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

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.

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

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