ORIGINAL

19-1224

No.

IN THE
SUPREME COURT OF THE UNITED STATES

JEREMIAH F. MANNING,

Petitioner,

v.

LUCY J. KIM,

Respondent.

On Petition For A Writ of Certiorari To The Supreme Court of California

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

I. The public record shows that Judge Susan Greenberg of the California Superior Court of San Mateo County accepted campaign contributions from Respondent's attorneys well in excess of the statutory limit ($1500) that required her disqualification and she declined to recuse herself and failed to disclose this to Petitioner for over a year thereby depriving him of the exercise of his peremptory challenge as provided to him by California law, and then refused to recuse herself upon motion, instead striking Petitioner's disqualification motion and later entering judgment on child custody against Petitioner. The question presented is whether Judge Greenberg's refusal to recuse herself and failure to timely and accurately disclose the campaign contributions to the Petitioner violated the Due Process and Equal Protection Clauses of the Fourteenth Amendment.

II. The record also shows that Judge Greenberg accepted campaign contributions from Respondent's attorneys well in excess of the $100 that under California law required Judge Greenberg to timely and accurately disclose them, and that Judge Greenberg failed to disclose them for over a year in contravention of said statute while making ruling after ruling against Petitioner, including rulings involving the fundamental Constitutional rights to an attorney and cross-examination, and then made an incomplete, inaccurate and misleading disclosure after the child custody phase of trial had been completed and subsequent to her almost contemporaneous recusal of herself for the same reason in a similar matter also involving child custody. The question presented is whether Judge Greenberg's failure to recuse herself where she had accepted excessive campaign contributions and failed to disclose them as required by law, but did contemporaneously recuse herself in a similar matter where both parties were represented by counsel, violated the Fourteenth Amendment.

PARTIES TO THE PROCEEDING AND RULE 29.6 STATEMENT

There are no additional parties to this case other than those named in the caption, and neither party is a non-governmental corporation for which disclosure is required as specified in Rule 29.6.

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Jeremiah F. Manning respectfully submits this petition for a writ of certiorari to review the judgment of the Supreme Court of California.

OPINIONS BELOW

The denial of Petitioner's Petition for Review by the Supreme Court of California was ordered on June 26, 2019. Pet. App. A27. The Opinion of the California Court of Appeals for the First District dated April 10, 2019 is available in the Appendix. Pet. App. A2. The Court of Appeals denied Petitioner's Rehearing Petition on April 30, 2019. Pet. App. A25. Judge Greenberg's September 16, 2016 Judgment is available in the Appendix. Pet. App. A29. Petitioner includes his motion to disqualify Judge Greenberg and his Rehearing Petition to demonstrate that the Constitutional issues raised herein were raised below and for the arguments and information contained therein. Pet. App. A86 and A109, respectively.

JURISDICTION

The Supreme Court of California entered its denial of Petitioner's Petition for Review on June 26, 2019. The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a).

CONSTITUTIONAL PROVISIONS INVOLVED

The Fourteenth Amendment to the U.S. Constitution provides, in relevant part:

> No State shall . . . deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

US. Const. amend. XIV, § 1.

STATEMENT

This is a case where the clear law of California required the judge, Hon. Susan Greenberg, to recuse herself because she accepted campaign contributions from one party's attorneys and not the other's in excess of the statutory amount that triggered disqualification. As set forth in Appendix F, Judge Greenberg sat on this case all the way to the end, depriving Petitioner of his state right to peremptory challenge and eventually entering judgment on custody issues against Petitioner. Because she flouted the clear law, her participation and the judgment in the case was and is in absolute conflict with constitutional due process under the line of cases from *Ward v. Village of Monroeville*, 409 U.S. 47 (1972) to

Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) to most recently *Williams v. Pennsylvania*, 579 U.S. __ Slip Op. 15-5040 (2016) and *Rippo v. Baker*, 580 U.S. __ Slip Op. 16-6316 (2017). As the Court put it most eloquently in *Ward*: "Petitioner is entitled to a neutral and detached judge in the first instance". *Ward* at 61-62. Petitioner was *prima facie* denied a neutral and detached judge in the first instance in this case because Judge Greenberg took the campaign contributions from Respondent's attorney and they were in excess of the statutory amount requiring her disqualification. Because of the importance of this issue for all Americans who must be able to trust the that the judiciary will be neutral in their cases, Petitioner asks this Court to

grant this Writ. And because the California Supreme Court chose to not address these fundamental Constitutional issues, Petitioner also requests that the judgment be vacated and the case remanded so that the California Court considers them.

