NO: 20-8286

IN THE
SUPREME COURT OF THE UNITED STATES

KEMON THOMPSON

***Petitioner*,**

v.

UNITED STATES OF AMERICA,

***Respondent*.**

On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Eleventh Circuit

REPLY BRIEF FOR PETITIONER

MICHAEL CARUSO
Federal Public Defender

SARA W. KANE*
Assistant Federal Public Defender
150 West Flagler Street, Suite 1700
Miami, Florida 33130-1555
Telephone (305) 530-7000
Email: Sara_Kane@fd.org

Counsel for Petitioner

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Rules

REPLY BRIEF FOR PETITIONER

Because Mr. Thompson's petition presents three important questions of federal law, which have not been, but should be, settled by the Court, certiorari should be granted.

I. This Court should grant certiorari to clarify that a guilty plea, predicated on an erroneous and unconstitutional interpretation of a criminal statute, is not knowing, voluntary and intelligent.

After Mr. Thompson pled guilty to violating 18 U.S.C. § 924(c)(1)(A)(ii), *United States v. Davis* halved the "crime of violence" element of that offense. 139 S. Ct. 2319 (2019). That is error, under *Bousley v. United States*, 523 U.S. 614 (1998). Further, Mr. Thompson would not have pled guilty but for the error—making this error plain, under *Dominguez Benitez*.

The government's response fails to mention—let alone distinguish—*Bousley*. This omission is telling. The petitioner in *Bousley* sought to challenge his guilty plea to "using" a firearm in relation to a drug trafficking offense because it was entered before the Court narrowed the definition of "using" a firearm, in *Bailey v. United States*, 516 U.S. 137 (1995). *Bousley*, 523 U.S. at 617-18. Since the petitioner in *Bousley* pled guilty to violating § 924(c) pursuant to the broader, pre-*Bailey* definition of "using," the petitioner in *Bousley* argued that "neither he, nor his counsel, nor the court correctly understood the essential elements of the crime with which he was charged," and that he therefore lacked "real notice of the true nature of the charge against him." *Id.* at 618. The Court held that, "[w]ere this contention proved, petitioner's plea would be . . . constitutionally invalid." *Id.* at 618-19. The Court so

held without determining whether the petitioner had actually "used" the firearm in a way that would have satisfied the newer, narrower definition of that elemental term. *Id.* at 623-24 (noting actual innocence was relevant only to whether the petitioner could overcome procedural default, not to whether his plea was valid).

Rather than address this closely analogous case—which strongly supports a finding of error, here—the government argues that "[t]he indictment . . . made clear that Section 924(c)(3)(A), not Section 924(c)(3)(B), was the basis for classifying the Hobbs Act robbery as a 'crime of violence' for purposes of the charge to which petitioner pleaded guilty." Br. in Opp. 8. The government says this is so because circuit caselaw, at the time of Mr. Thompson's guilty plea, had held that Hobbs Act robbery satisfied § 924(c)(3)(A), and because the indictment specifically referred to the Hobbs Act robbery counts as the § 924(c) predicates. *Id.*

It is true that Mr. Thompson received a copy of the indictment, D. Ct. Doc. 127, at 6, and that this "give[s] rise to a presumption that the defendant was informed of the nature of the charge against him." *Bousley*, 523 U.S. at 618 (internal citations omitted). However, the indictment did *not* specify that count 4—brandishing a firearm in furtherance of a crime of violence, to wit, the Hobbs Act robberies in counts 2 and 3—relied on § 924(c)(3)(A). *See* D. Ct. Doc. 3 (describing counts 2, 3, and 4 without mentioning either subsection of § 924(c)(3)). *See also* D. Ct. Doc. 42, ¶ 1 (describing count of conviction in plea agreement without mentioning § 924(c)(3)). Moreover, binding circuit caselaw at the time of Mr. Thompson's plea—and his sentencing—held that § 924(c)(3)(B) was constitutional (as in, not vague), and that

Hobbs Act robbery satisfied *both* § 924(c)(3)(A) and (B). *United States v. St. Hubert*, 883 F.3d 1319, 1328–29 (11th Cir.), *opinion vacated and superseded,* 909 F.3d 335 (11th Cir. 2018). *See also Ovalles v. United States*, 905 F.3d 1231(11th Cir. 2018) (*en banc*), *abrogated by Davis*, 139 S. Ct. 2319. So, when Mr. Thompson pled guilty to brandishing a firearm in furtherance of a "crime of violence," the law of the circuit where he pled guilty held that the "crime of violence" element of his offense included § 924(c)(3)(B), and that Hobbs Act robbery satisfied § 924(c)(3)(B). *See id*. That the same circuit had also held that Hobbs Act robbery satisfied § 924(c)(3)(A), could not have informed Mr. Thompson that count 4 relied *exclusively* on § 924(c)(3)(A) because, in fact, at that time, it did not.

