

**COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS STATE LOTTERY COMMISSION**

In re: *Appeal of Edwin Tran*

INTRODUCTION

The claimant, Edwin Tran (“Edwin Tran”), appeals the decision of the Massachusetts State Lottery (“Lottery”) denying his claims for \$1,000.00 on each of four instant scratch tickets and \$1,601.00 on a KENO ticket, a combined prize of \$5,601.00. As outlined below, because Edwin Tran obtained all of the tickets through improper assignments, the Hearing Officer recommends that the Massachusetts State Lottery Commission affirm the Lottery’s denial.

PROCEDURAL BACKGROUND

On November 23, 2020, Edwin Tran came to the Lottery’s offices to claim prizes related to four instant scratch tickets and one KENO ticket. By letter dated March 3, 2021, the Lottery denied the claims because he was not the proper recipient of the prize winnings. *See In the Matter of Appeal of Edwin Tran*, January 11, 2022 hearing transcript, Exhibit (cited herein as “Tr. Exh.”)

1. The letter advised Edwin Tran of his right to an informal hearing with the Executive Director or designee. *Id.* On March 14, 2021, Edwin Tran requested such a hearing. Tr. Exh. 2.

By agreement of the parties, a pre-hearing conference was held by telephone on December 13, 2021 before the Hearing Officer. Edwin Tran participated and Attorney Gregory M. Polin, Esq. appeared on the Lottery’s behalf. At the pre-hearing conference, among other things, the parties agreed that the hearing would take place on January 11, 2022 by video conference.

The hearing occurred on January 11, 2022 via Zoom video conference platform. Edwin Tran appeared, was sworn, and testified on his own behalf. Attorney Gregory M. Polin, Esq. appeared on behalf of the Lottery. Kevin Floster, Security Investigator, was sworn and testified on the Lottery's behalf. Without any objection, fourteen documents were marked as exhibits and entered into evidence. Those documents are listed in Exhibit A attached hereto.

At the close of the hearing, the parties requested and received leave to submit written closing arguments. Edwin Tran submitted his written closing arguments on February 22, 2022. In his submission, Edwin Tran admitted that his father gave him the four instant tickets at issue, but claimed he was entitled to the prize winnings because they were a gift. Because the instant tickets were sold at stores in Dorchester/Fields Corner and Randolph, where Vietnamese community and markets are located, it proved his father had purchased the instant tickets. He disagreed with the Lottery's statistical and probability calculations, but did not identify what aspect he disagreed. However, Edwin Tran also contended that his father would have purchased the necessary number of instant tickets because his father has the time and drinking and gambling issues. Edwin Tran affirmed that he purchased the KENO ticket and was entitled to the winnings.

The Lottery submitted its written closing arguments on February 24, 2022. In its submission, the Lottery asserted that there was substantial evidence that Edwin Tran acquired the instant tickets and KENO ticket through impermissible assignments. The Lottery pointed to 1) inconsistencies in statements that Edwin Tran and Tommy Tran (collectively, the "Trans") made to Lottery investigators; 2) the validating of the five tickets at Tommy Tran's store prior to their being claimed; 3) the statistical data indicating that it was improbable that one person had purchased the five tickets; and 4) the cumulative history of the Trans' cashing winning tickets and statistical data indicating the improbability that one person purchased the tickets on their own.

Finally, the Lottery argued that to award the prize money to Edwin Tran would create an improper secondary market for winning Lottery tickets.

FACTUAL BACKGROUND

I. EDWIN TRAN'S CLAIMS

On November 23, 2020, Edwin Tran submitted claim forms to collect prize money for four instant scratch tickets and one KENO ticket. *See* Tr. Exh. 3.¹ Edwin Tran is employed at a laboratory located in Framingham, Massachusetts, and, since July 2020, his regular work hours are 10:00 a.m. to 6:00 p.m. *In the Matter of Appeal of Edwin Tran*, January 11, 2022 hearing transcript (cited as “Tr.”) at 28:2 – 11; Tr. at 64:4 - 8. In 2020, his annual salary at the laboratory was approximately \$49,000.00 - \$50,000.00. Tr. 29:20 – 30:1.

