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IN THE SUPREME COURT
OF THE STATE OF FLORIDA

WILLIAM THOMAS ZEIGLER, JR.,

vs.

STATE OF FLORIDA

Case No. 50,355
FILED
SID J. WHITE
MAY 16 1988

PETITION FOR A WRIT
OF ERROR CORAM NOBIS

CLERK SUPREME COURT
By Anya
Chief Deputy Clerk

Petitioner, William Thomas Zeigler, Jr., by and through his undersigned attorney, petitions for leave to make application to the trial court which rendered judgment against him for murder, for a writ of error coram nobis and prays that this Court take judicial cognizance of the record of the original appeal in this cause and, from it, and the following allegations of the application and accompanying affidavits and documents, determine that sufficient facts exist to warrant the issue of the writ of coram nobis to the trial court to determine the truth of the facts alleged in this petition in order to set aside the judgment against petitioner so that a new proceedings may be had. The allegations of fact additional to the original record on appeal are as follows:

1

EDWARD WILLIAMS

A. Sodium Rodesinate Test of Pants

Pocket of Edward Williams

BACKGROUND

The state's theory of Zeigler's guilt necessarily involved showing that a primary witness against him, Edward Williams, a black, part-time store employee of Zeigler's innocently came into possession of one of the murder weapons.

A part of Williams' testimony was that he went to the store (murder site) with Tommy Zeigler to help move Christmas presents. The store was dark. Zeigler went into the store first. When Williams came into the darkened hallway, he saw a figure in front of him and heard three "clicks" where upon he said "Mister Tommy, why did you try to shoot me?", or words to that effect, turned and fled the store. Tommy followed him into the rear parking area, put his arm around him and asked him to come back in the store. Tommy gave him the gun (which was one of the murder weapons, a revolver with 6 expended cartridges still in the cylinder), and Williams put it in his pants pocket. Zeigler got down on his knees and begged Williams to come back in the store. Thereafter, Williams fled. He spent the next several hours traveling to Orlando, talking to people in Orland and coming back to Winter Garden. At the time he arrived at the police station with the gun, it was on the floorboard of the automobile he arrived in.

This murder weapon with six recently expended cartridges should reasonably have been expected to have gunshot residue on its exterior which would have transferred to Edward Williams pants pocket if the gun had ever been deposited there.

The defense put on evidence that the clothes worn by Edward Williams, at the time he came to the police with the gun on the car floorboard, were different from those he was wearing when he left his apartment ostensibly to meet Tommy to move the Christmas presents. The defense theory being that Williams was a participant in the murders who had changed his bloody clothes to escape detection.

DUE DILIGENCE TO HAVE THE TEST CONDUCTED.

During pretrial investigation, the defense requested that the Court order the prosecution to have various tests made including an examination of Williams' clothing. The requests were denied. The prosecution delayed the test by the defense by withholding the clothing from inspection for about 30 days after it was due under discovery rules. When it was finally procured, it was submitted for testing to defense expert, Roger Morrison. It was part of a tremendous volume of material the defense had tested. Due to the delays encountered and test equipment failure, the defense did not receive the test results on Williams pants pockets until after the trial was concluded.

THE TEST RESULTS

The sodium rodesinate test of the pants pocket was negative. There was no detectable gun shot residue. A copy of the test is attached.

SIGNIFICANCE

Had the test been introduced, it would have tended to conclusively support the defense theory that Edward Williams was

an active participant who had changed his clothing after the murders occurred, and before proceeding to the police station.

B. Edward Williams Relationship to Mary Ellen Stewart.

BACKGROUND

During the course of the proceedings, Edward Williams testified that when he went to Orlando, after fleeing from Tommy Zeigler, he went to the home of Mary Ellen Stewart. He testified that he did not know her very well but was dating her daughter, Pam Williams. Williams said it was at Mary Ellen Stewart's home that the NAACP was contacted and he was sent to the 33rd street sheriff's sub-station. Mary Ellen Stewart corroborated his testimony about his appearance at the house. This corroboration was a significant factor in establishing the credibility of Edward Williams.

