OFFICE OF TAX APPEALS

STATE OF CALIFORNIA

In the Matter of the Appeals of: **J. WILLERFORD,** **dba Willerford Auto Sales**	OTA Case Nos.: 18053157, 19014253 CDTFA Case IDs: 946533, 731870

OPINION

Representing the Parties:

For Appellant:	Mitchell Stradford, Representative J. Willerford, Appellant
For Respondent:	Nalan Samarawickrema, Hearing Representative Jason Parker, Chief of Headquarters Ops. Stephen Smith, Tax Counsel IV
For Office of Tax Appeals:	Lisa Burke, Business Taxes Specialist III

N. RALSTON, Administrative Law Judge: Pursuant to Revenue and Taxation Code (R&TC) section 6561, John M. Willerford (appellant) appeals two Decisions issued by California Department of Tax and Fee Administration (respondent) denying appellant's petition for redetermination of the Notice of Determination (NOD) issued on April 23, 2013 (Case No. 19014253), and an administrative protest of the NOD issued on February 23, 2016 (Case No. 18053157). The NOD issued on April 23, 2013, is for a tax liability of $125,738.32, plus accrued interest, and a penalty of $31,434.59 for fraud for the period April 1, 2009, through June 30, 2011 (first audit period). The NOD issued on February 23, 2016, assessed a tax liability of $112,829.78, plus accrued interest, and a penalty of $28,207.49 for fraud for the period April 1, 2012, through March 31, 2015 (second audit period).

Office of Tax Appeals (OTA) Administrative Law Judges Josh Aldrich, Andrew J. Kwee,[1] and Natasha Ralston, held an oral hearing for these matters in Sacramento, California, on July 20, 2022. At the conclusion of the hearing, the record was closed, and these matters were submitted for decision.

ISSUES

1. Whether appellant has established that a reduction to the amount of unreported taxable sales is warranted.
2. Whether respondent has established with clear and convincing evidence that the understatements were due to fraud or an intent to evade the payment of tax.

FACTUAL FINDINGS

1. Appellant operated a used car dealership in Hemet, California from February 1, 2009, through June 30, 2016. Appellant's business was located on a corner lot with space for approximately 20 vehicles.
2. Appellant's seller's permit was effective beginning February 1, 2009. At the time appellant signed up for the seller's permit, appellant was provided with several publications, including Publication 51 – Resource Guide to Tax Products and Services for Small Businesses which explains that seller's permit holders are required to report their sales of tangible personal property and also provides a list of various publications from respondent that explain how to complete sales and use tax returns. Respondent also provided appellant with Publication 159 – Guide to Online Filing for Sales and Use Tax and EFT Accounts, as well as various other informational materials regarding filing sales and use tax returns.
3. Previously, appellant was the president of a corporation that operated a used car dealership at the same location as appellant's location from August 17, 1998, through January 31, 2009. In the two audits of the corporation, respondent computed unreported taxable sales of $144,612 for the period July 1, 1999, through June 30, 2002, and unreported taxable sales of $26,298 for the period January 1, 2003, through December 31, 2005. Moreover, those two prior audits of the corporation revealed average quarterly taxable sales of $249,640 and $311,606 respectively. In the current

[1] Judge Kwee was substituted for Judge Geary. The parties made no objection to the substitution.

audit of appellant, the auditor computed average quarterly taxable sales of $223,608, which is consistent with the prior audited average quarterly taxable sales of the corporation, however, in the current audit appellant only reported average quarterly taxable sales of $94,940 to respondent.

First Audit Period (April 1, 2009, through June 30, 2011)

