Decision No. R25-0748

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 25G-0191CP

COLORADO PUBLIC UTILITIES COMMISSION,

COMPLAINANT,

V.

ESTES PARK RIDE SHARE AND/OR ESTES PARK RIDESHARE BY JM CONCIERGE SERVICES LLC,

RESPONDENT.

RECOMMENDED DECISION ASSESSING CIVIL PENALTY, ISSUING CEASE AND DESIST ORDER, AND CLOSING PROCEEDING

Issued Date: October 16, 2025

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I. STATEMENT

1. This proceeding concerns Civil Penalty Assessment Notice ("CPAN") No. 143615 issued by the Colorado Public Commission's ("Commission" or "PUC") Staff on May 9, 2025 ("CPAN No. 143615"), against Respondent Estes Park Ride Share and/or Estes Park Rideshare by JM Concierge Services LLC ("Respondent" or "Estes Park Ride Share"). CPAN No. 143615 assesses Respondent a total penalty of $13,915 for violation of §§ 40-10.1-107(1) and 40-10.1-201(1), Colo. Rev. Stat. (2025) ("C.R.S."). The nature of the violations was listed in CPAN No. 143615 as follows:

> Failure to maintain and file evidence of financial responsibility in sums as required by the Public Utilities Commission. No insurance on file when the ride was booked to Fort Collins.
>
> Operating or offering to operate as a common carrier in intrastate commerce without a certificate of public convenience and necessity from the Commission. No permit on file when a ride was booked for service to Fort Collins on 4/02/25 through the company website.[1]

The CPAN further states that the Commission may also order Respondent to cease and desist activities that violate statutes or Commission rules.[2]

2. On June 4, 2025, the Commission referred this proceeding to an Administrative Law Judge ("ALJ") by minute entry.

3. On July 1, 2025, Trial Staff of the Commission ("Staff") filed its Notice of Intervention as of Right by Trial Staff of the Commission, Entry of Appearance, Notice Pursuant to Rule 1007(a) and Rule 1401, and Request for Hearing.

[1] CPAN No. 143615 at p. 1.
[2] *Id*. at p. 3.

4. By Decision No. R25-0505-I, issued August 6, 2025, the undersigned ALJ, among other things, set an evidentiary hearing for August 20, 2025.

5. At the scheduled time and place, the matter was called for hearing. Staff appeared through counsel and participated in the hearing. Respondent did not appear at the hearing. At the outset of the hearing, Staff's counsel submitted an oral motion requesting the "entry of default" against respondent and the vacating of the evidentiary hearing ("Motion").

6. During the course of the hearing, Hearing Exhibits 100-112 were identified, offered, and admitted into evidence. Criminal Investigator Erin Haislett ("Investigator Haislett") testified in support of the allegations contained in CPAN No. 143615.

7. Staff and Respondent are the only parties to this Proceeding.

8. In reaching the findings and conclusions made herein, the undersigned ALJ considered all arguments and evidence presented in this Proceeding, even if such arguments and/or evidence are not specifically set forth herein.

II. RELEVANT LAW

9. Under § 40-7-116, C.R.S., the Commission enforcement personnel have authority to issue CPANs.[3] The statute also provides that the Commission has the burden of demonstrating a violation by a preponderance of the evidence.[4]

10. Except as otherwise provided by statute, the Administrative Procedure Act imposes the burden of proof in administrative adjudicatory proceedings upon "the proponent of an order."[5] As provided in Rule 1500 of the Commission's Rules of Practice and Procedure, 4 *Code of Colorado Regulations* ("CCR") 723-1, "[t]he proponent of the order is that party commencing a

[3] Section 40-7-116(1)(a), C.R.S.
[4] Section 40-7-116(1)(d) (II), C.R.S.
[5] Section 24-4-105(7), C.R.S.

proceeding." Here, Staff is the proponent since it commenced this Proceeding through issuance of CPAN No. 143615. Staff bears the burden of proof by a preponderance of the evidence.[6] The preponderance standard requires the finder of fact to determine whether the existence of a contested fact is more probably true than its non-existence.[7] "Substantial evidence is that quantum of probative evidence which a rational fact-finder would accept as adequate to support a conclusion, without regard to the existence of conflicting evidence."[8]

11. Pursuant to § 40-7-113(3), C.R.S., "[i]f a person is assessed a civil penalty for a violation referenced in subsection (1) of this section occurring on a date within twenty-four months after a previous violation, the civil penalty assessed for the second violation may be up to two times the amount specified by rule for the violation."

