

CLAIMANT INFORMATION

LAST NAME Grab		FIRST NAME Christine	MIDDLE INITIAL N.
INMATE OR PATIENT IDENTIFICATION NUMBER (if applicable) _____		BUSINESS NAME (if applicable) _____	
TELEPHONE NUMBER _____		EMAIL ADDRESS _____	
MAILING ADDRESS _____		CITY San Diego	STATE CA
IS THE CLAIMANT UNDER 18 YEARS OF AGE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		INSURED NAME (Insurance Company Subrogation) _____	
IS THIS AN AMENDMENT TO A PREVIOUSLY EXISTING CLAIM? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		EXISTING CLAIM NUMBER (if applicable) _____	EXISTING CLAIMANT NAME (if applicable) _____

ATTORNEY OR REPRESENTATIVE INFORMATION

LAST NAME N / A		FIRST NAME _____	MIDDLE INITIAL _____
TELEPHONE NUMBER _____		EMAIL ADDRESS _____	
MAILING ADDRESS _____		CITY _____	STATE _____

CLAIM INFORMATION

STATE AGENCIES OR EMPLOYEES AGAINST WHOM THE CLAIM IS FILED Multiple People in Multiple Agencies -	DATE OF INCIDENT 1-31-2023 + 2-27-2023
LATE CLAIM EXPLANATION (Required, if incident was more than six months ago) SEE Attached	

DOLLAR AMOUNT OF CLAIM \$140,000	CIVIL CASE TYPE (Required, if amount is more than \$10,000) <input type="checkbox"/> Limited (\$25,000 or less) <input checked="" type="checkbox"/> Non-Limited (over \$25,000)
--	--

DOLLAR AMOUNT EXPLANATION
SEE Attached

INCIDENT LOCATION
Sacramento, CA

SPECIFIC DAMAGE OR INJURY DESCRIPTION
SEE Attached

CIRCUMSTANCES THAT LED TO DAMAGE OR INJURY
SEE Attached

EXPLAIN WHY YOU BELIEVE THE STATE IS RESPONSIBLE FOR THE DAMAGE OR INJURY
SEE Attached

AUTOMOBILE CLAIM INFORMATION

DOES THE CLAIM INVOLVE A STATE VEHICLE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	VEHICLE LICENSE NUMBER (if known)	STATE DRIVER NAME (if known)
HAS A CLAIM BEEN FILED WITH YOUR INSURANCE CARRIER? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	INSURANCE CARRIER NAME	INSURANCE CLAIM NUMBER
HAVE YOU RECEIVED AN INSURANCE PAYMENT FOR THIS DAMAGE OR INJURY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AMOUNT RECEIVED (if any)	AMOUNT OF DEDUCTIBLE (if any)

NOTICE AND SIGNATURE

I declare under penalty of perjury under the laws of the State of California that all the information I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code section 72).

SIGNATURE <i>C. Grab</i>	PRINTED NAME Christine N. Grab	DATE July 6, 2023
-----------------------------	-----------------------------------	----------------------

INSTRUCTIONS

- Include a check or money order for \$25, payable to the State of California.
 - \$25 filing fee is not required for amendments to existing claims.
- Confirm all sections relating to this claim are complete and the form is signed.
- Attach copies of any documentation that supports your claim. Do not submit originals.

Mail the claim form and all attachments to:
Office of Risk and Insurance Management
Government Claims Program
P.O. Box 989052, MS414
West Sacramento, CA 95798-9052

Claim forms can also be delivered to:
Office of Risk and Insurance Management
Government Claims Program
707 3rd Street, 1st Floor
West Sacramento, CA 95605
1-800-955-0045

Department of General Services Privacy Notice on Information Collection

This notice is provided pursuant to the Information Practices Act of 1977, California Civil Code Sections 1798.17 & 1798.24 and the Federal Privacy Act (Public Law 93-579).

The Department of General Services (DGS), Office of Risk and Insurance Management (ORIM), is requesting the information specified on this form pursuant to Government Code Section 905.2(c).