The government argues also that, since the magistrate judge who conducted the plea colloquy correctly identified the elements of the charge to which Mr. Thompson pled guilty, there can be no Rule 11 error. Br. in Opp. 9-10. Not so. The magistrate judge summarized the elements of the offense as follows:

> Number one, the first element being that you committed a crime of violence. Number two, that you knowingly used or possessed a firearm in connection with that crime of violence. And you used that or possessed that firearm in relation to a violent crime. And in this case, the government is charging you with aiding and abetting in that offense.

D. Ct. Doc. 127, at 14. While that recitation is correct on the surface, the magistrate judge—like everyone else in the courtroom—was bound at the time by incorrect Eleventh Circuit law. *See St. Hubert*, 883 F.3d at 1328–29. Only *after* Mr. Thompson pled guilty, and was sentenced, did the Court hold that the definition of a "crime of violence" in § 924(c)(3)(B) was unconstitutionally vague, thereby abrogating Eleventh

Circuit law. *Davis*, 139 S.Ct. at 2323-25. As noted previously, the Court's holding in *Davis* reflects what a "crime of violence" in § 924(c)(3) has *always* meant. *See* Pet. 12 (quoting *Rivers v. Roadway Express, Inc.*, 511 U.S. 298, 313 n.12 (1994)). Therefore, the magistrate judge could not have correctly identified the elements of the charge to which Mr. Thompson pled guilty, because at the time of his change of plea hearing, in the Eleventh Circuit, the "crime of violence" element was overly-broad, unconstitutional, and wrong.[1]

Just like the petitioner in *Bousley*, then, neither Mr. Thompson, nor his counsel, nor the district court (or the magistrate judge), correctly understood the "crime of violence" element of the § 924(c) offense with which he was charged. He was therefore misinformed of the true nature of an element of the charge to which he pled guilty, resulting in an unintelligent guilty plea—and a Rule 11 violation.

Whether Mr. Thompson's admitted conduct actually satisfies the narrower "crime of violence" definition later sanctioned in *Davis*, does not mean that no error occurred.[2] An error of this kind stems from Mr. Thompson's misunderstanding—and

---

[1] The government's reliance on *Brady v. United States*, 397 U.S. 742, 749-758 (1970), to support its contention that the magistrate judge did not commit Rule 11 error, is doubly misplaced. *See* Br. in Opp. 10. The Court in *Brady* found that the invalidation of the death sentence as a punishment for the petitioner's offense did not make his earlier guilty plea involuntary. However, Mr. Thompson argues that his plea was unintelligent—not coerced. Further, the legal change at issue in *Brady* did not narrow the elements of the offense to which the petitioner had pled guilty. *See Bousley*, 523 U.S. at 619 (distinguishing *Brady* from petitioner in *Bousley* because *Brady* "involved a criminal defendant who pleaded guilty after being correctly informed as to the essential nature of the charge against him").

[2] As argued in the district court, on direct appeal, and in this petition, Mr. Thompson maintains that Hobbs Act robbery does not satisfy § 924(c)(3)(A).

therefore lack of "real notice"—"of the true nature of the charge against him, the first and most universally recognized requirement of due process." *See Bousley,* 523 U.S. at 618 (internal citation omitted). A guilty defendant has the same constitutional right to trial as an innocent one, and the choice to forego that fundamental right must be just as informed in either case. *Cf. United States v. Dominguez Benitez*, 542 U.S. 74, 85 (2004) ("The point of the question is not to second-guess a defendant's actual decision; if it is reasonably probable he would have gone to trial absent the error, it is no matter that the choice may have been foolish.").