12. Section 40-7-116(1)(b), C.R.S. provides that a CPAN:

> … shall be tendered by the enforcement official, either in person or by certified mail, or by personal service by a person authorized to serve process under rule 4(d) of the Colorado rules of civil procedure, and shall contain:
>
> (I) The name and address of the person cited for the violation;
>
> (II) A citation to the specific statute or rule alleged to have been violated;
>
> (III) A brief description of the alleged violation, the date and approximate location of the alleged violation, and the maximum penalty amounts prescribed for the violation;
>
> (IV) The date of the notice;
>
> (V) A place for the person to execute a signed acknowledgment of receipt of the civil penalty assessment notice;
>
> (VI) A place for the person to execute a signed acknowledgment of liability for the violation; and

[6] *See* § 13-25-127(1), C.R.S. and 4 CCR 723-1-1500.
[7] *Swain v. Colorado Dept. of Revenue*, 717 P.2d 507 (Colo. App. 1985).
[8] *Metro Moving & Storage Co. v. Gussert*, 914 P.2d 411 (Colo. App. 1996) (*citing Monfort, Inc. v. Rangel*, 867 P.2d 122 (Colo.App.1993)).

> (VII) Such other information as may be required by law to constitute notice of a complaint to appear for hearing if the prescribed penalty is not paid within ten days.

13. Pursuant to 40-10.1-106, C.R.S.:

> (1) The commission has the authority and duty to prescribe such reasonable rules covering the operations of motor carriers as may be necessary for the effective administration of this article, including rules on the following subjects:
>
> (a) Ensuring public safety, financial responsibility, consumer protection, service quality, and the provision of services to the public…

14. Section 40-10.1-112(1), C.R.S., provides in pertinent part that:

> Except as specified in subsection (3) of this section, the commission, at any time, by order duly entered, after hearing upon notice to the motor carrier and upon proof of violation, may issue an order to cease and desist… for the following reasons:
>
> (a) A violation of this article…

15. Section 40-10.1-107, C.R.S. states, in part:

> (1) Each motor carrier shall maintain and file with the commission evidence of financial responsibility in such sum, for such protection, and in such form as the commission may by rule require as the commission deems necessary to adequately safeguard the public interest.
>
> (2) The financial responsibility required by subsection (1) of this section must be in the form of a liability insurance policy issued by an insurance carrier or insurer authorized to do business in this state, or a surety bond issued by a company authorized to do business in this state, or proof of self-insurance.
>
> (3) An insurance policy, surety bond, or self-insurance pursuant to subsection (2) of this section shall be kept continuously effective during the life of a certificate or permit and the commission shall require such evidence of continued validity as the commission deems necessary…

16. Section 40-10.1-201, C.R.S. states:

> (1) A person shall not operate or offer to operate as a common carrier in intrastate commerce without first having obtained from the commission a

> certificate declaring that the present or future public convenience and necessity requires or will require such operation.
>
> (2) The fact that a person carries on operations, in whole or in part, between substantially fixed points or over established routes, or under contracts with more than one person, or by making repeated or periodic trips is prima facie evidence that the person is a common carrier and subject to this part 2 and part 1 of this article.

17. According to Rule 1302(b) of the Rules of Practice and Procedure., 4 CCR 723-1:

> The Commission may impose a civil penalty, when provided by law. The Commission will consider any evidence concerning some or all of the following factors:
>
> (I) the nature, circumstances, and gravity of the violation;
>
> (II) the degree of the respondent's culpability;
>
> (III) the respondent's history of prior offenses;
>
> (IV) the respondent's ability to pay;
>
> (V) any good faith efforts by the respondent in attempting to achieve compliance and to prevent future similar violations;
>
> (VI) the effect on the respondent's ability to continue in business;
>
> (VII) the size of the respondent's business; and
>
> (VIII) such other factors as equity and fairness may require.

III. MOTION

18. At the outset of the evidentiary hearing, after the undersigned ALJ noted for the record that the respondent had failed to appear despite proper notice by both U.S. mail and email, Staff's counsel made an oral motion seeking an entry of default against the respondent and requested that the scheduled hearing be vacated.