The claimed tickets and the prize amounts were:

Ticket Name/Description	Serial Number	Prize Amount
\$2,000,000 50X Cashword	277-143436-071	\$1,000.00
Diamond Millions	218-212684-014	\$1,000.00
200X	150-591240-009	\$1,000.00
200X	150-592246-023	\$1,000.00
KENO	09452-008019978-159410	\$1,601.00

See Tr. Exhs. 3, 4, & 5.

At the hearing, Edwin Tran testified that his father, Tommy Tran, gave him the winning instant scratch tickets as a gift couple days prior to November 23, 2020. Tr. at 20:1 – 21:6; Tr. 22:23 – 23:22. Tommy Tran told him that the tickets were “big winners” and he had been keeping them for a while. Tr. at 24:3 – 8. Edwin Tran did not know exactly where his father obtained the instant tickets, saying that his father “mindlessly scratches stuff and like sometimes he buys whole books” and “generally sticks in the neighborhood of like Ashmont, Fields Corner and stuff like

¹ Edwin Tran testified that his signatures appear on the reverse side of the instant scratch and KENO tickets at issue and the associated claims forms that comprise Exhibit 3. Tr. 45:14 – 24.

that.” Tr. 25:19 – 26:6. Edwin Tran describes his father as “ha[ving] a gambling problem”, “scratches a ton”, “gambles a lot”, and is “a pretty lucky person.” Tr. at 14:14 – 16:7. According to Edwin Tran, for years, his father has walked around the neighborhood buying tickets, “he doesn’t really drive places to walk”, and takes long walks with his recently acquired dogs. Tr. at 28:12 – 24. Edwin Tran claimed not to know why his father gave him the tickets. Tr. 26:20 – 27:9. However, Edwin Tran testified that his father gives him winning instant scratch tickets to provide him with money at “convenient times”, such as when he graduated in 2018 and obtained a new job in 2020. Tr. at 19:12 – 18. He claimed the winning tickets, paid the taxes, and kept the prize money. Tr. at 21:1 – 6. Edwin Tran has never asked his father why he gives him winning Lottery tickets rather than cash. Tr. at 29:6 – 10.

Finally, with respect to the KENO ticket at issue, Edwin Tran testified that he purchased it while working at his father’s store, Smoke Shop & More. Tr. at 20:1 – 21:6; Tr. 22:10 – 22. The KENO ticket reflects the date Monday, November 16, 2020, the selected numbers 60, 61, 64, 67, 68, and 69, and a \$1.00 wager on 10 games numbered 2294144 – 2294153. Tr. Exh. 3. Edwin Tran testified that the numbers are those that he usually plays. Tr. at 20:2 – 24. He explained: “[t]he reason I do six, six and six, it is like, the devil, and then, like 69, and it just has to end with 69.” Tr. 30:8 – 31:13. Further, he testified that he had been playing multiple draws and, because he had to go somewhere, did not know he had won until a day or so later. *Id.* Edwin Tran generally plays KENO and generally only at Smoke Shop & More when he is working or at the end of his shift. Tr. 20:1 – 21:6.

II. LOTTERY INQUIRY

Kevin Floster is a Security Investigator in the Lottery’s compliance department (“Mr. Floster”) since he first began working for the Lottery in October 2020. Tr. 36:12 – 24. Previously, for seven years, he was as a senior investigator with the State Inspector General’s Office and a

financial investigator in the Criminal Bureau of the Attorney General's Office. Tr. at 37:1 – 9. In his Lottery role, Mr. Floster investigates claims, interviews witnesses, obtains evidence, works with law enforcement officials, prepares reports, and testifies at claims-related proceedings. Tr. at 38:6 – 18.

Consistent with its practice, on November 23, 2020, the claim center called Mr. Floster when Edwin Tran attempted to cash five Lottery tickets and because he had claimed multiple tickets in the past. Tr. at 39:22 – 41:3. Mr. Floster reviewed the tickets to determine where and when they were purchased and reviewed Edwin Tran's and Tommy Tran's cashing histories. Tr. at 46:19 – 47:2. Mr. Floster said it is unusual for a person to submit five winning tickets in a single day. Tr. at 46:16 – 18.

