IN THE
SUPREME COURT OF FLORIDA

CASE NO. **73,195**

THE MIAMI HERALD PUBLISHING CO. and JOEL ACHENBACH,

Petitioners,

vs.

THE HONORABLE HOWARD GROSS, ARISTIDES MOREJON, and THE STATE OF FLORIDA,

Respondents.

ON REVIEW FROM THE
THIRD DISTRICT COURT OF APPEAL
MIAMI, FLORIDA

AMICUS CURIAE BRIEF OF THE TRIBUNE COMPANY

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TABLE OF CONTENTS

TABLE OF CITATIONS

STATUTES

OTHER AUTHORITY

STATEMENT OF INTEREST OF THE TRIBUNE COMPANY

Amicus Curiae The Tribune Company (the "Tribune") is the publisher of The Tampa Tribune, a daily newspaper of general circulation in the State of Florida.

This appeal involves a critical aspect of the press' qualified privilege under the First Amendment to the United States Constitution. In the past, the Tribune's entire newsgathering process has been encompassed within the protection of a vigilant First Amendment qualified privilege against compelled testimony and production. Traditionally, the Tribune has vigorously and successfully asserted that privilege and kept its newsgatherers out of the courtroom and detached from the partisan politics of the judicial system. The Tribune has been at the forefront of litigation concerning that privilege. See Tribune Co. V. Huffstetler, 489 So.2d 722 (Fla. 1986); Tribune Co. V. Green, 440 So.2d 484 (Fla. 2d DCA 1983).

The certified question at issue directly affects the interests of the Tribune and poses a serious and imminent threat to its First Amendment right to gather the news. See Branzburg V. Hayes, 408 U.S. 665 (1972). Should the ruling of the District Court of Appeal be affirmed, the Tribune's capacity to gather the news will be significantly diminished.

PRELIMINARY STATEMENT

The Tribune adopts the description of the parties set forth in the initial brief of the Miami Herald Publishing Co. (the "Herald") and Joel Achenbach ("Achenbach") (collectively the "Miami Herald").

STATEMENT OF THE CASE AND FACTS

The Tribune accepts and adopts the statement of the case and the statement of the facts contained in the Miami Herald's Initial Brief. The Tribune stresses that, at the time Achenbach observed the arrest and search of Aristides Morejon ("Morejon"), he was engaged in newsgathering activities as a professional journalist. The Tribune further emphasizes that any information possessed by Achenbach was obtained in his newsgathering capacity. Achenbach in fact wrote an article concerning the arrest and seizure at issue.

SUMMARY OF THE ARGUMENT

Before a reporter can be compelled to testify about newsgathering information, a balancing process should occur to ensure that First Amendment rights are not infringed upon unnecessarily. The court below held that Achenbach could be automatically compelled to testify, without regard for his First Amendment rights, merely because he observed information relevant to a criminal case and because that information was not from a confidential source. The court below erred.

In Tribune Co. v. Huffstetler, 489 So.2d 722 (Fla. 1986) and Morgan v. State, 337 So.2d 951 (Fla. 1976), this Court held that a reporter could not be automatically compelled to testify, even though that reporter possessed sole evidence of the very commission of a crime. Under Huffstetler and Morgan, the court below erred when it held that Achenbach must testify because he witnessed Morejon's arrest and search.

The lower court also erred by denying Achenbach First Amendment protection because Morejon sought nonconfidential information. Important First Amendment interests are impacted whenever reporters are called to testify regardless of the confidential or nonconfidential nature of the information sought. A balancing process should occur to prevent unnecessary intrusion into the newsgathering process.

In effect, the court below has undertaken in advance the balancing process mandated by Huffstetler and Morgan and has reached the conclusion that the need for nonconfidential criminal

information will always outweigh the reporter's First Amendment rights. Those rights, however, deserve case-by-case protection and attention.

The federal and state courts of this country have unanimously adopted a three-part test to ensure all relevant interests are weighed. That test takes into account the relevancy of the information sought, its availability from alternative sources besides the press and whether the litigant has a compelling need for the information. That test effectively balances the interests at stake and should be adopted for use by the courts of Florida.