1. This Court has repeatedly emphasized that "any tribunal permitted by law to try cases and controversies not only must be unbiased but also must avoid even the appearance of bias." *Commonwealth Coatings Corp. v. Cont'l Cas. Co.*, 393 U.S. 145, 150 (1968). This case has both the Due Process issue raised above, and also affords the Court the opportunity to clarify the circumstances in which a judge's refusal to follow State campaign contribution laws and recuse herself after accepting and benefitting from

campaign contributions from one party in excess of the statutorily disqualifying amount, when she did in fact recuse herself in another similar, contemporaneous case involving child custody, creates an "appearance of bias" that is so significant that constitutional equal protection requires her recusal or disqualification. This question is vitally important to preserving the "reputation for impartiality and nonpartisanship"—and, ultimately, the "legitimacy"—"of the Judicial Branch." *Mistretta v. United States*, 488 U.S. 361, 407.

With regard to Due Process, Justice Kennedy reiterated the objective standard that must be used to decide whether a judge must recuse herself in *Caperton*, 556 U.S. 868:

> Under our precedents there are objective standards

> that require recusal when "the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." *Withrow* v. *Larkin*, 421 U.S. 35, 47 (1975).

Caperton, 556 U.S. at 870 (Kennedy, J., writing for the majority and holding that a judge must recuse himself not only when actual bias has been demonstrated or when the judge has an economic interest in the outcome of the case, but also when "extreme facts" create a "probability of bias.")

While this is not a case where there are millions of dollars in campaign contributions at issue as in *Caperton*, it is a case that affects the millions of Americans that must make their way through the family law system in each of our 50 United States. *Broken Hearts:*

A Rundown Of The Divorce Capital Of Every State, USA Today, February 2, 2018, at https://www.usatoday.com/story/money/economy/2018/02/02/broken-hearts-rundown-divorce-capital-every-state/1078283001/ (relying on Census Bureau data to demonstrate that between 10-20% of Americans in each of the 50 states are divorced). Additionally, the divorce and family law "industry", including attorneys, family law consultants, psychologists and related personnel, processes one million divorces a year so there are clear economic implications that make this case an important one for the Court to address. *The Big Business of Divorce*, CNBC, July 2, 2012 at https://www.cnbc.com/id/48045774.

Americans must be confident that their family law judges are impartial and that they will not be biased against one party because that party did not make a campaign contribution.

Most important, however, this is a case where the Judge completely ignored the clear law on disqualification and campaign finance disclosure, and rendered judgment. Her continued participation in the case created a situation that denied Petitioner constitutional due process and equal protection from the outset.

2. In this case, Judge Greenberg completely disregarded the clear California statute on disqualification when a campaign contribution to her exceeded $1500. Petitioner's Appendix, A8-A9. She also disregarded the clear California statute concerning campaign

contribution disclosure for over a year, all the while making adverse rulings against Petitioner, and then when she finally disclosed her acceptance of and benefit from campaign contributions from Respondent's attorneys, her disclosure was incomplete, inaccurate and untimely since it did not occur until after the conclusion of an eight day custody phase of trial. *Id.* Petitioner respectfully submits to the Court that this total disregard of state judicial disqualification and campaign contribution disclosure law meets the "extreme facts" standard that creates a substantial probability of bias.

Although judicial elections and contributions to elected judges are a well-established means of selecting a state judiciary, a judge's refusal to follow the clear state law on recusal

in a manner that deprives a litigant of his state right creates a constitutionally unacceptable appearance of impropriety. This case affords the Court an ideal opportunity both to clarify the circumstances in which judges must follow state recusal and disqualification statutes because it is mandated by constitutional due process and equal protection, and to restore the public's waning confidence in state judicial systems in the face of the increasingly significant role of campaign contributions to state judicial elections.

