

**From:** Christi Grab [REDACTED]  
**Subject:** My 7 TBOR Requests for the December 8 meeting  
**Date:** December 7, 2025 at 9:11 AM

**To:** FTBAAdvocate@ftb.ca.gov, Jones, AngelaC@FTB [REDACTED] FTB Board Liaison@FTB  
FTBBoardLiaison@ftb.ca.gov, [REDACTED]  
Andrianarimanana, Danamona [REDACTED]  
Perrault, Michele [REDACTED]  
Stanislaus, Selvi@FTB [REDACTED] Hofeling, Shane@FTB [REDACTED]  
Shavor, Nadean@FTB [REDACTED]  
Williams, Carol D@FTB [REDACTED]  
**Cc:** Malone, Candie@FTB [REDACTED] Rouse, Raymond@FTB [REDACTED]  
[REDACTED] Scullary, Melody@FTB [REDACTED] Gardner, William@FTB [REDACTED]  
Dendorfer, Erin@FTB erin.dendorfer@ftb.ca.gov, [REDACTED]

Christine Grab  
[REDACTED]  
[REDACTED]

December 7, 2025

Franchise Tax Board Taxpayer Advocate Office  
Email: FTBAAdvocate@ftb.ca.gov

Re: Seven (7) Requests for 2024 Annual Taxpayer Bill of Rights Meeting

Dear FTB Taxpayer Advocate Staff, FTB Executive Staff and FTB Board Members:

I want to begin by stating that I am deeply disappointed in Ms. Jones for yet again allowing herself to be held responsible for the contents of last year’s ATBOR Response that I believe contained fraud. I do not believe that Ms. Jones wrote that letter herself, and I find it unconscionable that the true author set Ms. Jones up as a patsy instead of taking responsibility for their own words.

Likewise, I am disgusted that Human Resources allowed Ms. Jones to be set up as a patsy. As I said in my public comment at the September 2025 Board Meeting, I believe that the legal department framing other staff for the crimes perpetrated by the legal department constitutes psychological abuse. Ms. Jones should not have to live in perpetual fear indictment, and the fact that HR didn’t step in to protect her from this psychological abuse is unconscionable.

In the closing of my 2024 ATBOR written requests, I wrote:

“I suggest that this in this year’s response, FTB take into account the multiple recent Supreme Court rulings made in 2024 which reign in government overreach, particularly *Loper v. Raimondo (The Chevron Deference)*, which allows judges to interpret laws instead of relying on an agency’s interpretation.

Thanks to these recent rulings, the days of FTB maliciously altering statutes and engaging in extra-legal activities has ended. FTB is at a cross-roads: FTB can voluntarily change its policies and procedures to comply with existing federal and state law, or “we the people” can force FTB to change – which will likely involve federal lawsuits and criminal prosecutions. FTB has built its business model on fraud; there is no statute of limitation on fraud.”

It is disappointing that FTB did not heed my warning. I am sure that everyone receiving a copy of these requests is aware that the federal government has begun indicting employees of the State of California. I believe that more indictments will be

the federal government has begun harassing employees of the State of California. I believe that more harassment will be coming. In my opinion, the best way for the federal government to neutralize California is by crippling California's primary source of revenue -- which is FTB -- via so many arrests that FTB can no longer function. I will be surprised if the federal government does not use such a strategy.

Here are my seven (7) requests for 2025.

## 1. Require Staff to cite all statutes/regulations verbatim

Currently, FTB staff are routinely violating TITLE 18, U.S.C., SECTION 242, Color of Law as a part of FTB's standard operating procedures. For example, I have had numerous staff tell me that withholding estimated tax payments from married couples was required by law. However, the authority cited to justify this practice, Treas. Reg. § 1.6654-2(e)(5)(ii)(A) (*note: not a law*) actually says "the payment made on account of the estimated tax for that taxable year may be treated as a payment on account of the tax liability of either the husband or wife for the taxable year, or may be divided between them in such manner as they may agree." I believe that the Trump administration would view the claim that "withholding payments from married couples is required by law" as a false claim made Under the Color of Law and would prosecute anyone who makes this false claim.

My request is that FTB protect their employees from prosecution by implementing a policy that requires that all staff are trained on the statutes and regulations that are pertinent to their particular job duties. The staff should always cite the text verbatim and not paraphrase. No more saying something is a law and not being able to cite the statute number because no such statute exists. No more misrepresenting what is written in the statutes by cherry picking words out of context, omitting words, or adding words that aren't there.