Mr. Floster and a Customer Service Representative then interviewed Edwin Tran. Tr. Exh. 6. Edwin Tran said that he purchased the instant tickets at various places in Randolph, Massachusetts and in the Dorchester neighborhood of Boston. Tr. at 48:7 – 50:15; *see also* Tr. Exh. 6. According to Mr. Floster, Lottery data showed that the tickets had been purchased in locations different from Edwin Tran's recounting. Tr. at 48:7 – 50:15; *see also* Tr. Exh. 6. Lottery investigative staff advised Edwin Tran that they believed it was "highly unlikely" that he had purchased the instant scratch tickets. Tr. Exh. 6. For example, Edwin Tran was unable to identify the stores where the tickets were sold. Tr. 47:3 – 47:18. According to Mr. Floster, "[t]ypically, especially large Lottery players, are very knowledgeable about where they buy their tickets, exactly when they win, where those winning tickets were purchased from ... players who legitimately purchase tickets can usually rattle off that information pretty easily." Tr. 79:20 – 80:2. In addition, Lottery data showed that the four instant tickets had been purchased at different sale agent locations but later were scanned (e.g., "validated") at Smoke Shop & More, Tommy Tran's

store. Tr. at 51:11 – 55:19. According to Mr. Floster, such a pattern suggests a customer with a large value ticket who does not want to cash it themselves and sells the ticket at a reduced rate to someone at the Lottery Agent location. Tr. at 55:1 – 19. Because of the pattern of validation at Smoke Shop & More, Mr. Floster concluded that Edwin Tran’s father was involved in the purchase of the tickets. Tr. 46:19 – 47:18.

Eventually, Edwin Tran admitted that his father purchased and played the instant scratch tickets and gave them to him to cash. Tr. Exh. 6. Tommy Tran told his son that he could keep the prize money. *Id.* Edwin Tran also admitted that the three instant tickets he cashed on July 8, 2020 and the six he cashed in 2018 were his father’s tickets. *Id.* According to Lottery data, although the nine instant tickets were purchased at different places, all were validated at Smoke Shop & More prior to claiming. Tr. Exh. 8. At the end of the interview, Lottery investigators told Edwin Tran that his claims would not be processed. Tr. Exh. 6.

Finally, for the claimed KENO ticket, Lottery data showed that it was purchased on Monday, November 16, 2020 at 10:07 a.m. from a Lottery agent operating on State Street in downtown Boston. Tr. at 55:21 – 56:17; Tr. Exh. 5. The data also showed that it was validated at the Smoke Shop & More at 7:33 p.m. on the same evening. Tr. at 55:21 – 56:17; Tr. Exh. 5.

III. TOMMY TRAN’S CLAIM HISTORY

On November 30, 2020, Mr. Floster and the Lottery’s Assistant Executive Director of Security, Compliance and Internal Audit interviewed Tommy Tran at the Lottery’s Dorchester office. Tr. Exh. 6. Tommy Tran is a Lottery Agent. *Id.* During the interview, Tommy Tran said that he “spends a large amount of money on Lottery each month ...”, but was unable to provide a dollar estimate. *Id.* Tommy Tran purchases tickets during his walks near his home but also at “locations as he goes about his daily business.” *Id.* He could identify only two of the stores where he purchased the tickets. *Id.*

Tommy Tran gave Edwin Tran the tickets as a gift because “he recently got married, is just starting out in his career, and can use the money.” Tr. Exh. 6. Tommy Tran admitted to giving one other winning ticket to his wife. *Id.* He has never purchased winning tickets from his customers or anywhere else because “there is not enough profit after taxes when people typically ask for around \$800-\$900 on a \$1,000 winning instant ticket.” *Id.*

Lottery investigators asked Tommy Tran to scratch a void “Diamond Millions” ticket identical to one of the claimed tickets. Tr. Exh. 6. Mr. Floster observed that the instant scratch tickets at issue showed a scratch pattern different from Tommy Tran’s described scratching pattern and the sample Diamond Millions ticket. *Id.* Mr. Floster testified that “high volume players often scratch their tickets [in] exactly the same way.” Tr. at 73:6 – 74:9.

Mr. Floster concluded that Tommy Tran was not the proper claimant based upon statistical data and probability calculations, the marked increase in the number of tickets claimed in 2020 compared to prior years, the pattern of validating the tickets at Smoke Shop & More, and his inability to identify where the tickets were purchased. Tr. at 79:6 – 80:9.

IV. INSTANT SCRATCH TICKET GAME STATISTICS

Mr. Floster testified about the prize structure of instant scratch ticket games. The odds of winning any ticket with a value of over \$1,000 is predetermined by the game manufacturer. Tr. at 59:15 – 21. Further, each game has a predetermined amount of prize payouts. Tr. at 60:1 – 8.

