

NEW YORK STATE
DEPARTMENT OF ECONOMIC DEVELOPMENT
207 GENESEE STREET
UTICA, NEW YORK 13501

In the Matter

- of -

the Application of Hamburg Overhead Door, Inc.
for Certification as a Woman-owned Business Enterprise
pursuant to Executive Law Article 15-A.

NYS DED File ID No. 68936

RECOMMENDED ORDER

-by-



David A. Murad
Administrative Law Judge
January 9, 2024

This matter considers the written appeal by Hamburg Overhead Door, Inc., (“Hamburg” or “applicant”) pursuant to New York State Executive Law Article 15-A and Title 5 of the Official Compilation of Codes, Rules and Regulations of the State of New York (5 NYCRR) parts 140-144, challenging the determination of the Division of Minority and Women’s Business Development (“Division”) of the New York State Department of Economic Development (“DED”) that the business enterprise does not meet the eligibility criteria for certification as a woman-owned business enterprise (“WBE”).

PROCEDURAL HISTORY

1. On May 30, 2021, Ms. Jennifer Kuhn, as President, applied on behalf of Hamburg for certification as a woman-owned business enterprise (“WBE”) (DED Exhibit 1).
2. On April 21, 2023, the Division denied the application on the following grounds (DED Exhibit 2):
 - (a) Minority group members or women relied upon for certification have not demonstrated having made a capital contribution to the business enterprise proportionate to their equity interest therein, as demonstrated by, but not limited to, contributions of money, property, equipment or expertise, as required under 5 NYCRR § 144.2(b)(2);
 - (b) Minority group members or women relied upon for certification do not possess adequate, industry-specific competence to make critical business decisions without relying upon other persons, as required under 5 NYCRR §144.2(c)(1);
 - (c) Minority group members or women relied upon for certification do not make operational decisions on a day-to-day basis with respect to the critical functions of the business enterprise, as required under 5 NYCRR §144.2(c)(2); and

(d) Minority group members or women relied upon for certification must be the highest-ranking officer of the business enterprise for which certification is sought, and, where applicable, control the board of directors, as required under 5 NYCRR §144.2(d)(1).

3. Hamburg timely filed a Request to Appeal on May 3, 2023 (APP Exhibit A/ DED Exhibit 3).
4. A notice to proceed via written appeal was sent to Hamburg on May 31, 2023 (DED Exhibit 4).
5. Hamburg filed its written appeal by memorandum dated June 20, 2023, from its attorney, Margot Knab, Esq. of Colligan Law, LLP (APP Exhibit B).
6. The Division filed an Affidavit of Raymond Emanuel, Associate Director, dated October 12, 2023, and a brief of Karen Bernstein Esq., counsel for the Division, dated October 13, 2023.

FINDINGS OF FACT

7. Hamburg is engaged in the business of garage door, freezer door, and high-speed door installation, preventative maintenance, and repair services (DED Exhibit 1).
8. Ms. Jennifer Kuhn is the President and has a 51% ownership interest. Mr. Jason Kuhn is the Vice President and has a 49% ownership interest (DED Exhibit 1).
9. Hamburg was established on March 17, 1989, by Mr. Jeffrey Kuhn, father of Ms. Jennifer Kuhn and Mr. Jason Kuhn. Mr. Jeffrey Kuhn also owned: (1) Western New York Distributors, Inc. (“WNY”); (2) Overhead Door of Buffalo Niagara (“OHD”), currently known as Buffalo Garage Door Solution (“Buffalo Garage”); (3) Boston Holdings, LLC, currently known as 5659 Herman Hill Rd, LLC; and (4) 7048 Interstate Island, LLC, currently known as 5659 Kinne, LLC, (DED Exhibits 6 and 7). Hamburg, WNY and OHD/

Buffalo Garage are collectively referred to herein as the “Operating Entities”. The other two entities are collectively referred to herein as the “Real Estate Entities”.