The government next argues that Mr. Thompson cannot establish "a reasonable probability that, but for the error, he would not have entered the plea." Br. in Opp. 10 (citing *Dominguez Benitez*, 542 U.S. at 83). The government contends that Mr. Thompson "knew of the possibility of challenging Section 924(c)(3)(B)'s validity . . . but chose to plead guilty anyway," and he never tried to withdraw his guilty plea or "express any confusion about its terms." Br. in Opp. 10. Mr. Thompson never expressed any confusion before the district court because the applicable law was clear: a "crime of violence" included §§ 924(c)(3)(A) *and* (B), and Hobbs Act robbery satisfied both definitions. *See St. Hubert*, 883 F.3d at 1328–29. Mr. Thompson did express disagreement with that law, however, before the district court (and in his initial brief on direct appeal), arguing both that § 924(c)(3)(B) was unconstitutionally vague, and that Hobbs Act robbery was not a "crime of violence," under either §§ 924(c)(3)(A) *or* (B). *See* D. Ct. Doc. 129, at 5-6; Pet. C.A. Initial Br. at 29-35. Moreover, as soon as *Davis* was published, Mr. Thompson moved to file supplemental briefing

to challenge the validity of his guilty plea. *See* Pet. C.A. Mot. Supp. Br.[3] Once permitted to file supplemental briefing, Mr. Thompson explicitly asserted that he would not have pled guilty had he been accurately informed of the constitutionally-correct, narrower definition of the "crime of violence" element of the offense to which he pled guilty. *See* Pet. C.A. Supp. Br. at 8 ("Mr. Thompson maintains that he would not have pled guilty had he known that a 'crime of violence,' is defined only by § 924(c)(3)(A), because he does not agree that aiding and abetting a substantive Hobbs Act robbery satisfies that definition, and he did not know at the time of his plea that conspiracy to commit a Hobbs Act robbery is not a 'crime of violence.'").[4]

By expressing his disagreement with the broad, unconstitutional definition of a "crime of violence" that nonetheless bound the district court at the time it accepted his guilty plea, and by speaking up as soon as that definition was narrowed to conform with the Constitution, to state that he would not have pled guilty had he been correctly informed of the elements of his § 924(c) offense, Mr. Thompson has established plain error under *Dominguez Benitez*. *See Greer v. United States*, 141 S. Ct. 2090, 2100 n.1 (2021) (finding that the petitioner failed to satisfy *Dominguez Benitez* standard because, on direct appeal, the petitioner failed to "suggest that he

---

[3] In fact, 24 days after *Davis* was published—and before his counsel filed a motion to permit supplemental briefing—Mr. Thompson wrote the Court of Appeals himself, seeking to "amend" his "direct appeal briefing to raise [the claim that] [his] guilty plea was no good after the S.Ct. decision in U.S. v. Davis." *See* Pet. C.A. Mot. Jud. Notice (returned unfiled pursuant to 11th Circuit Rule 25-1).

[4] Though not charged as a predicate for his § 924(c) offense, Mr. Thompson had also been charged with conspiracy to commit Hobbs Act robbery. D. Ct. Doc. 3.

would not have pled guilty" absent the Rule 11 error at issue). Accordingly, the Court should grant this petition clarify that a guilty plea, predicated on an erroneous and unconstitutional interpretation of a criminal statute, is not knowing, voluntary and intelligent.

II. The Court should grant certiorari to clarify that the intrastate, armed robbery of two foreign tourists of their personal effects and cash is not an offense "for which [a] person may be prosecuted in a court of the United States."

In response to Mr. Thompson's claim that the intrastate, armed robbery of two foreign tourists of their personal effects and cash is not a federal offense, the government argues that Mr. Thompson's guilty plea precludes relief—and that there is no error, anyway, because his admitted conduct satisfies the commerce clause element of Hobbs Act robbery. Br. in Opp. 11-14.