THE "MARRIAGE"

It appears from some of the public records of Orange County, Florida, which came to the attention and knowledge of the defense after trial, that Edward Williams and Mary Ellen Stewart had been married or had been holding themselves out as married on June 1, 1973. They appear to have purchased a home together pursuant to the warranty deed attached hereto. On October 22, 1975, two months before the murders occurred, Edward Williams, a single man, quit-claimed his interest in the property to Mary Ellen Stewart, a copy is attached. In 1982, Mary Ellen Stewart obtained a mortgage on the property by an instrument where she is also known as Mary Ellen Williams. Copy attached. The signature

on the quit-claim deed appears to be that of the Edward Williams who testified against Tommy Zeigler.

SIGNIFICANCE

Edward Williams appears to have lied about his involvement with a critical state witness to bolster his credibility with the jury.

II NEW WITNESSES

BACKGROUND

The State's theory at trial was that Tommy Zeigler, alone and unaided, at or about 7:24 p.m., on December 25, 1975, shot and killed his wife, his mother-in-law, and father-in-law at the Zeigler furniture store in Winter Garden, Florida. The state produced evidence of numerous gun shots from multiple weapons occurring at that time.

The defense contended that the murders were committed by other persons and that the state's principal witnesses necessarily had to be involved.

The state presented no positive testimony of Tommy Zeigler being in the store at that particular time.

MR. ROACH

On or about May of 1979, contact with a Mr. Roach was established. Mr. Roach stated that he had come forward at such a late date because he had begun going to church and it bothered his conscience that he had information that may be helpful. He stated that he had tried to give the information to the Orange

County Sheriff's department some time around the time the trial was starting. The person who took his call said it was not important. In response to his inquiries, he was told the sheriff's department did not know who the defense attorneys were and he would have to find it out himself. No further contact was had between him and the Sheriff's department. Mr. Roach's existence was never revealed by the state to the defense.

The information Mr. Roach had to offer is as follows:

1. On Christmas Eve, 1975, he, his wife and other family members were traveling from a city outside Winter Garden to the residence of other relatives who lived south of Winter Garden. Their course of travel placed them in front of the Zeigler furniture store at or about 7:20 p.m. on December 24, 1975.

2. At that time and place, Mr. Roach heard an explosion which sounded like an M-80 firecracker followed by a series of about 10 other explosions. He looked to the right (west) and saw:

(a) a pick-up truck parked in the driveway at the north side of the store.

(b) a dark man in front of the store walking toward the pick-up truck. The description given by Mr. Roach of this man could fit Edward Williams.

(c) four (4) cars in the front parking lot of the store.

(d) lights inside the store.

See, affidavit attached.

MRS. ROACH

Mrs. Roach's statement corroborated most of Mr. Roach's observations, including his call to the sheriff's department. And, in addition, she was able to describe a particular light fixture which was burning in the store. After giving the description of the light, she was shown a state crime scene photograph of the front of the store which portrayed a light of the same description. She positively identified this light as being the one she saw illuminated that evening. See, affidavit attached.

FAILURE OF STATE TO INVESTIGATE

The existence of these two witnesses was made known to the state together with a synopsis of their potential testimony. A motion was made in Federal Court to take depositions for preservation of testimony. These witnesses, without being identified, appeared on a television show on channel 9 in Orlando, Florida. To preserve their safety, their identity has not been revealed until now. The state has never inquired of their identity from the defense and to the best knowledge of the defense, has never attempted to investigate the accuracy of their statements. The identity of these witnesses has been kept silent because of the defense's firm belief that the murderers in the case are still at large.

SIGNIFICANCE

Mr. and Mrs. Roach are disinterested witnesses. Their testimony conclusively demonstrates the fallacy of the state's

theory and supports the defense theory. The state's contention was that Tommy Zeigler acted alone to collect the insurance money. At no time was there any demonstration or suggestion that he acted with others. The defense on the other hand, contended that the three primary witnesses against Tommy Zeigler acted in concert. The presence of a dark man tending to fit Edward Williams' description clearly supports this defense contention.

The description of the timing of the shots by Mrs. Roach fits the known physical evidence of the murders within the store.