10. On November 23, 2020, Mr. Jeff Kuhn sold Hamburg and the other four businesses to Ms. Kuhn and Mr. Jason Kuhn (DED Exhibits 1, 6 and 7).
11. A narrative submitted with the application states that the total purchase price for all five entities was \$ [REDACTED] with Ms. Kuhn paying \$ [REDACTED] (51%) and Mr. Jason Kuhn paying \$ [REDACTED] (49%) (DED Exhibit 7).
12. A separate document entitled “breakdown in the purchase price” lists the total paid for the Operating Entities as \$ [REDACTED] (DED Exhibit 8).
13. Section 5.G of the application states that three loans were secured to purchase the business, totaling \$ [REDACTED] (DED Exhibit 1):

Loan	Name of Creditor / Lender	Amount
#1	M&T Bank	\$ [REDACTED]
#2	M&T Bank	\$ [REDACTED]
#3	Jeff Kuhn	\$ [REDACTED]

14. Provided with the application is a “Term Note” with M&T Bank dated November 23, 2020, in the amount of \$ [REDACTED]. The borrower is “Jason Kuhn and Jennifer Kuhn.” (DED Exhibit 12). Also provided with the application is a second “Term Note” with M&T Bank dated November 23, 2020, in the amount of \$ [REDACTED]. The borrower is “Jason Kuhn and Jennifer Kuhn.” (DED Exhibit 13). The document states that “each of them shall be jointly and severally liable for all amounts and obligations that become due.”
15. Provided with the application is a “Subordinated Promissory Note” dated November 23, 2020, in the amount of \$ [REDACTED]. The Payor of the Note is Ms. Kuhn and Mr. Jason Kuhn. They both are also Guarantors, who “agree to jointly and severally guaranty the

payments and obligations to the Holder for any amounts owed pursuant to” the note. The Holder of the note is Jeff Kuhn (DED Exhibit 14).

16. Provided with the application is a “Business Flex Line of Credit Note” with M&T Bank dated November 23, 2020, in the amount of \$ [REDACTED]. The borrower is “Hamburg Overhead Door, Inc.” (DED Exhibit 15).

17. Applicant also submitted two U.S. Small Business Administration (“SBA”) Standby Creditor’s Agreements. Both are dated March 8, 2021, list the loan Name as “Hamburg Overhead Door, Inc.”, the Standby Borrower as “Jennifer Kuhn and Jason Kuhn” and list the Lender as “Empire State Certified Development Corporation dba Pursuit CDC.” The first agreement lists the Standby Creditor as “Jeffrey Kuhn...”. It provides that Ms. Kuhn and Mr. Jason Kuhn owe \$ [REDACTED] principal to the Standby Creditor, and the Lender makes an SBA guaranteed loan to Standby Borrower in the amount of \$ [REDACTED]. The second agreement lists the Standby Creditor as “Jeffrey Kuhn...”. It states that Ms. Kuhn and Mr. Jason Kuhn owe \$ [REDACTED] principal to the Standby Creditor, and Lender makes an SBA guaranteed loan to Standby Borrower in the amount of \$ [REDACTED] (DED Exhibit 16). These loans were used by Ms. Jennifer Kuhn and Mr. Jason Kuhn to pay off the Note issued by Jeff Kuhn (APP Exhibit B).

18. The draft, unsigned Share Purchase Agreement states that the purchase price for all three Operating Entities was \$ [REDACTED] and the purchase price will be paid in cash (\$ [REDACTED]) and a promissory note (\$ [REDACTED]) (DED Exhibit 9). The breakdown was listed as follows:

Hamburg	\$ [REDACTED]
OHD/Buffalo Garage	\$ [REDACTED]
<u>WNY</u>	<u>\$ [REDACTED]</u>
Total	\$ [REDACTED]

19. Section 2.F of the application states that Ms. Kuhn paid \$█ for 102 shares of Hamburg stock and Mr. Jason Kuhn paid \$█ for 98 shares of Hamburg stock (DED Exhibit 1). The Stock Ledger states that the transfer of stock to Ms. Kuhn and Mr. Jason Kuhn took place on November 23, 2020 (DED Exhibit 10). “Stock Power” documents for each of the Operating Entities show transfers to Ms. Kuhn (51%) and Mr. Jason Kuhn (49%) (DED Exhibit 11). The documents state “for value received”, but no purchase price is listed.
20. Ms. Kuhn’s resume states that she has a Bachelor of Science in Business Administration (Major: HR Management; Minor: Economics). As President of Hamburg, she is “Responsible for daily functions; Oversee finances on daily/weekly/monthly basis; Quoting on projects; Overseeing purchasing; Oversee sales team; Oversee all advertising media (online, print, radio, tv, yellow pages).” Prior to working at Hamburg, she worked as a Branch Rental Manager at Enterprise Rent-A-Car (DED Exhibit 17). Her responsibilities include communicating with Mr. Jason Kuhn, answering questions from technicians; reviewing billing; handling bank accounts; assisting and/or preparing quotes; ordering materials; attending to emails and faxes; reviewing and signing contracts; handling payroll and issuing commission checks; attending estimator meetings; attending sales meetings; visit other office sites; updating inventory; handling invoices; and filling in for office staff when needed (DED Exhibit 18).
21. Mr. Jason Kuhn’s resume states: “Oversee installation work; Quoting on projects; Oversee purchasing; Oversee sales team; Oversee service department (DED Exhibit 19). His daily responsibilities include “purchasing of some product; warehouse management; answering questions by installers/technicians.” (DED Exhibit 7).

