

**U.S. Department of Agriculture
Food and Nutrition Service
Administrative Review
Alexandria, VA 22302**

Hartford Convenience,

Appellant,

v.

Retailer Operations Division,

Respondent.

Case Number: C0202324

FINAL AGENCY DECISION

It is the decision of the USDA that the record indicates that Hartford Convenience, (hereinafter Appellant) committed violations of the Supplemental Nutrition Assistance Program (SNAP). There is sufficient evidence to support a finding that the permanent disqualification from participation as an authorized retailer in the program, 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(c) and (e)(1) in its administration of the SNAP, when it assessed a permanent disqualification against Appellant by letter dated October 18, 2017.

AUTHORITY

7 U.S.C. § 2023 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 September 7, 2017, Retailer Operations Division charged the 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 2017 through July 2017. 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 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).

In correspondence dated September 13, 2017, Appellant replied to the charge letter and generally stated that the allegations are not correct and it has not violated any SNAP regulations. 5 U.S.C. § 552 (b)(6) & (b)(7)(C). One of the helpers indicated that a product 5 U.S.C. § 552 (b)(6) & (b)(7)(C) would be round up to a solid dollar 5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(6) & (b)(7)(C). Appellant indicated that the Attachment 2 transactions are due to having two registers, although most times only one is used, and between the 1st and 8th of the month two calculators are on the counter next to the main register available for use.

Appellant also indicated that there are two people in the shop in order to get the customers out as fast and efficient as possible. All it takes is 5 U.S.C. § 552 (b)(6) & (b)(7)(C) to swipe if a total has already been established or if someone only has one item. Also, if ownership is totaling someone and sees that a customer has a simple transaction, that customer will be serviced first, using one of the calculators, while the first customer's transaction is still on the main register. Customers also place orders prior to the first of every month and usually the total for those items is ready for them when the items are picked up.

Appellant explained that the Attachment 3 and Attachment 4 transactions are likely due to customers that shop frequently at the store and that the store carries products that are only available to retailers and restaurants and not the public. Most of the customers purchase the same items every month. Many of the customers purchase large amounts between the 1st and 3rd of the month and many return to purchase cold cut sandwiches or just cold cuts to have sandwiches for dinner. Customers also forget items and return to make the additional purchases.

During a telephone conversation with Retailer Operations Division on September 28, 2017, Appellant requested an extension of time in which to reply to the charge letter. In correspondence dated September 28, 2017, Retailer Operations Division granted Appellant an extension to October 4, 2017, and advised Appellant that the time to request a civil money penalty in lieu of permanent disqualification and to provide the documentation to support such a request has not been extended. In correspondence dated October 2, 2017, Appellant provided eight color photographs

of a customer shopping with allegedly his own shopping cart, 53 color photographs of the surrounding area near the store and stores stock, registers and calculators. Appellant also provided five pages consisting of a list of products and prices, three pages of a travel itinerary and boarding passes and 266 pages of purchase invoices/receipts in support of its position.

Retailer Operations Division issued a Determination letter dated October 18, 2017. The letter informed Appellant that it was permanently disqualified from the SNAP in accordance with Sections 278.6(c) and 278.6(e)(1) of the SNAP regulations. The letter also stated that Retailer Operations Division considered Appellant's eligibility for a trafficking civil money penalty (CMP) according to the terms of Section 278.6(i) of the SNAP regulations. However, Retailer Operations Division determined that Appellant was not eligible for the CMP because it failed to submit sufficient evidence to demonstrate that Appellant had established and implemented an effective compliance policy and program to prevent violations of the SNAP.

In a letter dated October 30, 2017, Appellant appealed the Retailer Operations Division's assessment and requested an administrative review of this action. 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 actions should be reversed. That means 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

The controlling statute in this matter is contained in the Food & Nutrition Act of 2008, as amended, 7 U.S.C. § 2021 and 278 of Title 7 of the Code of Federal Regulations (CFR). Part 278.6(a) (c) and (e)(1)(i) establish the authority upon which a permanent disqualification may be imposed against a retail food store in the event that personnel of the firm have engaged in trafficking SNAP benefits.

7 CFR § 278.6(a) states, inter alia, that "FNS may disqualify any authorized retail food store...from further participation in the program 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..."

7 CFR § 278.6(c) reads, in part, “Review of Evidence. 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)...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...”

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.” Trafficking is defined, in part, in 7 CFR § 271.2, as “the buying or selling of SNAP benefits for cash or consideration other than eligible food.”