19. In support of the Motion, Staff invoked Rule 1001 of the Rules of Practice and Procedure, 4 *Code of Colorado Regulations* ("CCR") 723-1, which permits a hearing officer to

look to the Colorado Rules of Civil Procedure ("C.R.C.P.") when not inconsistent with Title 40 or Commission rules. Staff specifically relied on C.R.C.P. 55(a), which provides that default may be entered when a party against whom affirmative relief is sought fails to plead or otherwise defend. Counsel argued that the respondent had wholly failed to participate in the proceeding, having not responded to the CPAN, not appeared for any prior steps, and not appeared for the hearing itself.

20. Staff emphasized that, for reasons of judicial economy and conservation of resources, default should be entered at that juncture. Counsel represented that, if the motion were granted, Staff would promptly submit a written motion for default judgment, supported by affidavits establishing service, venue, and Respondent's eligibility for default, and setting forth the factual basis for issuance of the CPAN and assessment of penalties. Staff further indicated it would also file a proposed order and judgment in compliance with the rule.

21. From the bench, the undersigned ALJ denied the Motion for Entry of Default. This ruling is memorialized herein.

22. Although the undersigned ALJ denied Staff's oral motion for entry of default from the bench, it is appropriate to provide a written explanation of that ruling. Because Staff grounded its request in Rule 1001's allowance for a presiding officer to "seek guidance from or … employ the Colorado Rules of Civil Procedure" where not inconsistent with Title 40 or these rules, and indicated it may pursue similar requests in future non-appearance situations, the ALJ finds it prudent to explain why default was not appropriate in this case and to clarify the framework that will guide consideration of such motions going forward.

23. Rule 1001 of the Commission's Rules of Practice and Procedure CCR 723-1, provides, in part that that: "Where not otherwise inconsistent with Title 40 or these rules, the Commission, a hearing Commissioner, or an Administrative Law Judge may seek guidance from

or may employ the Colorado Rules of Civil Procedure." This language allows reference to the C.R.C.P. only where doing so is consistent with the Public Utilities Law and the Commission's rules. It does not authorize adoption of judicial default procedures that conflict with the Commission's established administrative process.

24. Staff urged entry of default under C.R.C.P. 55(a) in reliance on Rule 1001, but adopting that civil-rule mechanism would override the Commission's own administrative process. In *Silver Eagle Services v. Public Utilities Commission*, 768 P.2d 208, 212–14 (Colo. 1989), the Colorado Supreme Court held that the procedures in § 40-6-115, C.R.S., governing judicial review of Commission decisions, are the exclusive method for invoking the district court's jurisdiction, and that the Colorado Rules of Civil Procedure apply only when they are not inconsistent with Title 40 or the Commission's rules. The Court reversed a district court's entry of default against the Commission because importing civil-rule pleading requirements conflicted with the governing statutory framework. By the same reasoning, introducing C.R.C.P. 55(a)'s default procedure into a Commission enforcement proceeding would be inconsistent with the Public Utilities Law and the Commission's established hearing process. Accordingly, it would be improper to enter judicial default in an administrative proceeding, where the Commission's rules already prescribe how to proceed when a party fails to appear.

25. The Commission's rules address a party's non-participation without relying on judicial default. For example, the rules authorize the presiding hearing officer to take up the scheduled hearing, receive competent evidence, and develop the administrative "record of a proceeding" consisting of "all information introduced by the parties, as provided in § 24-4-105(14), C.R.S., and all information set out in § 40-6-113(6), C.R.S."[9] The Rules also make clear

[9] Rule 1504(a) of the Rules of Practice and Procedure, 4 CCR 723-1.

that the Commission "shall not be bound by the technical rules of evidence" and may admit reliable, probative material consistent with civil practice.[10] Proceeding on the merits under these provisions, rather than entering default, is the administratively appropriate response to a non-appearance of a party.