4. Appellant reported total sales of $913,637 and claimed deductions of $29,290 for nontaxable sales for resale and $29,884 for bad debts, which resulted in reported taxable sales of $854,463.
5. For audit, appellant provided his federal income tax returns (FITRs) for 2009 and 2010, incomplete sales journals for 2009 through the second quarter of 2011 (2Q11), various purchase invoices and sales contracts, and incomplete Department of Motor Vehicles (DMV) Report of Sale (ROS) slips.
6. Respondent compared the gross receipts of $270,815 and $1,090,145 reported on appellant's FITRs for 2009 and 2010, respectively, with the total sales reported on the sales and use tax returns for the same periods. Respondent found differences of $32,467 for 2009 and $815,028 for 2010.
7. Respondent examined appellant's sales journals and the related ROS slips for the audit period; it found that appellant had recorded 266 taxable sales totaling $2,012,468, with an average taxable sales price of $6,868, and 27 nontaxable sales for resale totaling $84,074. Respondent then obtained Consumer Motor Vehicle Recovery Corporation (CMVRC) reports[2] from respondent's Consumer Use Tax Division (CUTS) and a purchase history report from appellant's main vendor, an auto auction house, and found 33 additional vehicle sales. DMV registration documentation showed selling prices totaling $268,879 for 32 of the 33 vehicles. For the remaining vehicle, respondent applied appellant's average taxable used car sales price of $6,868. Respondent established audited taxable sales of $2,288,215 ($2,012,468 + $268,879 + $6,868), which exceeded appellant's reported taxable sales of $854,463 for the audit period by $1,433,752.
8. In considering whether the fraud penalty should be imposed, respondent concluded that appellant's experience in a similar business that had been audited twice showed that he

[2] CMVRC reports track the one-dollar fee for each vehicle sold by a dealer that DMV collects and remits to CMVRC, together with Vehicle Identification Numbers and registration dates.

had knowledge of sales tax reporting requirements, especially since he had attended the exit conference to discuss the results of one of those audits. Further, respondent noted that appellant had access to computerized sales records that properly documented sales and the tax amounts collected. Nevertheless, respondent found that appellant's recorded sales tax of $27,310 for 2009 exceeded his reported tax for that year by $9,017. For 2010, recorded sales tax of $85,524 exceeded appellant's reported sales tax by $71,406, and for 1Q11 and 2Q11, recorded sales tax of $76,202 exceeded the reported sales tax by $41,188. Respondent concluded that appellant's failure to report a substantial amount of the recorded sales tax that was clearly shown in his records could not be attributed to mere negligence, and instead was due to fraud or an intent to evade the payment of tax. Therefore, respondent imposed the 25-percent penalty for fraud.

9. Respondent also established unreported district taxes (for Los Angeles County and Los Angeles County Metro Transportation Authority) measuring $28,499.

10. Subsequently respondent issued an NOD for a tax liability of $125,738.32, plus accrued interest, and a fraud penalty of $31,434.59. Appellant timely filed a petition for redetermination disputing the amount of unreported taxable sales and the fraud penalty, but not disputing the unreported district taxes. Appellant waived appearance at the appeals conference, which was held on August 21, 2018.

11. In a Decision issued on January 14, 2019, respondent denied the petition for redetermination in full. This appeal to OTA followed.

Second Audit Period (April 1, 2012, through March 31, 2015)

12. Appellant reported total sales of $374,756, and claimed deductions of $220,290 for bad debts, which resulted in reported taxable sales of $154,466.

13. For audit, appellant did not provide any books and records. Therefore, respondent obtained appellant's reported sales data from the DMV. Respondent used the vehicle registration fees that appellant reported to the DMV to compute audited taxable sales of $1,578,949, which exceeded appellant's reported taxable sales for the audit period by $1,424,483. Respondent determined that audited taxable sales did not include taxable smog fees, taxable documentation fees, and additional taxable vehicle sales that were not reported to the DMV but decided that the materiality of any potential adjustments did not warrant further investigation.

14. In considering whether the fraud penalty should be imposed, respondent noted that appellant provided no records for examination even though he was notified several times between April 24, 2015, and October 22, 2015, that his records were required for audit. Respondent also noted that appellant not only had experience as president of a similar business that had been previously audited twice, but he also had gained experience from his prior audit. Respondent determined that appellant consistently underreported his taxable sales for every quarter of the audit period, with an overall percentage of error of 922.20 percent. Respondent concluded that appellant's failure to provide any records and his failure to report more than 90-percent of his taxable sales could not be attributed to mere negligence, and instead was due to fraud or an intent to evade the payment of tax. Therefore, respondent imposed the 25-percent penalty for fraud.
15. Subsequently respondent issued an NOD for a tax liability of $112,829.78, plus accrued interest, and imposing a fraud penalty of $28,207.49.
16. Appellant filed an untimely appeal of the determination, which respondent accepted as an administrative protest. Respondent held an appeals conference with appellant's representatives on October 3, 2017. In the Decision issued on February 28, 2018, the respondent concluded that the finality penalty should be relieved on the condition that appellant pay the tax portion of the liability within 30 days of the issuance of the final decision in the appeal, and that otherwise, the appeal should be denied. This appeal to OTA followed.

