

Why it matters: Oct 5, 2026, 9:57 AM: Garrett's own words describing the apprenticeship's paid/unpaid structure and that he has "not received any wages since September 11." This is the email DOR's SOP mischaracterizes as "not employed." Read this against the SOP's paraphrase.

Subject: Re: Urgent Records Request – Transportation Services / SHN-105316215

From: Garrett Madden <garrettmadden479@gmail.com>

To: Zapanta, Kamie@DOR <Kamie.Zapanta@dor.ca.gov>

Date: Mon, 5 Oct 2026 09:57:06 -0700

Please see attached and please help me understand:

From the little bit I have read, CCR 7161.5 is not being applied to my situation correctly, because I do not think the standard behind it fits an apprenticeship program.

Section 7161.5(a) deems a client financially capable of assuming transportation costs after receiving one full month of salary or wages, unless hardship exists. That assumes steady, continuous wages. My situation is not that. I am in the ABC NorCal apprenticeship program, which alternates paid on-the-job training with mandatory, unpaid classroom training that I am required to attend as a condition of the program. This is not optional, and it is not something within my control to schedule around.

My last day of paid work was September 11, 2026. I already missed one week of entirely because I had no transportation, due to DOR's transportation assistance not being resolved. I then attended five consecutive days of mandatory, unpaid classroom training from September 21 through September 25. I have not received any wages since September 11, for either reason, through no fault of my own: first because of the unresolved transportation gap, and then because of a mandatory unpaid training requirement built into the apprenticeship program itself. The program has training sessions like this throughout which I thought the DOR would be aware of since the DOR referred me.

I do not believe it is accurate to evaluate my situation as though I have had steady wages this entire period. For nearly a month, I have had no income at all, through circumstances outside my control, while continuing to incur the transportation and household costs this review concerns. I am asking DOR to consider these factors directly in the hardship determination, rather than applying the standard one-month-of-wages assumption as though it reflects my actual circumstances.

Also, I didn't want to disclose my personal business but I have been in the middle of a separation/divorce since 2024. None of the bills I pay are in my name - I provide support for my kids which includes rent and utilities or whatever else they need. My kids' mom has been gracious enough to help me provide the info you need. I thought I told you this already.

Thank you, Garrett Madden

On Mon, Oct 5, 2026 at 6:01 AM Zapanta, Kamie@DOR <Kamie.Zapanta@dor.ca.gov> wrote:

Good morning, Mr. Madden,

Thank you for attachments. Unfortunately, we are not able to verify your bills with the bank statements. As requested, please submit a copy of your bills for the amount listed in the table.

To keep things together, please kindly submit copies of the bills requested in one email by 5:00 PM on October 9th if you wish for DOR to continue to review your financial hardship request for a 3rd month of car rental services. If we don't receive the documents from you by the specified time, your request for support with a 3rd month of transportation services will be closed.

Thank you,

Kamie

Thank you,

Kamie

<https://www.google.com/maps/search/721+Capitol+Mall,+Suite+110+%0D%0A+Sacramento,+CA+95814?entry=gmail&source=g>

Kamie Zapanta

Team Manager

Capitol Mall Branch Office

[721 Capitol Mall, Suite 110](#)

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From: Zapanta, Kamie@DOR

Sent: Tuesday, September 29, 2026 9:15 AM

To: Keller, Esther@DOR <Esther.Keller@dor.ca.gov>

Subject: FW: Urgent Records Request – Transportation Services / SHN-105316215

Here you go.

<https://www.google.com/maps/search/721+Capitol+Mall,+Suite+110+%0D%0A+Sacramento,+CA+95814?entry=gmail&source=g> Kamie

Kamie Zapanta

Team Manager

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From: Garrett Madden <garrettmadden479@gmail.com>

Sent: Thursday, September 24, 2026 9:23 AM

To: Zapanta, Kamie@DOR <Kamie.Zapanta@dor.ca.gov>

Subject: Re: Urgent Records Request – Transportation Services / SHN-105316215

Good morning Kamie,

Sending this on my break. I want to correct the record on what is actually being reviewed, address a documentation gap, and update you on the current, urgent situation.