Failure to implement this policy will be interpreted by the constituents -- the people who pay your salaries -- as FTB intentionally setting its employees up to be the patsies for unlawful policies and procedures imposed by FTB's executives and legal department.

## 2. Full disclosure of information regarding FTB's "no payment suspense account"

In previous ATBOR Responses, FTB has stated that the estimated tax payments that FTB collects are immediately identified as revenue and turned over to the State Controller: <https://www.ftb.ca.gov/about-ftb/meetings/taxpayer-bill-of-rights/2023-Supplemental-response-Grab-Reply.pdf>

FTB has also stated that some types of estimated tax payments are not immediately applied to the taxpayer's account; these payments are held in a suspense account until the taxpayer files that year's tax return. When I log into MyFTB estimated payments page, it states "Funds listed below can only be claimed when you file a tax return for the corresponding tax year." I believe this indicates that all estimated tax payments that I may make are withheld from my account and placed into the suspense account.

In the San Diego Superior Court case *Grab v FTB*, FTB propounded documents that stated that the estimated tax payments which are held in suspense are identified as "no payments." Two years ago, FTB stated "It is unclear to what indicators you are referring to as 'no payments' indicators." So to clarify, here is one of the documents that FTB propounded under penalty of perjury: <https://gwsandiego.net/blog/wp-content/uploads/2021/09/22no-payment22.pdf>.

The only purpose I can think of to identify payments as “no payments” is to not include these funds into the revenue collected totals.

In 2022, I had asked “Please specify exactly when these withheld payments are counted in the revenue totals for the State of California for that year.” FTB’s deceptive reply was “Yes, estimated tax payments are recorded as revenue when the funds are remitted.” I hadn’t asked about payments that FTB had identified as estimated tax payments. I had asked about payments FTB had identified as “no payments”: <https://www.ftb.ca.gov/about-ftb/meetings/taxpayer-bill-of-rights/2022-bor-final-responses-grab.pdf>

In 2022, I had also asked “Who is the custodian of the suspense accounts in which the withheld payments are placed for the interim?” FTB’s deceptive reply was “All funds are deposited into accounts within the Centralized State Treasury System (CTS) and remitted to the State Controller’s Office (SCO).” Again, I hadn’t asked about payments that FTB had identified as funds. I had asked about payments that FTB had identified as “no payments,” which obviously weren’t yet identified as funds.

When I asked about the “no payment suspense account” again in 2023, FTB falsely stated that it had already addressed the issue in the 2022 supplemental response: <https://www.ftb.ca.gov/about-ftb/meetings/taxpayer-bill-of-rights/2024-Grab-FTB-TBOR-Reply.pdf>

In *Grab v FTB*, I used the records that FTB propounded to show numerous egregious accounting irregularities associated with these withheld payments. When I asked FTB about these irregularities during Discovery, Chelsea Hubbard stated under penalty of perjury that FTB does not keep accurate accounting records. I was so curious to know where my estimated tax payments had vanished to that I filed a Motion to Compel to obtain the omitted and redacted documents that contained the information about what had happened to my money: <https://gwsandiego.net/blog/wp-content/uploads/2021/02/motion-to-compel-redacted-pages-1-21.pdf> (you can get an unredacted copy and the attached supporting evidence from the court’s website: <https://roa.sdcourt.ca.gov/roa/faces/CaseSearch.xhtml>). The case number is year 2020, case number 00005100.

The strange accounting irregularities makes it appear that these funds are somehow utilized in the interim between being received by FTB and being applied to the taxpayer’s account. The complete details can be found in the *Statements of Undisputed Facts and Supporting Evidence in Opposition to Motion for Summary Judgment* (68 - 129 exposes the accounting fraud), which can be downloaded from the court’s website.