DISCUSSION

Issue 1: Whether appellant has established that a reduction is warranted to the audited understatements of reported taxable sales.

California imposes on retailers a sales tax measured by the retailer's gross receipts from the retail sale of TPP in this state unless the sale is specifically exempt or excluded from taxation by statute. (R&TC, § 6051.) For the purpose of the proper administration of the Sales and Use Tax Law and to prevent evasion of the sales tax, the law presumes that all gross receipts are subject to tax until the contrary is established. (R&TC, § 6091.) It is the retailer's responsibility to maintain complete and accurate records to support reported amounts and to make them available for examination. (R&TC, §§ 7053, 7054; Cal. Code Regs., tit. 18, § 1698(b)(1).)

If respondent is not satisfied with the amount of tax reported by any taxpayer, or if any taxpayer fails to make a return, respondent may determine the amount required to be paid on the basis of any information within its possession or that may come into its possession. (R&TC, §§ 6481, 6511.) In the case of an appeal, CDTFA has a minimal, initial burden of showing that its determination was reasonable and rational. (*Appeal of Talavera*, 2020-OTA-022P.) Once CDTFA has met its initial burden, the burden of proof shifts to the taxpayer to establish that a result differing from CDTFA's determination is warranted. (*Ibid*.) Unsupported assertions are not sufficient to satisfy a taxpayer's burden of proof. (*Ibid*.)

A retailer is relieved from liability for sales tax that became due and payable, insofar as the measure of tax is represented by accounts that have been found to be worthless and charged off for income tax purposes by the retailer or, if the retailer is not required to file income tax returns, charged off in accordance with generally accepted accounting principles. (R&TC, § 6055(a).) A retailer may claim a bad debt deduction provided that the sales tax has been paid to the state on such bad debt accounts. (Cal. Code Regs., tit. 18, § 1642(a).) In support of deductions or claims for credit for bad debts, a retailer must maintain adequate and complete records showing: (1) the date of original sale; (2) the name and address of the purchaser; (3) the amount the purchaser contracted to pay; (4) the amount on which the retailer paid tax; (5) the jurisdiction to which the local taxes and district taxes were allocated; (6) all payments or other credits applied to the account of the purchaser; (7) evidence that the uncollectible portion of gross receipts on which tax was paid actually has been legally charged off as a bad debt for income tax purposes, or, if the retailer is not required to file income tax returns, has been charged off in accordance with generally accepted accounting principles; and (8) the taxable percentage of the bad debt properly allocable to the amount on which the retailer reported and paid tax. (Cal. Code Regs., tit. 18, § 1642(e).)

Here, respondent found that the sales recorded in appellant's sales journals substantially exceeded his reported taxable sales for the first audit period. Respondent also found that appellant had reported additional sales to the DMV that were not shown in his sales journals. Appellant failed to provide documentation or other evidence to show any errors in his recorded sales or to support his claimed nontaxable sales for resale and claimed bad debts. Therefore, we find that it was reasonable for respondent to include appellant's recorded sales of vehicles and the additional vehicle sales reported to the DMV in audited taxable sales with no adjustments for

the first audit period. Given that appellant provided no records at all for the second audit period, (2Q12 – 1Q15) we find that it was reasonable for respondent to establish audited taxable sales based on the vehicle sales reported to the DMV. Therefore, the burden shifts to appellant to establish by documentation or other evidence that a reduction to the amount of unreported taxable sales established for one or both audit periods is warranted.

Appellant asserts that the measure of tax is overstated because respondent failed to allow for nontaxable bad debts that appellant improperly netted from reported taxable sales. According to appellant, he sold vehicles primarily to low-income customers or those with a challenging credit history, and the vast majority of his sales were financed by Credit Acceptance Corporation (CAC). CAC provided "recourse" financing, wherein appellant was responsible for the portions of the loans on which his customers defaulted. Appellant explains that when he sold a vehicle financed by CAC, he received a down payment from his customer and only a portion of the remaining sale price as an "advance" from CAC. As explained by appellant, CAC then allocated the advance to an advance pool, and the remaining portion of the loan to a general pool. When the customer made a payment, CAC collected a fee for administering the loan and applicable interest, and reduced the advance pool by the remaining amount of the payment. Eventually, once the advance pool was paid off, the principal amounts would be applied to the general pool, and, in theory, appellant would receive payments from CAC for those amounts as they were received. However, because CAC allocated the loans to pools, if a customer defaulted on an amount in the advance pool, payments from other customers were applied to the advance pool instead of the general pool to offset the bad debt. According to appellant, he did not receive any payments from the general pool because the combination of the high default rate, administrative fees, interest, and the application of principal payments to the advance pool resulted in the general pool essentially never maturing. Therefore, appellant argues that it was reasonable to report his taxable sales based on the payments he received from the lender, CAC (as opposed to the gross receipts from the sales he made to his customers) because there was a high probability that the financed portion of each vehicle sale would ultimately result in a bad debt.

