

**From:** Christi Grab [REDACTED]  
**Subject:** Fwd: My First Annual Taxpayer Bill of Rights Request for 2021 (This is supporting documentation re: Protest Violation email)  
**Date:** December 10, 2025 at 8:10 AM

CG

**To:** [REDACTED]  
[REDACTED] Andrianarimanana, Danamona  
Perrault, Michele [REDACTED] Jones, AngelaC@FTB [REDACTED] FTB Advocate@FTB  
FTBAdvocate@ftb.ca.gov  
**Cc:** Stanislaus, Selvi@FTB [REDACTED]  
[REDACTED] Shavor, Nadean@FTB [REDACTED] Hofeling, Shane@FTB  
[REDACTED] Williams, Carol D@FTB [REDACTED]  
[REDACTED] Rouse, Raymond@FTB  
[REDACTED] Scullary, Melody@FTB [REDACTED] Dendorfer, Erin@FTB [REDACTED]  
[REDACTED] Gardner, William@FTB

Begin forwarded message:

**From:** Christi Grab <[REDACTED]>  
**Subject:** My First Annual Taxpayer Bill of Rights Request for 2021  
**Date:** October 23, 2021 at 11:22:43 AM EDT  
**To:** "Voet, Brenda@FTB" <[REDACTED]> "FTB Advocate@FTB" <FTBAdvocate@ftb.ca.gov> "Stowers, Yvette@SCO" <[REDACTED]> "Chamberlain, Ja @DOF" <[REDACTED]> "Hammond, Kari@ASM" <[REDACTED]> "Reguindin, Joemil" <[REDACTED]>  
**Cc:** "Maples, Susan@FTB" <[REDACTED]>

Dear FTB Board Members and Taxpayer Advocate:

I will be submitting several Requests this year, but I decided to submit this one now because I am also contacting legislators about the issue and I want everyone to be on the same page.

In California, a creditor is required to prove to a judge that a debt is owed and get the judge's authorization to implement a wage garnishment, bank levy or lien. The exception is the taxation agencies. I am requesting that this loophole be closed, and that the taxation agencies be required to prove to an independent judge that a debt is actually owed prior to implementation of collection tools.

Here is an excerpt from my Reply that I submitted in my court case last week:

"Many of these irregularities are so egregious that I believe they qualify as fraudulent. For example, on 01-23-2014, I made a \$9,000 estimated tax payment designated for tax year 2011 (this was a repayment of a previous payment that had been "misapplied" and refunded to us). In Exhibit 49, Accounting Irregularities, I documented in questions 10F, 15C, 16C, 16D, 16F, and 23C that this one payment was applied to four different tax years on overlapping dates.

Per the Taxpayer Advocate's stated policy of withholding estimated tax payments made by married couples until that year's return is filed, the \$9,000 the payment should have been applied to tax year 2011 on 03-06-2014, the day that FTB received our tax year 2011 returns. However, FTB representatives insisted that the \$9,000 payment could not be located no matter how many times I sent in the canceled check. As I documented in Exhibit 52, pages 6 – 7, Qs 20 – 25, FTB filed a new wage garnishment against my husband on 06-27-2014 for \$3,8511.11. Meanwhile, FTB's own accounting ledgers that were submitted to this court by FTB state that on 06-27-2014, that single \$9,000 payment was simultaneously fully applied to both tax years 2011 and 2013. Per FTB's own 2011 ledger, this garnishment was filed despite the fact that our 2011 tax year was paid in full and no money was due.

This is only one of the fifteen "lost" payments. All of the "lost" payments have accounting irregularities surrounding them, and all of them were difficult and time-consuming for me to

irregularities surrounding them, and all of them were difficult and time consuming for me to rectify.”

I’d like to remind you that there was a second payment made for 2011 for \$4,393 that was missing, as well, at the time the garnishment was implemented.

And I’d also like to remind you that that this was the second wage garnishment FTB filed against us for 2011, as another payment for \$13,393 made via credit elect had previously vanished. This second garnishment referenced above resulted from trying to correct the egregious accounting irregularities surrounding that “lost” \$13,393 payment.

Both times, I should have had the right to go before a judge to prove the debt was not owed. Instead, my rights to due process were violated.

If FTB had real accountability to a third party, these kind of “mistakes” would quickly cease. If you want to put a stop to the accounting irregularities, being held accountable to a neutral third party is an important first step.

If you have not yet read Exhibits 49, entitled Accounting Irregularities and Exhibits 52, Plaintiff’s Request for Admissions, I would suggest that you do so. It is well worth your time to understand how extensive FTB's fraud is. They can be downloaded from here: <https://roa.sdcourt.ca.gov/roa/faces/CaseSearch.xhtml>. The case number is year 2020 number 00005100. The Exhibits are attached to item #39, The Declaration.

If you’d like to read the rest of the Reply Brief that I quoted from above, it is item number 68.

Regards,

Christine Grab  
Psalm 64