26. By contrast, Staff's request to invoke C.R.C.P. 55(a) would circumvent the Commission's established administrative framework. Rule 1001 authorizes reference to the Colorado Rules of Civil Procedure only "[w]here not otherwise inconsistent with Title 40 or these rules" and solely for purposes of "seek[ing] guidance from or … employ[ing]" those rules. Colorado appellate precedent confirms that when a statute or Commission rule prescribes a specific procedural framework, conflicting provisions of the C.R.C.P. cannot be imported to alter or override that framework[11] Applying C.R.C.P. 55(a) to terminate a Commission proceeding at the outset, without creating the evidentiary record contemplated by §§ 24-4-105(14) and 40-6-113(6), C.R.S., would conflict with the Commission's hearing-based process and the procedural safeguards established by its governing statutes and rules. The same principle applies here: when Commission rules and the State Administrative Procedure Act ("APA")[12] prescribe how hearings are conducted and how the administrative record is developed, judicial default procedures that bypass those requirements are inconsistent and therefore unavailable under Rule 1001 of the Rules of Practice and Procedure, 4 CCR 723-1.

27. Staff is not without remedies under the Commission's own procedural framework. In contrast to judicial proceedings governed by the C.R.C.P., a respondent in a CPAN enforcement matter has no obligation to file an answer or otherwise defend; thus, the procedural basis for entry

[10] Rule 1501(a) of the Rules of Practice and Procedure, 4 CCR 723-1.
[11] *See Silver Eagle Services*, 768 P.2d 208, 212–14.
[12] The APA is codified in Title 24, Article 4 of the Colorado Revised Statutes. Section 24-4-105(14) is contained within the APA.

of default under C.R.C.P. 55(a) is absent. Under Rule 1409(d) of the Rules of Practice and Procedure, 4 CCR 723-1, where a party fails to respond to a motion, the Commission "may deem a failure to file a response as a confession of the motion." Similarly, in complaint proceedings governed by Rule 1308 of the Rules of Practice and Procedure, if a respondent fails to file a required responsive pleading, the Commission "may deem the party to have admitted" the allegations and "grant any or all of the relief requested." Although § 40-10.1-116(1)(d), C.R.S., provides that an unpaid CPAN "constitutes a complaint to appear before the Commission," the resulting enforcement proceeding is governed by that statute and the Commission's hearing rules, rather than by Rule 1308's complaint-pleading provisions. Accordingly, the Commission's rules, not imported judicial default mechanisms, govern the appropriate response to non-appearance or non-participation. In CPAN matters, the proper course, consistent with Rules 1501 and 1504 of the Rules of Practice and Procedure, 4 CCR 723-1, is to convene the scheduled hearing, receive Staff's competent evidence, and adjudicate the CPAN on the merits of the record created.

28. For these reasons, Staff's motion for entry of default was properly denied from the bench. The hearing then proceeded in Respondent's absence after proper notice. Staff's exhibits[13] were admitted into evidence, and Investigator Haislett's testimony was taken under oath. By proceeding in this manner, Staff adhered to the process contemplated by the Commission's rules, presenting evidence to establish the alleged violations and developing a complete record upon which the matter could be adjudicated on the merits, consistent with principles of due process.

IV. FINDINGS, ANANLYSIS AND CONCLUSIONS

29. The undisputed facts in this Proceeding show that Respondent Estes Park Ride Share LLC, also known as Estes Park Ride Share by JM Concierge Services LLC, is a business

[13] Hr. Exs. 100-112.

formed and operated by Jason Michael Martinez, with its principal office and mailing address at 1691 Soaring Circle, Estes Park, Colorado 80517.[14]

30. The Commission's Integrated Filings Management System ("IFMS") identified Mr. Martinez as both the member and designated agent for Estes Park Ride Share. The IFMS record also reflected that the company's transportation authority was inactive at all times pertinent to CPAN No. 143615, and that the same physical and mailing address, 1691 Soaring Circle, Estes Park, Colorado 80517, was associated with both the entity's PUC filings and dismissed luxury-limousine applications (Nos. 22AP-LL-42114 and 22AP-LL-42606), and the Secretary of State registrations for related entities operating under similar names, including JM Concierge Services, LLC and Estes Park Ride Share by JM Concierge Services Limited.[15]

31. Commission Investigator Haislett was assigned to investigate a complaint alleging that Respondent was operating or offering to operate as a common carrier without Commission authority or proof of financial responsibility.[16]

32. The complaint originated from a duly permitted transportation company operating in the Estes Park region, which reported that Mr. Martinez continued to advertise and perform for-hire transportation despite lacking a certificate of public convenience and necessity ("CPCN").[17]

33. During her investigation, Investigator Haislett discovered multiple online postings and advertisements promoting "Estes Park Ride Share" and related entities on Facebook, TripAdvisor, and the Town of Estes Park's transportation listings, each representing that the company provided ride services for compensation.[18]

[14] *See* Hr. Ex. 101.
[15] Hr. Exs. 101, 104.
[16] *See* Hr. Ex. 100.
[17] *See id*.
[18] Hr. Exs. 105, 106.