Appellant provided a document titled Credit Acceptance Dealer Monthly Statement, which appellant contends supports a bad debt deduction of approximately $500,000. Appellant did not provide any supporting documentation to verify the amounts on the form, nor could appellant provide the exact amount of bad debts that appellant was claiming. While it is possible

that some portion of appellant's vehicle sales likely resulted in bad debts, appellant has failed to provide any of the documentation required by California Code of Regulations, title 18, section (Regulation) 1642 to support any deduction for nontaxable bad debts. Accordingly, we have no basis on which to find that a reduction to the amount of unreported taxable sales established for either audit period is warranted.

Issue 2: Whether respondent has established with clear and convincing evidence that the understatements were due to fraud or an intent to evade the payment of tax.

In the case of a deficiency determination, a penalty of 25 percent of the amount of the determination applies if any part of the deficiency is due to fraud or an intent to evade the law or any authorized rules or regulations. (R&TC, § 6485.) Fraud or intent to evade must be established by clear and convincing evidence. (Cal. Code Regs., tit. 18, § 1703(c)(3)(C); *Appeal of ISIF Madfish, Inc.*, 2019-OTA-292P.) The express language of R&TC section 6485 makes it clear that a fraud penalty shall be imposed on the entire deficiency "if any part" of that deficiency determination is due to fraud. (*Ibid*.)

The R&TC does not define fraud, but there are many federal precedents that we may look to for guidance. (*Ibid*.) Fraud is intentional wrongdoing on the part of the taxpayer with the specific intent to avoid a tax known to be owing. (*Tenzer v. Superscope, Inc.* (1985) 39 Cal.3d 18, 30; *Bradford v. Commissioner* (9th Cir. 1986) 796 F.2d 303, 307.) Fraud can be proven by circumstantial evidence. (*Tenzer v. Superscope, Inc.*, *supra*.) Circumstantial evidence of fraud or intent to evade taxation includes, but is not limited to: substantial discrepancies between recorded amounts and reported amounts that cannot be explained (the indication that a deficiency is due to intent to evade increases in direct proportion to the ratio of the understatement); when sales tax or sales tax reimbursement is properly charged, evidencing knowledge of the requirements of the law, but not reported; inadequate records; failure to cooperate with tax authorities; failure to file tax returns; and lack of credibility in the taxpayer's testimony. (*Ibid*; *Rau's Estate v. Commissioner* (9th Cir. 1962) 301 F.2d 51, 54-55; *Powell v. Granquist* (9th Cir. 1958) 252 F.2d 56, 60.) Federal courts have also concluded that the "'[m]ere omission of reportable income is not of itself sufficient to warrant a finding of fraud [but] repeated understatements in successive years when coupled with other circumstances showing an intent to conceal or misstate taxable income present a basis'" for inferring fraud. (*Rau's Estate v.*

Commissioner (9th Cir. 1962) 301 F.2d 51, 54-55 [quoting *Furnish v. Commissioner* (9th Cir. 1958) 262 F.2d 727, 728].)

In the current matter, there is no direct evidence of fraud, thus respondent has relied on circumstantial evidence to determine that the understatement is due to fraud. In the first audit, respondent determined that appellant had knowledge as to the reporting requirement and proper application of sales tax. Respondent asserts appellant was the President of a corporation previously engaged in the same line of business and at the same location as appellant, which had previously been audited by respondent, twice. As the President of the corporation appellant had the ultimate responsibility for and access to the sales and use tax information. Moreover, appellant's computer software correctly computed sales tax and transcribed that amount onto the sales contracts, meaning appellant was able to generate computerized sales reports with detailed information, such as, the sales price of the vehicle and the amount of sales tax accrued. Further gross receipts filed on FITRs for 2009 and 2010 are consistent with the auditor's reconstructed sales amounts.