22. Ms. Kuhn’s 2020 and 2021 personal tax returns listed her occupation as “Manager.” (DED Exhibits 20 and 21). Mr. Jason Kuhn’s 2020 personal tax returns listed his occupation as “Installation and Repair” and “Repair” (DED Exhibit 22).
23. Jennifer Kuhn, President, and Jason Kuhn, Vice President, are the members of Hamburg’s Board of Directors (DED Exhibit 1). Section 1 of the corporate Bylaws states “Any director may be removed at any time, with or without cause...” Section 3 states “The business and affairs of the Corporation shall be managed by or under the direction of its Board of Directors which may exercise all such powers of the Corporation...”. Section 7 states “At all meetings of the board, a majority of the total number of directors shall constitute a quorum for the transaction of business and the act of a majority of the directors present at any meeting at which there is a quorum shall be the act of the Board of Directors...”. Section 8 states “At all meetings of the Board of Directors, each director is to have one vote.” (DED Exhibit 23).

APPLICABLE LAW

5 NYCRR §144.2(b)(2) states in relevant part as follows:

Minority group members and women relied upon for certification must demonstrate a capital contribution to the business enterprise for which certification is sought proportionate to their equity interest therein.

- (i) Sources of capital contribution. Minority group members and women may demonstrate a capital contribution by providing documentary evidence of, for example and without limitation, one of more of the following:
 1. Money;
 2. Property;
 3. Equipment; or
 4. Expertise, provided that the contribution of such expertise must be uncompensated, the expertise must be specialized and directly applicable to one or more critical aspects of the operation of the business enterprise, and a reasonable assessment of the fair market value of the expertise must be clearly documented.

5 NYCRR §144.2(c) states in relevant part as follows:

Minority group members and women relied upon for certification must make day-to-day decisions concerning the operation of the business enterprise for which certification is sought. The division shall evaluate whether minority group members or women operate a business enterprise for which certification is sought based upon the following criteria:

- (1) Minority group members and women relied upon for certification must possess adequate, industry-specific competence to make critical business decisions without relying upon other persons. This requirement cannot be satisfied by expertise or experience in office management or general business administration, among other things...
- (2) Minority group members and women relied upon for certification must make operational decisions on a day-to-day basis with respect to the functions of the business enterprise for which certification is sought. The critical functions of a business enterprise shall be determined by the division based upon the following factors, but is not limited to:
 - (i) The products or services the business enterprise provides to clients; and
 - (ii) The means by which the business enterprise obtains contracts or orders.

5 NYCRR §144.2(d)(1) states as follows:

- (1) Control of business management. A minority group member or woman relied upon for certification must be the highest-ranking officer of the business enterprise for which certification is sought, and, where applicable, control the board of directors or serve as a general partner. Any agreements describing the management of the business enterprise shall be consistent with the foregoing.

STANDARD OF REVIEW

On this administrative appeal, applicant bears the burden of proof to establish that Division staff's determination to deny the application filed by Hamburg for certification as a WBE is not supported by substantial evidence (*see* State Administrative Procedure Act § 306[1]). The substantial evidence standard "demands only that a given inference is reasonable and plausible, not necessarily the most probable," and applicant must demonstrate that Division staff's conclusions and factual determinations are not supported by "such relevant proof as a reasonable

mind may accept as adequate to support a conclusion or ultimate fact.” (*Matter of Ridge Rd. Fire Dist. v Schiano*, 16 NY3d 494, 499 [2011]).

