No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

ANDRES MATA, TDCJ-CID #1297972 — PETITIONER
(Your Name)

vs.

LORIE DAVIS, Director, TDCJ-CID — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT
FOR THE FIFTH CIRCUIT COURT OF APPEALS NUMBER 17-10052

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Andres Mata, Pro Se
(Your Name)

TDCJ-CID #1297972, Connally Unit, 899 FM 632
(Address)

Kenedy, Texas 78119
(City, State, Zip Code)

NA
(Phone Number)

QUESTION(S) PRESENTED

Whether a federal court of appeals' determination that a habeas petitioner failed to make a substantial showing of the denial of a constitutional right is proper when the state court of appeals on direct appeal determined that the petitioner's federal constitutional rights were violated.

LIST OF PARTIES

[X] All parties appear in the caption of the case on the cover page.

[ ] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

TABLE OF CONTENTS

OPINIONS BELOW 1

JURISDICTION 2

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED 3

STATEMENT OF THE CASE 4

REASONS FOR GRANTING THE WRIT 6

CONCLUSION 14

INDEX TO APPENDICES

APPENDIX A: Texas Court of Criminal Appeals Refusal to Grant Petition for Discretionary Review With Justice Meyers Dissenting Stating He Would Grant

APPENDIX B: Texas Court of Appeals Opinion

APPENDIX C: Federal District Court Denial of Habeas Petition and Denial of COA With Magistrate Judge's Memorandum

APPENDIX D: Fifth Circuit Single Judge Denial of COA

APPENDIX E

APPENDIX F

TABLE OF AUTHORITIES CITED

CASES PAGE

Blake v. State, 365 S.W.2d 795, 796 (Tex.Crim.App.1963).....9

Brecht v. Abrahamson, 507 U.S. 619, 637–38 (1993).....10

Carroll v. State, 916 S.W.2d 494, 497 (Tex.Crim.App.1996).....8, 9

Coleman v. State, 545 S.W.2d 831, 834 (Tex.Crim.App.1977).....8

Cox v. State, 523 S.W.2d 695, 700 (Tex.Crim.App.1975).....9

Davis v. Alaska, 415 U.S. 308, 316 (1974).....9

Delaware v. Van Arsdall, 475 U.S. 673, 679 (1986).....9 12 , 13, 14

Fry v. Piller, 551 U.S. 112, 119 (2007).....11

Hinojosa v. State, 788 S.W.2d 594, 600 (Tex.App.—Corpus Christi 1990, pet. ref'd).....8

Jackson v. State, 482 S.W.2d 864, 868 (Tex.Crim.App.1972).....8

Miller-El v. Cockrell, 537 U.S. 322, 336 (2003).....7, 10

Pointer v. Texas, 380 U.S. 400, 406 (1965).....8

Shelby v. State, 819 S.W.2d 544, 550–51 (Tex.Crim.App.1991).....9

STATUTES AND RULES

28 U.S.C. § 1746.....14, 15

28 U.S.C. § 2253(c)(2).....ii, 3, 6, 7, 10

28 U.S.C. § 2254(d)(1).....3, 12, 14

28 U.S.C. § 2254(d)(2).....3, 12, 14

S. Ct. R. 10(c).....7

TEX.R.APP.P. 44.2(a).....12

OTHER

Texas Rules of Evidence Handbook 597 (4th ed. 2001).....12

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[X] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix D to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[X] is unpublished.

The opinion of the United States district court appears at Appendix C to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[X] is unpublished.

[ ] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

JURISDICTION

[X] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was May 1, 2018.

[X] No petition for rehearing was timely filed in my case.

[ ] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ___A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

[ ] For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

[ ] A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ___A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

A. U.S. Const. amend. VI

> In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defence.

B. 28 U.S.C. § 2253

> (c)(1) Unless a circuit justice or judge issues a certificate of appealability, an appeal may not be taken to the court of appeals from—
>
> (A) the final order in a habeas corpus proceeding in which the detention complained of arises out of process issued by a State court; or
>
> (B) the final order in a proceeding under section 2255.
>
> (2) A certificate of appealability may issue under paragraph (1) only if the applicant has made a substantial showing of the denial of a constitutional right.

C. 28 U.S.C. § 2254

> (d) An application for a writ of habeas corpus on behalf of a person in custody pursuant to the judgment of a State court shall not be granted with respect to any claim that was adjudicated on the merits in State court proceedings unless the adjudication of the claim—
>
> (1) resulted in a decision that was contrary to, or involved an unreasonable application of, clearly established Federal law, as determined by the Supreme Court of the United States; or
>
> (2) resulted in a decision that was based on an unreasonable determination of the facts in light of the evidence presented in the State court proceeding.