Respondent determined that appellant concealed records with intent to evade payment of tax because appellant did not provide source documents showing how sales and use tax returns were prepared. Based on a reconstruction of records, respondent computed average quarterly sales of $223,608 for the audit period. These amounts are consistent with average reported taxable sales of over $200,000 per quarter for prior quarters. However, appellant only reported average taxable quarterly sales of $94,940 for the audit period. Respondent also compared DMV data and auction house information to appellant's sales journals and report of sales slips, which disclosed 34 unrecorded sales by appellant. Further appellant participated in the exit meeting with respondent for an audit of the prior corporation during which they discussed the audit report. Thus, respondent determined that this evidence demonstrates that appellant knowingly and intentionally defrauded the State of California during the first audit period.

With regard to the second audit period, respondent determined that appellant had knowledge as to the requirement and proper application of sales tax because appellant was the sole proprietor and thus was involved in the day-to-day operations of the business. Respondent asserts that appellant served as the President for Norman Automotive Inc., which owned the business previously and was audited twice by respondent with minor liabilities. Respondent points out that appellant was also previously audited while under the same permit number (first

audit) and that the error rate calculated in the prior audit was 167.80-percent, while the percentage of error in the second audit is 922.20-percent which is a significant increase. Respondent also asserts that appellant did not provide records, but evidence from the prior audit (first audit) indicates that appellant had access to sales journals and collected sales tax as shown on sales contracts. Respondent found that appellant reported different and higher amounts to DMV than it did to respondent. Thus, respondent determined that appellant knowingly and intentionally evaded payment of sales tax to CDTFA in the second audit.

At the hearing appellant argued that respondent had failed to meet its burden to show by clear and convincing evidence that appellant intentionally evaded the payment of tax. Appellant asserted that appellant could not have intentionally evaded the payment of tax because appellant was unaware of the amount of taxes that were due. This was due to the fact that the business incurred substantial bad debts which were not accounted for in the audit. Appellant further argued that at best, respondent's evidence establishes that appellant was negligent, but not fraudulent. Appellant further argued that for the two audit periods at issue in this appeal, he reported total sales based on the down payments he received from customers and the advances he received from CAC, essentially netting potential bad debts from his reported total sales.

For the period January 1, 2003, through December 31, 2005, the corporation reported taxable sales averaging $249,640 per quarter, and for the period January 1, 2006, through December 31, 2008, the corporation reported taxable sales averaging $311,606 per quarter. Thus, for the six-year period January 1, 2003, through December 31, 2008, the taxable sales reported by the corporation substantially exceeded appellant's average reported taxable sales of $94,940 per quarter for the first audit period beginning on April 1, 2009, and $12,872 per quarter for the second audit period beginning on April 1, 2012. When asked to explain the substantial decrease in reported taxable sales from the time the business was operated by a corporation until appellant operated the business, appellant claimed that he did not prepare the sales and use tax returns for the corporation, but rather all sales and use tax matters were handled by Gosch Auto Group. In support, appellant provided a letter from E. Gosch, Owner/Corporate Secretary of Norman, Automotive Inc. stating that "to the best of our knowledge" appellant did not complete sales tax reports for the company and that office staff at Gosch Auto Group completed the reports. Appellant also stated that Gosch Auto Group sent an accountant "in the beginning" to assist appellant with filing sales and use tax returns.

Respondent has established by clear and convincing evidence that the understatement in both audit periods was due to fraud. Appellant had knowledge as to the reporting requirement and proper application of sales tax. As the president of the corporation operating the previous used car dealership for 10 years before the business was converted, appellant had ample opportunity to learn and understand sales and use tax recordkeeping and reporting requirements. As the President of the corporation appellant had the ultimate responsibility for and access to the sales and use tax information. Moreover, appellant's computer software correctly computed sales tax and transcribed that amount onto the sales contracts, meaning appellant was able to generate computerized sales reports with detailed information, such as, the sales price of the vehicle and the amount of sales tax accrued.