7 CFR § 271.2 states in part that, “Eligible foods mean: Any food or food product intended for human consumption except alcoholic beverages, tobacco and hot food and hot food products prepared for immediate consumption.”

SUMMARY OF THE CHARGES

The charges on review were based on an analysis of SNAP electronic benefit transfer (EBT) transactions dated during the five month period of March 2017 through July 2017. This involved four patterns of EBT transaction characteristics indicative of trafficking:

1. Unusual number of transactions ending in the same cents value.
2. Multiple transactions were made too rapidly to be credible.
3. Multiple transactions were made from individual benefit accounts in usually short time frames.
4. Excessively large purchase transactions were 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

The Appellant made the following summarized contentions in its request for administrative review, in relevant part:

- The owner and manager of Hartford Convenience have never been involved in or guilty of any violation of the SNAP regulations, trafficking, or fraud of any kind.

- The owner is a fastidious record keeper who has retained all of the receipts of every food sale made in the store throughout the period of your investigation. We can produce witnesses who will truthfully testify as to the legal manner in which Hartford Convenience conducts its business.
- Disqualification or a lengthy suspension from the SNAP will result in the end of Hartford Convenience and will have a devastating effect on the residents living in the Hartford Projects. It is the position of Hartford Convenience that their small size and past, spotless business practices, support the notion that disqualification of their SNAP participation is a grossly unfair penalty.
- There appears to be no efforts on the part of your agency to undertake any actual investigation of these matters beyond reliance on a statistical analysis of a five-month window of activity. The allegations are not supported by any credible evidence.

The Appellant provided a signed and notarized General Power of Attorney authorizing counsel's representation. No other documentation was provided, by Appellant, in its request for review. The preceding may represent a brief summary of Appellant's contentions in this matter however, in reaching a decision, full attention has been given to all contentions presented, including any not specifically recapitulated or referenced herein.

ANALYSIS AND FINDINGS

The FNS authorized the business as a small grocery store on November 10, 2010. The file indicates that in reaching a disqualification determination, Retailer Operations Division considered information obtained during an August 19, 2017, store visit to the business 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 EBT transactions at Appellant that formed patterns indicative of trafficking.

It is noted that Appellant indicated that the store would be closed for two weeks, starting August 20, 2017, and therefore there was a limited amount of fresh foods available in the store during the visit. The firm review summary documented the following store size, description, and characteristics:

- Store was estimated to be approximately 1000 square feet in size.
- One cash register for grocery purchases and one POS device with a small counter area partially obstructed by lottery sales, POS devices and the structure of the counter. No optical scanners were available at checkout. No specialty registers present.
- No shopping baskets or carts available for customers.
- Store does not operate through a night window or plastic barrier with food stock behind the barrier.

- No evidence of wholesale business such as posted prices or separate entrances for wholesale customers.
- No unusual pricing structure such as ending most products with 00 cents and does not round transaction totals.
- Food stored in an area outside of public view that is approximately 100 square feet in size. Store does not have storage freezers or coolers off site.
- Store is not primarily selling one food type such as meat, poultry, dairy, seafood, fruits, baked goods or vegetables.
- Store does not take telephone or online orders and does not offer delivery
- Highest priced eligible food items were Oil (\$19.99), Tang (\$10.99), Rice (\$12.49), Similac Formula \$20.99).
- Store stocks a significant amount of non-food items such as but not limited to paper goods, clean products, health and beauty aids, lottery tickets, tobacco products, and charcoal.
- Store stocks limited amounts of dairy products, bread and cereal products, fruit and vegetable products and meat, poultry and fish products. Limited amounts of fresh fruits or produce, no fresh meat or poultry was noticed. Most meats are canned, packaged or frozen.
- A small deli kitchen/prepared food area with limited hot foods sold. A menu posted that offers cold subs, hot sandwiches, chicken patty sandwiches, hot dogs and Jamaican Patties with prices posted. Microwave not for customer use.
- No meat or seafood specials or bundles or fruit/vegetable boxes sold.

The issue for consideration is whether Retailer Operations Division has presented a convincing case that Appellant likely trafficked in SNAP benefits. 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.

Attachment 1 of the Charge Letter – There were an unusual number of transactions ending in a same cents value.

This attachment lists 214 transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). When such repetitive patterns are unsupported by special pricing structures they are a strong indicator of trafficking in SNAP benefits.