The purpose of the Edwards visit to the store was to look at a lazyboy recliner Tommy and Eunice were giving her father for Christmas that year. These recliners were on the north side of the store, on the Dillard Street (east) side of the showroom. This is the area where Perry Edwards was shot. This is known by two pieces of physical evidence. The large pool of blood on the carpet in this exact area was Mr. Edwards' type by FBI typing. (This is the same pool of blood that Detective Frye, after being in the store about 30 minutes, erroneously concluded was Tommy Zeigler's blood which he lost after shooting himself to cover the crime). There were glass fragments in this blood area which the initial F.B.I. report was unable to identify. When the defense was finally able to examine the physical evidence collected by the state, the defense forensic expert, Pete Ragsdale discovered in Perry Edward's clothing the remnants of a 38 caliber bullet. It was in Mr. Edward's glasses case. There was also shattered glass which matched the glass in the carpet. The

glasses case was found in the pocket of an upper garment which would have covered the left side of Mr. Edward's chest.

There were three shots fired in Mr. Edward's direction from someone facing him in a position more to the center of the store. The shots traveled in a northeasterly direction.

It is logical to assume that shots were first fired at Mr. Edwards because he was the male of the victims and because he subsequently became involved in a fierce struggle which resulted in him dying at the rear of the store.

The first shot fired would have been the shot fired at Mr. Edwards which missed him and exited the store just as Mr. and Mrs. Roach approached the store. It went through the northeast side of the metal building and had to travel over the Roach's car path. This could be the shot which, to Mrs. Roach, sounded like a tire blowing out. This was followed by two more shots at Mr. Edwards. One of these shots went through his upper torso and was apparently the source of the heavy bleeding on the carpet. The third shot hit the glasses case and put Mr. Edwards down - stunned. He later gets up and engages one or more of the assailants in a fierce struggle.

The next series of shots was apparently a grouping of six shots fired in a southwesterly direction from a position around the counter and in the doorway leading to the store kitchen. Eunice Zeigler was apparently trying to flee her assailants out the back door of the kitchen. At least one of these bullets exited the metal building almost directly over Charlie May's van where it was parked in the Winter Garden Inn parking

lot next to the Zeigler store fence. Felton Thomas, state's witness, who claimed to have been sitting in the van in that position would have had to hear these shots. One of these six shots hit Eunice in the head, killing her.

Virginia Edwards was shot twice. The final shot was administered to her assailant after she had time to run from the north area of the store where the recliners were kept. By the trail of blood splatters, she apparently went to the front of the store but could not get out and then went to the south side where she went down on the floor. It appears she was killed by a bullet fired to her head while she was in this position. Thus, it is demonstrable that it was physically impossible for a single assailant to have fired the series of shots heard by the Roaches as coming in rapid succession after the first and be in all of the positions the physical evidence of the killings demands.

The foregoing, coupled with the fact of three automobiles present at the store at this time and the viewing of a black male being present, is strong and compelling circumstantial evidence of multiple assailants, none of whom have been shown to be Tommy Zeigler.

The description of Barbara Woodard of a man at the Zeigler store easily fits the description of Frank Smith, the third primary state witness against Zeigler.

Mr. Roach's description of the dark man in front of the store and walking toward a pick-up truck backed into the driveway on the north side is consistent with the physical characteristics of Edward Williams.

These three primary witnesses against Tommy Zeigler can thus be placed at the scene. In addition, Felton Thomas' story of his activities after his departure from the store was expressly repudiated at trial by the persons who he was with during this period.

Edward Williams and Frank Smith were the purchasers of two of the murder weapons. The third was readily accessible by and known by Edward Williams to be kept in Tommy Zeigler's pick-up truck.

ED ROWE RE: CHARLES MAYS

BACKGROUND

The state portrayed Charlie Mays as a hapless victim who was lured to the store by Tommy Zeigler on the pretext of selling him a \$350.00 color t.v. set on Christmas Eve.

The defense attempted to show Charlie Mays as a perpetrator who was killed by his accomplices.

Charlie Mays, by the testimony of Felton Thomas who was riding with him, left Oakland, Florida in his van about dark on December 24, 1975, to go to the Zeigler store in Winter Garden. According to the weather bureau, this would have been between 6:30 and 7:00 p.m. They went around the Zeigler furniture store and parked in the Winter Garden Inn south of the store and next to a six foot chain link fence which enclosed the rear parking area of the Zeigler furniture store. There was no entrance to the parking area and the rear doors of the store from this area. It was necessary to have traveled completely around the store to reach an entrance at the northeast corner of the parking area.