Appellant failed to provide complete sales records for either audit period and only provided FITRs for 2009 and 2010. Furthermore, appellant reported total sales of only $275,117 on his sales and use tax returns for 2010, but reported gross receipts of $1,090,145 on his federal income tax return for that same year. The discrepancy between the gross receipts appellant reported on the income tax returns and his reported total sales, is strong evidence that a significant portion of the audited understatement of reported taxable sales is not due to appellant netting bad debts from his reported sales for the first audit period. Further, the gross receipts reported on appellant's federal income tax returns for 2009 and 2010 exceeded his reported total sales by $32,467 for 2009 and by $815,028 for 2010, with no deductions for bad debts in either year.

Appellant further argued that for the two audit periods at issue in this appeal, he reported total sales based on the down payments he received from customers and the advances he received from CAC, essentially reporting on a cash basis, and also netting potential bad debts from his reported total sales.

We find that appellant's explanation that he reported his sales based on the payments he received lacks credibility, in part, because appellant had sufficient experience operating a used car dealership to understand that he was required to report his sales as they occurred, rather than just reporting his cash receipts. Further, the gross receipts reported on appellant's federal income tax returns for 2009 and 2010 exceeded his reported total sales by $32,467 for 2009 and by $815,028 for 2010, with no deductions for bad debts in either year. Given that appellant had experience with sales and use tax matters for a similar business prior to the beginning of the first

audit period, but substantially understated his reported taxable sales in comparison to amounts he reported on his income tax returns and reported to the DMV, OTA concludes that the audited understatement for the first audit period is due to fraud or an intent to evade the payment of tax.

For the second audit period, the gross receipts reported on appellant's federal income tax returns are not in evidence because appellant provided no records whatsoever. While appellant asserted that he had records to show that he incurred a significant amount of bad debts during the audit period, he never provided the alleged records. A taxpayer's failure to produce evidence that is within his control gives rise to a presumption that such evidence, if provided, would be unfavorable to the taxpayer's case. (*Appeal of Bindley,* 2019-OTA-179P.) Appellant's failure to provide any records, combined with the unique facts of this case including OTA's finding of fraud for the other audit period, constitutes evidence of an intent to evade the payment of tax. Appellant contends that he was never given the opportunity to provide the documents. Appellant referenced respondent's Assignment Activity History, which includes information regarding respondent's attempts to obtain information from appellant. OTA reviewed this document and it indicates that appellant was given multiple opportunities to submit documentation but failed to do so. Furthermore, appellant went through the appeals process with respondent and would have been able to submit documentation at that time. At the hearing, OTA asked appellant whether he had any additional evidence to submit to OTA to support his contentions, but he stated that he did not. Thus, appellant has had ample opportunity to submit evidence to support his case.

Moreover, a comparison of appellant's reported taxable sales of $154,466 for the second audit period with audited taxable sales of $1,578,949 shows that appellant reported only 9.78-percent of his taxable sales during that period. Further, appellant's reported taxable sales declined dramatically after the NOD for the first audit period was mailed on April 23, 2013. For the period April 1, 2012, through June 30, 2013, appellant reported taxable sales of $131,129, averaging $26,226 per quarter, while subsequently, for the period July 1, 2013, through March 31, 2015, appellant reported taxable sales of $23,337, averaging only $3,334 per quarter. Because DMV records show that appellant continued to sell vehicles throughout the audit period, a quarterly average of only $3,334 clearly is unreasonable. Additionally, appellant continued to substantially understate his reported taxable sales even after he had hired qualified tax consultants is April 2014. Considering that appellant's reported taxable sales were substantially

lower than the taxable sales he reported to the DMV throughout both audit periods, is strong indication of an intent to evade the payment of tax.

The evidence supporting the imposition of the 25-percent penalty for fraud in both audit periods is clear and convincing, and thus, the penalty is applicable.

HOLDINGS

1. Appellant has failed to establish that a reduction to the amount of unreported taxable sales for either audit period is warranted.
2. Respondent respondent has established with clear and convincing evidence that the understatements were due to fraud or an intent to evade the payment of tax.

DISPOSITION

CDTFA's actions in denying the appeals for the periods April 1, 2009, through June 30, 2011, and April 1, 2012, through March 31, 2015, are sustained.

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Natasha Ralston
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Natasha Ralston
Administrative Law Judge

We concur:

DocuSigned by:
Josh Aldrich
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Josh Aldrich
Administrative Law Judge

DocuSigned by:
3CADA62FB4864CB...
Andrew J. Kwee
Administrative Law Judge

Date Issued: 10/27/2022