The principal purpose for requesting this data is to process claims against the state. The information provided will/may be disclosed to a person, or to another agency where the transfer is necessary for the transferee-agency to perform its constitutional or statutory duties, and the use is compatible with a purpose for which the information was collected and the use or transfer is accounted for in accordance with California Civil Code Section 1798.25.

Individuals should not provide personal information that is not requested.

The submission of all information requested is mandatory unless otherwise noted. If you fail to provide the information requested to DGS, or if the information provided is deemed incomplete or unreadable, this may result in a delay in processing.

Department Privacy Policy

The information collected by DGS is subject to the limitations in the Information Practices Act of 1977 and state policy (see State Administrative Manual 5310-5310.7). For more information on how we care for your personal information, please read the [DGS Privacy Policy](#).

Access to Your Information

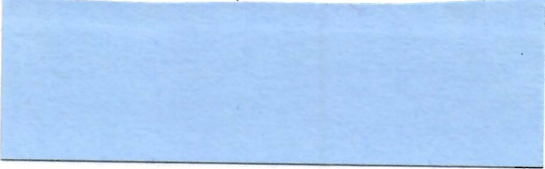
ORIM is responsible for maintaining collected records and retaining them for 5 years. You have a right to access records containing personal information maintained by the state entity. To request access, contact:

DGSORIM
Public Records Officer
707 3rd St., West Sacramento, CA 95605
(916) 376-5300

**Department of General Services
Office of Risk and Insurance Management
Government Claims Program**

Claimant:

Christine N. Grab,



Accused 1:

Malia Cohen
State Controller
State Controller's Office
300 Capitol Mall, Suite 1850
Sacramento, California 95814

Accused 2:

Hasib Emran
Deputy State Controller for Taxation
300 Capitol Mall, Suite 1850
Sacramento, California 95814

Accused 3:

Joe Stephenshaw
Director
California Department of Finance
915 L Street, Suite 1235 Sacramento, CA
95814

Accused 4:

Gayle Miller
Chief Deputy Director, Policy
California Department of Finance
915 L Street, Suite 1235 Sacramento, CA
95814

Accused 5:

Antonio Vazquez
Board of Equalization
621 Capitol Mall, #2160
Sacramento, CA 95814

Accused 6:

Brenda Voet
Taxpayer Advocate (at the time of incident)
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 7:

Shalini Nanda (Shelly)
Advocate Trend & Issue Specialist
Taxpayers' Rights Advocate Office
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 8:

Ann Wilson, Supervisor
Taxpayers' Rights Advocate Office
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 9:

Angela Jones (Trade Media Liaison at the
time of the incident)
Taxpayers' Rights Advocate Office
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 10:

Williams, Carol D.
Chief of the Administrative Services
Division
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 11:

Selvi Stanislaus
Executive Officer
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 12:

Jozel Brunet
Chief, Legal Officer
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 13:

Shane Hofeling
Deputy Chief Counsel
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Accused 14:

Jennifer Fowler
Chief, Accounts Receivable Management
Division
Franchise Tax Board
9646 Butterfield Way, Sacramento,
California 95827

Overview of Claim

The California Franchise Tax Board (FTB) has a business practice in which payments and/or portions of payments disappear from FTB's records for the purpose of calculating how much interest a taxpayer must pay. This causes the taxpayer to pay a higher interest amount than if the payments/portions of payments had been applied (exhibit 1).

I have tried to get clarification regarding how FTB decides which payments/portions of payments to apply and which to not apply for the purpose of calculating interest due. I have also tried to get FTB to disclose the legal codes which justify not applying all funds received from the interest calculations.

FTB has consistently been evasive. I believe that if this practice of not timely applying monies collected to the taxpayer's account were lawful, FTB would have disclosed the appropriate statutes and calculations. Thanks to FTB's evasion, it is clear that this practice is unlawful.