In my 2023 and 2024 ATBOR Requests, I alleged that in the 2022 response, FTB tried to deceive me by conflating payments that FTB had identified as estimated tax payment with payments that had been identified as “no payments.” If my allegations were incorrect, FTB would have denied them. FTB has made no such denial. Failure to deny constitutes admission of truth. At this point, it appears that the funds withheld in suspense are placed into an off-the-books spending account. I request that **FTB provide full disclosure about this “no payment suspense account” that the withheld estimated tax payments are held in:**

- Is this account a “borrowable funds” account?
- If so, please provide complete details about the terms of when these funds can be utilized, including who can utilize them and for what purposes.
- If not, please explain the nature of how these funds are utilized in the interim between FTB receiving the funds and applying the funds to the taxpayer’s account.
- Who controls the funds within the “no payment suspense account” account? Is it FTB, the State Controller, or another agency?
- Are there records from this account available to the public to scrutinize, or is this an

“off-the books” or a “secret” account?

Furthermore, **Ms. Cohen**: Back in 2017, Yvette Stowers told me that she had opened an audit into FTB’s accounting irregularities involving “misapplied” payments. I have made multiple Public Records Requests from the State Controller’s Office for the results of this audit. All of my requests have gone unacknowledged. As the head of the California Auditor’s Office, **will you please publicly release the results of the audit?**

### 3. **Disclose exactly when tax payments are applied to the taxpayer’s account**

In the SDSC court case *Grab v FTB*, I documented that, year in and year, out the Taxpayer’s Advocate office told me that withholding some types of estimated tax payments from the taxpayer’s account until the tax return for that year was filed was FTB’s standard business practice. However, the Disclosure Department repeatedly denied the existence of these same withholding practices.

In the court case, FTB never confirmed nor denied the existence of these withholding practices. If these practices were lawful, FTB would have stated so in court. This failure to admit to these practices in court indicates that these practices are extralegal (also referred to as “underground regulations.”)

In the SDSC case, I alleged that the practice of temporarily withholding estimated tax payments instead of immediately applying the funds to the taxpayer’s account was an embezzlement scheme. I also alleged that the practice of imposing late fees, penalties and interest for “paying late” when the funds had been received by the due was a racketeering scheme. FTB never denied these allegations. Failure to deny constitutes admission of truth.

Since the case ended, I have tried multiple times to get FTB to provide full disclosure regarding **exactly when** all tax payments are **actually applied** to the taxpayer’s accounts. FTB has repeatedly evaded disclosure of this information.

In 2022, FTB gave a vague response “The timing of when the payments are applied may vary based on how the payments are made, the number of taxpayers the payment is made on behalf of, the method of payment, and whether additional information is needed to apply to the correct amount to the taxpayer’s account”: <https://www.ftb.ca.gov/about-ftb/meetings/taxpayer-bill-of-rights/2023-Supplemental-response-Grab-Reply.pdf>

In my 2023 request, I wrote:

“The following is a list of Personal and/or Business Entities payment types that are applied to the accounts of taxpayers:

Estimate Payments

Return Payments

Bill Payments

Proposed Assessment Payments Extension Payments

Suspense Payments

Amended Return Payments

Prior Year Estimate Payments

Prior Year Miscellaneous Payments

Tax Deposits

Fiscal Payments

Accounts Receivable Payments

Federal and State Offset Payments Collection Payments

Limited Liability Company (LLC) Tax Voucher LLC Estimated Fee

Automatic Extension Payments Pass-Through Entity Elective Tax Payment

I request that FTB clarify *exactly when* the payments are applied in each of the above listed scenarios, along with the specific *California* Revenue and Tax Codes utilized to justify the delay in application of funds. I believe that 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), which states in part:

it is a federal crime, in a matter within the jurisdiction of a government agency, to (1) falsify, conceal or cover up a material fact.”

FTB’s response was: “FTB applies bill payments on the date they are received”: <https://www.ftb.ca.gov/about-ftb/meetings/taxpayer-bill-of-rights/2024-Grab-FTB-TBOR-Reply.pdf>

I’d requested disclosure of FTB’s standard operating procedures on fourteen types of payments. FTB only addressed one of the fourteen types of payments. Last year, I made the same request. In the response that she signed, Angela Jones stated “FTB...has previously addressed this issue in its response to you for the 2022 Taxpayers’ Bill of Rights dated February 15, 2023.” I believe the federal government would identify that sentence as fraud since the issues were not fully addressed. **If FTB was performing its duties as a public servant lawfully and ethically, FTB would disclose exactly when the payments are applied to the taxpayers account** since 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). **At this point, it appears that FTB is temporarily embezzling these taxpayer funds to run the off-the-books spending account addressed in item #2 above.**

**This year, I expect FTB to comply with the above referenced federal law and fully disclose *exactly when each type of the rest of the tax payments are actually applied to the taxpayer’s account.***

The improper application of payments in accordance with the assorted laws is a violation public policy. The deceptive wording used to evade disclosing these practices are clearly intentional schemes of deceit.