The facts of this case are "extreme facts" of a judge that completely disregarded the clear law, and Petitioner respectfully requests that this Court grant the writ and take action by vacating judgment and remanding this case so that the

California Supreme Court considers whether Judge Greenberg's recusal should have been required because objectively speaking, "the probability of actual bias on the part of the judge is too high to be constitutionally tolerable." *Withrow*, at 35.

3. The trial court judge in this matter, Hon. Susan Greenberg, was elected as Superior Court Judge in San Mateo County in June 2014, just a few months prior to being assigned this case. During her campaign for Superior Court Judge, public records indicate that Judge Greenberg accepted campaign contributions. They indicate that she received $2,000 in campaign contributions from Joseph Crawford, Esq. and his law firm Hanson Crawford Crumm. Petitioner's Appendix, A8-A9. Mr. Crawford and the Crawford firm

were the lead attorneys representing the Respondent, and represented her through the entirety of the pre-trial and trial proceedings in this matter.

Public records show that Judge Greenberg received these campaign contributions from the Crawford attorneys on April 10, 2014 and that she was assigned this case in late August 2014. *Id.* She then conducted the first mandatory status conference on September 5, 2014 with the parties and the Respondent's attorneys, including the Crawford firm. She should have recused herself at that time because California Code of Civil Procedure § 170.1(a)(9)(A) requires judges to recuse themselves where they accept more than $1500 from lawyers or parties before them. She also could have made lawful disclosure of the Crawford firm's

significant campaign contributions at that time as she was required to do by California Code of Civil Procedure § 170.1(a)(9)(C). However, Judge Greenberg ignored the law and did not recuse herself and made no disclosure whatsoever for over a year afterward.

Judge Greenberg could also have recused herself or issued a minute order making the campaign contribution disclosure in the days and weeks that followed. She did not.

In fact, at no time during the assignment of the case to her, or at the first status conference with the parties, or at the numerous pre-trial appearances that followed over the next 13 months where she heard and decided litigated issues, did Judge Greenberg disclose the fact that she had received $2500 in campaign contributions from

Respondent's lead attorneys. She continued to sit on the case. She also did not make any § 170.1 disclosure prior to opening statements at trial in September 2015, the last possible time at which, under the statute, the Appellant could have made a California Code of Civil Procedure § 170.6 peremptory challenge. Appendix F, A123.

Throughout this period of time where required disclosure was not being made, Judge Greenberg also repeatedly denied Appellant attorneys' fees. She also excluded all of Appellant's witnesses while allowing all of Respondent's, and refused to enforce the subpoena for the custody evaluators source records, thus depriving Appellant of meaningful cross-examination.

Contemporaneous with Judge Greenberg's ongoing failure to disclose the campaign contributions from the Crawford firm, she was also assigned to another marriage dissolution proceeding, *Marriage of Stupp & Schilders*, 216 Cal.App. Unpub.LEXIS 8136. In the *Stupp* case, she also accepted campaign contributions from only one party's attorneys that she also failed to disclose to the other party in compliance with California law. In the *Stupp* case, both parties were represented by experienced family law attorneys admitted to the California bar. Petitioner was proceeding *pro se*, as he does here.

Judge Greenberg eventually recused herself from the *Stupp* case after the attorneys who had not donated

to her campaign for Superior Court Judge objected to her failure to disclose the campaign contributions from opposing counsel.

Trial commenced in this case on September 28, 2015, just over 13 months after Judge Greenberg was assigned to it. The trial spanned 9 months and took approximately 15 days. At no time during this period did Judge Greenberg recuse herself as she had done in the *Stupp* case.

Judge Greenberg bifurcated trial such that custody was tried first. Immediately prior to the commencement of the custody phase of trial Judge Greenberg presided over extensive settlement discussions between Petitioner and the Crawford firm. At no time during these discussions did she disclose the

campaign contributions from the Crawford firm. She continued to improperly sit on the case and withhold the campaign contribution disclosure through opening statements and through days and days of trial from late September 2015 until late October 2015.

When Judge Greenberg finally disclosed the campaign contributions from the Crawford firm in the last days of the custody trial, she again did not follow the law regarding required disclosure. She made an incomplete and inaccurate disclosure and she never fully corrected her disclosure as required by law in a minute order or on the record in open court. Petitioner's Appendix A, A7-A8.

