

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

Siesta Shores Store #1,

Appellant,

v.

Retailer Operations Division,

Respondent.

Case Number: C0199169

FINAL AGENCY DECISION

It is the decision of the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), that there is sufficient evidence to support a finding that a **Permanent Disqualification** from participation as an authorized retailer in the Supplemental Nutrition Assistance Program¹ was properly imposed against Siesta² Shores Store #1 (hereinafter “Siesta Shores Store #1” and/or “Appellant”) and its owners of record, by the Retailer Operations Division of the FNS.

ISSUE

The issue accepted for review is whether the Retailer Operations Division took appropriate action, consistent with 7 CFR § 278.6(e)(1) in its administration of the Supplemental Nutrition Assistance Program (SNAP) when it imposed a Permanent Disqualification against Siesta Shores Store #1 in a letter dated June 13, 2017.

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.

¹ Section 4001(b) of the Food, Conservation, and Energy Act of 2008 (P.L. 110-234; 122 Stat. 1092) amended the Food and Nutrition Act of 2008 by striking “food stamp program” and inserting “supplemental nutrition assistance program” effective October 1, 2008

² Store name is posted as both Fiesta Shores and Siesta Shores – Store visit materials indicate Appellant’s owner clarified the name of the store as Siesta not Fiesta and the address of the store to be 5330 not 5338.

CASE CHRONOLOGY

In a letter dated May 31, 2017, the Retailer Operations Division informed Appellant that it was being charged with violation of the terms and conditions of the SNAP regulations, 7 CFR §§ 270-282, based on Electronic Benefit Transaction (EBT) SNAP benefit transactions considered to “establish clear and repetitive patterns of unusual, irregular, and inexplicable SNAP activity for your type of firm.”

The Retailer Operations Division record indicates Appellant did not respond to the letter of charges, therefore the Retailer Operations Division advised Appellant of a final determination of permanent disqualification from participation in the SNAP in accordance with 7 CFR § 278.6(c) and § 278.6(e)(1) for trafficking violations, in a letter dated June 13, 2017, documented to have been delivered to Appellant on June 14, 2017.

The determination letter also stated that the 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. The Retailer Operations Division determined that the Appellant was not eligible for the trafficking CMP because the Appellant did not submit any evidence to demonstrate the firm had established and implemented an effective compliance policy and program to prevent violations of the SNAP.

In a letter dated June 15, 2017, received in the offices of the Administrative Review Branch on June 19, 2017, Appellant, through one (1) of its owners of record submitted an appeal of the Retailer Operations Division’s assessment, requesting an administrative review of the action. The appeal was granted.

STANDARD OF REVIEW

In appeals of adverse actions, an 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 AND REGULATIONS

The controlling law in this matter is contained in the Food and Nutrition Act of 2008, as amended (the “Act”)³, 7 U.S.C. § 2021 and promulgated through regulation under Title 7 of the Code of Federal Regulations (CFR),⁴ part 278. In particular CFR § 278.6(a) and (e)(1)(i)

³ Effective October 1, 2008, the Food Stamp Act of 1977 was superseded by the Food and Nutrition Act of 2008, as amended through P.L. 110-246.

⁴ Title 7 of the Code of Federal Regulations may be accessed in its entirety via the Internet at https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title07/7tab_02.tpl

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, *inter alia*:

... 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(e)(1)(i) states, *inter alia*:

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

7 CFR § 271.2 states, *inter alia*:

*“ **Trafficking** means the buying, selling, stealing, or otherwise effecting an exchange of SNAP benefits ... 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, *inter alia*:

“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(a) states, *inter alia*:

*“FNS may disqualify any authorized retail food store ... if the firm fails to comply with the Food & Nutrition Act of 2008, as amended, or this part. Such disqualification shall result from a finding of a violation on the basis of evidence that may include facts established through on-site investigations, inconsistent redemption data, **evidence obtained through a transaction report under an electronic benefit transfer system....**”*
(Emphasis added.)

7 CFR § 278.6(c) states, *inter alia*:

“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...”