ARGUMENT

Introduction

The issue in this case is not, as Morejon would suggest, whether the press should be absolutely immune from process. The issue is whether, before a reporter can be compelled to testify about newsgathering information, a balancing process should occur to ensure that First Amendment rights are not infringed upon unnecessarily.' This Court has specifically recognized the importance of that balancing process by establishing in Florida a qualified privilege against compelled disclosure of information gathered in the course of a news reporter's work. Tribune Co. V. Huffstetler, 489 So.2d 722 (Fla. 1986); Morgan V. State, 337 So.2d 951, 954 (Fla. 1976). This Court's recognition of that privilege grew out of the United States Supreme Court's acknowledgment, in Branzburg v. Hayes, 408 U.S. 665 (1972), that the newsgathering process deserves First Amendment protection.

The opinion below is a fundamental departure from Huffstetler and Morgan. The court's decision effectively limits the protection afforded by the qualified privilege to only those cases in which the press seeks to protect confidential information and confidential sources. In all other cases, a reporter can be compelled to testify about his or her newsgathering activ-

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[1] The Florida Constitution, Article I, Section 4, also guarantees that "[n]o law shall be passed to restrain or abridge the liberty of speech or of the press." That provision itself is an adequate and independent ground for reversal of the court below.

ities no matter how great the impact upon the newsgathering process, no matter how irrelevant or unnecessary the information sought by the subpoenas. In effect, the court below has undertaken in advance the balancing process mandated by Huffstetler and Morgan and has reached the conclusion that the need for nonconfidential information will always outweigh the reporter's First Amendment rights.

As will be demonstrated below, the balance cannot be so easily struck against the press. Important First Amendment interests are impacted whenever reporters are called to testify regardless of the confidential nature of the information sought. This Court can protect the interests of all concerned, both litigants and the press, simply by requiring that the balancing process mandated by Morgan and Huffstetler be applied in all cases where compulsory process is used to compel testimony about information gathered during the newsgathering process.

Section I of this brief discuss why the concerns of Morgan and Huffstetler apply to this case. Section II then addresses how that balancing process should be undertaken by the trial court in this case.

I. THE FIRST AMENDMENT QUALIFIED PRIVILEGE AGAINST COMPELLED TESTIMONY APPLIES WHEN A REPORTER OBSERVES AN ARREST AND SEIZURE IN THE COURSE OF NEWSGATHERING.

The facts underlying this appeal are critical. Achenbach was not present in the Miami International Airport ("MIA") in his capacity as a random traveler passing through the airport. He was not there merely on the way to an assignment. Instead,

Achenbach entered the airport solely to gather general information for an article on MIA. As part of that newsgathering process, he observed Morejon's arrest and seizure. He did not witness the commission of any crime. The Morejon incident became part of the article which resulted from Achenbach's MIA assignment.

The court below erred by automatically compelling Achenbach to testify merely because he possessed nonconfidential information relevant to a criminal matter. The Tribune's argument addresses both grounds advanced by the court below for ignoring Achenbach's privilege. First, the court erred by ruling that a reporter must always testify when, in the course of newsgathering, he gathers information relevant to a crime. The court again erred when it ruled that a reporter could be automatically compelled to reveal nonconfidential information.

In Huffstetler and Morgan, this Court recognized that the qualified privilege protects the press from compelled testimony -- even when, in the course of newsgathering, a member of the press witnesses events relevant to a criminal case. In both Huffstetler and Morgan, this Court extended the privilege to encompass journalists who possessed sole knowledge of the very commission of a crime. The Court jealously protected the newsgathering process.

In Huffstetler, a Tampa Tribune reporter, James Tunstall ("Tunstall"), was the only witness to the crime of disclosing the filing of an ethics complaint. See §112.317(6), Fla. Stat. (1987). Even so, this Court found the qualified privilege

applied to Tunstall and rejected any suggestion that the reporter could automatically be compelled to release such evidence. Huffstetler, 489 So.2d at 723. Rather, in determining the privilege applied, the Court balanced the need for the information held by the reporter against the damage to the news process which would result from an order compelling the reporter's testimony. Id. The Court determined that the press' need to protect its sources outweighed the public's interest in prosecuting for a violation of the statute at issue. Id. at 722-23.

Huffstetler illustrates the breadth of the qualified privilege and establishes that the privilege protects the entire newsgathering process. There, this Court quashed a subpoena directed to a reporter/witness. In fact, Tunstall was the sole source of the requested information -- as well as the only possibility for securing a criminal conviction.