Judge Greenberg did make certain corrections to her late October

2015 campaign contribution disclosure when she struck Petitioner's 170.3 disqualification motion. However, these corrections still did not bring her disclosure into compliance with California law or the judicial canons, and nothing she could have done would have cured the fact that she accepted campaign contributions that required her recusal in the first instance.

4. Throughout this period of time where Judge Greenberg was not making the required campaign contribution disclosure, she also repeatedly denied Petitioner's requests attorneys' fees that would allow him to hire an experienced family law attorney. Judge Greenberg also excluded almost all of Petitioner's witnesses, while allowing all of Respondent's, and refused to enforce

Petitioner's subpoena for the custody evaluator's source records and documents, thus depriving him of the right to meaningful cross-examination.

On August 3, 2015 Judge Greenberg heard Petitioner's motion to exclude the custody evaluator's (Dr. Press) testimony and report. Petitioner wanted to subpoena Dr. Press for a deposition and the data she relied on to prepare her report. However, Dr. Press demanded $2,700 for travel and "preparation" time. Petitioner could not afford to depose Dr. Press and Judge Greenberg denied his motion to exclude her report at trial:

> You had plenty of time to come up with the money to be able to pay her for her testimony today. You haven't done so. I am not going to continue this, because I'm not going to

> continue the trial. . . . So the request is denied.

Significant from a due process standpoint, Petitioner also requested attorneys' fees and that his subpoena be enforced to obtain the underlying source documents from Dr. Press so that he could have meaningful cross-examination. Judge Greenberg denied all of his requests. As a result, when Respondent used Dr. Press as an expert witness at trial, Petitioner did not have necessary materials to meaningfully and effectively cross-examine Dr. Press.

REASONS FOR GRANTING THE PETITION

This Court should grant certiorari to reinforce for all Americans the circumstances in which a judge's failure to follow the law relating to

disqualification and campaign contribution disclosure should necessitate recusal. Specifically, this Court is asked: when a judge does not follow the law with regard to these matters, and deprives a litigant of a state right, does this create a *prima facie* case of "extreme facts" that necessitate vacating her judgment to ensure constitutional due process and equal protection? This question is vitally important to preserving the "reputation for impartiality and nonpartisanship"—and, ultimately, the "legitimacy"—"of the Judicial Branch." *Mistretta v. United States*, 488 U.S. 361, 407.

Judge Greenberg's conclusion that she could participate in this case consistent with the requirements of due process and equal protection cannot be

squared with this Court's repeated admonition that, in order to foreclose the possibility of actual judicial bias, a judge "must avoid even the appearance of bias." *Commonwealth Coatings Corp. v. Cont'l Cas. Co.*, 393 U.S. 145, 150 (1968). Judge Greenberg's insistence on participating in this case conflicts with this Court's decisions specifying the circumstances in which due process requires recusal. It is also does deep harm to the rule of law, since if a law that is so clear can be so brazenly disregarded by judge, how can any party in a family court matter (or any other matter) feel that a judge will impartially apply the law without undue influence and that the fair application of the law is what governs justice?

I. JUDGE GREENBERG'S REFUSAL TO RECUSE HERSELF CONFLICTS WITH THIS COURT'S DUE PROCESS AND EQUAL PROTECTION PRECEDENT

This Court has emphasized that a "fair trial in a fair tribunal is a basic requirement of due procees." *In re Murchison*, 349 U.S. 133, 136 (1955). A "neutral and detached judge" is an essential component of this due process requirement. *Ward v. Village of Monroeville*, 409 U.S. 47 (1972). Indeed, "even if there is no showing of actual bias" on the part of a judge, "due process is denied by circumstances that create the likelihood or appearance of bias" because such a *possibility* of judicial impropriety creates a constitutionally

unacceptable risk of *actual* impropriety." *See Peters v. Kiff*, 407 U.S. 493, 502 (1972).

Because Judge Greenberg accepted the campaign contributions from the Respondent's lawyers, and benefitted from them, she created an unavoidable and constitutionally impermissible appearance that she was biased in favor of Respondent and her attorneys. Her refusal to recuse herself conflicts with this Court's decisions specifying the circumstances in which due process requires recusal.

