

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

Peralta’s Deli & Grill, Inc,

Appellant,

v.

Case Number: C0200942

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 of Peralta’s Deli & Grill Inc. (hereinafter “Appellant”) from participation as an authorized retailer in the Supplemental Nutrition Assistance Program (SNAP) was properly imposed by the Retailer Operations Division.

ISSUE

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

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.”

SUMMARY OF CHARGES

The Appellant was charged with trafficking and subsequently permanently disqualified based on an analysis of EBT transaction data from February 2017 through July 2017. This involved the following transaction patterns which are common trafficking indicators:

- There were multiple transactions made from individual household benefit accounts within unusually short timeframes.
- Excessively large purchase transactions were made from recipient accounts.

CASE CHRONOLOGY

The agency's record shows that FNS initially authorized Peralta's Deli & Grill Inc. for SNAP participation as a convenience store on February 28, 2014. In a letter dated August 21, 2017, the 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 between the months of February 2017 and 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 stated that the Appellant could request a civil money penalty (CMP) in lieu of permanent disqualification for trafficking, but noted that such a request must be made within 10 days of receipt of the charge letter under the conditions specified in 7 CFR § 278.6(i).

In a telephone call on August 30, 2017, the Appellant responded to the charge letter, stating that the firm had not trafficked, but rather it had allowed some of its customers to shop at the store on credit and then pay their credit balance with SNAP benefits once the household's EBT allotment was replenished.

In response to the Appellant's claim that it allowed credit accounts at the store, the Retailer Operations Division sent the firm a letter dated August 30, 2017. In this letter, the Appellant was asked to provide documentation to support its claim of credit accounts. The letter stated that the documentation must identify specific accounts along with corresponding dates and amounts.

It should be noted that the practice of allowing SNAP households to purchase food items on credit is prohibited by regulation. If a firm is found to have committed credit account violations instead of trafficking, the firm would be subject to a one-year disqualification from SNAP in accordance with regulations at 7 CFR § 278.2(f).

In response to the August 30, 2017, letter, the Appellant submitted an additional letter of explanation along with seven typewritten statements from apparent SNAP customers. The statements indicate that the customers make all of their grocery purchases at Peralta's and that sometimes they "paid a few receipts together" (ie, credit) or shopped at the store a few times per day. Each statement lists the client's name, address, EBT card number, and phone number.

After considering the Appellant's response and documentation and further reviewing the evidence in the case, the Retailer Operations Division concluded that trafficking had occurred as charged and issued a determination letter dated September 18, 2017. This letter informed the Appellant that it would be permanently disqualified from SNAP upon receipt of the letter in accordance with 7 CFR § 278.6(c) and § 278.6(e)(1). The letter also stated that the Retailer Operations Division considered the Appellant's eligibility for a trafficking CMP according to the terms of Section 278.6(i) of the SNAP regulations, but that a CMP was not appropriate in this case because the Appellant failed to submit sufficient evidence to demonstrate that the firm had established and implemented an effective compliance policy and program to prevent SNAP violations.

On September 20, 2017, the Retailer Operations Division received a fax from attorney **5 U.S.C. § 552 (b)(6) & (b)(7)(C)** stating that he was now representing the Appellant in this

matter. The Retailer Operations Division informed Appellant's counsel that a determination had already been made, but that an appeal could be submitted to the Administrative Review Branch.

In a letter postmarked September 29, 2017, the Appellant appealed the Retailer Operations Division's determination by requesting an administrative review. The request was granted.

It should be noted that on October 30, 2017, Appellant's counsel sent an additional letter of contentions to the Retailer Operations Division. This letter was then forwarded to the Administrative Review Officer on November 1, 2017. That same day, the Administrative Review Officer sent Appellant's counsel an e-mail which stated that all correspondence related to the appeal should be sent to the Administrative Review Officer. The e-mail further stated that counsel was welcome to send any additional documents or files. The e-mail included both the Administrative Review Officer's e-mail address and mailing address, but no additional documentation or evidence was sent.