STATEMENT OF THE CASE

A. Procedural History

Petitioner ANDRES MATA (Mr. Mata) filed his petition for a writ of habeas corpus on January 20, 2015, attacking his state-court conviction of aggravated sexual assault and his life sentence (Dkt. No. 3). The federal district court denied the petition and a certificate of appealability (COA) on December 23, 2016 (Attached Appendix C). On May 1, 2018, a single judge of the court of appeals denied Mr. Mata's COA application (Attached Appendix D).

B. Statement of Facts

Mr. Mata was tried by jury in Texas district court for aggravated sexual assault, which allegedly occurred at about 3:30 a.m. on April 19, 2003 (1 CR 2–3). He was convicted and sentenced to a mandatory life sentence (4 RR 53, 69). His defense was that the sexual encounter was consensual (see e.g. 3 RR 64, 81; 4 RR 44, 50–51). He attempted to present evidence that would support a defense that the complainant was involved in a scam to sue the apartment complex where the alleged offense took place, but the trial court would not allow him to present that evidence (see e.g. 3 RR 206–07; 3 RR 236–37; 2 RR 8–9; 1 CR 22). The State presented only one witness to the sexual encounter, Courtney Ellis (the complainant).1

Before the trial, the State filed a motion in limine requesting that the defense not mention any civil litigation in which the complainant was a

1. "CR" refers to the state trial court clerk's record. "RR" refers to the state reporter's record (statement of facts). Both "CR" and "RR" are preceded by a volume number and followed by a page number. "Dkt. No." refers to the docket entry number in the federal district court.

party (1 CR 22; 2 RR 8–9). This included a civil lawsuit for "tons of money" filed by the complainant against the apartment complex where the alleged offense took place and Mr. Mata. Defense counsel objected and made a bill of exception, arguing that such a restriction of evidence violated Mr. Mata's right to confrontation guaranteed by the Sixth Amendment to the United States Constitution (3 RR 206–07; 3 RR 236–37). The judge overruled (3 RR 206–07; 3 RR 236–37).

Defense counsel sought to introduce evidence that the complainant filed a civil lawsuit against Mr. Mata and the apartment complex seeking tons of money (1 CR 22; 2 RR 8–9; 3 RR 206—7; 3 RR 236–37). Counsel informed the judge during his objections and his bill of exception that "[d]uring the pendency of this litigation—this case, I have observed a representative from her attorney, Frank Branson's office has been here the entire time as well as one of the two people she's suing in this case, which is the apartment complex" (3 RR 206–07). "The Court has been around longer than I have and the Court is obviously aware of the elite personal injury lawyer that Mr. Branson is" (3 RR 236–37). "I'll represent to the Court that I've been contacted by the apartment complex's attorneys I've seen them here today, and I've seen Mr. Branson's representatives here today" (3 RR 236–37).

Defense counsel sought permission to cross-examine the complainant "and possibly other witnessese about what their involvement is and what Mr. Branson's office has done to prosecute the lawsuit against the apartment complex and Mr. Mata" (3 RR 236–37). The judge denied defense counsel's request (3 RR 206).

During closing arguments, the element of consent was a hotly contested issue (see e.g. 4 RR 31–32; 4 RR 40–43; 4 RR 44). What's more is that the prosecutor assured the jury that there was no "motivation to come and frame him" and no civil lawsuit to "get a huge judgment of money" against him and the apartment complex (4 RR 46–47). Defense counsel immediately objected stating that such argument was a violation of the State's own motion in limine and that the prosecutor's argument was improper (4 RR 46–47). The judge overruled the objection (4 RR 46–47).

C. Direct Appeal

The Texas court of appeals determined that the trial court violated Mr. Mata's Sixth Amendment right of confrontation when it denied him permission to cross-examine the complainant regarding the civil lawsuit but that sufficient harm was not shown for reversal of the conviction (Attached Appendix B, pp. 4–5). The Texas Court of Criminal Appeals refused Mr. Mata's petition for discretionary review with Justice Meyers dissenting and stating he would grant the petition (Attached Appendix A). This Court denied certiorari review. See Mata v. Texas, 555 U.S. 845 (2008).

