

From: Christi Grab [REDACTED]

Subject: Since the public comment was limited to three minutes, I was unable to raise all of my concerns about the CalEITC education and outreach program. Here are the rest of the issues

Date: September 9, 2025 at 6:00 PM

To:

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CG

Hi FTB Board, Executives and Staff:

Below is the speech that I wrote for the meeting. Since it timed out at 5.5 minutes, I had to cut the below speech almost in half when I spoke on Monday. I wanted to share the whole speech with you so that you were aware of all of my concerns.

Regards,

Christine Grab

My name is Christine Grab and I am a people of California. Over the last year, I have tried to gather more information on FTB's education and outreach program. I have concerns.

1. The contract between FTB and CDS says that the NGO recipients are required to help people file ITIN applications. We taxpayers would like more information about this clause. At the June 2024 meeting, Jeanne Harriman said that migrants in California qualify for credits that the federal government doesn't offer. Are migrants legally filing in California when they cannot legally file federally? If so, is FTB issuing its own ITINs separate from the federal government? If FTB is not issuing ITINs, then how are migrants accessing health care and other benefits without any identification number?
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

semi 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.