As such, Huffstetler mandates application of the privilege here. In contrast to Tunstall, Achenbach is merely one of many sources of information concerning the arrest and search of Morejon. Unlike Tunstall, Achenbach witnessed -- not the commission of any crime -- but only Morejon's subsequent arrest and search. Most significantly, Achenbach -- like Tunstall -- was engaged in newsgathering at the time he observed those events. If this Court refused to disrupt the newsgathering process under the circumstances of Huffstetler, it certainly should disapprove of the lower court's blanket decision to eliminate the privilege in cases where, as here, the reporter does not singularly possess direct evidence of a crime.

Even prior to Huffstetler, this Court refused to compel a reporter's testimony when the reporter actually witnessed an alleged crime. Morgan V. State, 337 So.2d 951 (Fla. 1976). Section 905.24, Florida Statutes (1975) required grand jury proceedings be kept secret. In contravention of Section 905.24, someone leaked a sealed grand jury presentment to a Pasco Times reporter. The State immediately subpoenaed the reporter to learn the perpetrator's identity. Id. at 952. When the reporter refused to divulge the name of her source, she was cited for contempt.

This Court overturned the contempt citation. In so doing, it balanced the interests at stake. Id. at 955-56. There, the State forwarded the need to protect grand jury secrecy as justification for compelling the reporter's testimony. Despite the fact that grand jury secrecy is accorded extraordinary deference by the courts, id. at 955; In re The Grand Jury, 528 So.2d 51 (Fla. 2d DCA 1988), this Court favored the First Amendment and protected the newsgathering process.

Morgan, too, requires quashing the subpoena here. For the same reasons Huffstetler applies and under the heightened deference accorded newsgathering in Morgan, Morejon's interest here in Achenbach's testimony simply cannot abrogate application of the qualified privilege. In sum, Achenbach cannot be automatically compelled to testify simply because he possesses evidence tangentially relevant to a criminal matter.

In essence, Huffstetler and Morgan both protect the same First Amendment interest: the newsgathering process. In Morgan, this Court remarked:

> The Branzburg dissenting and concurring opinions recognize newsgathering as an essential precondition to dissemination of news, and the plurality opinion also conceded that "without some protection for seeking out the news, freedom of the press could be eviscerated."[2]

Morgan, 337 So.2d at 954 (quoting Branzburg, 408 U.S. at 681). Numerous post-Branzburg courts, in a number of contexts, have also seized on Branzburg's recognition that the First Amendment protects newsgathering. Von Bulow v. Von Bulow, 811 F.2d 136 (2d Cir.), (Branzburg protects newsgathering process), cert. denied, . U.S. ____, 107 S.Ct. 1891 (1987); Continental Cablevision v. Storer Broadcasting, 583 F.Supp. 427 (E.D. Mo. 1984) (Branzburg extended First Amendment protection to the entire newsgathering process); Maughan v. N. L. Industries, 524 F.Supp. 93 (D.D.C. 1981) (newsgathering process protected by Branzburg); Gulliver's Periodicals, Ltd. v. Chas. Levy Circulating Co., Inc., 455 F.Supp. 1197 (N.D. Ill. 1978) (embracing Branzburg as guaranteeing newsgathering process constitutional protection); Mitchell v. Superior Court, 690 P.2d 625 (Cal. 1984) (en banc) (Branzburg acknowledged newsgathering entitled to First Amendment protection).

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[2] Branzburg was a plurality opinion; however, a majority of the Court recognized the newsgathering process deserves First Amendment protection.

Because the qualified privilege protects the entire newsgathering process, the privilege encompasses not only confidential sources of information encountered in newsgathering, but nonconfidential sources also. As such, the lower court erred by denying Achenbach the right even to assert the privilege here.

The privilege is designed to protect the press against the indiscriminate and unnecessary use of compulsory process whatever the information sought. See Sweezey v. New Hampshire, 354 U.S. 234, 245 (1957); Tribune Co. v. Green, 440 So.2d 484 (Fla. 2d DCA 1983), rev. denied, 447 So.2d 886 (1984); Times Publishing Co. v. Burke, 375 So.2d 297 (Fla. 2d DCA 1979). The purpose of the privilege is to avoid impediments to the free flow of information -- so vital to our democratic system -- and to avoid even the appearance of partiality on the part of the press. Branzburg v. Hayes, 408 U.S. 665 (1972). Those interests are implicated when compelled disclosure of nonconfidential as well as confidential information is at issue.