There were 214 transactions analyzed in this Attachment. The store visit documentation indicates that Appellant does not have a special pricing structure that would account for the percentage of transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). It is also important to note that this set of transaction patterns only occurred during the months of March and April of the review period and did not occur in May, June or July. Though Appellant's explanation and pricing list may explain a few of these

transactions, it does not adequately explain all of the transactions in this Attachment or the abnormal occurrence of the transactions. Based on the contractor's store visit the store's inventory contains almost exclusively inexpensive single-serving, prepared food items and accessory foods. 5 U.S.C. § 552 (b)(6) & (b)(7)(C).

When there are a disproportionate amount of transactions ending in same cent value it appears the transactions are contrived and absent any compelling rationale to the contrary it is a strong indicator of trafficking. 5 U.S.C. § 552 (b)(6) & (b)(7)(C). In its reply to the charge letter, Appellant provided a pricing list and all of the items on that list, with the exception of a few, ended in a 5 U.S.C. § 552 (b)(6) & (b)(7)(C) price value. Moreover, a store that is rounding prices up or down or an even value would not have any transactions ending in odd values.

Based on the analysis above, it appears that the transactions cited in the charge letter are contrived and therefore, in the absence of plausible evidence to the contrary, are likely the result of trafficking in SNAP benefits.

Attachment 2 – Multiple transactions were made too rapidly to be credible.

This attachment lists 39 sets of transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(6) & (b)(7)(C). These types of rapid transactions at a firm mainly using one register and limited counter space are suggestive of trafficking in EBT benefits. Although the store visit shows two registers and Appellant's claims that the transactions are as a result of the two registers, it also stated that most times only one register is used but from the 1st to the 8th of the month two calculators are on the counter next to the main register available for use. Appellant also stated that there are two people in the shop to help service the customers faster and more efficiently. Additionally, although the store visit report indicates that Appellant does not take orders over the phone or provide delivery service, Appellant states that some customers may place pre-orders or customers call and place orders over the phone.

In light of Appellant's explanation for the transaction pattern in this Attachment and the store's operational set up as outlined in the contracted store visit and photographs provided, it is determined that the transactions cited in charge letter Attachment 2 do not establish trafficking by a preponderance of the evidence.

Attachment 3 of the Charge Letter - Multiple transactions were made from individual accounts in unusually short timeframes.

This attachment lists 38 sets of 78 transactions t5 U.S.C. § 552 (b)(6) & (b)(7)(C). Multiple transactions conducted by the same household account within 5 U.S.C. § 552 (b)(6) & (b)(7)(C) period is a method which violating stores use to avoid the detection of single high dollar transactions that cannot be supported by the retailer's inventory and structure. Appellant contends that it sells items from vendors that are sold to the public. Appellant was not specific in this statement but it is noted that it is not unusual for retailers to sell items that large wholesale vendors (i.e. Frito Lay, UTZ, Coca Cola) will not sell directly to the public. It is also noted that SNAP households can also obtain vendor specific items from other retailers that purchase wholesale.

Appellant contends that customers conduct large shopping trips at its store during the 1st and 3rd of every month. Retailer Operations conducted an analysis of the shopping habits of the three of the households identified in the charge letter. This analysis concluded that these households also shopped at other area grocery stores including full-line supermarkets and superstores that offer a much larger quantity and variety of eligible food items for likely better prices either 5 U.S.C. § 552 (b)(6) & (b)(7)(C) of visiting Appellant's firm. This again indicates that lack of access to other stores is not at issue. However, despite this access to large supermarkets and superstores, these households consistently conducted much higher transactions at the Appellant firm than at better stocked supermarkets/superstores in and around the Providence County area of Rhode Island. This is another strong trafficking indicator.

In conclusion, it is therefore more likely true than not true that the irregular transactions cited in the charge letter Attachment 3 are due to trafficking in SNAP benefits.

Attachment 4 of the Charge Letter - Excessively large purchase transactions were made from recipient accounts.

This attachment lists 315 SNAP transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). Based on the results of the contracted store visit, the large transaction amounts are not consistent with the store's inventory of low priced foods. The firm does not offer food in bulk or any ethnic or specialty foods that sell for a high price. Therefore, the substantial number of high dollar purchases calls into question the legitimacy of these transactions.