7 CFR § 278.6(b)(2)(ii), states, *inter alia*:

*“Firms that request consideration of a civil money penalty in lieu of a permanent disqualification for trafficking shall have the opportunity to submit to FNS information and evidence ... that establishes the firm’s eligibility for a civil money penalty in lieu of a permanent disqualification in accordance with the criteria included in §278.6(i). **This information and evidence shall be submitted within 10 days, as specified in §278.6(b)(1).**”* [Emphasis added]

7 CFR § 278.6(i), states, *inter alia*:

*“FNS may impose a civil money penalty in lieu of a permanent disqualification for trafficking as defined in §271.2 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.”* [Emphasis added]

SUMMARY OF THE CHARGES

The Retailer Operations Division materials and the charge letter dated May 31, 2017, reveal that charges were based on an analysis of EBT SNAP benefit transaction data during the six (6) month period of October 2016 through March 2017 and involved two (2) patterns of EBT transaction characteristics indicative of trafficking as follow:

- Attachment #1 lists multiple SNAP EBT transactions made from individual benefit accounts in unusually short timeframes.
- Attachment #2 lists excessively large purchase transactions made from the accounts of SNAP recipients.

APPELLANT’S CONTENTIONS

In the letter dated June 15, 2017, submitted under the signature of one (1) of Appellant’s owner, it is indicated that ownership stands ready to engage in dialogue to clarify whatever misunderstanding may have occurred. Examples of the violating transactions are requested and it is indicated that specific responses will be provided.

On June 30, 2017 an additional package of materials was provided consisting of a letter stating that it was never understood that repeated use of the same SNAP card; or large transaction amounts, were SNAP violations. It is further stated that Appellant has always followed the most important SNAP rules of no cash, no beer/cigarettes, and no taxable items (soap) etc. exchanged. Appended to the letter were:

- Two (2) maps showing the location of Appellant in a concentrated area;
- Cash Register “Detailed Daily Report” for January through May 2017 listing total monthly sales amounts as well as a breakdown by payment type for each month;

- Handwritten expense reports compared to the “Detailed Daily Report” for each month identifying net gains/losses; and,
- 36 invoices from R.C. Food Service & Produce Inc. dated January through May 2017 evidencing total staple food purchases 5 U.S.C. § 552 (b)(6) & (b)(7)(C) representing resale value of 5 U.S.C. § 552 (b)(6) & (b)(7)(C) (50 percent markup per ownership declaration).

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

ANALYSIS AND FINDINGS

On review, the investigative materials provided by the Retailer Operations Division, including computer printouts of transaction data available from Federal records, store visit observations, information regarding area competitor firms, and household shopping patterns, were analyzed.

With regards to Appellant’s contentions in explanation of questionable transactions, the issue in review is whether there is sufficient evidence, through a preponderance of that evidence, that it is more likely true than not true that the questionable transactions were the result of trafficking.

Appellant Operations:

The record reveals that in reaching a disqualification determination, the Retailer Operations Division considered information obtained during a store visit conducted by FNS contracted personnel on March 18, 2017. The March 18, 2017 visit was authorized by a “cashier” and resulted in materials reflecting observations made during the store visit which describe the nature and scope of Appellant’s operation, as well as the stock and facilities. The store visit materials indicate that although the “cashier” authorized the firm review one (1) of Appellant’s owners arrived on premises and proceeded to follow the inspector around, making herself available for questions and clarifications as the visit progressed.

Appellant is reported to be open seven (7) days per week from 6AM until midnight; operating out of a commercial space of approximately 1250 square feet as estimated by store personnel; conducting some transactions through a drive-up window.



**Photo #7 – Drive-Up Window (left)
Front Entrance (right)**



Photo #8 – Inside View of Drive-Up Window

No out of public view storage was declared however the store visit layout sketch annotates the presence of “Kitchen Storage” and some “Storage” behind the ice machine.