The review is limited to such information that was before the division at the time of the denial determination (5 NYCRR 145.2(b)(1)). Evidence that seeks to clarify and explain previously submitted materials will be considered, however new evidence will not be considered. See *Scherzi Systems, LLC v. White*, 197 A.D.3d 1466 (3d Dept 2021).

DISCUSSION

I. Ownership

The Division interprets 5 NYCRR §144.2(b)(2) to require an applicant to demonstrate that the woman-owner’s contribution came from assets belonging solely to the woman-owner. Given this criterion, the Division consistently denies applications for MWBE certification where, as here, an applicant fails to substantiate the source of the capital contribution by the minority/woman-owner. See *Matter of Otone Mechanical Construction, Inc.*, Recommended Order dated April 24, 2015 (Final Order 17-28, dated May 2, 2017), *Matter of Spring Electric, Inc.*, Recommended Order dated March 17, 2017 (Final Order 17-21, dated March 27, 2017).

The Applicant bears the burden in establishing that she has met this certification requirement. Failure to satisfy this burden is proof that the denial was supported by substantial evidence. See *A.A.C. Contracting, Inc. v. NYS Dept. of Economic Development*, 195 A.D. 3d 1284, 151 NYS 3d 187 (3d Dept. 2021).

It is the responsibility of the applicant “to clearly identify, quantify, and explain on the certification application, what is to be considered a capital contribution.” *Matter of Scherzi Systems*, Final Order 19-16, dated September 6, 2019, *Scherzi Systems, LLC v. White*, 197 AD 3d 1466 (3d Dept. 2021).

Pursuant to the Stock Purchase Agreement executed by Jeffrey Kuhn, his wife Donna Kuhn, Jennifer Kuhn, and Jason Kuhn on November 18, 2020, the total purchase price was \$ [REDACTED], representing the fair market value of all of the issued and outstanding shares of Hamburg, OHD, and WNY. Pursuant to the terms of the agreement, Jeffrey Kuhn sold one hundred two (102) shares of Hamburg stock to Jennifer Kuhn for a 51% ownership interest; and ninety-eight (98) shares of stock to Jason Kuhn for a forty-nine percent (49%) ownership interest. (APP Exhibit B)

Closing for the transaction was held on November 23, 2020. Payment was made to the sellers from the proceeds of two loans obtained from M & T Bank for \$ [REDACTED] and \$ [REDACTED] (less \$ [REDACTED] diverted to upgrade the fleet of vehicles). The remaining balance was paid pursuant to the terms of a promissory note issued by Jeff Kuhn in the amount of \$ [REDACTED] with a maturity date of February 1, 2031. (App Exhibit B; DED Exhibits 8 and 14)

The “Term Notes” with M&T Bank dated November 23, 2020, were provided and evidence the borrower as “Jason Kuhn and Jennifer Kuhn.” (DED Exhibit 12). The term note for \$ [REDACTED] states that “each of them shall be jointly and severally liable for all amounts and obligations that become due.” (DED Exhibit 13)

Provided with the application is a “Subordinated Promissory Note” dated November 23, 2020, in the amount of \$ [REDACTED]. The Payor of the Note is Ms. Kuhn and Mr. Jason Kuhn. They both are also Guarantors, who “agree to jointly and severally guaranty the payments and obligations to the Holder for any amounts owed pursuant to” the note. The Holder of the note is Jeff Kuhn (DED Exhibit 14).

On appeal applicant argues that Ms. Jennifer Kuhn is paying her pro-rata share of the purchase price, however the documents in evidence refute this assertion as both Ms. Kuhn and Mr.

Jason Kuhn are jointly and severally liable under the term note and the promissory note and none of the documentation provided reflect anywhere that Ms. Jennifer Kuhn is only liable for her pro-rata share. (APP Exhibit B)

The Division's determination to deny the application on the basis that Hamburg failed to demonstrate that Ms. Kuhn made capital contributions to Hamburg in proportion to her ownership interest, as required under 5 NYCRR §144.2(b)(2) is supported by substantial evidence.

II. Operation

5 NYCRR §144.2(c)(1) requires that the woman-owner possess adequate, industry-specific competence to make critical business decisions without relying upon other persons, and that "this requirement cannot be satisfied by expertise or experience in office management or general business administration, among other things". In *Upstate Electrical, LLC v. N.Y. State Dept. of Economic Development*, 2020 NY Slip Op. 340 (N.Y. App. Div. 2020), the Court affirmed the denial where the woman-owner had no training or experience in the industry to make her qualified to supervise the work of her employees.