#### **4. Disclosure of which payments/portions of payments are recognized for interest calculation purposes**

In the SDSC court case *Grab v FTB*, it was disclosed that, for the purpose of calculating interest, FTB only recognized some of the payments that had been made and only portions of other payments that had been made. Thus, my husband and I paid interest when we should not have because it falsely appeared that we had an outstanding balance when we did not – all monies owed had been paid prior to the due date and no funds had been due for any of the tax years in dispute:  
<https://gwsandiego.net/blog/wp-content/uploads/2021/02/proof-of-4-schemes-to-overcharge-interest.pdf>

In 2022, 2023, and 2024 I asked FTB to 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.



3C: ... I heretofore, any protest on the ground that FTB did not include the prepayments or credits is not supported by legal authority.

As has been established by Revenue and Tax Code 19087, a Notice of Proposed Assessment can only be issued on accounts that have an outstanding tax liability due for the year as assessed by FTB using a status of single, filing 0 exemptions.

My husband and I filed Protests to the NPAs that FTB issued. FTB “misclassified” all of our Protests and thus denied us our right to Protest under R&TCs 21010 and 20102 (please see the above referenced court document. SUF 29 - 67 expose FTB’s violations of the Right to Protest).

However, as FTB employee Keith Swank stated under penalty of perjury, even if our Protests had not been “misclassified,” the Protests would have been denied on the grounds that FTB does not legally have to include all prepayments and credits received into the calculations. I believe that the denial of the right to Protest on these grounds is a violation of the Taxpayer Bill of Rights Sections 21010 and 20102.

Mr. Swank failed to provide any legal codes to substantiate this claim that FTB is not required to include all prepayments and credits, which is one of the reasons that I filed the *Motion to Compel*. While the judge did not order Mr. Swank to provide the legal codes, I believe that FTB has a responsibility to disclose these legal codes in order to comply with its own Foundational Principals:

- 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.

As such, I request that FTB provide all of the relevant legal codes which justify not applying all prepayments and credits that have been collected by FTB into the taxpayer’s NPA totals.

I also request all legal codes that justify not allowing Protests on the grounds that FTB had underreported the totals collected.

If FTB again fails to provide codes to justify these nefarious and malicious business practices, the Taxpayer Advocate has a legal obligation to immediately halt these extralegal business practices accordance with our constitutional protections.

I am sure that you will want to review the full context of the quote above for your

response. Please download the *Declaration* from the court: <https://roa.sdcourt.ca.gov/roa/faces/CaseSearch.xhtml>. The case year is 2020 and the case number is 00005100. The Declaration is Item #39. Item #3C, the quote referenced above, encompasses pages 10 – 16.

FTB’s Response to my 2024 request was:

“Pursuant to California Revenue and Taxation Code section 19307 and FTB Notice 20056, voluntary payments remitted before a return is filed or before a final liability is established are held in suspense until the liability is final.”

California Revenue and Taxation Code section 19307 states:

“For purposes of Section 19306, a return filed within four years from the last day prescribed for filing the return showing a credit allowable by Section 19002 or estimated tax paid pursuant to Section 19023, 19024, or 19136 in excess of the tax due, shall be considered a claim for refund of the excess if the amount thereof is more than one dollar (\$1). No refund of tax withheld or estimated tax paid shall be allowed to an employee or taxpayer who fails to file a return for the taxable year in respect of which the tax withheld or estimated tax was allowable as a credit.”

R&TC 19307 is about claiming refunds of overpayments. It does not say anything about payments being held in suspense, nor does it address which payments are to be included in NPA totals. The application of the word “withheld” in this context means payments withheld by employers from the employee’s paycheck and sent to FTB on behalf of the employee. The word “withheld” is not utilized in conjunction with estimated tax payments. It appears whoever framed Ms. Jones used a sleight-of-word manipulation tactic to conflate two separate topics in an effort to deceive me into believing that this tax code referred to payments held in suspense.

FTB Notice 20056 repeals the allowance of "deposit in the nature of a cash bond" and specifies it will only accept "tax deposits," which are estimated tax payments for specific points in time. It states:

“Payments made before a return is filed are estimated tax payments, not deposits...”