Survey Form Page 7

USDA SNAP Store Visit Sketch

Store Name Siesta Shores Date 3-18-14

The Store Sketch should outline the general store layout and include, at a minimum: all store entrances, cash registers and checkout areas, staple foods, labeled with specific labels, and non-food items with specific labels for categories listed on Survey Form. Storage Areas where FOOD is stored should also be shown on the sketch. Handwriting must be clear, legible (block printing is preferred) and dark enough to appear in photo/scan.

The store visit materials describe Siesta Shores Store #1 as a convenience store; operating with one (1) cash register that is equipped with scanning technology; and, one (1) point-of-sale (POS) terminal. The checkout operation is seen in the certified store visit photographs to have limited access due to the placement of product displays on the checkout counter. Telephone orders are identified as accepted however no delivery service is declared.



The store visit materials document that there are no hand-held shopping baskets or shopping carts available to support the delivery of purchases to the counter/checkout area for the completion of merchandise price totaling and payment. There is no identifiable area for staging and packaging items presented for purchase.

The sale of prepared ready-to-eat foods is prominently advertised both inside and outside Appellant firm and include “Breakfast Tacos”; and full plate meals such as “Fajita Plate” @ \$8.99; “Enchiladas Mexicanas” @ \$6.99 and specials on weekends including “Menudo” and “Barbacoa (Barbecue Meat)”. These foods are not eligible for purchase using SNAP benefits. The store visit materials indicate that food for sale and food used to prepare ready-to-eat meals are co-mingled in coolers and freezers.

SNIP from Photo #13 – Drive-Up Window advertising prepared foods and drinks



Photo #16 – Menu posted over kitchen area

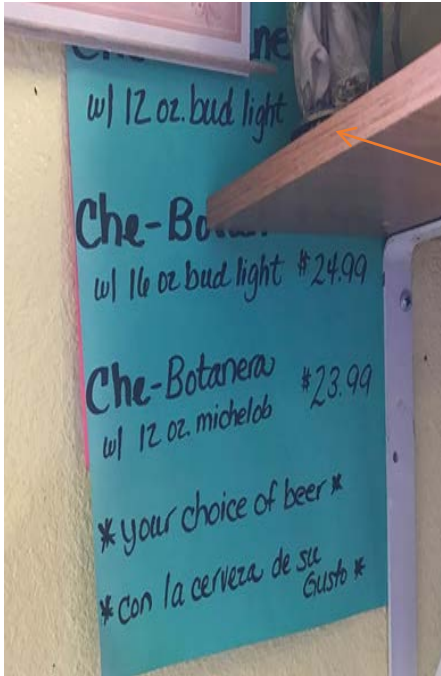
HAMBURGER COMBO \$ 5.99 CHICKEN BURGERS \$ 4.99 FAJITA PLATE \$ 8.99 ENCHILADAS MEXICANAS \$ 6.99 BARBACOA Y MENUDO LOS DOMINGOS SOPES DESHEBRADA O POLLO \$ 9.99 TOSTADAS \$ 3.99 FILLO \$ 2.99 CAKES (various)		BREAKFAST TACOS FRIOLES CON CHORIZO Y SAUSAGE 1.99 MACHACADO 1.99 FAJITA 2.99 BARBACOA 1.99 CHICHARRON 1.99 BACON 1.49 PAPAS 1.49 HUEVO 1.49 CAFE
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Photo #17 – co-mingled foods



Photo #19 – Prepared Foods (Kitchen) Area



SNIP from Photo #10 that advertises “Che-Botanera” which Appellant ownership explains is appetizer trays/platters that include nuts and other foods that complement beer and are prepared to order for customers with the specials sold including beer. Appellant ownership declares these trays are not exchanged for SNAP benefits.

The inventory at the time of the March 18, 2017 store visit includes varieties in each of the four (4) staple food groups as follows:

- Three (3) varieties of dairy products with between six (6) and 20 units each of cheese, ice cream/ice milk; and milk.
- Seven (7) varieties of fruits and vegetables with potatoes and white onions as the only “fresh/frozen/refrigerated” items. Canned vegetables including soups/stews are identified as are packaged foods such as beans.
- Six (6) varieties of breads and cereals were identified with between six (6) and 20 units in each variety including loaf bread, breakfast cereals, rice, pasta, flour and snacks.
- Seven (7) varieties of meat/poultry/fish staple foods with two (2) of those varieties, pork (ham, bacon, sausage) and deli meats/hot dogs, identified as fresh/frozen/refrigerated; each in quantities of between (6) and 20 units. Notably photo #17 (above) shows fresh/refrigerated eggs however the store visit materials did not designate those as available for purchase.