Ms. Kuhn's resume states that she has a Bachelor of Science in Business Administration (Major: HR Management; Minor: Economics). As President of Hamburg, she is "Responsible for daily functions; Oversee finances on daily/weekly/monthly basis; Quoting on projects; Overseeing purchasing; Oversee sales team; Oversee all advertising media (online, print, radio, tv, yellow pages)." Prior to working at Hamburg, she worked as a Branch Rental Manager at Enterprise Rent-A-Car (DED Exhibit 17). Her responsibilities include communicating with Mr. Jason Kuhn, answering questions from technicians; reviewing billing; handling bank accounts; assisting and/or preparing quotes; ordering materials; attending to emails and faxes; reviewing and signing contracts; handling payroll and issuing commission checks; attending estimator meetings;

attending sales meetings; visiting other office sites; updating inventory; handling invoices; and filling in for office staff when needed (DED Exhibit 18).

The only managerial operations that Ms. Kuhn is solely responsible for are negotiating bonding, and marketing and sales. All other managerial operations are equally divided or performed by other company personnel (DED Exhibit 1).

Ms. Kuhn's 2020 and 2021 personal tax returns listed her occupation as "Manager." (DED Exhibits 20 and 21). Mr. Jason Kuhn's 2020 personal tax returns listed his occupation as "Installation and Repair" and "Repair" (DED Exhibit 22).

Mr. Jason Kuhn's resume states: "Oversee installation work; Quoting on projects; Oversee purchasing; Oversee sales team; Oversees service department (DED Exhibit 19). His daily responsibilities include "purchasing of some product; warehouse management; answering questions by installers/technicians." (DED Exhibit 7).

Ms. Kuhn does not have any industry specific expertise; her skills are related to general business or office management. She does not possess any academic or technical training relevant to the business' industry. These are administrative functions which do not involve the critical functions of garage door, freezer door, and high-speed door installation, preventative maintenance, and repair services, which are specific to this business. Her resume confirms that her role at the business is primarily business management and administrative and does not reflect any academic or technical training to manage the employees of the business (DED Exhibit 17).

Applicant argues on appeal that Ms. Kuhn is "familiar with the Company's operations" and states she understands "how to operate a business, handle human resources matters, and apply economic principles", and that while in college, she worked at the business "going on sales calls,

resolving IT issues, and handling collections.” (APP Exhibit B). These tasks are administrative and financial in nature, and do not include training or experience in Door systems.

On appeal, Applicant argues for the first time, that during summers in college, Ms. Kuhn went “out in the field with the Company’s installers” and “also worked in the field as an installer for the Company.” (APP Exhibit B). This is new information which does not seek to clarify or explain previously submitted materials, and therefore will not be considered. See *Scherzi Systems, LLC v. White*, 197 A.D.3d 1466 (3d Dept 2021).

Mr. Jason Kuhn and other employees have direct experience installing, maintaining, and repairing door systems. Mr. Jason Kuhn oversees the installation work and the service department, and trains new installers (DED Exhibits 1 and 19). There is no evidence demonstrating that Ms. Kuhn has the training or experience to properly supervise field operations.

5 NYCRR §144.2(c)(2) states that “... women relied upon for certification must make operational decisions on a day-to-day basis with respect to the critical functions of the business enterprise for which certification is sought. The critical functions of a business enterprise shall be determined by the division based upon the following factors but is not limited to: (i) the products or services the business enterprise provides to clients; and (ii) the means by which the business enterprise obtains contracts or orders”.

The woman-owner “must exercise independent operational control over the core functions of the business in order to establish the requisite control for WBE certification”. See *J.C. Smith, Inc. v. New York State Department of Economic Development*, 163 AD3d, 1517 (4th Dept. 2018).

Ms. Kuhn does not have experience in the business’ critical functions (DED Exhibits 1 and 17). Mr. Jason Kuhn is relied upon for managing the core functions of the business, such as supervising field operations (DED Exhibits 1 and 19).

The Division's determination to deny the application on the basis that Hamburg failed to demonstrate that Ms. Kuhn possesses adequate, industry-specific competence to make critical business decisions without relying upon other persons, as required under 5 NYCRR §144.2(c)(1), and make operational decisions on a day-to-day basis with respect to the critical functions of the business, as required under 5 NYCRR §144.2(c)(2) is supported by substantial evidence.