Therefore, since specifically I asked about estimated tax payments, this Notice is irrelevant to what I asked to be addressed. Furthermore, the laws cited to justify this policy include:

“Subsection (a) of IRC section 6603 provides authority for taxpayers to make cash deposits that may be used by the IRS to satisfy any tax liability that has not been finally assessed at the time the deposit is made.”

To me, it sounds like the IRS will accept all payments made and immediately apply them – which is the exact opposite of what FTB tried to state. Again, it appears that whoever framed Ms. Jones used a sleight-of-word manipulation tactic to conflate two separate topics in an effort to deceive me.

I believe that Ms. Jones has taken for responsibility for fraud committed in violation of TITLE 18, U.S.C., SECTION 242, Color of Law. I believe this fraud was committed for two reasons. First, FTB was trying to cover up what I believe to be a count of perjury committed by FTB employee Keith Swank. But more importantly, it appears that the fraudulently issued NPAs are the lynchpin of FTB’s racketeering scheme: FTB unlawfully embezzles estimated tax payments (items #2 and #3 above), then fraudulently issues NPAs to people who had paid their tax liability in full (NPAs can only be issued on accounts that have underfunded their estimated tax liability).

Ms. Jones, your job is *literally* to protect the taxpayer. I realize that you probably didn’t write the letter, but I believe that you knew what you were signing. ***I believe it is unconscionable that you have conspired with the FTB executives and Board to knowingly betray the very people who specifically pay you to protect them.***

Furthermore, FTB failed to address the issue of the denial of the Taxpayer Right to Protest NPAs on the basis that all payments were not credited.

## 6. Conform to IRS guidelines by considering married couples as one tax entity

The IRS treats married couples as a single taxpaying entity from the moment the couple notifies them of marriage until the couple notifies them that the marital status has changed. However, FTB considers all individuals as unmarried. Each year, after a married couple files that year's return, FTB updates their records with proper marital status for only that particular year. In the SDSC case *Grab v FTB*, I documented that:

1. FTB utilizes this incorrect marital status in order to falsely impose penalties and fees via policy and procedure violations (please see the above referenced court document, *Statements of Undisputed Facts*. Numbers 29 - 67 expose FTB's violations of the Right to Protest).

2 FTB utilizes this incorrect marital status to temporarily unlawfully enrich themselves by demanding additional tax liability and penalty payments above and beyond what FTB knows — *by its own records* — is actually owed (please see the above referenced court document *Statements of Undisputed Facts*. 68 - 129 exposes the accounting fraud).

While the excess funds are eventually refunded, FTB considers the refund to be income, and thus the married couple is required to pay higher income taxes in order to get extorted funds back.

I have been asking FTB since 2017 to provide the legal statutes that it utilizes in order to justify this unlawful imposition of extra tax and penalty liabilities. Various FTB employees have committed fraud numerous times by citing irrelevant statutes and federal guidelines which say the exact opposite of what FTB claimed the guideline said.

In *Grab v. FTB*, I alleged these business practices to be an embezzlement and racketeering scheme. If these business practices had been lawful, FTB would have provided the pertinent statutes in court.

FTB never provided any statutes, nor did FTB deny the allegations of running a systematic embezzlement and racketeering scheme specifically targeting married people. Failure to deny constitutes admission of truth. FTB has tacitly admitted that these business practices are extralegal "underground regulations."

Marital status is considered a class. Financially penalizing people for being married violates the 14th Amendment of the Constitution. The Taxpayer Advocate must immediately bring FTB's business practices in line with our constitutional protections by halting the extralegal business practices over overcharging married people.

I made this request last year. In FTB's response, FTB wrote:

"As you have previously been informed, FTB cannot enact, amend, or repeal laws. You can contact your state legislators regarding any suggested changes to California law regarding conformity."

FTB has yet to provide a relevant statute to justify this practice. If one existed, FTB would have provided it during *Grab v FTB*. FTB did not. I believe the Trump Administration would view this as a violation of TITLE 18, U.S.C., SECTION 242, Color of Law. I sincerely hope the Trump Administration prosecutes.

## **7. Concerns about the CAL-EITC "Education and Outreach Program"**

Please address the concerns about FTB's Cal-EITC Education and Outreach Program that I addressed at the September 2025 Board Meeting. The text is in the email below in the email chain. I am frustrated that FTB did not respond within 30-days as is required.

