



**Division of Minority  
and Women's  
Business Development**

New York State  
Department of Economic Development  
Division of Minority and Women's  
Business Development

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In the matter of the appeal of

**Complete Spiral Manufacturing, Inc.**

FINAL ORDER 19-03

From a denial of certification as a Women-owned Business Enterprise pursuant to Executive Law Article 15-A.

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This order arises from an administrative action brought by Complete Spiral Manufacturing, Inc. ("Complete Spiral") pursuant to 5 NYCRR Section 144.4. Appellant, Ms. Karen Vassallo, seeks reversal of the decision of the Division of Minority and Women's Business Development (the "Division"), dated February 7, 2017, to deny Complete Spiral certification as a Women-owned Business Enterprise ("WBE").

This appeal was assigned to Administrative Law Judge P. Nicolas Garlick. The appellant submitted a written appeal which was received by the Division on February 23, 2017. The Division, represented by Thomas Regan, Esq., filed a response on January 25, 2019. The submissions of the parties are contained in the appeal record.

On March 1, 2019, the Division received from Administrative Law Judge Garlick a Recommended Order that affirmed the Division's determination to deny the application by Ms. Vassallo to certify Complete Spiral as a WBE.

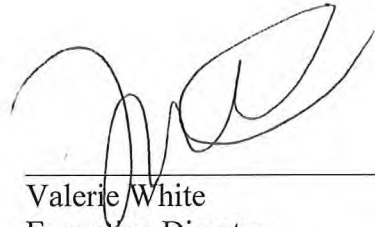
The issues on appeal were whether: Ms. Vassallo shared in the risks and profits in proportion to her ownership interest in the business enterprise, whether she made decisions pertaining to the operations of the business enterprise and whether she had adequate managerial experience or technical competence to operate the business enterprise.

After considering the appeal record, I accept the recommendation of the Administrative Law Judge as it pertains to the facts of this case. Incorporation by reference is hereby made with

respect to the findings and conclusions of the Recommended Order; namely, that Complete Spiral does not meet the requirements for certification as set forth in Article 15-A of the Executive Law and the rules and regulations promulgated thereunder.

It is hereby **ORDERED** that the decision to deny certification, dated February 7, 2017, is affirmed. Accordingly, Complete Spiral will not be listed in the Division's directory of certified Minority and Women-owned Business Enterprises.

March 7, 2019

A handwritten signature in black ink, appearing to read 'Valerie White', is written over a horizontal line. The signature is stylized with large, sweeping loops.

Valerie White  
Executive Director  
Division of Minority and Women's  
Business Development