The store visit materials indicate that the most expensive SNAP eligible items sold @ Appellant include milk @ \$5.89 per gallon; spice bottles @ \$6.29; meat @ \$5.25 per pound; and saltine crackers @ \$5.00 per box.

Non-SNAP products and services offered at Appellant include tobacco products, alcohol, health and beauty aids, paper goods and cleaning products.

A review of the Internet reveals a FACEBOOK account under the name of “Siesta Shores Stores” located in Zapata, Texas which shows multiple photos and posts referencing only prepared ready-to-eat foods. No mention of grocery style sales identified.

[Siesta Shores Store - Home | Facebook](#)

<https://www.facebook.com> > Places > Zapata, Texas > Public Services ▼ [Translate this page](#)

★★★★★ Rating: 4.7 - 7 votes

En siesta shores la esquina del sabor en *comida y *bebida la mejor ... See more of **Siesta Shores Store** on Facebook September 28, 2016 · Zapata, TX ·

Charge Letter Attachment Analysis:

The data reflected in the letter of charges dated May 31, 2017 is the result of information gained primarily from the Anti-Fraud Locator using Electronic Benefits Transfer (EBT) Retailer Transactions (ALERT) system which is a fraud detection, decision support system designed to monitor and track electronically conducted retail transactions completed by SNAP recipients in authorized meal program and food retailer locations.

The ALERT System facilitates management of the program by providing transaction-level information to Federal personnel charged with the responsibility of SNAP retailer management and compliance. The system uses pre-defined criteria or patterns for potential fraud detection. Pre-formatted reports provide information on those stores and transactions meeting the criteria. ALERT supports both online analysis and online queries and reports for use by FNS. The system does not make the final determination instead it is used by Retailer Operations Division to develop information and evidence for consideration in support of their development of an ultimate decision.

Attachment #1: Represents **multiple SNAP EBT transactions made from individual benefit accounts in unusually short timeframes** and includes 50 transactions; grouped in 19 sets; where 13 households redeemed SNAP benefits in sets of two (2) to six (6) transactions per set; **5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(6) & (b)(7)(C).**

The Retailer Operations Division documents that completing multiple transactions **5 U.S.C. § 552 (b)(6) & (b)(7)(C)** is a method used by some stores to avoid high dollar transactions that cannot be supported and are indicative of trafficking.

5 U.S.C. § 552 (b)(6) & (b)(7)(C). Further, Retailer Operations Division analyzed the 13 households identified to have had transactions identified in Attachment #1 noting that 10 of the 13 households also conducted transactions at large grocery stores, supermarkets or superstores on the same day as the repeated transactions at Appellant firm.

On review it is noted that there were three (3) of the 13 households that had multiple transactions in more than one (1) month of the focus period. Most notably one (1) household was responsible for five (5) of the 19 transaction sets for the highest amounts as recorded in the following table:

5 U.S.C. § 552 (b)(7)(E)

5 U.S.C. § 552 (b)(7)(E).

Given Appellant's operational information it is not reasonable that households could bring to the counter quantities of SNAP eligible foods, in the amounts identified in the Attachment #1 materials, from the inventory identified at the store visit. Therefore, on review it is determined that the transactions as identified in Attachment #1 of the May 31, 2017, remain suspicious, and based on a preponderance of the evidence are found more likely than not to represent trafficking transactions.

Attachment #2: Represents **excessively large purchase transactions made from the accounts of SNAP recipients** with 318 transactions 5 U.S.C. § 552 (b)(6) & (b)(7)(C). 5 U.S.C. § 552 (b)(6) & (b)(7)(C).