My original request was for assistance with a vehicle purchase, not rental car service. I raised this in writing on June 17, 2026, explaining that public transit was not a viable option for my Roseville worksite due to timing and multiple transfers across three transit agencies (SacRT, Roseville Transit, and Placer County Transit), and that because the position is ongoing and indefinite, purchasing a reliable used vehicle (\$5,000–\$10,000) was the lower-total-cost option compared to open-ended car rentals, which I estimated at \$1,000–\$1,500 per month. Since that training, I have been placed at jobs sites that were 40 and no 51 miles away.

On June 24, 2026, Sharon O'Sullivan responded in writing stating, "while DOR will not purchase a vehicle as you requested, we can temporarily assist you with car rental." That is a denial of my vehicle purchase request. I have never received a formal written denial notice for that request, only this informal email, which was also bundled into an attempt to have me withdraw my separate mediation and fair hearing request, which I declined to do. I am formally requesting that DOR provide the written denial notice for the vehicle purchase request, with applicable appeal rights, as required. If DOR takes the position that no such notice is required or that this June 24 email constitutes that notice, please confirm that in writing.

The numbers from my June 17 request have since been confirmed in practice. After my DOR-provided rental ended, I paid for a one-week Turo rental myself (9/7/26–9/14/26, \$429.95). When that ended without resolution from DOR, I was forced to book a second rental through Turo (Ninth Ave Rentals, reservation #61432278, 9/20/26–10/4/26, \$718.28). That is \$1,148.23 in out-of-pocket transportation costs in a single month, from an account that runs close to zero. This is exactly the open-ended rental cost pattern I flagged in June, and it will keep recurring every few weeks unless this is resolved.

Thank you for confirming in writing that DOR is conducting a review under CCR 7161.5 for financial hardship, and that the DR 233 is not the hardship determination itself but would only come into play to calculate share-of-cost if hardship is not established.

Most urgently: my last date on the job was September 11. I have not worked since, and I will not have a paycheck this week or next. I am currently in unpaid class training for this same job, which I have only been able to attend because the training site is close by. I do not have the funds to rent a vehicle again once this current rental ends; I keep having to borrow money. Without a resolution before then, I will have no way to get to the Colfax worksite starting 10/5/2026 and no income to cover transportation myself. This is the exact situation my June 17 request was meant to prevent.

I have attached my bank statement as it actually shows the payments I've had to make regarding taking care of my kids. I am not part of my kids' household, but I still help provide for them.

Thank you,

Garrett Madden

On Thu, Sep 24, 2026 at 7:46 AM Zapanta, Kamie@DOR <Kamie.Zapanta@dor.ca.gov> wrote:

Good morning, Garrett,

I am sorry if my previous responses to your questions was not clear to you. Please see my answers to your questions below.

1. Part II of the DR 233 is designated "To Be Completed By The Counselor," and Part III is a payment agreement to be completed by the counselor and consumer together. I have completed my section. I will not sign a payment agreement until DOR completes its portion. Directing me to review the regulations to complete DOR's section of DOR's own form is not an acceptable instruction. Please have the counselor complete Part II and return it to me.

**** ****

Thank you for completing the top portion of the DR 233. We will complete the bottom portion of the DR 233 with the additional information you've provided us.

1. Please explain, in writing, which determination DOR is actually conducting. My request concerns continued transportation assistance and undue financial hardship under CCR 7161.5. The DR 233 and the Chapter 5 materials you sent concern Client Financial Participation, which is a separate determination about whether a consumer must pay toward the cost of services. Please state in writing whether DOR is conducting a 7161.5 transportation hardship review, a Chapter 5 financial participation assessment, or both, and how the DR 233 relates to my transportation request.

We are evaluating your request for a 3rd month of transportation service. With the information you provide us, we will determine if you meet the criteria for financial hardship under CCR 7161.5.

**** 3. Please explain, in writing, why a financial participation / cost-of-services form is being used to decide a transportation hardship request, and identify the specific regulation that requires it for that purpose.****

The DR 233 form is not being used to determine whether you meet the criteria for a financial hardship. The form is use to determine your share of your cost if you do not meet the definition of financial hardship.

As a reminder, at this time, your review of your request for support with the 3rd month of rental car services has been placed on hold as you have yet to provide us with the documentation, we are seeking to verify the amounts listed in the attached table. The documents you have pro