STANDARD OF REVIEW

In an appeal of adverse action, such as disqualification from SNAP participation, an 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 AND 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 (e)(1)(i) establish the authority upon which a permanent disqualification may be imposed against a retail food store or wholesale food concern.

7 U.S.C. § 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 § 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, **inconsistent redemption data, [or] evidence obtained through a transaction report under an electronic benefit transfer system....** [Emphasis added.]

7 CFR § 278.6(e)(1)(i) states:

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

7 CFR § 271.2 states, in part:

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

7 CFR § 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...

7 CFR § 278.6(b)(1) states, in part:

Any firm considered for disqualification...under paragraph (a) of this section...shall have full opportunity to submit to FNS information, explanation, or evidence concerning any instances of noncompliance before FNS makes a final administrative determination. The FNS regional office shall send the firm a letter of charges before making such determination. The letter shall specify the violations or actions which FNS believes constitute a basis for disqualification.... The letter shall inform the firm that it may respond either orally or in writing to the charges contained in the letter within 10 days of receiving the letter...

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(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(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...

APPELLANT'S CONTENTIONS

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

- Appellant acknowledges its burden of proving by a preponderance of the evidence that the administrative action should be reversed.
- The owners started the business in 2013 and have never had any issues with state or federal law enforcement or any issues with SNAP. The owners run an honest business.
- In the event that the charges are not dismissed outright, Appellant requests a civil money penalty in lieu of permanent disqualification and hopes to work out a mutually satisfactory installment plan to pay the CMP.
- When Appellant received the initial charge letter, it was caught by surprise because the owners have never done anything to intentionally violate SNAP regulations.
- The firm has not committed any trafficking violations. The firm also does not wish to pay a CMP for something that it did not do, nor can it afford to pay a CMP of any amount without an installment plan.
- Based on the definition of trafficking in Section 271.2 of the SNAP regulations, there is no evidence whatsoever of trafficking. Further, the charge letter fails to provide the section in the U.S. Code which would identify those transactions as constituting trafficking. The regulations are silent on transactions made within a short timeframe, and silent on transactions that are "excessively large." There is nothing in the regulations which states that the transactions identified in the charge letter constitute trafficking.
- The charge letter is overly broad and does not state the basis of the alleged violations. There is nothing in the regulations which links the types of transactions alleged to trafficking or a specific SNAP violation. The charge letter is devoid of any evidence of trafficking. The transactions listed in the charge letter attachments were legitimate transactions.
- Nonetheless, the Appellant meets all of the statutory requirements for a CMP as listed in 7 CFR § 278.6(i).

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

The primary issue for consideration in a case based on suspicious SNAP redemption data is whether or not the Retailer Operations Division adequately established that the Appellant firm engaged in the violation of trafficking. In other words, did the Retailer Operations Division, through a preponderance of the evidence, establish that it is more likely true than not true that the irregular and unusual transactions cited in the charge letter were the result of trafficking?

Contractor Store Visit

The case file indicates that in reaching a disqualification determination, the Retailer Operations Division considered not only the Appellant firm's EBT transactions, but also information obtained from a June 16, 2017, store visit which was conducted by an FNS contractor to observe the nature and scope of the firm's operation, stock, and facilities. This store visit information was used to ascertain if there were justifiable explanations for the firm's irregular SNAP transaction patterns. The store visit report and photographs documented the following store size, description, and characteristics:

- Peralta's Deli & Grill Inc. is a convenience store, approximately 750 square feet in size, operating in the Bronx, New York.
- At the time of the contractor's visit, the firm had no shopping carts but did have one hand-held shopping basket. A limited number of carts and baskets is not uncommon for stores of this size. Customers shopping in such stores generally do not purchase more food than they can carry in their arms.
- The store visit photographs show one cash register and agency records reflect the use of one EBT point-of-sale device.
- The store does not appear to use optical scanners to process transactions.
- The store's staple food stock is moderate in each of the four staple food categories and appears to be typical of a convenience store or neighborhood deli.
- The report also indicates that the store sells SNAP-eligible, non-staple accessory food items, such as carbonated and uncarbonated drinks, snacks, candy, and condiments. The store also sells ineligible, nonfood items, including medicines, paper goods, and other miscellaneous household merchandise.
- The firm also sells prepared foods, including hot, made-to-order sandwiches. Hot foods are not eligible for purchase with SNAP benefits. There was no posted menu or prices for these food items.
- The firm also sells deli meat and cheese by the pound, priced between \$5.49 and \$6.00 per pound.
- The checkout area consists of a cluttered, narrow countertop, perhaps 12 inches by 18 inches in size. The constricted checkout area is not suitable for conducting large or rapid transactions as there is very little space on the counter to place more than a few small items at a time and little room for customers to maneuver with large amounts of groceries.
- There is no indication from the store visit report that the firm has a special pricing structure, and the most expensive food items are a 12.4 ounce container of infant formula for \$18.00; one gallon of cooking oil for \$12.99; a 10-pound bag of rice for \$9.99; and a 12-ounce can of coffee for \$12.99.

The available inventory of SNAP-eligible food at the time of the store visit showed stock that would be typical of a convenience store, where households normally purchase a limited number of items. There was no indication that SNAP households would be inclined to regularly visit Peralta's Deli & Grill Inc. to purchase large quantities of groceries, especially considering the absence of shopping carts and the extremely constricted checkout area.

Given the available inventory and the store's characteristics, this review could find no reason why the Appellant firm's SNAP redemption patterns differed significantly from those of similar-sized competitors.

SNAP Transaction Analysis

Charge Letter Attachment 1: Multiple transactions were made from individual benefit accounts in unusually short time frames. This attachment lists 11 sets of transactions (26 transactions in all) 5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(7)(E).

For example, 5 U.S.C. § 552 (b)(6) & (b)(7)(C).

These sorts of transactions are very unusual for convenience stores that have no shopping carts and that sell primarily low-priced merchandise. Such transactions are strongly suggestive of trafficking.

Charge Letter Attachment 2: Excessively large purchase transactions were made from recipient accounts. This attachment lists 242 SNAP transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). These large transactions are not consistent with a convenience store in the state of New York. The Retailer Operations Division has determined that during the review period, the average SNAP transaction amount for convenience stores in New York was \$8.69. 5 U.S.C. § 552 (b)(6) & (b)(7)(C).

Given that the Appellant firm does have a moderate inventory of staple foods, it is probable that there would be an occasional purchase where the transaction amount is high, 5 U.S.C. § 552 (b)(6) & (b)(7)(C). As such, there are almost certainly some legitimate SNAP transactions sprinkled among the transactions listed in Attachment 2. However, as noted earlier, there is no evidence that the firm would be likely to have SNAP redemption patterns that differ significantly from similar-sized competitors, especially considering the lack of shopping carts and baskets and the severely constricted checkout area. The substantial number of high-dollar transactions in a six-month period calls into question the legitimacy of these transactions.

5 U.S.C. § 552 (b)(6) & (b)(7)(C). Considering how many low-priced items it would take to add up to 5 U.S.C. § 552 (b)(6) & (b)(7)(C) or more, it is very unlikely that the Appellant firm's customers would carry large amounts of merchandise around the store without the benefit of shopping carts, especially since the evidence shows that the firm's customers regularly shop at larger, better stocked stores in the area, where shopping carts help facilitate the purchase of large numbers of items.

The transactions identified in the charge letter are highly unusual and substantially different from comparable stores in the area. As noted earlier, in an appeal of adverse action, the onus is on the Appellant to prove, by a preponderance of the evidence, that the administrative action should be reversed. This means submitting sufficient and compelling evidence that would lead a reviewer to conclude that trafficking did not occur. Unfortunately the Appellant in this case has not offered any evidence, such as itemized cash register receipts, inventory records, or other accounting documentation to verify that the specific transactions listed in the charge letter were legitimate purchases of eligible food. Without such evidence, it is reasonable for this review to conclude that the transactions listed in the charge letter were, more likely than not, the result of trafficking violations committed by the Appellant.