The government is wrong on both fronts. Whether the interstate commerce element of Hobbs Act robbery itself is truly "jurisdictional," Br. in Opp. 13 (citing *United States v. Grimon*, 923 F.3d 1302, 1306 (11th Cir. 2019))—is a red herring. Mr. Thompson's admitted conduct is not an offense "for which [a] person may be prosecuted in a court of the United States." *See* Pet. i, 19-25. Because that aspect of his offense of conviction *is* jurisdictional, his claim may be heard. *See* 18 U.S.C. § 924(c)(1); *Lopez v. Gonzales*, 549 U.S. 47, 62 (2006) (Thomas, J., dissenting) (discussing how phrase "for which the person may be prosecuted in a court of the United States," "acts as a jurisdictional limitation, carving out the subset of *federal*

[crimes of violence and] drug trafficking crimes and making only those eligible for use in §§ 924(c)(1)(A)").[5]

Mr. Thompson's challenge to his guilty plea is also viable according to *Class v. United States*, 138 S.Ct. 798 (2018). The Court in *Class* held that the petitioner could challenge "the Government's power to criminalize [the petitioner's] admitted conduct"—despite having entered an unconditional guilty plea. 138 S.Ct. at 805. Mr. Thompson's claim does not "contradict the terms of the indictment or written plea agreement," it can be "resolved without any need to venture beyond [the existing] record," and it does not "focus upon case-related constitutional defects that occurred prior to the entry of the guilty plea." *See id*. at 804-5 (internal quotations and citations omitted). Just like the petitioner in *Class*, Mr. Thompson merely "seeks to raise a claim which, 'judged on its face' based upon the existing record, would extinguish the government's power to 'constitutionally prosecute' the defendant if the claim were successful." *See id*. at 806. (internal citations omitted). His claim is therefore permissible—and should be heard.

Mr. Thompson recognizes the "traditional rule" against granting certiorari on questions that were "not pressed or passed upon below." *See United States v.*

---

[5] Even if this aspect of § 924(c) were not jurisdictional, either, Eleventh Circuit precedent limits the jurisdictional holding of *United States v. Cotton*, 535 U.S. 625 (2002)—relied on by the government, Br. in Opp. 13—to the *omission* of elements from the indictment. *United States v. St. Hubert*, 909 F.3d 335, 342 (11th Cir. 2018), *abrogated on other grounds by Davis* (citing *United States v. Peter*, 310 F.3d 709, 713-714 (11th Cir. 2002)). In contrast, if (as here), "an indictment 'affirmatively alleged a specific course of conduct that is outside the reach' of the statute of conviction . . . the district court has no jurisdiction to accept the guilty plea." *See* i*d*. (citing *Peter*, 310 F.3d at 715).

Williams, 504 U.S. 36, 41 (1992) (internal citations omitted). However, there are exceptions. *Id*. at 41-45. This case ought to be one of them, as the Eleventh Circuit has "passed upon" part of the issue in a closely related case, it involves a pure question of law, and the existing record demonstrates an unconstitutional extension of federal jurisdiction to a purely local offense.

As mentioned in Mr. Thompson's petition, one of Mr. Thompson's co-defendants—Rashard Stepherson—went to trial, lost, alleged that his robbery had not actually affected interstate commerce, on appeal. *See* Pet. 22-23; Pet. App. A2, 2-3. The evidence as to the effect on interstate commerce at Mr. Stepherson's trial was analogous to the evidence in Mr. Thompson's factual proffer. *Compare* D. Ct. Doc. 43, at 1-2 *with* Pet. App. A2, at 1-2. In affirming Mr. Stepherson's Hobbs Act robbery conviction, the Eleventh Circuit noted that "[t]he government's case rests on an inference that [the victim] *would have* spent more money in the hours leading up to his departure from the United States, so he was likely interrupted from engaging in interstate commerce." Pet. App. A2, at 3. Though Mr. Stepherson argued that the Court of Appeals had "never held that such a hypothetical connection to interstate commerce can qualify for Hobbs Act robbery," the Eleventh Circuit found that, for that very reason, there could be no plain error. *Id*. (holding Mr. Stepherson could not establish plain error because he "identified no case from this Court or the Supreme Court that place these minimal effects on interstate commerce outside prosecution under the Hobbs Act").

Through *Stepherson*, the Court knows the essence of the Eleventh Circuit's position. The Court also now knows that the government has an even more extreme position than the Eleventh Circuit. The government maintains that there was no error—let alone plain error—because the foreign tourist victims where "actively patronizing Miami Beach businesses" and therefore "engaged in foreign commerce." Br. in Opp. 14.[6] Thus, according to the government, "[p]etitioner's depletion of the foreign tourists' money and personal effects constitutes 'an[] obstruction, delay, or other effect on commerce, even if small,' for purposes of the Hobbs Act." *Id*. If the government is correct, *every* robbery of a tourist, anywhere in the United States, is a Hobbs Act robbery.[7] But that can't be correct. The government's position—like Mr. Thompson's conviction, if allowed to stand—obliterates the fundamental, constitutionally-required distinction between federal and local crime. *See* Pet. 19-25. Because this is an important issue implicating the limits of federal authority, it warrants review.