REASONS FOR GRANTING THE PETITION

The United States court of appeals has decided an important question of federal law that has not been, but should be, settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court, in that a single judge of the court of appeals determined that Mr. Mata did not make a substantial showing of the denial of a constitutional right under 28 U.S.C. § 2253(c)(2), notwithstanding the fact that the state court of appeals on direct appeal determined that the trial court violated Mr. Mata's Sixth Amendment right of confrontation. See

S. Ct. R. 10(c).

Section 2253(c)(2) requires only a substantial showing of the denial of a constitutional right. Once a defendant on state direct appeal has persuaded the state court of appeals that the trial court deprived the defendant of a federal constitutional right, § 2253(c)(2) has been satisfied.

This case is of national importance because the AEDPA and § 2253(c)(2) are not meant to serve as a complete bar to appeal a federal district court's denial of a habeas petition, but that's precisely what happened here: the lower courts used AEDPA and § 2253(c)(2) to serve as a complete bar to an appeal of the district court's ruling. When a state appellate court determines that a trial court has deprived the defendant of a federal constitutional right, a COA should issue under 28 U.S.C. § 2253(c)(2).

ARGUMENT

Question Restated

> Whether a federal court of appeals' determination that a habeas petitioner failed to make a substantial showing of the denial of a constitutional right is proper when the state court of appeals on direct appeal determined that the petitioner's federal constitutional rights were violated.

A prisoner is entitled to a COA if he makes "a substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c)(2); see Miller-El v. Cockrell, 537 U.S. 322, 336 (2003).

Here, the state court of appeals on direct appeal determined that the trial court deprived Mr. Mata of the right to confront and cross-examine the only witness present at the time this alleged rape took place, the complainant, in violation of the Sixth Amendment to the United States Constitution, but a single judge of the federal court of appeals determined

that Mr. Mata did not even make even a substantial showing of the denial of a constitutional right (see Attached Appendix B, Opinion of State Court of Appeals and Appendix D, Fifth Circuit Single Judge Order Denying COA).

To keep this simple, here's how the state appellate court ruled:

> In his first issue, appellant contends that the trial court erred by limiting his cross-examination of Ellis. Specifically, appellant contends the trial court erred by refusing appellant the opportunity to cross-examine Ellis concerning a civil suit against appellant and the apartment complex in which Ellis lived. We agree.
>
> Prior to trial, the State filed a motion in limine seeking to exclude any mention of civil litigation in which Ellis was a party. Before the close of the evidence, appellant requested the opportunity to introduce evidence of the lawsuit to show bias. The trial court stated it would "keep the motion in limine the way it is," but allowed appellant to make a bill of exceptions. Counsel then stated, among other things, that Ellis had filed a lawsuit against appellant and the apartment complex where she lived and that evidence of the lawsuit would show a motive to "overdramatize to capitalize on the fact that she was raped at this apartment complex."
>
> The Sixth Amendment to the United States Constitution guarantees a defendant the right to confront the witnesses against him. See U.S. Const. amend. VI; Pointer v. Texas, 380 U.S. 400, 406 (1965). The trial court violates a defendant's right of confrontation when it limits appropriate cross-examination. Carroll v. State, 916 S.W.2d 494, 497 (Tex.Crim.App.1996). A party should be allowed to show all facts that tend to demonstrate bias, interest, prejudice, or any other motive, mental state, or status of the witness that, fairly considered and construed, might even remotely tend to affect the witness's credibility. Hinojosa v. State, 788 S.W.2d 594, 600 (Tex.App.—Corpus Christi 1990, pet. ref'd). Evidence to show bias or interest of a witness covers a wide range and "encompasses all facts and circumstances, which when tested by human experience, tend to show that a witness may shade his testimony for the purpose of helping to establish one side of the cause only." Carroll, 916 S.W.2d at 497 (quoting Jackson v. State, 482 S.W.2d 864, 868 (Tex.Crim.App.1972)). Any motive that operates on the mind of a witness during testimony is material to the trial because of its effect on the witness's credibility. See Coleman v. State, 545 S.W.2d 831, 834 (Tex. Crim.App.1977). Nevertheless, the scope of appropriate cross-examination is not unlimited. Carroll, 916 S.W.2d at 498. A trial court may limit the scope of cross-examination to prevent harassment, prejudice, confusion of the issues, harm to the