The Lottery submitted statistical data and probability calculations related to the instant tickets.² For each game, among other data, the Lottery produced the probability of purchasing a winning ticket valued at \$1,000 or more, the prize payout percentage, the estimated costs, and the

² The Lottery’s calculations did not include a statistical analysis pertaining to the claimed KENO ticket. Tr. at 58:8 – 22.

amount of prize winnings generated due to purchasing the required number of tickets. The statistical data and probability calculations respecting the four instant tickets are outlined below. Lottery data shows that the instant tickets were sold between September 4, 2020 and November 26, 2020. Tr. at 60:14 – 23.

(a)	(b)	(c)	(d)	(e)	(f)
Game	Ticket Price	Odds of Purchasing a Winning Ticket of \$1,000+	Payout %	Est. Costs (b) x (c)	Est. Expected Win Amt. (d) x (e)
200X	\$30	948.50	80.70%	\$28,455	\$22,963.19
200X	\$30	948.50	80.70%	\$28,455	\$22,963.19
\$2,000,000 50X Cashword	\$10	3,468.69	80.2%	\$34,686.90	\$27,818.90
Diamond Millions	\$30	1,326.32	80.71%	\$39,789.60	\$32,114.19

In total, to acquire the four \$1,000+ winning scratch tickets, a player must purchase roughly 6,693 tickets and spend approximately \$131,386, which would yield an additional \$105,859 in prize awards. Tr. 63:18 – 64:3; Tr. Exh. 7. To acquire the necessary number of tickets during the 84-day period, a player must purchase nearly 80 tickets every day. Tr. Exh. 7.

FACTUAL & LEGAL FINDINGS

I. EDWIN TRAN ACQUIRED HIS RIGHT TO LOTTERY PRIZES THROUGH IMPROPER ASSIGNMENTS AND HIS CLAIMS WERE PROPERLY DENIED.

A. The Law Prohibits Assigning Lottery Prizes Except In Limited Circumstances.

Massachusetts court have held consistently that the relationship between a Lottery player and the Lottery is one based in contract where the terms of the contract are the rules of the game. See *Jacobs v. State Lottery Comm'n*, 60 Mass. App. Ct. 303, 308 (2004) (affirming the Lottery's decision to award plaintiff \$10). The Appeals Court, in *Bretton v. State Lottery Commission*, wrote that "[b]y purchasing a ticket the plaintiff entered into a contractual agreement with the

commission and is deemed to have reasonable notice of the pertinent regulations and rules of the game.” *Bretton v. State Lottery Comm’n*, 41 Mass. App. Ct. 736, 741 (1996). Instant ticket players are advised in numerous ways that the games are subject to Lottery Commission rules. *See, e.g.*, Exh. 3. The rules include state laws and Lottery regulations.

Under Massachusetts law, while contract rights are generally assignable, some cannot be assigned when expressly forbidden by statute. *See Rubenstein v. Royal Ins. Co. of Am.*, 45 Mass. App. Ct. 244, 246 (1998) (affirming assignment of right of contribution); *see Nova Assignments, Inc. v. Kunian*, 77 Mass. App. Ct. 34, 42 (2010) (approving assignment of rights under a contract). An assignment is a transfer of rights or property. *See Black’s Law Dictionary*, 128 (8th ed. 2007).

The Lottery contends that it properly denied Edwin Tran’s claims because he acquired the right to the instant tickets’ and the KENO ticket’s prize money through an improper assignment. Massachusetts law prohibits the assignment of Lottery prizes, except in four limited circumstances:

Section 28. The right of any person to a prize drawn is not assignable except under the following limited circumstances:

- (1) Payment of any prize drawn may be paid to the estate of a deceased prize winner or to the IV–D agency under chapter 119A.
- (2) Payment of any prize drawn may be made to any person under an appropriate judicial order.
- (3) The commission may, by regulations adopted under section 24, permit assignment of prizes for purposes of paying estate and inheritance taxes, or to a trust the beneficiaries of which are the prize winner, his mother, father, children, grandchildren, brothers, sisters or spouse.
- (4) Payment of any prize drawn may be made to a person under a voluntary assignment of the right to receive future prize payments, in whole or in part, if the assignment is made to a person or entity named as the assignee in an appropriate judicial order of a court of competent jurisdiction, which shall be the superior court sitting within and for the county in which the commission is situated or in which the assignor resides.