III. The consensus among circuit courts that Hobbs Act robbery is categorically a "crime of violence" is wrong, and the Court should grant certiorari to correct it.

Mr. Thompson has shown that, pursuant to the statutory text and the pattern jury instructions of at least two circuits, Hobbs Act robbery does not categorically

[6] There is no record evidence that the victims would have continued to patronize local businesses but for the robbery.

[7] The government's theory would also logically apply to the robbery of non-tourists' credit cards and cash, as long as the victims regularly "patronize" out-of-state or foreign businesses, such as on the internet.

require the use of any physical force, because it can be committed by causing a victim to fear a future financial loss, including a loss of intangible property. *See* Pet. 27-29. Though this argument comes directly from the statute's text and pattern jury instructions,[8] the government says that it is nonetheless "an unrealistic scenario," because "[t]he Hobbs Act would classify a crime that involves only threats or harm to intangible property as the separate crime of 'extortion,' rather than 'robbery.'" Br. in Opp. 12, *Steward*.[9,10] However, the line is not so bright between Hobbs Act robbery and extortion—as the government itself has argued. *See United States v. Eason*, 953 F.3d 1184, 1194 (11th Cir. 2020) (rejecting the government's argument that any portion of the Hobbs Act robbery statute that enumerated robbery does not capture is covered by the Guidelines' definition of extortion); *United States v. Camp*, 903 F.3d 594, 602–04 (6th Cir. 2018) (same, but noting that "even if a robbery statute is broader than generic robbery, it may be a categorical match with generic extortion");

---

[8] *See Bourtzakis v. U.S. Att'y Gen.*, 940 F.3d 616, 620 (11th Cir. 2019) (describing an "exception to th[e] rule" that the defendant present a case in which the statute has been applied in a particular manner "when the statutory language itself . . . creates the realistic probability" that the statute would apply to the proscribed conduct).

[9] The government principally relies on its brief in opposition to the petition for certiorari in *Steward v. United States*, No. 19-8043 (May 21, 2020), to argue that Hobbs Act robbery categorically satisfies § 924(c)(3)(A). Br. in Opp. 15.

[10] Mr. Thompson notes that the petitioner in *Steward* failed to raise this issue before the district court. Br. in Opp. 5, *Steward*. In contrast, Mr. Thompson did argue that Hobbs Act robbery is not a "crime of violence," under § 924(c) before the district court, and in his initial brief on direct appeal. D. Ct. Doc. 129, at 5-6; Pet. C.A. Initial Br. at 29-35. Further, the Eleventh Circuit explicitly rejected his claim in its opinion affirming his § 924(c) conviction. Pet. App. A1, at 3-4. Therefore, unlike in *Steward*, this issue is fully preserved and squarely presented for review.

United States v. O'Connor, 874 F.3d 1147, 1153, 1155–58 (10th Cir. 2017) (rejecting the government's argument that Hobbs Act robbery conviction fell within the Guidelines' definition of extortion).

The government points out that there is a distinction between the two, in that Hobbs Act robbery involves an unlawful taking against the victim's will, whereas Hobbs Act extortion prohibits obtaining the victim's property with consent that is "inducted by wrongful use of actual or threatened force, violence, or fear, or under the color of official right." *See* Br. in Opp. 12, *Steward* (citing 18 U.S.C. §§ 1951(b)(1) & (2)). Yet this distinction fails to explain why "a victim who hands over personal property to protect a stock option"—to use the government's example—could not satisfy the elements of a Hobbs Act robbery, as outlined in the Eleventh or Tenth Circuits' pattern jury instructions. *See* Pet. 28-29 (explaining that these jury instructions include merely causing the victim to fear future financial loss, including a loss of "intangible rights").