Many people in multiple agencies are currently participating in this evasion in order to cover up FTB's unlawful business practice. In the latest instance of cover-up that this claim is based upon (exhibits 2 and 3 -- detailed in Specific Damage/Injury and Circumstances Which Led to Damage/Injury sections below), co-conspirators include:

- FTB Board of Directors: State Controller Malia Cohen and her Deputy, Hasib Emran. Mr. Emran currently represents Ms. Cohen for Franchise Tax board matters (exhibit 4).
- FTB Board of Directors: Director of the California Department of Finance Joe Stephenshaw and his Chief Deputy Director, Policy, Gayle Miller (exhibit 5). Ms. Miller has consistently represented the Department of Finance on Franchise Tax Board matters for many years, even prior to Mr. Stephenshaw's appointment.

- FTB Board of Director: Board of Equalization Chairman Antonio Vasquez (exhibit 6).
- FTB's Taxpayer Rights Advocate Staff: At the time, the Taxpayer Advocate was Brenda Voet. However, Ms. Voet was in the process of retiring. While Ms. Voet signed both of the letters that are the focal point of this claim, her email auto-responder indicated that she was no longer working when the letters were issued (exhibit 7).
- FTB's Taxpayer Rights Advocate Staff: Because the incriminating emails from FTB were sent by Shalini Nanda (Shelly) and Ann Wilson was copied on them, it appears that these two people were helping to fill in for Ms. Voet (exhibits 2 and 3).
- FTB's Taxpayer Rights Advocate Staff: Per FTB's website, FTB appointed Angela Jones as the new Taxpayer Rights Advocate, effective May 2, 2023 (exhibit 8). Per FTB's website, Angela Jones had been part of the Taxpayer's Rights Advocate staff since at least October 2021, so she was a part of the staff – and possibly had already taken over Ms. Voet's role -- when the incriminating emails were sent (exhibit 8).
- FTB's Taxpayer Rights Advocate Staff and FTB Executive Staff: Carol D. Williams is the Chief of the Administrative Services Division. Ms. Williams oversees communications, executive and advocate services, and taxpayers' rights advocate. Ms. Williams would have personally approved these two correspondences prior to the Advocate's office remitting them (exhibit 9).
- FTB Executive Staff: Selvi Stanislaus, Executive Officer; Jozel Brunet, Chief, Legal Counsel and Shane Hofeling, Deputy Chief Counsel. All three of these people would also have approved these two correspondences prior to remitting them (exhibit 10). Jozel Brunett does not have a fully executed Oath of Allegiance (STD 689) as is required per Government Code sections 1360, 1362-1369 and Section 3 of Article XX of the

Constitution of California. Without a fully executed Oath, Ms. Brunett is working for FTB illegally and is considered a foreign corporate officer posing as a government official. Under Title 18 U.S.C.A. § 912, this is a felony punishable with up to three years in federal prison (exhibit 10).

- FTB Executive Staff: Jennifer Fowler, Chief of the Accounts Receivable Management Division. She heads up the collections department. Interest is charged on accounts in collection, so it appears that Ms. Fowler oversees the department which is committing the accounting irregularities (exhibit 11).

Details of Claim:

Background Information:

On 08-04-2014, claimant filed an Abatement Request (which means a request for refund of penalties, fees and interest) with the California Franchise Tax Board (FTB) for tax year 2011. FTB denied claimant's Abatement Request, not just for 2011, but also for 2013 and 2014, even though no Abatement Request was filed for either of those years. I filed an appeal with the Board of Equalization (BOE) on 08-21-2017, which at the time was the administrative court that handled FTB Appeals. While my case was pending, the administration of FTB Appeals was moved from the BOE to the newly created Office of Tax Appeals (OTA). In November 2019, the OTA upheld FTB on the matter. On 01-29-2020, claimant filed a new appeal with San Diego Superior Court (SDSC) in accordance with A.B. 102 section 13, A.B. 131 section 14 and Cal Government Code section 15677.

While I was auditing the records submitted by FTB during discovery in the OTA/SDSC court cases, I found two instances where FTB employees directed me to remit more money than the applicable billing stated was due (exhibits 1 and 12). In both cases, the employees falsified FTB's internal records to make it appear that was the correct amount due. In both cases, their employer was the beneficiary of the criminal activities, so it appeared that each employee had conspired with FTB to overcharge me. Because the overcharge/falsification of records happened twice with two different employees, it appeared to be systematic.