Appellant, through counsel, contends that a household placed a large pre-order because the store would be closing for 2 weeks for vacation. It is not disputed that Appellant closed from July 9, 2017 thru July 17, 2017, however; a review of the SNAP transactions of the household in question shows that this household also shopped at area supermarkets and superstores one day after the questionable

transaction and returned to Appellant's store a couple of days later. It is also noted that the time frame in which Appellant's store was closed had no effect on the monthly spending habits of this household. Appellant did not provide any documentation including, but not limited to, sales receipts, EBT receipts with corresponding cash register receipts or cash register tapes to verify its claims of customer purchases.

It is important to note that households with small children who are eligible for FSP benefits are also eligible for WIC benefits. The WIC Program provides participants with vouchers to obtain free baby formula, as well as other products for lactating women, infants and children, from participating vendors. Appellant participates in the WIC Program and took in WIC vouchers at an average monthly value of **5 U.S.C. § 552 (b)(6) & (b)(7)(C)** during the review period, substantiating that WIC vouchers are, in fact, being redeemed in the store.

Invoice/Receipt Analysis

Appellant, through counsel, contends that the owner is a fastidious record keeper and has retained all of the receipts of every food sale made in the store throughout the period of the investigation. With regard to this contention, Appellant did not provide any EBT sales receipts with corresponding cash register receipts however; an analysis was conducted on the 266 pages of purchase invoices/receipts provided. Appellant indicated that SNAP accounts for 55 percent of its food sales, WIC accounts for 21 percent of its food sales and cash sales accounts for 24 percent of its total food sales. Retailer Operations Division conducted an analysis of the vendor purchase invoices/receipts provided and found that Appellant's eligible staple food purchases, based on its purported mark-up value, was significantly less than its SNAP redemptions for the review period. Even if Appellant's eligible food purchases justified its SNAP redemptions for the review period, it does not adequately explain the unusual and irregular transaction patterns as cited in the charge letter.

Retailer Operations Division compared the Appellant's SNAP transactions with the average small grocery store in Providence County Rhode Island. The average transaction amount for a small grocery store in Providence County is \$11.87. **5 U.S.C. § 552 (b)(6) & (b)(7)(C)**. **5 U.S.C. § 552 (b)(6) & (b)(7)(C)**.

Based on the evidence of the case, and in the absence of sufficient evidence as to the legitimacy of such transactions, a conclusion can be drawn, through a preponderance of evidence that the "unusual, irregular, and inexplicable" transactions and patterns cited in Attachment 1, Attachment 3 and Attachment 4 of the charge letter evidence trafficking as the most likely explanation. In this case, ownership did not provide sufficient evidence to legitimize Appellant's transaction data as outlined in those three Attachments. Retailer Operations Division determined that Appellant's

contentions did not outweigh the evidence that the store was trafficking and concluded, through a preponderance of evidence, that trafficking is the most probable explanation for the questionable transactions listed in the charge letter attachments.

Appellant, through counsel, contends that the owner/manager of Hartford Convenience has never been involved in or guilty of any violation of SNAP regulations, trafficking, or fraud of any kind. With regard to this contention, a record of program participation with no previously documented violations does not constitute valid grounds for mitigating the impact of the present serious charge of trafficking. Further, the Act itself provides that a store's disqualification "shall be permanent upon ... the first occasion of a disqualification based on ... trafficking ... by a retail food store."

Appellant, through counsel, contends that disqualification or a lengthy suspension from the SNAP will result in the end of Hartford Convenience and will have a devastating effect on the residents living in the Hartford Projects. With regard to this contention, it is recognized that some degree of economic hardship is a likely consequence whenever a store is disqualified from participation in SNAP. However, there is no provision in the SNAP regulations for waiver or reduction of an administrative penalty assessment on the basis of possible economic hardship to the firm resulting from imposition of such penalty. To allow ownership to be excused from an assessed administrative penalty based on purported economic hardship to the firm would render virtually meaningless the enforcement provisions of the Food and Nutrition Act of 2008, as amended, and the enforcement efforts of the USDA. Furthermore, giving special consideration to economic hardship of the firm would forsake fairness and equity, not only to competing stores and other participating retailers who are complying fully with program regulations, but also to those retailers who have been disqualified from the program in the past for similar violations. Therefore, ownership's contention that the firm may incur economic hardship based on the assessment of an administrative penalty does not provide any valid basis for dismissing the charges or for mitigating the penalty imposed.

Appellant, through counsel, contends that there appears to be no efforts on the part of the agency to undertake any actual investigation of these matters beyond reliance on a statistical analysis of a five month window of activity. The allegations are not supported by any credible evidence.