There was no legitimate way to pick up a t.v. from the location Mays parked his van. This parking location also placed Felton Thomas almost directly under at least one of the bullets exiting the metal building which were fired at or about 7:20 p.m. according to the Roaches. At one point in his narration of events, Felton Thomas places Charlie Mays and a white man, ostensibly Tommy Zeigler, at the rear of the furniture store, attempting to break in the store to gain access to the t.v. set.

Store receipts and money were found in and about the clothing of Mays' dead body when police arrived. The state's theory was that this was planted on Mays by Tommy Zeigler.

AFFIDAVIT OF ED ROWE

In March of 1982, Ed Rowe contacted Ralph V. Hadley, III, Tommy Zeigler's lead counsel at the trial in 1976. Rowe had no previous connection with the case. He related the information contained in his affidavit attached hereto. The gist of this being that Ernie Mays' father, Charlie Mays went to the store that Christmas with a gun and the intent to rob the store.

In April, 1986, Ralph V. Hadley, III and Vernon Davids interviewed Ernie Mays about the facts of this affidavit. At no time during this interview did Ernie Mays deny he had made the statements to Ed Rowe nor did he claim the facts were false.

After a subsequent interview with the states attorneys office, Ernie Mays did not deny making the statements but said the facts were not true.

SIGNIFICANCE

The statement by Ernie Mays that his father went to the Zeigler store to rob it conclusively establishes that Charlie Mays was attempting to rob the store as shown by the money and store receipts on his person. Charlie Mays' action, in going to the store with a gun and the intent to rob, means he obviously was not a hapless victim but was, in fact, a participant in the murders.

CONCLUSIVENESS REQUIREMENT FOR THE WRIT

The present test for granting the issuance of a Writ of Coram Nobis is the requirement that the newly presented evidence would have conclusively prevented the entry of the judgment. This is the "broad-brush" test applied to all cases, including death penalty cases, to "foster the rule of finality" and put an end to litigation.

Death penalty cases are afforded special consideration in a number of instances because of the finality of the sentence once carried out.

Death penalty cases should also be a special class of cases falling outside of the conclusiveness test. They should be classified as cases where a new trial can be granted in the interests of justice when the new evidence can be said to be of such a nature that it would probably have changed the verdict.

The allowance of such a rule in the class of death penalty cases only would not completely subsume the conclusiveness tests in all cases. It would be a narrowly defined class of

cases whose classification as a special category can be justified on grounds of humanity and the special need for certainty of the guilt of those the state seeks to put to death. The harm to the state and society in executing an innocent person far outweighs any perceived need for a rule of finality in death penalty cases. Every safeguard known to man should be utilized by the state in death penalty cases in order to prevent the state from being a party to a miscarriage of justice.

Under our system of justice as it presently exists, a person wrongfully accused of first degree murder stands a much greater risk of being executed than the foulest of murderers who are in fact guilty who confess and strike a bargain with the state for a life sentence. This is particularly true in a circumstantial evidence case. Even though innocent, he must go to trial and risk the very substantial risk of conviction.

A typical circumstantial evidence case might be a person who has had a violent argument with a neighbor. And, who, upon hearing a commotion down the hall, goes out and sees the neighbor's door open. He walks into the room. The murder weapon is a knife protruding from the body and he bends over to check vital signs. At this point other neighbors walk in. He is arrested, tried and convicted because the knife handle was made of a material which did not hold fingerprints and he has no one to testify he was in his apartment when the murder occurred.

This court admitted in Riley v. State, 433 So.2d, 976 (Fla. 1983), that the evidence in that case, if available at trial, would probably have prevented the verdict but still denied

his petition and left his death sentence in effect. It is a gross miscarriage of justice in death penalty cases for such a situation to occur.

It is a completely artificial distinction without any rational justification in a death penalty case to say that the newly discovered evidence which would probably change the verdict would be judicially cognizable if presented in a motion for a new trial within 10 days of the verdict, but cannot be heard if presented 11 days or 10 years after the verdict.

There should be no place in the law for such an artificial distinction when a person's life is at stake. The state's interest should be as great in assuring that an innocent life is not taken as it is in seeking to make sure the guilty are punished. When this type of artificial distinction is allowed to exist in the law it is clear that punishment, whether of the guilty or innocent, has achieved paramount importance. As a society, we must constantly be on guard against injustice as we regress rather than progress.