The Retailer Operations Division indicates that the average convenience store transaction in the County of Zapata, Texas during the focus period was \$8.92 5 U.S.C. § 552 (b)(6) & (b)(7)(C). Retailer Operations Division documents that the transactions are suspicious in consideration of the operation and facilities of Appellant. In the request for administrative review Appellant's ownership indicated that she did not understand that high dollar transactions were violations of SNAP rules. The Retailer Operations Division notes that there are no maximum dollar limits on SNAP transactions; however, the feasibility of the transaction amounts, considering the stock and operational facilities of Appellant must be considered in the full analysis.

On review it is noted that there are two (2) households responsible for the 12 highest dollar transactions identified in Attachment #2. 5 U.S.C. § 552 (b)(6) & (b)(7)(C). Absent specific explanation for the suspicious transactions the excessively large transactions as individually identified for Appellant in the May 31, 2017 letter of charges, cumulatively represent unreasonable SNAP transaction activity that cannot be reasonably supported with the stock and facilities as identified at Appellant in the March 18, 2017 store visit. The transactions identified are therefore found, more likely than not, to represent SNAP trafficking transactions.

Location

Included in the June 20, 2017 materials provided for consideration on administrative review Appellant explained that it is located in a neighborhood consisting of approximately 500 houses, with many undocumented aliens that avoid travelling long distances for fear of immigration situations. Two (2) maps are provided for consideration indicating that the larger stores are in Laredo and in Rio Grande, Texas therefore many customers prefer to make purchases locally. Some of these individuals are explained to be in need of making bulk purchases of meat, chicken, and shrimp in larger quantities to realize savings. Appellant ownership indicates that on request she makes bulk order sales but as noted in the store visit report materials these items are not generally available or advertised.

Although Appellant has provided a potentially reasonable explanation for bulk meat, poultry and seafood sales no evidence of those sales was provided for consideration and no nexus between the transactions identified in Attachments #1 and #2 to the May 31, 2017 letter of charges was provided for consideration. Therefore, absent evidence of the situation, Appellant's contention cannot be accepted as a basis for mitigating or reversing the Retailer Operations Division charges.

Sales/Expenses/Invoices:

Also included in the June 20, 2017 materials provided for consideration on administrative review Appellant provided 10 pages of materials summarizing the income, expenses, and providing invoices for one (1) vendor representing purchases from January through May 2017 which includes three (3) months in the focus period of January, February, and March 2017.

The "Detailed Daily Report" for each month summarized gross and net sales; taxable, tax-exempt, and non-taxable sales; and a breakdown by payment type. The information was reviewed by the Retailer Operations Division and compared to the official Agency records of SNAP redemptions for each of those months. The comparison is summarized in Table II below:

5 U.S.C. § 552 (b)(6) & (b)(7)(C)

5 U.S.C. § 552 (b)(6) & (b)(7)(C).

The handwritten listing of expenses provided for consideration did not include invoices supporting the declared expenses beyond the invoices for one (1) vendor and therefore were not accepted as evidence of inventory purchases or expenses.

The 36 invoices for the one (1) vendor provided by Appellant covered the period of January 2017 through May 2017. The information for the three (3) months included in the focus period (January through March 2017) were used to calculate Appellant's verified purchased SNAP eligible inventory 5 U.S.C. § 552 (b)(6) & (b)(7)(C). This was then adjusted with a 50 percent markup, as declared by Appellant, resulting in an estimated 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in inventory available for resale. 5 U.S.C. § 552 (b)(6) & (b)(7)(C).

In summary, the materials provided by Appellant on request for administrative review do not support the mitigation or reversal of the charges as identified in the May 31, 2017 letter from the Retailer Operations Division.

Denial of Charges:

Although Appellant indicates that the three (3) basic rules of SNAP prohibiting exchange for cash; sale of beer (alcohol) and cigarettes (tobacco); and sale of taxable items such as soap; have never been violated unsupported declarations of innocence, absent supportive evidence, cannot

be accepted as a valid basis for mitigating or reversing the current charges as detailed in the May 31, 2017 letter of charges.