34. Commission records showed that Mr. Martinez submitted two luxury-limousine permit applications: the first as "Estes Park Ride Share by JM Concierge Services LLC" and the second as "Estes Park Ride Share LLC." Both applications were dismissed for failure to supply required documentation, including commercial-insurance certificates and vehicle-inspection reports.[19]

35. Each dismissal letter explained that the filings were incomplete and that issuance of a permit required evidence of insurance, vehicle inspection, and other materials under Commission rules.[20]

36. To verify whether Respondent was still offering transportation services to the public, Investigator Haislett accessed the website https://concierge-of-estes-park.square.site/, which identified the business as "Concierge of Estes Park by JM." Through that website she successfully booked and paid for a one-way ride from Estes Park to Fort Collins scheduled for April 9, 2025.[21]

37. The booking confirmation reflected a paid appointment for "Service to Fort Collins – One Way," with a cancellation policy directing customers to contact Concierge of Estes Park by JM.[22]

38. Following the booking, Investigator Haislett received automated text messages confirming the trip and identifying the driver as "Jason," who would pick her up in a blue Chrysler van. The text originated from the same contact information used on the business website and was consistent with a vehicle depicted in the company's online advertisement.[23]

[19] Hr. Exs. 107, 108.
[20] *Id*.
[21] *See* Hr. Ex. 109.
[22] *Id*.
[23] Hr. Ex. 110.

39. Payment records corroborated that a $75.00 charge was processed by "Concierge of Estes Park by JM" using the Commission's undercover government credit card. The corresponding charge appeared on the agency's statement.[24]

40. After canceling the ride within the stated time frame, Investigator Haislett telephoned Mr. Martinez and obtained a refund for the full $75.00, as documented by a refund receipt issued by the same merchant account.[25]

41. When Investigator Haislett personally served CPAN No. 143615 on Mr. Martinez at 1691 Soaring Circle on May 9, 2025, Mr. Martinez first denied operating the business but then acknowledged remembering the canceled ride and handling the refund transaction.[26]

42. CPAN No. 143615 alleged two statutory violations: (1) operating or offering to operate as a common carrier without a CPCN in violation of § 40-10.1-201(1), C.R.S.; and (2) failing to maintain and file evidence of financial responsibility as required by § 40-10.1-107(1), C.R.S.[27]

43. Commission records confirmed that no insurance certificate or permit was on file for Respondent at the time the April 2, 2025 booking was made.[28]

44. Investigator Haislett testified that, during a May 2025 conversation at the time she served CPAN No. 143615 on the Respondent, Mr. Martinez stated that he had been warned previously by another Commission investigator in 2021 about the need for a permit but did not obtain one because he could not afford commercial insurance. He admitted to maintaining only a personal insurance policy and expressed that he believed it was sufficient.[29]

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[24] Hr. Ex. 111.
[25] Hr. Ex. 112.
[26] *See id*. and Hr. Ex. 100.
[27] Hr. Ex. 100.
[28] Hr. Exs. 101, 107, 108.
[29] *See, generally*, Hr. Ex. 100 (documenting service of CPAN No. 143615).

45. The evidence further showed that Mr. Martinez operated a common-carrier business from the same address under variations of the names "Estes Park Ride Share" and "JM Concierge Services," and advertised, accepted, and received payment for passenger-transportation services without Commission authority or proof of financial responsibility.[30]

46. Accordingly, the evidentiary record established by Staff demonstrated that Respondent engaged in activities constituting the operation and offering of common-carrier services without the required authority or insurance, in violation of Colorado law and Commission rules.[31]

47. The credible and unrefuted evidence presented by Staff establishes that Respondent operated or offered to operate as a common carrier without Commission authority in violation of § 40-10.1-201(1), C.R.S. Investigator Haislett's testimony and Hearing Exhibits 100–112 demonstrate that Respondent, through Mr. Martinez, advertised and accepted bookings for passenger transportation within Colorado, received payment for such services, and maintained no certificate or permit on file with the Commission.