> witnesses, and repetitive or marginally relevant interrogation. Delaware v. Van Arsdall, 475 U.S. 676, 679 (1986); Carroll, 916 S.W.2d at 498.
>
> Cross-examination regarding a civil suit may be appropriate to show an interest or bias on the part of the witness. See Davis v. Alaska, 415 U.S. 308, 316 (1974); Carroll, 916 S.W.2d at 498; Shelby v. State, 819 S.W.2d 544, 550–51 (Tex.Crim.App.1991); Blake v. State, 365 S.W.2d 795, 796 (Tex.Crim.App.1963). Thus, when a witness has a pending civil suit against the defendant arising out of the same incident, evidence of the pending suit is admissible to show the pecuniary interest and bias of the witness. See Cox v. State, 523 S.W.2d 695, 700 (Tex.Crim.App. 1975).
>
> Here, Ellis filed a civil lawsuit against appellant and the apartment complex where she lived regarding the incident at issue. Thus, Ellis had an economic motive to shade her testimony against appellant and appellant should have been able to cross-examine Ellis on the general nature of the lawsuit. See id. Such cross-examination would not have confused the issues, harmed or harassed Ellis, was not repetitive, and was more than marginally relevant to show bias. We conclude, therefore, that the trial court erred in failing to allow appellant to cross-examine Ellis regarding the civil suit against appellant and the apartment complex.
>
> * * *
>
> [T]he trial court improperly excluded [this evidence] at the State's request in violation of appellant's constitutional right of confrontation.

(Attached Appendix B, pp. 2–4, 6.)

Indeed, the state appellate court was correct because the trial court did violate Mr. Mata's Sixth Amendment right to confront and cross-examine the complainant. The fact that the only witness to the act alleged to support the criminal complaint and the only witness, who directly denied that the act of intercourse was consensual, sued the apartment complex for tons of money clearly reflected on the complainant's pecuniary interest and bias. The right to cross-examine for the purpose of affecting a witness's credibility is twofold: A defendant may ask a witness any question to

which the answer may have a tendency to affect her credibility; if she denies anything that would show a motive for, or animus to, testify against the defendant, it may be shown by other witnesses and by independent facts.

When the trial court improperly denies the opportunity to ask a question and receive the witness's answer for fact-finder consideration, the trial court concomitantly denies the right to establish facts that illustrate the true circumstances bearing on the issue by extrinsic proof. In such a case the accused's right to effective confrontation is thoroughly frustrated. Hence, Mr. Mata makes a substantial showing of the denial of a constitutional right and he therefore qualifies for a COA under 28 U.S.C. § 2253(c)(2). See Miller-El v. Cockrell, 537 U.S. at 336.

Moreover, sufficient harm is shown for a federal court to vacate the state-court conviction and sentence. This Court has held that a federal habeas court may not grant relief on trial errors unless the petitioner demonstrates that the error "had a substantial and injurious effect or influence in determining the jury's verdict." Brecht v. Abrahamson, 507 U.S. 619, 637–38 (1993). As shown below, Mr. Mata can meet this burden and show that this constitutional violation had a substantial and injurious effect or influence in determining the jury's verdict.

In this case, the State argued that this was not a consensual sexual encounter (4 RR 31–32). Defense counsel responded that the State did not prove that this was not a consensual encounter (4 RR 40–44). The prosecutor then struck a foul blow; and according to the opinion of the state court of appeals, "it was an intentional misstatement regarding evidence which the trial court improperly excluded at the State's request in violation of appellant's constitutional right of confrontation. As

such, it was improper and we conclude the trial court erred by overruling appellant's objection" (Attached Appendix B, p. 6). Here's what happened:

> What in the world can possibly be her motivation to come frame him? Do you think he's got a lot of money? Do you think she's going to go after him in a civil suit—
>
> Judge—
>
> —and get a huge judgment against him?
>
> Judge. I apologize. That is a violation of the State's own motion in limine. Improper argument.
>
> All right.
>
> I'm just responding to his argument.
>
> I'll overrule the objection.

(4 RR 46–47).

The trial court's exclusion of this defensive evidence regarding the impending lawsuit had a substantial and injurious effect or influence in determining the jury's verdict because it effectively precluded Mr. Mata from presenting his defense that the sex was consensual and that this was some sort of scam for tons of money—and the State capitalized on this constitutional violation by misleading the jury to believe that there was no lawsuit when in fact there was a lawsuit.

Finally, the state court's harmless error determination was objectively unreasonable. See Fry v. Piller, 551 U.S. 112, 119 (2007) ("when a state court determines that a constitutional violation is harmless, a federal court may not award habeas relief under § 2254 unless the harmlessness determination itself was unreasonable." (emphasis in original)).

On the one hand, the state court's harmless error determination was an objectively unreasonable determination of the facts in light of the

evidence presented in the state court proceedings because the judge's ruling had the effect of preventing Mr. Mata from adequately presenting his case. 28 U.S.C. § 2254(d)(2). "[W]hen the judge's ruling has the effect of preventing one of the parties from adequately presenting its case, the judge's discretion may be deemed 'unreasonable' and reversible." Texas Rules of Evidence Handbook 597 (4th ed. 2001) (citation omitted).