Based on the above analysis, it is the determination of this review that Peralta's Deli & Grill Inc. likely trafficked in SNAP benefits during the review period. The attachments furnished with the charge letter adequately identify the irregular patterns of SNAP transactions which indicate that trafficking was likely taking place. Conversely, the Appellant has failed to provide a rational explanation to why such patterns might exist. As there are multiple unexplained patterns of irregular transactions, the case of trafficking is convincing.

Credit Accounts

The primary contention offered by the Appellant as an explanation for the unusual transaction patterns is a claim that the firm has a practice of allowing SNAP customers to shop on credit and then pay the store back when the household's benefit allotment is replenished. In support of this argument, the Appellant submitted seven typed statements from apparent SNAP recipients. Unfortunately, the Appellant's evidence is inadequate to prove that trafficking was not occurring. When a retailer claims that credit accounts are a reason for the irregular SNAP transactions and data patterns, FNS requires a level of detail regarding the legitimacy of the claim. This is because retailers have often made false admissions of credit in an attempt to obtain a lesser one-year disqualification penalty after committing more egregious violations such as trafficking. Credit transactions must be accounted for with substantive evidence such as the dates credit was extended, to whom, for what amount, and for what items. Such proof should also correspond with the transactions identified in the letter of charges. Unfortunately, the documentation provided by the Appellant falls far short of these expectations. The written statements do not specify any dates on which food items were obtained on credit, nor do they identify the dates or amounts of payments, and there is no payment information that corresponds to the transactions listed in the charge letter.

The documentation provided by the Appellant is not nearly enough for this review to conclude that the firm was, more likely than not, committing credit account violations rather than trafficking. Based on the customer statements provided, it is certainly possible that credit account activity was taking place at the Appellant firm to some degree. But the Appellant's evidence in this case is not adequate enough for this review to eliminate trafficking as the primary reason for the unusual transaction patterns identified in the charge letter.

Trafficking Case based on EBT Data

The Appellant, through counsel, has argued that the agency's charge letter is overly broad and offers no evidence of trafficking. The Appellant further contends that the statute and regulations do not specify that transactions made in a short timeframe or that are "excessively large" constitute trafficking.

With regard to these contentions, this review acknowledges that a conclusion of trafficking cannot be drawn from EBT data alone, nor would it be possible to do so in a case based primarily on inconsistent redemption data. It is noted that FNS employs a computerized fraud detection tool to identify EBT 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 analyze the transaction data and patterns with other factors, such as observations from a store visit, an analysis of customer shopping behavior, and a comparison with similar stores in the area, and then render a determination as to whether or not the questionable transactions were, more likely than not, the result of trafficking.

The legality of this method is identified in 7 CFR § 278.6(a) which 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, inconsistent redemption data, [or] evidence obtained through a transaction report under an electronic benefit transfer system**" [Emphasis added.]

Prior to a disqualification determination, the accused firm is given an opportunity to reply to the charges and provide any information it deems appropriate in justifying as legitimate the transaction activity detailed in the charge letter.

It should be noted that this reviewer has thoroughly examined the documentation and information provided by the Retailer Operations Division and found no evidence to suggest that the agency simply churned out numerical data and declared it to be trafficking. From all indications, the Retailer Operations Division obtained the EBT data, 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.

It is important to restate here that in an appeal of adverse action, the onus is on the Appellant to prove by a preponderance of the evidence that the administrative action should be reversed. In its request for review, the Appellant acknowledged its burden in this case, and yet, despite having a specific list of questionable transactions presented to the firm, it offered no evidence, such as itemized cash register receipts, to prove that the transactions listed in the charge letter were legitimate purchases of eligible food.