Comparison/Competitor Store Information:

Retailer Operations Division documents that the subject firm is located within a three-mile radius of 11 alternative SNAP authorized stores including one (1) supermarket, two (2) small grocery stores, and eight (8) alternative convenience/combination stores. The total number of SNAP transactions; value of redemptions; and incidence of identification of suspicious transactions clearly identifies Appellant as an outlier with a much higher than average SNAP redemption total; resulting from fewer overall transactions than the surrounding competitor convenience stores; with a higher number of suspicious transactions. Appellant generated over 5 U.S.C. § 552 (b)(6) & (b)(7)(C) in additional SNAP redemptions when compared to the county average for convenience stores during the review period; and, is documented to show a higher number of SNAP transactions in amounts 5 U.S.C. § 552 (b)(6) & (b)(7)(C) than the average county convenience store.

Household Analysis:

Retailer Operations Division documents that of the 105 households with suspicious transactions identified in the letter of charges attachments 95 of those used an area large grocery store, supermarket, or superstore within three (3) days of conducting a transaction at Appellant. A review of the store visit materials revealed no SNAP eligible inventory available at Appellant that was not also available at competitor convenience stores as well as the larger stores in the area.

An analysis was completed of the SNAP transactions of four (4) households identified in the attachment materials to the letter of charges. The analysis reveals that each of the households conducted numerous suspicious transactions at Appellant, clearly distinct from the patterns for the same households at alternative shopping venues.

Civil Money Penalty

Part 278.6(f)(1) of the SNAP regulations provides for civil money penalty assessments in cases where disqualification would cause “hardship” to SNAP households because of the unavailability of a comparable participating food store in the area to meet their needs. However, this regulation also sets forth the following specific exception to assessments thereunder: “A civil money penalty for hardship to Food Stamp households may not be imposed in lieu of a permanent disqualification.” Therefore, this civil money penalty provision is not applicable in the present case.

As previously indicated the June 13, 2017 determination letter advised Appellant of the ineligibility for consideration for a trafficking civil money penalty (CMP) according to the terms

of Section § 278.6(i) of the SNAP regulations. The letter of charges dated May 31, 2017 advised Appellant that documentation of eligibility for that alternative sanction was to be provided within 10 days. Although Appellant reports not receiving the letter of charges that was delivered to Appellant and signed for by one (1) of the store employees, no extension of time for the provision of materials for consideration of the alternative penalty is allowed by regulation.

As indicated in the June 13, 2017 determination letter, no information was provided by Appellant for consideration. A review of the administrative record finds no evidence of materials or information timely provided. Therefore, on review the Retailer Operations Division's determination that Appellant firm is ineligible for the imposition of civil money penalties in lieu of disqualification is affirmed.

CONCLUSION

The Retailer Operations Division analysis of Appellant's EBT transaction records, upon which charges of violations are based, together with observations made during the contracted store visit provide substantial evidence that questionable transactions during the focus period have characteristics that are not consistent with legitimate sales of eligible food to SNAP customers at a store of the nature and scope as described in the preceding materials. Rather, the characteristics are indicative of illegal trafficking in program benefits.

Therefore, based on a review of the evidence in this case, it is more likely true than not true that program violations did, in fact, occur as charged and that the Retailer Operations Division has provided substantial evidence of trafficking violations.

Based on the discussion above, the decision to impose a permanent disqualification from participation in the SNAP against Siesta Shores Store #1 is sustained.

RIGHTS AND REMEDIES

Applicable rights to a judicial review of this decision are set forth in 7 U.S.C. § 2023 and 7 CFR § 279.7. If a judicial review is desired, the complaint must be filed in the U.S. District Court for the district in which Appellant's owner resides, is engaged in business, or in any court of record of the State having competent jurisdiction. This complaint, naming the United States as the defendant, must be filed within thirty (30) days of receipt of this decision.

Under the Freedom of Information Act, we are releasing this information in a redacted format as appropriate. FNS will protect, to the extent provided by law, personal information that could constitute an unwarranted invasion of privacy.

NANCY BACA-STEPAN
Administrative Review Officer

November 14, 2017