A."[O]ur system of law has always endeavored to prevent even the probability of unfairness." *Murchison*, 349 U.S. at 136. This "stringent rule," the Court has explained, "may sometimes bar trial by judges who have no actual bias and who would do their

very best to weigh the scales of justice equally between contending parties. But to perform its high function in the best way justice must satisfy the appearance of justice." *Id.* (internal quotation marks omitted). Accordingly, in *Murchison*, the Court held that it violated constitutional due process for a judge who acted as a "one-man judge-grand jury" to charge a witness with contempt in grand jury proceedings and then convict the defendant of that charge because, having been part of the accusatory process that culminated in the contempt charge, it was improbable that the judge could be "wholly disinterested" in the outcome of the contempt proceedings. *Id.* at 137.

And, in *Aetna Life Insurance Co. v. Lavoie*, 475 U.S. 813 (1986), the Court held that it violated due process for a

state supreme court justice to participate in the court's review of a verdict for bad-faith refusal to pay an insurance claim because the justice was at that time pursuing his own bad-faith suit against an insurance company and the legal principles established by the supreme court's decision had a direct impact on the outcome of the justice's own case. *Id.* at 825. The Court explained that it was "not required to decide whether in fact Justice Embry was influenced, but only whether sitting on the case then before the Supreme Court of Alabama would offer a possible temptation to the average...judge to...lead him not to hold the balance nice, clear and true." *Id.* (alterations in original; internal quotation marks omitted). Justice Embry's ongoing pursuit of monetary damages through a

cause of action identical to the one pending before the state supreme court offered just such a "temptation."

Most significant, as described above, is the recent *Caperton* case, where Justice Kennedy directly addressed the point that individual states may adopt strict recusal laws: "It is for this reason that States may choose to 'adopt recusal standards more rigorous than due process requires.'" *Caperton*, at 876.(Kennedy, J., citing *Republican Party of Minn. v. White*, 536 U.S. 765, 793 (2002)).

B. While Justice Kennedy's holding in *Caperton* was based on the extent of the campaign contributions and the fact that they were used to achieve a particular result, here we have different campaign contribution issue that picks up where his

cause of action identical to the one pending before the state supreme court offered just such a "temptation."

Most significant, as described above, is the recent *Caperton* case, where Justice Kennedy directly addressed the point that individual states may adopt strict recusal laws: "It is for this reason that States may choose to 'adopt recusal standards more rigorous than due process requires.'" *Caperton*, at 876.(Kennedy, J., citing *Republican Party of Minn. v. White*, 536 U.S. 765, 793 (2002)).

B. While Justice Kennedy's holding in *Caperton* was based on the extent of the campaign contributions and the fact that they were used to achieve a particular result, here we have different campaign contribution issue that picks up where his

opinion leaves off: to wit, a judge that declines to follow the law of a more rigorous State recusal and campaign disclosure statute. Petitioner submits that this is a different, but similarly clear-cut case of extreme facts that necessitate review and the granting of certiorari on due process grounds.

C. A party's right to Equal Protection of the laws under the United States Constitution is regarded as the twin of the procedural due process right and Justice Ginsberg has noted that these principles often converge. *M.L.B. v. S.L.J.*, 519 U.S. 102, 105 (1996). The standard of review in state law cases involving child custody was elucidated by this Court in *Little v. Streater*, 451 U.S. 1 (1981). Building on the *Matthews v. Eldridge* and *Boddie v. Connecticut* decisions, the Supreme Court's analysis

first considered whether due process involving custody should receiving a heightened level of scrutiny since it concerns such a fundamental human right. *See Matthews v. Eldridge*, 424 U.S. 319 (1976); *Boddie v. Connecticut*, 401 U.S. 371 (1971). *See also M.L.B. v. S.L.J.*, 519 U.S. 102 (1996) (Ginsberg, J., "the interest of parents in their relationship with their children is sufficiently fundamental to come within the finite class of liberty interests protected by the Fourteenth Amendment"). This Court was unanimous in finding that it should. *Little*, 452 U.S. at 5-12.