III. Control

The Division also denied certification on the ground that Ms. Kuhn is not the highest-ranking officer or control the board of directors, as required under 5 NYCRR §144.2(d)(1).

Jennifer Kuhn, President, and Jason Kuhn, Vice President, are the members of Hamburg's Board of Directors (DED Exhibit 1). Section 1 of the corporate Bylaws states, "Any director may be removed at any time, with or without cause..." Section 3 states "The business and affairs of the Corporation shall be managed by or under the direction of its Board of Directors which may exercise all such powers of the Corporation...". Section 7 states "At all meetings of the board, a majority of the total number of directors shall constitute a quorum for the transaction of business and the act of a majority of the directors present at any meeting at which there is a quorum shall be the act of the Board of Directors...". Section 8 states "At all meetings of the Board of Directors, each director is to have one vote." (DED Exhibit 23).

To transact business, the Board requires the presence of a quorum, consisting of a majority of the Directors. Each Director gets one vote. Since there are only two Directors, Ms. Kuhn cannot act without Mr. Jason Kuhn (DED Exhibit 23). Applicant argues on appeal that "no vote will pass if Jennifer does not approve" (APP Exhibit B). However, the same is true if Mr. Jason Kuhn does not approve. Since the Board cannot act without both Ms. Kuhn and Mr. Jason Kuhn voting the same way, Ms. Kuhn cannot act unilaterally, and therefore does not control the Board.

Applicant further argues that Ms. Kuhn, as President, has the power to call regular and special meetings of the shareholders, and the Board, and that she presides at each shareholder and Board meeting and states “Jennifer’s status as the majority shareholder and as President and Chief Executive Officer make her control of the Company unequivocal.” (APP Exhibit B). However, the Board cannot act without a majority vote of the Directors.

The Division’s determination to deny the application on the basis that Hamburg failed to demonstrate that Ms. Kuhn is the highest-ranking officer and/or controls the board of directors, as required under 5 NYCRR §144.2(d)(1) is supported by substantial evidence.

CONCLUSION

Hamburg did not meet its burden to demonstrate that the Division’s determination to deny its application for certification as a woman-owned business enterprise with respect to the eligibility criteria at 5 NYCRR §§144.2(b)(2), 144.2(c)(1), 144.2(c)(2) and 144.2(d)(1) was not based on substantial evidence.

RECOMMENDATION

For the reasons set forth above, I recommend that the Director affirm the Division’s determination to deny Hamburg’s application for certification as a woman-owned business enterprise.

In the Matter of Hamburg Overhead Door, Inc.
DED File ID No. 68936
Exhibit Chart

Exhibit #:	Description of the Exhibits	Offered (Yes/No)	Admitted (Yes/No)
APP A	Request to Appeal	Y	Y
APP B	Appeal Submission	Y	Y
DED 1	Application for Certification	Y	Y
DED 2	Denial Letter	Y	Y
DED 3	Request to Appeal	Y	Y
DED 4	Notice to Proceed Via Written Appeal	Y	Y
DED 5	Certification of Incorporation	Y	Y
DED 6	May 2, 2022 Narrative	Y	Y
DED 7	November 4, 2022 Narrative	Y	Y
DED 8	"Sale Explained"	Y	Y
DED 9	Draft Share Purchase Agreement	Y	Y
DED 10	Stock Ledger	Y	Y
DED 11	Stock Power Agreements	Y	Y
DED 12	M&T Bank Term Note (\$ [REDACTED])	Y	Y
DED 13	M&T Bank Term Note (\$ [REDACTED])	Y	Y
DED 14	Subordinated Promissory Note	Y	Y
DED 15	M&T Bank Business Flex Line of Credit Agreement	Y	Y

DED 16	Two U.S. SBA Standby Creditor's Agreements	Y	Y
DED 17	Resume of Jennifer Kuhn	Y	Y
DED 18	"Position Summary" of Jennifer Kuhn	Y	Y
DED 19	Resume of Jason Kuhn	Y	Y
DED 20	2020 Jennifer Kuhn Personal Taxes	Y	Y
DED 21	2021 Jennifer Kuhn Personal Taxes	Y	Y
DED 22	2020 Jason Kuhn Personal Taxes	Y	Y
DED 23	By-Laws	Y	Y