With regard to this contention, it is important to note that the extensive analysis of Appellant's EBT transaction record, upon which charges of violations are based, provides substantial evidence that questioned transactions during the focus period have characteristics that are not consistent with legitimate sales of eligible food to EBT customers at a store of this type and size. Rather, the characteristics are indicative of illegal trafficking in program benefits. A review of the record has yielded no indication of error or discrepancy in the reported findings by Retailer

Operations that program benefits were accepted in exchange for cash or consideration other than eligible food.

Therefore, based on a review of the evidence in this case, it appears the Retailer Operations has provided substantial evidence of trafficking violations, in three of the four patterns of EBT transaction characteristics indicated in the letter of charges, and that it is more likely true than not that program violations did, in fact, occur as charged.

CFR § 278.6(a), which establishes the authority upon which FNS may disqualify any authorized retail food store, reads, in part: “Such disqualification shall result from a finding of a violation on the basis of evidence that may include facts established through ... inconsistent redemption data (and) evidence obtained through a transaction report under an electronic benefit transfer system.” Therefore, that the Retailer Operations used computer printouts of transaction data and other reports, in addition to store visit observations and an analysis of household shopping behavior, in rendering a finding that violations indicative of trafficking are occurring, is as valid a means of establishing facts as direct evidence obtained through an on-site investigation and the eye witnessing of trafficking.

The transaction data and overall firm record convincingly demonstrate repetitive patterns of unusual, irregular, and inexplicable SNAP activity for this type of firm indicative of trafficking. Once Retailer Operations Division established a convincing case against Appellant, ownership 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. If this is not demonstrated, the case is to be sustained.

Retailer Operations Division has presented a convincing case that Appellant has likely trafficked in SNAP benefits. This is evidenced by: the suspicious patterns in three attachments of EBT transaction data, the inadequacy of the firm’s eligible food stock as observed and recorded during the onsite visit to support such large transactions, the lack of evidence of invoices of foods in inventory to cover SNAP redemption totals for the review months, the lack of explanation for customer spending habits given that there are other SNAP authorized stores located within proximity to Appellant, and the irregular SNAP transaction data of Appellant as compared to other small grocery stores in the County and State.

The purpose of the administrative review process is to ensure that firms aggrieved by Retailer Operations Division’s adverse actions have the opportunity to have their position fairly considered by an impartial review authority prior to that adverse action becoming final.

Appellant has been duly given, and has taken the opportunity to present to USDA through the administrative review process whatever evidence and information it deems pertinent in support of its position that Retailer Operations Division's adverse action should be reversed. Therefore, any evidence and information that Appellant presented to Retailer Operations Division, as well as any such information submitted subsequently, have now been considered in this administrative review in rendering the final agency administrative decision in this case. The record does not indicate any departure from established policy or procedures with regard to Appellant's right to a fair and thorough review.

CIVIL MONEY PENALTY

Appellant was notified in the charge letter dated September 7, 2017, that it had 10 calendar days upon receipt of the charge letter to provide required documentation in order to be considered for the trafficking CMP. Appellant failed to provide Retailer Operations Division with the required documentation to be considered for a trafficking CMP in lieu of disqualification. Therefore, Retailer Operations Division correctly determined that Appellant was not eligible for a trafficking CMP as set forth in the SNAP regulations.

CONCLUSION

Ownership has not provided sufficient evidence to rebut the case that Appellant most likely trafficked in SNAP benefits. As such, the SNAP regulations are specific with regard to the action that must be taken if personnel of the firm have trafficked, which is that FNS shall disqualify the firm permanently.

Retailer Operations Division's analysis of Appellant's EBT transaction record was the primary basis for its determination to permanently disqualify Hartford Convenience from participation in the SNAP. This data provided substantial evidence that the questionable transactions during the review period had characteristics that are consistent with trafficking 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, in fact, occur as charged by Retailer Operations Division in Attachment 1, Attachment 3 and Attachment 4 only. Based on the discussion herein, the determination to impose a permanent disqualification against Hartford Convenience is sustained in three Attachments.

RIGHTS AND REMEDIES

Your attention is called to Section 14 of the Food and Nutrition Act of 2008, as amended, (7 U.S.C. § 2023) and to Title 7, Code of Federal Regulations, Part 279.7 (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 (FOIA), 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.

Monique Brooks
Administrative Review Officer

January 31, 2018