48. Staff also proved by a preponderance of the evidence that Respondent failed to maintain and file evidence of financial responsibility, in violation of § 40-10.1-107(1), C.R.S. Commission records confirmed that no insurance certificate was on file at the time of the April 2025 booking, and Mr. Martinez's own statements corroborate that he maintained only personal, non-commercial coverage.

49. These violations directly implicate the public-safety and consumer-protection purposes that underlie the Public Utilities Law. The statutory requirements for Commission

[30] *See* Hr. Exs. 100-112.
[31] *Id*.

authority and for maintaining evidence of financial responsibility exist to ensure that only qualified and insured carriers provide transportation services to the public.

50. Because Respondent failed to appear and the evidence presented by Staff stands undisputed, the ALJ finds that Staff's exhibits and testimony are credible and accords them their full evidentiary weight.

51. In determining the appropriate penalty, the undersigned ALJ applies the factors set forth in Rule 1302(b) of the Commission's Rules of Practice and Procedure, 4 CCR 723-1. The violations cited in CPAN No. 143615 are serious in nature, as they involve the unpermitted operation of a public transportation service without proof of insurance, thereby exposing the public to potential financial and safety risks. Respondent's conduct was, at a minimum, knowingly indifferent, as demonstrated by Mr. Martinez's prior applications for authority and his acknowledgment of awareness of the Commission's CPCN requirement.

52. There is no evidence of mitigating factors, such as good-faith compliance efforts, inability to pay, or voluntary cessation of operations prior to the issuance of CPAN No. 143615.

53. The record supports issuance of a cease-and-desist order under § 40-10.1-112(1), C.R.S., to prevent continued or future violations.

54. Accordingly, the ALJ finds that Staff has met its burden of proof by a preponderance of the evidence on both alleged violations, and that the assessed civil penalty and cease-and-desist directive are warranted and appropriate.

V. TRANSMISSION OF THE RECORD

55. In accordance with § 40-6-109, C.R.S., the ALJ now transmits to the Commission the record and exhibits in this proceeding along with a this written Recommended Decision.

VI. ORDER

The Commission Orders That:

1. Consistent with the discussion above, Respondent Estes Park Ride Share and/or Estes Park Rideshare by JM Concierge Services LLC ("Respondent") is assessed a total civil penalty of $13,915, inclusive of the applicable surcharge, for the violations stated in Civil Penalty Assessment Notice No. 143615, as discussed and found above.

2. No later than 30 days following the issuance date of a final Commission decision in this Proceeding, Respondent shall pay to the Commission the civil penalties and the surcharge assessed in Ordering Paragraph No. 1.

3. Respondent is hereby ordered to cease and desist from violating §§ 40-10.1-107(1) and 40-10.1-201(1), Colo. Rev. Stat. (2025).

4. Proceeding No. 25G-0191CP is closed.

5. This Recommended Decision shall be effective on the day it becomes the Decision of the Commission, if that is the case, and is entered as of the date above.

6. As provided by § 40-6-109, C.R.S., copies of this Recommended Decision shall be served upon the parties, who may file exceptions to it.

   a. If no exceptions are filed within 20 days after service or within any extended period of time authorized, or unless the decision is stayed by the Commission upon its own motion, the recommended decision shall become the decision of the Commission and subject to the provisions of § 40-6-114, C.R.S.

   b. If a party seeks to amend, modify, annul, or reverse basic findings of fact in its exceptions, that party must request and pay for a transcript to be filed, or the parties may stipulate to portions of the transcript according to the procedure stated in § 40-6-113, C.R.S. If no transcript or stipulation is filed, the Commission is bound by the facts set out by the administrative law judge and the parties cannot challenge these facts. This will limit what the Commission can review if exceptions are filed.

7. If exceptions to this Decision are filed, they shall not exceed 30 pages in length, unless the Commission for good cause shown permits this limit to be exceeded.

(S E A L)

ATTEST: A TRUE COPY

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

AVIV SEGEV

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Administrative Law Judge