In closing, I would like to remind FTB that you are public servants who are employed by the constituents to serve us. As your employers, FTB is accountable to us. It is reprehensible that instead of serving the people, FTB is exploiting the very same people who pay their wages. It is even more reprehensible that FTB's legal staff evades responsibility for their unlawful policies and procedures and systematically frames lower-level staff as a part of standard operating procedures. This system of exploitation – exploiting both constituents and low-level employees -- must end.

Thank you for your attention to my requests. I look forward to speaking at the meeting unhindered. I presume that Ms. Cohen will not attempt to violate my right to speak again by eating up my time like she did last year. I also look forward to reading your Formal Resolutions to my requests.



2. The biggest recipient of money is Golden State Opportunity Fund. Based on the records I have received from CDS, Golden State's bookkeeping is opaque with questionable entries. I do not believe they would pass an audit. I've tried to contact them many times and have never been able to reach a human. Public tax records indicate that they spend their money mostly on salaries for themselves and tax lobbyists to get more money for this program. It appears they pass token amounts of money on to legitimate NGOs, then take credit for the work done by these other organizations. We taxpayers want more transparency about how the NGOs are vetted and chosen, how it is determined how much money each receives, and to make regular audits a part of the program.
3. United Way receives a lot of money, too. Their bookkeeping is excellent. I have confirmed they have multiple tax filing programs in place, and I commend them for their good work. However, their San Diego subsidiary, Dreams for Change, has had multiple allegations of staff sexually assaulting clients. It concerns me that United Way is sending vulnerable people to known sexual predators. I asked United Way about their oversight criteria they never responded to me. We taxpayers want transparency about oversight.
4. Since 2016, I have been accusing FTB of intentionally providing bad service as a cover for *bona fide* criminal schemes to fraudulently impose penalties. In *Grab v FTB* in San Diego Superior Court, FTB never denied the allegations that my penalties were a result of an embezzlement and racketeering scheme – FTB simply stated that was irrelevant to the case. Failure to deny constitutes admission of truth. While I am not low income, these criminal schemes seem to primarily target people of low socio-economic status. Primary targets include people who work more than one job, people who have a business license of some sort that they are not utilizing for income, and married couples.

If FTB truly just wanted low-income people to file tax returns, they would have simply paid tax preparers in low socio-economic areas to file returns for people who qualify under VITA guidelines. In previous speeches, the NGOs have repeatedly stated that the tax preparers charge \$150 for these returns. With the \$10-million dollars allotted, 66,666 tax returns could be filed. I believe that the tax preparers would advertise like crazy so that people were aware that they could get their taxes done for free and get cash in hand – and they'd likely do a better job of advertising than the NGOs currently are.

So why is the money going to NGOs, instead? From my perspective, it appears that FTB is paying NGOs to find them victims. The NGOs send the clients to VITA volunteers at temporary service locations to file the taxes on their behalf or encourage them to file via FTB's online filing system. When FTB later makes "mistakes" on these low-income taxpayers account, the taxpayer finds it is virtually impossible to resolve the matter on their own. Had

these people utilized tax professionals, the tax professionals would be their advocates and would help them clear up these alleged “mistakes.”

FTB’s perpetual inability to improve customer service confirms my belief. I first started having issues with FTB’s “mistakes” in 2008. It is now 2025 and the service has gotten no better than it was then for individual taxpayers or small business. But the service has improved for tax professionals, making it clear that people who cannot afford a tax preparer are the primary targets.

At this point, the bad service is clearly a feature, not a bug. If the Board wanted the service to improve, they would have fired the bad leadership and brought in competent people. The Board has failed to do so. Instead, they give Selvi annual bonuses, which have averaged \$42,000 per year over the last 10 years.

In March 2022, when FTB admitted that it was fraudulently imposing penalties as a result of its own customer service failures, its goal was to reduce the failure rate to only 30%. FTB never had any intention of eliminating these schemes to fraudulently impose penalties, they were just trying to make their schemes less obvious.

I expect a written response that thoroughly addresses the four concerns that I’ve raised and request that the board immediately fire the incompetent leadership at FTB and replace them with competent people that can improve the culture of FTB so that FTB can retain staff and provide sufficient customer service to end the fraudulently imposed penalties once and for all.

Thank you.