As to the argument that Federal regulations are silent regarding the frequency or size of SNAP transactions, it is true that SNAP regulations do not govern or mandate how a SNAP household spends its benefit allotment, including how many times a household may use its EBT card at a particular location or how large an individual transaction can be. However, the transactions noted in Attachments 1 and 2 are questionable not because they exceed any limits for use, but because they display patterns of use that are inconsistent with the store's documented physical characteristics and food inventory. It should be further noted that the transactions identified in the charge letter are not marginally abnormal, but decidedly so, especially in comparison with other nearby SNAP-authorized stores of similar size. This review does not contend that frequent or large EBT transactions are overtly suspicious when they occur on an occasional or intermittent basis, but when such transactions form questionable patterns on a consistent basis over a substantial period of time, such activity is considered highly irregular, and a firm's intent to comply with program regulations is called into question.

No Prior Violations

The Appellant, through counsel, contends that the firm has never had any issues with state or federal laws or with SNAP. The Appellant claims to run an honest business and claims that it was caught by surprise when it received the charge letter because the firm has never done anything to intentionally violation SNAP regulations.

Unfortunately, this contention does not provide a valid basis for dismissing the charges or for mitigating the penalty imposed. The law requires that when serious violations, such as trafficking, occur, permanent disqualification is the required penalty, even on the first occasion, as noted in 7 U.S.C. § 2021(b)(3)(B). Additionally, the Appellant's admission of credit accounts clearly shows that the firm has not always observed the rules and regulations of SNAP as it contends. The record shows that on January 30, 2014, the Appellant owner signed an application to participate as a retailer in SNAP. By signing this application, the Appellant owner agreed to accept responsibility on behalf of the firm for compliance with all statutory and regulatory requirements associated with participation in SNAP. The record clearly establishes that the Appellant owner agreed to abide by all program rules, including not exchanging SNAP benefits for cash (i.e. trafficking) and not accepting SNAP benefits as payment on credit accounts or loans.

From all indications, the Appellant ignored the rules that were disclosed by FNS from the earliest stages of SNAP participation.

Civil Money Penalty

The Appellant, through counsel, has stated that in the event that the trafficking charges are not dismissed, the Appellant requests a civil money penalty in lieu of permanent disqualification. It further requests a mutually satisfactory installment plan to pay the CMP. Finally, the Appellant contends that it meets all of the requirements for a CMP as outlined in 7 CFR § 278.6(i).

Unfortunately, a CMP is not an option in this case. As noted earlier, the Retailer Operations Division determined that the Appellant firm was not eligible for a CMP because it did not submit

sufficient evidence to demonstrate that it had established and implemented an effective compliance policy and training program to prevent SNAP violations.

In accordance with regulations at 7 CFR § 278.6(b)(2), in order for a civil money penalty to be considered, a firm must not only notify FNS that it desires the agency to consider a trafficking CMP in lieu of permanent disqualification, but it must also submit appropriate documentation within designated timeframes. The designated timeframe, pursuant to 7 CFR § 278.6(b)(1), is 10 days from receipt of the charge letter. The case record shows that the Appellant did not request a trafficking CMP when it responded to the charge letter and there is no evidence that the Appellant submitted any documentation that would indicate that the firm had a compliance policy or training program of any kind.

Therefore, in accordance with 7 CFR § 278.6(b)(2)(iii), a civil money penalty in lieu of permanent disqualification for trafficking cannot be granted in this case.

CONCLUSION

An analysis of the Appellant's EBT transaction record was the primary basis for the decision by the Retailer Operations Division to permanently disqualify Peralta's Deli & Grill Inc. from SNAP participation. This data provided sufficient evidence for this review to conclude that the questionable transactions and patterns listed in the charge letter were more likely than not the result of trafficking violations committed by the Appellant.

Based on a review of all available information in this case, it is the determination of this review that the Appellant has not proven, by a preponderance of the evidence, that the administrative action should be reversed. As such, the decision to impose a permanent disqualification against the Appellant, Peralta's Deli & Grill Inc., under the ownership of Josue B. Ayala and Maria D. Ayala, 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.

JON YORGASON
Administrative Review Officer

April 4, 2018