For example, in United States v. Cuthbertson, 630 F.2d 139 (3d Cir. 1980), cert. denied, 449 U.S. 1126 (1981), the Third Circuit Court of Appeals focused on the importance of protecting the entire newgathering process.[3] That circuit refused to limit

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[3] Many jurisdictions have recognized the qualified privilege extends to nonconfidential sources of information. Continental Cablevision v. Storer Broadcasting, 583 F.Supp. 427 (E.D. Mo. 1984) (First Amendment implicated regardless of whether confidential or nonconfidential sources sought); United States v. Blanton, 534 F.Supp. 295 (S.D. Fla. 1982) (privilege protects nonconfidential sources; compelled disclosure would cause "chilling effect"); Maughan v. N. L. Industries, 524 F.Supp. 93 (D.D.C. 1981) (nonconfidential sources within privilege to ensure unfet-

the qualified privilege solely to confidential sources. Such a restrictive view of the privilege would "substantially undercut the free flow of information to the public which is the foundation for the privilege." Id at 147 (emphasis added). Citing Loadholtz v. Fields, 389 F. Supp. 1299 (M.D. Fla. 1975), the Cuthbertson court emphasized the significant intrusion into the editorial and newsgathering processes that compelled production caused. Id. The privilege prevents intrusion into the editorial process and self-censorship as well as the revelation of confidential sources. Id. Based on those concerns, the court extended the privilege to encompass investigators' notes, audio tapes and video tapes concerning a relevant "60 MINUTES" newscast.

In essence, the First Amendment ensures the ability of the press to collect and edit the news freely -- unimpeded by repeated demands for its news resources. O'Neill V. Oakgrove Construction, 523 N.E.2d 277, 528 N.Y.S.2d 1, 3 (N.Y. 1988). Regularly permitting litigants access to journalists would jeopardize the press' autonomy. Id. Journalists routinely compile information about accidents, crimes and other types of events which normally give rise to litigation. Because the press is naturally involved in such matters, litigants' attempts to tap

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tered press); Loadholtz v. Fields, 389 F.Supp. 1299 (M.D. Fla. 1975) (compelled disclosure of reporter's resources "equally as invidious" as compelled disclosure of confidential informants); People v. Silverstein, 412 N.E.2d 692 (Ill. App. Ct. 1980), (Illinois shield law encompasses nonconfidential information) rev'd on other grounds, 429 N.W.2d 483 (Ill. 1981); Austin v. Memphis Publishing Co. 655 S.W.2d 146 (Tenn. 1983) (Tennessee shield law includes nonconfidential sources).

the press' comprehensive information would be widespread if not restricted:

> The practical burden on time and resources, as well as the consequent diversion of journalistic effort and disruption of newsgathering activity, would be particularly inimical to the vigor of a free press.

Id. Based on these concerns, the court in O'Neill recognized a broad qualified privilege which protected the entire newsgathering process, not just confidential sources of information. The O'Neill court applied the privilege to nonconfidential photographs of an automobile accident scene because those photographs were taken in the course of newsgathering.

The impact on the press of automatically requiring reporter testimony for all information gathered from nonconfidential sources is, in fact, great:

> . . . To the extent that the reporter's role [at the scene of an investigation] is driven by legal exposure to conform to that of the officer [whose job it is to formalize findings for use in court] -- or of other witnesses material to the case -- his or her public report will be inevitably distorted.
>
> A reporter who does not want to become a witness in some indeterminate future criminal or civil case -- and who has no guarantee that the law will prevent his or her becoming so embroiled -- will be far less inclined to stray from the official investigative track. After all, any novel angles or observations developed may well whet the evidentiary appetite of some future prosecutor or litigant. Better to report the case or incident as officials see it. Better not to ask probing questions or pursue untapped sources, no matter what the story value. Better, come to think of it, to cover the situation by handout and telephone calls to the press officer. Better to settle for The Official Story, if going beyond it or challenging it will only

> invite subpoenas from those who want the benefit of one's efforts to buttress their own case.

Statewide Bench/Bar Media Newsletter, January 1988, State Bar of California, Article, Terry Francke, Legal Counsel, California Newspapers Publishers Association, Sacramento, California.