While auditing the records, I also identified that FTB did not credit all of the estimated tax payments that my husband and I had made in the interest calculations, so we were overcharged interest based on it falsely appearing that we had remitted less funds than we actually had (exhibit 1). The calculations did not follow standard Principles of Tax Administration; some payments were fully credited, some payments were not credited at all, and some payments were only partially credited. There seemed to be no rhyme or reason regarding which funds were applied.

Furthermore, when I hand calculated the interest to make sure we were not overcharged, I found that the system automatically seems to add an excess (approximately) \$1 per year to each of the interest totals (exhibit 1).

On January 10, 2021, I notified the Taxpayer Advocate at the time, Chris Smith, and his assistant Terri Isedeh. I also notified the FTB Board Members, who at the time were State Controller Betty Yee and her Deputy Yvette Stowers, Director of Finance Keely Bosler and her Deputies Gayle Millers and Jay Chamberlain, and Board of Equalization Chairman Antonio Vasquez. I further notified the FTB Executive Staff, who were at the time: Selvi Stanislaus, Jozel

Brunett, Jeanne Harriman, Jennifer Fowler, Denise Mellor, John Sulenta, and Karen Thomas (exhibit 1).

I also submitted evidence of this, as well as other accounting fraud, in the then-pending SDSC court case. If you would like to procure this evidence directly from the court, the documents can be downloaded from here: <https://roa.sdscourt.ca.gov/roa/faces/CaseSearch.xhtml>. The case number is year 2020, number 00005100. Proof was submitted in Exhibits 49, entitled *Accounting Irregularities*, Exhibits 52, titled *Plaintiff's Request for Admissions*, which are both part of item #39 on the court website. More proof of accounting fraud can also be found in the *Plaintiff's Statements of Undisputed Facts and Supporting Evidence in Opposition to Motion for Summary Judgment* (SUF numbers 29 - 67 expose violations of Right to Protest and 68 - 129 expose accounting fraud), which is part of item #86.

Defendant FTB never denied the validity or accuracy of my findings; FTB stated that the records were immaterial to the case. Per CCP § 431.20(a), failure to deny constitutes admission: Any material allegation in the complaint that is not effectively denied is deemed admitted. [see *Hennefer v. Butcher* (1986) 182 CA3d 492, 504, 227 CR 318, 325]. As such, these documents are now legally deemed to be accurate. You can confirm for yourself that FTB never denied these allegations of overcharging interest by downloading all of the documents that FTB filed.

Specific Damage/Injury and Circumstances Which Led to Damage/Injury

As is required under Revenue and Taxation Code (RTC) 21006(a)(2), every year, the Franchise Tax Board allows the general public to make requests for changes to laws, policies and/or procedures that pertain to FTB. I participated in the December 2022 meeting by submitting a set of requests in writing on November 29, 2022 (exhibit 13) and an oral request of

the same items at the meeting held on December 8, 2022. The video of the meeting can be found here: <https://www.youtube.com/watch?v=18F6cXHJZwM>. I speak from 14:35 – 19:45. The minutes can be found here: <https://www.ftb.ca.gov/about-ftb/meetings/board-meetings/2022/december-2022/2022-12-08-text.pdf>).

At the meeting, Joe Stephenshaw was not present. He was represented by his deputy, Gayle Miller. Gayle Miller usually attends the FTB Board Meetings in lieu of Mr. Stephenshaw.

One of the items that I requested was clarification of how FTB determines which payments and portions of payments are withheld for the purpose of calculating how much interest is due. I wrote:

6. Disclosure of Guidelines Used for Calculating Interest

As FTB disclosed in the records submitted in my court case, for the purpose of calculating interest, FTB only recognizes some of the payments that had been made and only portions of other payments that had been made. Please provide the criteria and guidelines utilized for determining which payments and portions of payments are withheld from/applied to the totals of payments collected by FTB for the purpose of calculating interest.

Last year, I made this same Request. In FTB's Response, Brenda Voet stated that she was not required to address this Request since I had litigation pending against FTB. I believe that not addressing my Request was a violation of R&TC Section 21006(b)(2). I believe that alluding that pending litigation voided my right to be a violation of Federal Criminal Code 18 USC §242; Color of Law. Furthermore, how, when and where payments are applied are material facts, and refusing to disclose this information is a violation of 18 USC §1001 (a)(1).

