the same policy and program in place from the time of initial authorization through when the trafficking violations took place and given that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had only one charge against him, he did not know of a need to implement a different policy. On administrative review, Appellant added that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) policy was to examine surveillance video footage of transactions on a monthly basis, or as aberrations in sales appear, to insure other workers were operating consistent with store policy and SNAP regulations. Appellant says that cashiers were advised at impromptu, but regular meetings, of the company policy not to traffic SNAP benefits or to sell ineligible items for SNAP benefits, and that any irregularities were brought to the attention of the implicated worker.

With regard to these contentions, it bears repeating that the trafficking violations took place on nine occasions and the sale of ineligibles took place on four occasions over the course of five years, by every person working in the store, including 5 U.S.C. § 552 (b)(6) & (b)(7)(C) and 5 U.S.C. § 552 (b)(6) & (b)(7)(C). It seems extremely unlikely that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) advised cashiers to not traffic benefits or that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) monitored any transactions for trafficking when he, trafficked himself, and his partner did so repeatedly. Regardless, the Appellant submitted none of the documentation required in § 278.6(i)(2). For these reasons, Appellant has failed to meet Criterion 3.

Criterion 4 – Awareness of Trafficking Violations

In response to the charge letter, Appellant stated that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) was only involved in one violation, which was the result of an aggressive and menacing cooperating witness. On administrative review, Appellant provided that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) had a single violative transaction, as compared to 10 committed by others, which were unknown to him, and that the store only needed one cashier at a time.

As provided earlier, Appellant says 5 U.S.C. § 552 (b)(6) & (b)(7)(C) was not the sole owner of Corner Groceries, and the OIG/FBI investigation found 5 U.S.C. § 552 (b)(6) & (b)(7)(C) to be a co-owner of the store. 5 U.S.C. § 552 (b)(6) & (b)(7)(C) committed six trafficking violations. Although Appellant claims that 5 U.S.C. § 552 (b)(6) & (b)(7)(C) violative transaction was the result of an aggressive and mincing cooperating witness, there is no evidence in the OIG's report of investigation that this is true and the Appellant provided no evidence to support this allegation.

Here, the Appellant has not shown that the firm ownership was not aware of, did not approve, did not benefit from, or was not in any way involved in the conduct or approval of trafficking violations. In fact, both 5 U.S.C. § 552 (b)(6) & (b)(7)(C) and 5 U.S.C. § 552 (b)(6) & (b)(7)(C) personally conducted trafficking transactions. Therefore, the Appellant does not meet the requirements of Criterion 4.

Based upon the analysis above, this review finds the Appellant has failed to meet any of the four criterion necessary to demonstrate that the firm had established and implemented an effective

compliance policy and program to prevent SNAP violations. Therefore, 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

Based on a review of the evidence in this case, there is no question that violations charged against Corner Groceries during FNS and OIG/FBI investigations did occur. All transactions cited in the charge letter were thoroughly documented. A review of this documentation has yielded no indication of error or discrepancy in any of the reported findings. Rather, the investigative record is specific and appears to be accurate with regard to the dates of the violations, including the exchange of SNAP benefits for cash, and in all other critically pertinent details. Therefore, the decision to impose a permanent disqualification against the Appellant, Corner Groceries, is sustained.

RIGHTS AND REMEDIES

Applicable rights to a judicial review of this decision are set forth in Section 14 of the Food and Nutrition Act of 2008 (7 U.S.C. § 2023) and in Section 279.7 of the SNAP regulations. 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 owner resides or is engaged in business, or in any court of record of the State having competent jurisdiction. If a complaint is filed, it must be filed within 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.

MICHELLE WATERS
Administrative Review Officer

April 12, 2019