Unlike business persons or other non-press individuals, newspersons are constantly encountering situations which lead to litigation. It is the media's business to seek out newsworthy events; those events often logically lead to the courthouse steps. The present case is a typical example:

> For the press, whose agents are present at the occurrence or immediate aftermath of all manner of events likely to end up in court, the pressure from third party factseekers is, by contrast, considerable. Some institutional bar to hailing (sic) these observers into court except under the most extraordinary and compelling circumstances is essential, if we expect them to have the independence it takes to give us a fresh, uninhibited and resourceful look at what's happening out there. If we want to use reporters' work product as routine testimonial grist, we may as well send stenographers to cover the news, because that's what we'll get - stenography.

Id.

A balancing process prior to compelling a newsgatherer's participation is critical. Unless a balancing process occurs, reporters will be called first every time for the information they possess. (Any thinking lawyer would want the fruits of the reporter's investigation first of all.) Regardless of the actual impact on his ability to gather the news, the reporter will be subpoenaed even if his testimony is merely tangentially relevant or highly cumulative. Moreover, once the rule sequestering

witnesses is invoked, the subpoenaed reporter, who has been covering the event resulting in litigation, will lose his right to continue to cover that event through trial. As witness for a partisan, the reporter will next lose neutrality. Worst of all, reporters and editors will tailor investigations and articles to avoid being repeatedly hauled into court.

In fact, based on such concerns, the courts of this state have religiously shielded the newsgathering process. Unlike the instant case, most opinions dealing with the qualified privilege have not been preoccupied solely with confidential sources. Those courts have vigorously protected the entire newsgathering process, including information gathering and work product.

For example, in Tribune Co. v. Green, 440 So.2d 484 (Fla. 2d DCA 1983), rev. denied, 447 So.2d 886 (Fla. 1984), the Second District Court of Appeal quashed a subpoena issued to a reporter who possessed evidence relevant to a crime. There, a Tampa Tribune reporter had had repeated conversations with former Hillsborough County Circuit Judge Richard Leon who was charged with perjury, bribery, official misconduct and acceptance of unlawful compensation; the State subpoenaed the reporter. The court, recognizing newsgathering was involved, applied the privilege:

> Our research of the applicable case law as well as a reading of the cases submitted to us by the parties in support of their respective position (sic) show that the trend in cases like the one before us is to apply . . . [the privilege] . . . There is abundant case law that this test is applicable to criminal as well as civil cases and to confidential and nonconfidential sources of information.

Id. at 486. Although a nonconfidential source was implicated, the subpoena was quashed.

The Second District Court of Appeal has addressed the privilege more than any other district court of appeal. That district has repeatedly recognized the applicability of the privilege in a variety of newsgathering settings to ensure a proper balancing process occurs. See CBS, Inc. v. Cobb, ____ So.2d ____, 13 F.L.W. 2483 (Fla. 2d DCA 1988) (assumed privilege applied to videotape outtakes of interview of death row inmate); Waterman Broadcasting of Florida, Inc. v. Reese, 523 So.2d 1161 (Fla. 2d DCA 1988) (applied qualified privilege to subpeona directed to reporter who witnessed confession); Johnson v. Bentley, 457 So.2d 507 (Fla. 2d DCA 1984) (qualified privilege protects unpublished photographs of accident scene); Times Publishing Co. v. Burke, 375 So.2d 297 (Fla. 2d DCA 1979) (recognized First Amendment protects even nonconfidential sources).

The Second District is not alone. The First District Court of Appeal has also recognized the qualified privilege protects the newsgathering process. That district, in Gadsden County Times v. Horne, 426 So.2d 1234 (Fla. 1st DCA 1983), pet. denied, 441 So.2d 631 (Fla. 1983), refused to compel the disclosure of confidential sources from a reporter in a defamation suit against the reporter. In Carroll Contracting, Inc. v. Edwards, 528 So.2d 951 (Fla. 5th DCA 1988), the Fifth District Court of Appeal assumed the qualified privilege applied to photographs of an accident scene; it then proceeded to weigh the interests at

stake. In sum, the vast majority[4] of the decisions in this State have recognized the danger of a narrow privilege which fails to balance competing interests.

The court below abdicated its responsibility to the First Amendment by failing to consider any First Amendment interests at all. A case-by-case balancing process should occur even when a reporter possesses nonconfidential evidence relevant to a crime.

11. THE THREE-PART BALANCING TEST PROPERLY WEIGHS THE COMPETING INTERESTS AT STAKE.

As discussed above, the reporter's First Amendment rights must at least be factored into the compelled disclosure equation. Thus, the question now becomes what factors should comprise such an equation.[5] The courts addressing this concern have unanimously adopted a three-part test which takes into account the interests on both sides.