On January 31, 2023, FTB provided a written response to my request (exhibit 2). In their response, they addressed a different issue than the one I had requested to be addressed. I believe that failing to address the issue is a violation of California Taxpayer Right R&TC Section 21006(b)(2) and 18 USC §1001 (a)(1). FTB wrote:

Disclosure of guidelines used for calculating interest.

FTB allows interest on the following payments or overpayments: tax

overpayments; penalty overpayments; interest overpayments; tax deposit overpayments; payments not claimed on a tax return when an overpayment exists (e.g., estimate and extension payments); payments received with a tax return; bill payments; amounts credited against unpaid liabilities for a different tax year; refundable overpayments where the taxpayer had no filing requirement and filed a tax return; refunds returned to FTB due to FTB's error; and Excess State Disability Insurance.

Interest is allowed on overpayments only after a tax return is filed for that tax year. Under Revenue and Taxation Code, section 19341, interest is not allowed on an overpayment from the filing of a tax return if FTB refunds or credits the overpayment within 45 days of the tax return filing date for individual taxpayers and 90 days of the tax return filing date for corporate taxpayers.

In addition, FTB disagrees with your assertion that FTB's decision not to answer this question last year due to pending litigation violated any state or federal laws.

On February 2, 2023, I sent a response to FTB's written response (exhibit 14). Included in the response were twelve of the fourteen people accused in this claim. The two people not copied that email were Angela Jones and Shane Hofeling. I wrote:

For the items that FTB has failed to address (items #4, #5, #6), I will await FTB's supplemental response that FTB stated will be provided on or before February 28, 2023. In that response, I expect:

- In item #6, FTB failed to address the issue that I asked about. I asked for full disclosure of policies and procedures regarding the *withholding of payments and portions of payments for the purpose of calculating interest*. As is typical, FTB pretended as if I had asked a different question than I did. I expect the information that I requested to be provided along with all of the other withholding policies and procedures.

As FTB had promised, on February 27, 2023, FTB sent a supplemental response with more information (exhibit 3). However, no further information was provided regarding how it was determined which payments and/or portions of payments were withheld from the taxpayer's account for the purpose of calculating interest. FTB included Angela Jones on this email. Since Brenda Voet's auto-responder still indicated that she was out of the office (exhibit 6), I believe Ms. Jones inclusion indicates that she had already transitioned into the role of Advocate. FTB

also copied Shane Hofeling on the email, indicating that he was the person from legal who approved the content of the letter.

I believe that failing to disclose how FTB applies payments made to them, especially when the payments/partial payments seem to vanish from FTB's records, is a violation of FTB's Principals of (exhibit 15):

- Carry out our fiduciary responsibilities to taxpayers by managing their accounts with accuracy and financial integrity.
- Operate with transparency to maintain public trust and confidence.
- Conduct our business in accordance with the Statement of Principles of Tax Administration, Taxpayers' Bill of Rights, and our organizational values.

I believe that not crediting the full amount of money paid by taxpayers to be accounting fraud. I believe that charging interest on the falsely inflated balance is the federal crime of racketeering, which is defined as a pattern of illegal activity carried out as part of an enterprise that is owned or controlled by those who are engaged in the illegal activity. The definition derives from the federal Racketeer Influenced and Corruption Organizations Act (RICO), (18 U.S.C.A. §1961 et seq. [1970]).

My research leads me to conclude that an otherwise legal organization that derives some portion of its income through illicit activities may be in violation of the RICO laws. The U.S. Supreme Court, in Sedima S.P.R.L. v. Imrex Co., 473 U.S. 479, (1985), upheld the constitutionality of the RICO Act and made clear that, unless amended by Congress, the RICO statutes must be interpreted broadly. My understanding is that, for a civil case, I only have to show that via a Preponderance of Evidence that it is more likely than not that people are sustaining injuries from an ongoing criminal enterprise.