The courts should especially be vigilant to ensure that no innocent person dies at the hands of the state. The death of an innocent person by state execution completely subverts the judicial process. Such action fosters distrust of the legal and judicial system. Even the most ardent supporters of capital punishment must agree that innocent persons should not be executed for crimes that, but for evidence not being available at the time of trial which probably would have prevented the entry of the judgment against him, he was sentenced to death and executed.

The conclusiveness test is particularly inappropriate in a circumstantial evidence case. A circumstantial evidence case by definition cannot be said to be "conclusive." Thus, the conclusion test must not be applied on a case founded on circumstantial evidence.

ARGUMENT

This is a totally circumstantial evidence case. There was no direct eye witness testimony that Tommy Zeigler was the person who committed the murders. The first vote of the jury 20 minutes after retiring for deliberation was six to acquit and six to convict. See, affidavit of Dr. Stephen Roberson, attached. The three primary witnesses who testified against Tommy Zeigler were directly involved themselves. They had more to gain than lose by testifying against Tommy Zeigler. Edward Williams and Frank Smith purchased two of the murder weapons six months or more before the murders. The story that they were bought for Tommy Zeigler was adopted from the true story where Edward Williams bought a gun at Tommy Zeigler's request for Willie Mae Beaufort, who so testified at trial. Edward Williams and Frank Smith had several months after the murders to concoct their story about Zeigler. Their involvement in the purchase was not revealed when Edward Williams was initially interviewed but only after the guns were traced to Frank Smith. Felton Thomas came to the scene with Charlie Mays (who left home with a gun and the intention of robbing the store, according to his son, Ernie), where he claimed to have sat in the van hidden behind the William Thomas Zeigler furniture store. According to his time sequence,

this would have had to be at the time the first three murders were being committed. He then describes his first meeting with a white man introduced to him as Tommy Zeigler who drives up in a white Cadillac (which matches the description of one of the four cars seen earlier in front of the store by Mr. Roach, Tommy Zeigler was driving the two-tone brown Oldsmobile belonging to Curtis Dunaway that night but his own regular car was a white Tornado - which he had loaned to Curtis Dunaway earlier that day). The perpetrators had no way of knowing Tommy Zeigler wouldn't be driving his own white Tornado that night. The newly discovered evidence from Mr. Roach's affidavit places a "white cadillac" in front of the Zeigler store at the exact time of the murders. This would conclusively establish that the person driving the "white cadillac" was involved in the murder. Tommy Zeigler's "presence" in the area was shown by the state's witness, Tom Hale, to have been in a two-tone Oldsmobile.

Edward Williams testified he took Tommy Zeigler to the store, Tommy Zeigler allegedly tried to shoot him and he (Edward Williams) jumped the fence, went to Kentucky Fried Chicken and attempted to call the police. He then got a friend to take him to his car, went to Orlando and discussed what happened with another friend and they went to the Orange County Sheriff's Office. Actually, the testimony and time frame of Edward Williams shows that he took Tommy Zeigler to the store at approximately 8:00 p.m. Tommy Zeigler testified he never saw Edward Williams again after he (Tommy Zeigler) entered the store. The crucial fact is that four witnesses put Edward Williams at the

Kentucky Fried Chicken restaurant, but not until 9:00 p.m. or after. At the same time these witnesses saw Edward Williams at Kentucky Fried Chicken making a phone call, the police were arriving at the William Thomas Zeigler Furniture Store in response to Tommy Zeigler's call for help and they were taking Tommy Zeigler to the hospital all of which Edward Williams had to have witnessed. He then knew Tommy Zeigler wasn't dead and that he needed an explanation. (Edward William's truck was still locked behind the store and he had no way to get it out). It is reasonable to conclude that he had come back after changing his clothes to see what was happening at the store. He then went to Kentucky Fried Chicken to make a phone call, presumably to whomever else was involved, about Zeigler's untimely resurrection and then he disappeared. Additionally, two of the witnesses who saw Edward Williams at Kentucky Fried Chicken describe him in different clothing than that described by the witness who saw him leave home that evening. This change of clothing should be conclusively established by the newly discovered test results received after trial showing no gunshot residue on Edward William's pants where he testified he put a gun - murder weapon - in his pocket.