See M.G.L. c. 10, § 28 (“Section 28”). Interpreting Section 28, the Massachusetts Supreme Judicial Court (“SJC”) held that “[t]he first clause of G.L. c. 10, § 28, standing alone, is

unambiguous. It prohibits all assignment of rights to lottery prize money.” *Singer Friedlander Corp. v. State Lottery Comm’n*, 423 Mass. 562, 564 (1996). Examining Section 28, the SJC rejected the notion that any voluntary assignment judicially approved would be permitted, saying such an exception would swallow the rule against assigning lottery prizes. *Singer*, 423 Mass. at 565-566. The “prohibition of prize assignments, rather than the allowance of assignments, must be assumed to constitute the legislative policy.” *Id.* at 566.

Lottery regulations contain a prohibition on assignment of prizes with three similar limited exceptions.

2.28 Prizes

- (1) No person entitled to a prize may assign his or her right to claim it except:
- (a) that payments of a prize may be made to the estate of a deceased prize winner or to another according to law by an appropriate judicial order from a court of competent jurisdiction;
 - (b) for the purposes of paying estate and inheritance taxes[; and]
 - (c) to a trust, the beneficiaries of which are restricted to the prize winner, his or her mother, father, children, adopted children, grandchildren, brothers, sisters, or spouse.

See 961 C.M.R. 2.28. Where a Lottery prize is assigned improperly, Section 28 provides that the assignment is invalid and the Commonwealth and the Lottery Commission, Executive Director, agents and employees are relieved from awarding the prize payment. M.G.L. c. 10, § 28(14).

B. Edwin Tran Obtained His Claims to Lottery Prize Money Through Improper Assignments.

As a rule, decisions of administrative agencies must be supported by “substantial evidence”, defined as “such evidence as a reasonable mind might accept as adequate to support a conclusion.” *Cobble v. Comm’r of the Dept. of Soc. Svs.*, 430 Mass. 385, 390 (1999) (citing M.G.L. c. 30A, § 1(6)). The substantial evidence test is “fairly characterized as a test of rational probability: an agency’s conclusion will fail judicial scrutiny if ‘the evidence points to no felt or appreciable probability of the conclusion or points to an overwhelming probability of the

contrary.” *Id.* at 390-391 (citations omitted). When evaluating whether an agency’s decision is supported by substantial evidence, “[t]he entire record is to be taken into account, including evidence supporting the agency’s conclusion as well as evidence fairly detracting from that conclusion.” *B.K. v. Dept. of Children & Families*, 79 Mass. App. Ct. 777, 780 (2011) (citations omitted).

Here, there is substantial evidence that Edwin Tran acquired his right to the prize monies via improper assignments. First, with respect to the instant tickets, Edwin Tran admitted that his father gave him the tickets, knowing that they were winning ones and as a way of giving him money. Thus, I find that Edwin Tran was assigned the instant ticket prize awards and the assignment did not fit any of the exceptions allowed by Section 28 or 961 C.M.R. 2.28.

Second, with respect to the KENO ticket, there is substantial evidence that Edwin Tran did not properly acquire it. Lottery data showed the ticket was purchased on Monday, November 16, 2020, at 10:07 a.m. at a Lottery agent location in downtown Boston. Further, the Lottery submitted data showing that the KENO ticket was validated at Smoke Shop & More on the same night it was purchased. Based on his testimony, Edwin Tran should have been at his laboratory job in Framingham when the ticket was purchased in downtown Boston. Further, based on the ticket’s validation at Smoke Shop & More and testimony concerning the significance of the validation, I find that the original purchaser did not want to claim it themselves and, instead sold it at Smoke Shop & More, likely to one of the Trans. I find that Edwin Tran acquired the KENO ticket through an improper assignment and the Lottery properly denied his prize claim.

II. EDWIN TRAN’S INSTANT TICKETS WERE GIFTED IMPROPERLY.

Edwin Tran contends that he is entitled to the instant tickets’ prize money because the tickets were a gift from his father. However, because Tommy Tran “gifted” the tickets that he acquired illegally, Edwin Tran’s claims were properly denied.