On the other hand, the state-court harmless error determination was based on an unreasonable application of federal law, as determined by the Supreme Court in Delaware v. Van Arsdall, 475 U.S. 673, 684 (1986), because the state courts placed too little weight on the importance of the complainant's testimony and too much weight on the third, fourth, and fifth factors set out in Van Arsdall, at 684, when the third, fourth, and fifth factors carried no weight at all in the State's favor. See 28 U.S.C. § 2254(d)(1).

The state court of appeals conducted the following harmless error review:

> Having concluded that the trial court erred, we must reverse the judgment unless we can determine beyond a reasonable doubt that the error did not contribute to the conviction. See TEX.R.APP.P. 44.2(a). When making such a determination, we must first assume that the damaging potential of the cross-examination was fully realized. See Van Arsdall, 475 U.S. at 684. With that assumption in mind, we review the entire record and consider the following factors: (1) the importance of the witness's testimony in the prosecution's case; (2) whether the testimony was cumulative; (3) the presence or absence of evidence corroborating or contradicting the testimony of the witness on material points; (4) the extent of cross-examination otherwise permitted; and, (5) the overall strength of the prosecution's case. Id. Finally, we determine whether the error was harmless beyond a reasonable doubt. Id.
>
> We will address each of these considerations in turn. Without question, Ellis's testimony was vital to the State's case. As the complaining witness, she was the only witness to testify directly about the charged crime. Thus, without her testimony the State could not have established the elements of the offense. And, because she was the only witness to testify directly about

> the sexual assault, her testimony was not cumulative. With respect to evidence corroborating Ellis's testimony, the record shows (1) the DNA analysis on the vaginal smear collected from Ellis matched a DNA sample from appellant; (2) Vicki Sheahan, a resident in the apartment complex saw appellant near the parking garage two hours before Ellis was assaulted; and (3) when appellant was arrested, he had the ring taken from Ellis during the assault. Other than Ellis's testimony regarding the civil lawsuit, the trial court did not limit the extent of appellant's cross-examination. Finally, the overall strength of the State's case was strong. After considering the relevant factors, we conclude the error was harmless beyond a reasonable doubt.

(Attached Appendix B, pp. 4–5.)

The State appellate court's harmless error determination was objectively unreasonable for these reasons—

1. The complainant's testimony was so important to the prosecution's case that without it, the prosecution had no evidence that the sex was without the complainant's consent (see e.g. Attached Appendix B, p. 5).

2. The improperly excluded evidence was not cumulative (see e.g. Attached Appendix B, p. 5).

3. The State presented no evidence that corroborated the complainant's testimony on the material point that the sex was without consent (see e.g. Appendix B, p. 5).

4. The trial court otherwise did not permit Mr. Mata to present other witnesses regarding the lawsuit about what their involvement was and what elite personal injury lawyer Frank Branson's office had done to prosecute the lawsuit against both Mr. Mata and the apartment complex (see 3 RR 206–07; 3 RR 236–37; 1 CR 22; 2 RR 8–9).

5. The overall strength of the State's case was so weak that the State could not establish the elements of the charged offense without the complainant's testimony (see e.g. Attached Appendix B, p. 5).

Hence, the state-court harmless error determination was based both on an unreasonable determination of the facts in light of the evidence presented in the state court proceedings and an unreasonable application of federal law, as determined by this Court in Delaware v. Van Arsdall, 475

U.S. at 684. See 28 U.S.C. § 2254(d)(1) and (2).

CONCLUSION

The Fifth Circuit erred when it denied Mr. Mata's COA application. Mr. Mata has made a substantial showing of the denial of a constitutional right. The Confrontation Clause violation in his trial had a substantial and injurious effect or influence in determining the jury's verdict. And the state-court harmless error determination was objectively unreasonable.

The Petition for Writ of Certiorari should be granted.

Respectfully submitted,

Andres Mata

ANDRES MATA, Pro Se
TDCJ-CID #1297972
Connally Unit
899 FM 632
Kenedy, Texas 78119

Date: July 24, 2018

DECLARATION

"I, ANDRES MATA, TDCJ-CID #1297972, presently incarcerated in the Texas Department of Criminal Justice Correctional Institutions Division, at the Connally Unit, in Karnes County, Texas, declare under the penalty of perjury under 28 U.S.C. § 1746 that the foregoing statements are true and correct and that I placed this Petition in a postpaid package in the prison mailing system on this day.

"EXECUTED on this the 24 day of July, 2018."

Andres Mata

ANDRES MATA