In Horne the First District Court of Appeal adopted that three-part test specifically to satisfy this Court's mandate in Morgan that a "proper balance" be struck between the interests of

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[4] Only the Fourth Circuit in Satz v. News and Sun-Sentinel Co., 484 So.2d 590 (Fla. 4th DCA 1985), rev. denied, 494 So.2d 1152 (Fla. 1986) and the court below have failed to apply the privilege to newsgathering activities. Instead, those desisions sanction automatic production without engaging in any balancing process. For the reasons discussed here, neither the First Amendment nor this State's constitution should condone automatic production without some weighing of free press concerns.

[5] Huffstetler and Morgan, as well as the underlying policy concerns, require the court to engage in a balancing process before compelled production of newsgathering information can occur. Huffstetler, 489 So.2d at 723-24; Morgan, 337 So.2d at 954-55.

the press and the party seeking disclosure. Id.; See Morgan, 337 So.2d at 954. To overcome the press' qualified privilege, the party seeking newsgathering materials must establish:

1. The information sought is relevant to the pending litigation;

2. The information cannot be obtained from alternative sources; and

3. There is a compelling need for the information.

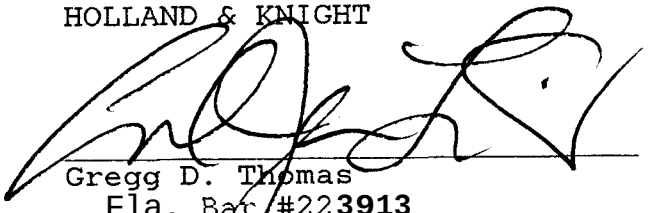
Id. This test has been applied in various contexts in both federal and state courts throughout this country. United States v. Blanton, 534 F.Supp. 295 (S.D. Fla. 1982) (three-part test applies to nonconfidential sources); Subpoena Duces Tecum to Stearns V. Zulka, 489 N.E.2d 146 (Ind. Ct. App. 1986) (even in nonconfidential source setting, balancing under the three-part test essential to ensure press' interests protected); O'Neill v. Oakgrove Construction, Inc., 528 N.Y.S.2d 1 (N.Y. 1988) (three-part test properly balances competing interests); Dooley v. Boyle, 53 N.Y.S.2d 161 (N.Y. Sup. Ct. 1988) (citing O'Neill, applied three-part balancing test to nonconfidential information at issue); Matter of Contempt of Wright, 700 P.2d 40 (Idaho 1985) (three-part test is one generally applied in compelled disclosure cases). Zelenka v. State, 266 N.W.2d 279 (Wis. 1978) (most post-Branzburg courts have adopted three-part test).

By employing the three-part test, both the press and the litigant are protected and all relevant concerns are assessed. For example, where the interest of society in bringing criminals to justice is weighed against the newsgathering privilege, the

three-part test may favor the societal interest. See Waterman, 523 So.2d at 1162. The use of the three-part test does not mean that the reporter will never appear in court to provide critical information which is unavailable from other sources. Application of the three-part test will mean, however, that the reporter will become the last -- not the first -- source of evidence.

Respectfully submitted,

HOLLAND & KNIGHT



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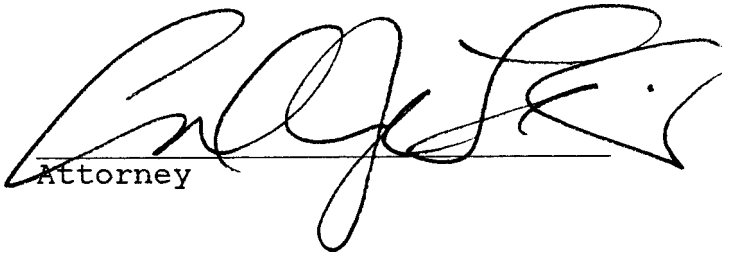
CONCLUSION

Based on the foregoing, the court below should be reversed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Sanford Bohrer, Thompson, Zeder, Bohrer, Werth & Razook, 200 S. Biscayne Boulevard, Suite 4900, Miami, Florida 33131 and Bennett H. Brummer and Bruce A. Rosenthal, 8005 Metropolitan Justice Building, 1351 N.W. 12th Street, Miami, Florida 33125 on this 15th day of December, 1988.



Attorney

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