I believe that FTB evading this issue by answering as if I had addressed a different topic in the initial response confirms that FTB is aware that this business practice is unlawful. Had the Response been a result of a misunderstanding of what I had asked, FTB would have clarified so in their Supplemental Response. However, the topic of payments being withheld for the purpose

of calculating interest was not addressed in the Supplemental Response, which makes it clear that the false topic of the original letter was intentional deception.

Taxpayer Advocate Brenda Voet signed the letter per the approval of the Board of Directors and their Deputies, as well as the approval of the FTB Executives and their Deputies. Since it appears that the Advocate had already retired, it seems the other staff in the Advocate's Office were involved in the criminal cover-up, using Ms. Voet as a shield to hide their own involvement.

All fourteen of the Accused were aware of the facts stated above. I believe that the fourteen individuals have all committed the federal crime of *Conspiring to Cover Up Criminal Activities*. Thirteen of these people took an *Oath of Allegiance* or *Oath of Office* to uphold federal and state laws. I believe that by *Conspiring to Cover Up Criminal Activities*, these thirteen have all also committed the federal crime of *Treason of Oath*. And as already stated above, the one person who never signed a proper Oath, Jozel L. Brunett, should be imprisoned for falsely posing as a public official.

Dollar Amount of Claim and Explanation

I seek restitution of \$10,000 per person Accused for FTB's violation of my rights under California Right R&TC Section 21006(b)(2), for violating 18 USC §1001 (a)(1) by refusing to disclose FTB's policies and procedures regarding how it is determined which payments/portions of payments are applied for the purpose of calculating interest, and for violating 18 US Code 242 by not allowing me full and free access of information in accordance with my rights, which is a Class A misdemeanor. In all, I seek restitution of \$140,000.

Furthermore, I demand that FTB immediately publicly disclose how it is determined which payments/portions of payments are applied for the purpose of calculating interest. I also

demand immediate termination and imprisonment of Jozel Brunet for working illegally as a foreign corporate officer posing as a government official.

I further demand that an investigation be conducted to determine if not crediting all monies to the taxpayer's account for the purpose of calculating interest is lawful. If this business practice is determined to be unlawful, I demand that FTB immediately cease and desist this practice.

Finally, I demand that ORIM immediately revoke the insurance policy of the thirteen Accused individuals who are still employed by the State of California for committing the federal crimes of *Colluding to Cover up Criminal Activities* and, for the employees with properly executed oaths, *Treason of Oath*. My understanding is that the revocation of their insurance policies will result in be immediate termination. Furthermore, all fourteen of the Accused should be criminally prosecuted.

Verification

I declare under penalty of perjury under the State of California that all of the information that I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading, I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code Section 72).

C. Grab July 6, 2023

Christine N. Grab

ORIM Exhibit List

Exhibit #	Description	Pages
1	Proof of 4 Schemes to Overcharge Interest	15
2	Letter from FTB's Taxpayer's Advocate Office in Response to my Annual Taxpayer Bill of Rights Requests	6
3	Supplemental Letter from FTB's Taxpayer's Advocate Office in Response to my Annual Taxpayer Bill of Rights Requests	5
4	Proof that Malia Cohen and Hasib Emran Oversee FTB's Business Practices	2
5	Proof that Joe Stephenshaw and Gayle Miller Oversee FTB's Business Practices	2
6	Proof that Antonia Vasquez Oversees FTB's Business Practices	1
7	Proof that Brenda Voet Had Already Stopped Working for FTB	2
8	Proof that Angela Jones Had Likely Already Taken Over as Taxpayer Advocate	3
9	Proof That Carol D. Williams Oversees Taxpayer Advocate's Office	1
10	Proof that Selvi Stanislaus, Jozel Brunet and Shane Hofeling Oversee FTB's Business Practices, and Jozel does not have a proper Oath	4
11	Proof that Jennifer Fowler Oversees FTB's Practice of Not Timely Applying All Payments	1
12	Proof of FTB's Accounting Fraud to Overcharge Interest	3
13	My 11 Requests for the FTB Annual Taxpayer Bill of Rights Meeting	14
14	My Response to FTB's Letter Dated January 31, 2023	3
15	FTB's Foundational Principals, Values and Goals	3