The gifting of Lottery tickets or shares is allowed by Massachusetts law:

No person other than a licensed lottery sales agent shall sell lottery tickets or shares, except that nothing in this section shall be construed to prevent any person from giving lottery tickets or shares to another as gift.

M.G.L. c. 10, § 29 (“Section 29”). Further, Lottery regulation provides:

No person other than a duly licensed Lottery Sales Agent may sell Lottery tickets, except that nothing in 961 CMR 2.27 shall be construed to prevent a person who may lawfully purchase tickets from making a gift of Lottery tickets to another.

961 CMR 2.27(1). There is no case law authority interpreting Section 29 or 961 CMR 2.27.

Implicit in Section 29 and 961 CMR 2.27(1) is the requirement that a person first lawfully obtain Lottery tickets before gifting them. To find otherwise would undermine the law and Lottery regulations. There is substantial evidence that Tommy Tran did not lawfully acquire the instant tickets at issue. That evidence includes the Lottery’s statistical data and probability calculations, the pattern of validating the tickets at Smoke Shop & More prior to their being claimed, and the discrepancy between Tommy Tran’s ticket scratching technique and the scratch pattern on the claimed tickets. I credit Mr. Floster’s testimony concerning the implications of the ticket validation patterns and scratching pattern inconsistencies. In addition, it is not credible that Tommy Tran would walk from Dorchester to Randolph, buying and scratching instant tickets. Finally, I do not credit Edwin Tran’s argument that, from September 4, 2020 to November 26, 2020, Tommy Tran purchased the 6,693 tickets and spent approximately \$131,386 necessary to acquire the four instant tickets. Thus, I find that Tommy Tran did not properly acquire the instant tickets. Instead, his alleged gift was an improper assignment.

III. AWARDING EDWIN TRAN THE PRIZE AWARD PERPETUATES AN IMPROPER SECONDARY WINNING LOTTERY TICKET MARKET.

As the Lottery argues, its actions are consistent with the legislative purpose of its authorizing statute and should be affirmed. The purpose of Section 28 and related Lottery regulations “prohibiting [] unpermitted assignments was, no doubt, intended to prevent the creation of a secondary, unregulated market in winning tickets, a legitimate legislative goal.” *Welford v. Norbrega*, 30 Mass. App. Ct. 92, 103 n.10 (1991) (approving assignment of prize money to a trust as provided by an exception in Section 28).

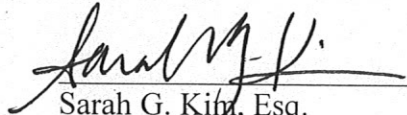
There is no question that Edwin Tran is involved in a secondary market for winning Lottery tickets. He admitted to receiving the four winning instant tickets from his father before claiming them. Further, as discussed above, I find that he acquired the rights to the KENO ticket prize through an improper assignment. This is not an isolated event, but a practice occurring over several years. Edwin Tran admitted that, in 2015, he cashed five instant scratch tickets and one KENO ticket that he received from his father. Tr. Exhs. 6 & 8. And, in July 2018, he cashed two Numbers Games tickets and one instant ticket that he received from his father. *Id.*

The danger of the secondary market is that it thwarts the Lottery’s mandate to ensure the collection of any past due taxes and child-support from Lottery winners. Prior to issuing any prizes above \$600.00, the Lottery is required to determine whether the winning ticket holder owes past child support or tax liability. *See* G.L. c. 10, § 28A. If there is such liability, the Lottery must first satisfy the outstanding child support and/or tax liability before paying whatever balance remains. *Id.* By accepting the winning tickets from his father, Edwin Tran shields his father from reporting Lottery winnings to tax authorities or paying any outstanding tax and/or child support liability. Similarly, Tommy Tran shields the original ticket purchasers from any reporting and/or payment obligations. Denying Edwin Tran’s claims was appropriate.

CONCLUSION & RECOMMENDATION

For the reasons set forth above, the Hearing Officer concludes that Edwin Tran acquired the four instant scratch tickets and one KENO ticket through assignments that violated M.G.L. c. 10, § 28 and 961 C.M.R. 2.28(1). The Hearing Officer recommends that the Massachusetts State Lottery Commission affirm the Lottery's denial of Edwin Tran's claims.

January 6, 2023
Date



Sarah G. Kim, Esq.
Hearing Officer