The Court next applied the second factor: the likelihood the case would not be fairly adjudged given the lower court's application of the procedures involved. The Court found

the risk "not inconsiderable." *Id.* at 13-16. Finally, the Court applied the third factor: whether the State of Connecticut would be unduly burdened by requiring that fairness be enforced, and found that it would not, even though it would have to bear the cost of a diagnostic paternity test. *Id.*

D. Here, it is undisputed that the core issue of Petitioner's case is custody and involves his relationship with his children. This satisfies the first part of the Supreme Court's test because this is one of the most compelling private interests. Second, for the State of California to have a statute that requires judicial officers to disclose campaign contributions in both its civil procedure and judicial canons, and then not enforce it when it deprives a party of the fair exercise of a state right to

peremptory challenge, would be certain to render the peremptory challenge right null and void in many cases. This situation would also be virtually certain to create a high risk that other judges would not bother to follow the law, would not disclose campaign contributions in timely fashion (if at all), and thus would result in many litigants being denied a fair trial by an impartial, neutral adjudicator, in addition to being denied the fair exercise of their peremptory right. This meets the Appellant's burden on the second factor. Finally, as to the third factor, the cost to the State of California would be negligible, since disclosure of campaign contributions by the judicial officer costs nothing except the Superior Court Judge's time and attention.

There is no doubt that Judge Greenberg accepted campaign contributions and did not recuse herself as the law directed, and also disclose them as prescribed by statute until after Appellant's window for the fair exercise of his peremptory challenge right had closed. If this Court were to allow this to stand, then there is serious risk to the perceived impartiality of the judicial system.

II. THE QUESTION PRESENTED IS EXCEPTIONALLY IMPORTANT TO THE PRESERVATION OF PUBLIC CONFIDENCE IN STATE COURT SYSTEMS ACROSS THE NATION

Although this Court has repeatedly recognized that "[t]rial before

'an unbiased judge' is essential to due process" (*Johnson v. Mississippi*, 403 U.S. 212, 216 (1971)(per curiam)), lower courts, including the lower courts in this case, one of which is the highest court in the largest of our 50 states, have reached conflicting conclusions regarding the federal constitutional standard governing recusal determinations—a conflict that extends to the statutory recusal and campaign contribution disclosure scheme in this case.

This case raises a recurring issue of far-reaching national importance. Thirty-nine States elect at least some of their judges, and the amount of money spent on state judicial elections by candidates and third-party interest groups, including the lawyers who will practice before the elected judges, is

steadily increasing. Indeed, between 1999 and 2006, candidates seeking seats on state courts raised more than $157 million which is nearly double the amount raised by candidates in the four previous election cycles. James Sample et al., *The New Politics of Judicial Elections* 15 (2006).

As the amount of contributions and independent expenditures in state judicial races increases, so will the number of cases in which a party or attorney has donated significant sums of money to a judge, and so, too, will requests for recusal of those judges. But what if the state judges do not follow the statutes that are designed to ensure that parties are before a neutral and impartial adjudicator? This is not merely a state question, but a constitutional one. If judges are

permitted to disregard the clear law or apply the same law in the same situation in a different way because some parties are unrepresented, the rule of law will quickly deteriorate and confidence in the judiciary will decline precipitously.

III. VACATING JUDGMENT AND REMAND IS APPROPRIATE HERE WHERE THE LOWER COURT DECISIONS SO CLEARLY ARE AT ODDS WITH THIS COURT'S DUE PROCESS AND EQUAL PROTECTION PRECEDENT

In this Court's recent line of cases where it granted certiorari, vacated the judgment and remanded the case to the individual State's highest court, the

procedure has successfully induced that court to consider and rule on the constitutional due process issues at play where a judge has been accused of not being impartial. *Rippo v. Baker*, 580 U.S. __ (2017) Slip.Op. (16-6316); *Rogers Lacaze v. Louisiana*, 580 U.S. __, (2017) Slip.Op. (16-1125).

This case occupies a procedural posture where the lower courts refused to address the Constitutional questions that Petitioner timely raised, and never addressed the fact that the deprivation of his state right was never appealable before or during trial using any appeal mechanism. For reasons of judicial economy and efficiency, this Court should give the California Supreme Court the opportunity to consider and rule on these issues, and vacate judgment and remand accordingly.

CONCLUSION

For the foregoing reasons, the petition for writ of certiorari should be granted.

Respectfully submitted,

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September 24, 2019