The government argues that "a victim who hands over personal property in order to protect a stock option may well do so with the kind of 'grudging consent' that would show Hobbs Act extortion," but that such a scenario could not constitute Hobbs Act robbery because robbery requires that the victim experience "force capable of causing pain or injury (or fear of such) for his 'will' to be overborne." Br. in Opp. 12, *Steward* (internal citations omitted). However, by asserting that Hobbs Act robbery requires force, the government puts the cart before the horse—and ignores the statute's text. The Hobbs Act statute provides that robbery can be committed "by

means of actual or threatened force, or violence, or fear of injury, immediate or future, to [the victim's] person or property." § 1951(b)(1) (emphasis added). The use of "or" suggests that the "fear of injury" is a means of overbearing the victim's will that is distinct from both "actual or threatened force" and "violence." *See* Pet. 27. In fact, because "all words in a text must be given independent meaning," the Eleventh Circuit has actually held that "fear" *must* have a separate meaning from "actual and threatened force [and] violence," under § 1951(b)(2)—and that "fear" includes the fear of economic loss. *United States v. Bornscheuer*, 563 F.3d 1228, 1236–37 (11th Cir. 2009) (citing *United States v. Menasche,* 348 U.S. 528, 538–39 (1955), and *United States v. Grassi,* 783 F.2d 1572, 1578 (11th Cir.1986)). Since a single statutory word or phrase "cannot . . . be interpreted to do" two different things "at the same time," *see Clark v. Martinez*, 543 U.S. 371, 378 (2005)— "fear" in § 1951(b)(1) must have a separate meaning from "actual and threatened force [and] violence," too. And, "fear" in § 1951(b)(1) must include the fear of economic loss. *See Grassi*, 783 F.2d at 1578. Finally, the term "property" appears in both §§ 1951(b)(1) and (2). As the government apparently agrees that "property" can be "intangible" as to extortion, "property" must also include intangible property in the rest of the statute—including as to Hobbs Act robbery. *See Clark*, 543 U.S. at 378. *See also Sekhar v. United States*, 570 U.S. 729, 736 (2013) (defining "property" under Hobbs Act as "something of value from the victim that can be exercised, transferred, or sold"). In sum, the government's argument that a future threat to harm intangible property could only be Hobbs Act

extortion, not Hobbs Act robbery, is speculative and, more importantly, unsupported by the statute's text.

The government also emphasizes that every Court of Appeals to have considered whether Hobbs Act robbery satisfies § 924(c)(3)(A) has found that it does. Br. in Opp. 16 (listing cases); Br. in Opp. 7, *Steward* (same). However, a consensus among the circuit courts does not preclude the Court's review.[11] Moreover, the Court's intervention is necessary precisely *because* the circuit courts' consensus is incorrect. Without intervention, this widespread misinterpretation of an important federal statute will continue to subject federal defendants to minimum mandatory, consecutive sentences under § 924(c), predicated on an offense that is not categorically violent. And, given the wall of wrong precedent in the lower courts, federal defendants will continue, unabated, to seek relief from this Court—as they have, in droves, since *Davis*.[12] The Court should grant this petition to finally settle this recurring, important question of federal law.

---

[11] *See Rehaif v. United States*, 139 S. Ct. 2191, 2201 (2019) (observing that the majority opinion "overturns the long-established interpretation of an important criminal statute . . . an interpretation that has been adopted by every single Court of Appeals to address the question. That interpretation has been used in thousands of cases for more than 30 years. According to the majority, every one of those cases was flawed"); *Gundy v. United States*, 139 S. Ct. 2116, 2119 (2019) (noting that every court to have considered Gundy's claim had rejected it, but that "[w]e nonetheless granted certiorari").

[12] Br. in Opp. 16 (listing seven denied petitions since *Steward* on this issue); Br. in Opp. 7 n.1, *Steward* (listing 21 denied petitions before *Steward* on this issue).

CONCLUSION

For the foregoing reasons, and those stated in the petition, Mr. Thompson respectfully requests that the Court grant this petition.

Respectfully submitted,

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER

/s/ Sara W. Kane
SARA W. KANE
ASSISTANT FEDERAL PUBLIC DEFENDER
**Counsel for Petitioner*
150 W. Flagler St., Suite 1700
Miami, FL 33130-1555
(305) 533-7000
Email: Sara_Kane@fd.org

Miami, Florida
October 15, 2021