Further, an attendant working at the Gulf Service Station next to the Kentucky Fried Chicken restaurant reported to the Sheriff's office that two men - one young black (fitting Felton Thomas' description) and one older black with a Bahamian accent (fitting Edward William's description) came into the gas station between 9 and 9:30 p.m. and told him there had been a

shooting and robbery at the furniture store across the street. The man described the car they were driving as a bronze mustang (which could fit the description of one of the four cars seen in front of the store by the Roaches).

The Sheriff's office apparently never followed up on this information by looking for these men in spite of the fact the information was first received at approximately 10:45 p.m on December 24, 1975 and a second, more detailed, report taken a few days later. Copies of both statements are attached. This information is very significant because the police did not know there had been a shooting or robbery at the store until at least 10:00 p.m. or after. This information was available at the time of trial but the defense counsel failed to use same.

Notwithstanding such failure of defense counsel, the testimony is available and becomes critically important when considered with the newly discovered evidence. The car fits the Roach's description of one of the cars they saw at the Zeigler store at the time of the first murders. No other witnesses have come forward with such information.

The information of the Gulf Station attendant is reliable because it was taken twice by the sheriff's personnel.

The conclusiveness of the effect of the newly discovered evidence hereinafter related might best be judged by assuming that Tommy Zeigler died of the wound he received on December 24, 1975.

If Zeigler had died, the police would have found five dead bodies. He would have been found in the same area as

Charlie Mays. Mays' body had store receipts and \$405.22 in cash on it. An objective observer would have concluded that Tommy Zeigler and the others had been killed by Mays in a robbery attempt. Upon further examination of the scene, they would discover Edward Williams' truck in the rear of the store. Edward Williams being well aware of this fact would have been compelled to come forward with his explanation of events. In order to place the blame solely on Zeigler, he had to bring back the murder weapon that he took from the scene.

His explanation is that the only thing he knows is he came to the store with Tommy Zeigler to move Christmas presents. He walks into the darkened store, hears three clicks and exclaims, "Mr. Tommy, why did you try to shoot me?" He further explains that he came into possession of the murder weapon that killed two of the victims by Zeigler giving it to him in an effort to persuade him to come back into the store. He is able to escape because Zeigler gets down on his knees to beg him to return, thus giving him the opportunity to run and climb over the fence. He explains that he leaves Winter Garden and goes to friends in Orlando who persuade him to go to the sheriff's department. He had tried to call the police in Winter Garden before he left but got a wrong number so he didn't try again. He does not at this time, mention to the police or sheriff that two of the other murder weapons in the store were guns he had a friend of his, Frank Smith, purchase for him some six months earlier.

Thus, Edward Williams is directly connected to the three actual murder weapons by purchase and possession.

Since Edward Williams' clothing does not have any gunshot residue in the pants pocket, he has no support that he carried the securities revolver murder weapon around in his pants pocket. The investigators will also become aware that despite Edward Williams' claim that Zeigler probably killed the others and Felton Thomas' claim of Zeigler firing weapons in the grove, he, Zeigler has no gunshot residue in his pants pockets despite an hour or more of probably putting his hands in his pockets to retrieve or replace his car keys.

Once Edward Williams began talking to police, Felton Thomas would have been compelled to come forward as he did. The news of the slayings was carried on local television on the 11:00 p.m. news. Thomas first approached a police officer at or after midnight at a restaurant in West Orlando.

All the hard evidence points directly at Edward Williams. He was the only one directly connected to any of the murder weapons at the scene.

CONCLUSION

If it had been presented to the jury, at the very least, the newly discovered evidence would probably have prevented the entry of the judgment against petitioner. Considered in the light of an initial vote by that jury of 6 to acquit and 6 to convict and considering that it was a totally circumstantial evidence case, it can be fairly concluded that the newly discovered

evidence would have conclusively prevented the entry of the judgment.

Respectfully submitted,



H. VERNON DAVIDS
Attorney for Peitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Express Mail to Richard Prospect, Assistant Attorney General, Beck's Building, 4th Floor, 125 North Ridgewood, Daytona Beach, Florida 32014, this 15th day of May, 1986.



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