

# APPENDIX 1 - ORDER OF 9th CIRCUIT - APPEAL

**FILED**

UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

JUL 3 2023

MOLLY C. DWYER, CLERK  
U.S. COURT OF APPEALS

UNITED STATES OF AMERICA,

Plaintiff-Appellee,

RONNIE SHAHAR,

Claimant-Appellant,

v.

5 CRATES OF COUNTERFEIT COINS,

Defendant.

No. 23-55075

D.C. No. 2:20-cv-08487-MWF-  
RAO

Central District of California,  
Los Angeles

ORDER

Before: SILVERMAN, R. NELSON, and BUMATAY, Circuit Judges.

Upon a review of the record and the opening brief, we conclude that the questions raised in this appeal are so insubstantial as not to require further argument. *See United States v. Hooton*, 693 F.2d 857, 858 (9th Cir. 1982) (stating standard). Accordingly, appellee's motion for summary affirmance (Docket Entry No. 8) is granted.

**AFFIRMED.**

## APPENDIX 2 - ORDER OF THE DISTRICT COURT

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JS-6

### CIVIL MINUTES—GENERAL

**Case No. CV 20-08487-MWF (RAO)**

**Date: December 5, 2022**

Title: United States of America v. 5 Crates of Counterfeit Coins

Present: The Honorable MICHAEL W. FITZGERALD, U.S. District Judge

Deputy Clerk:  
Rita Sanchez

Court Reporter:  
Not Reported

Attorneys Present for Plaintiff:  
None Present

Attorneys Present for Defendants:  
None Present

**Proceedings (In Chambers):**

ORDER GRANTING PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT AS TO  
FORFEITURE [42]

Before the Court is Plaintiff United States of America's (the "Government") Motion for Summary Judgment as to Forfeiture (the "Motion"), filed on December 2, 2021. (Docket No. 42). On February 3, 2022, pro se Claimant Ronnie Shahar filed a Motion to Extend Time to Oppose Summary Judgment. (Docket No. 49). The Court permitted the extension and Claimant filed his Opposition on February 25, 2022. (Docket No. 51). The Government filed a Reply on March 8, 2022. (Docket No. 66).

The Court notes that Claimant failed to include a "Statement of Genuine Disputes of Material Fact," as Local Rule 56-2 requires. Without an opposing Statement of Genuine Disputes, "the Court may assume that the material facts as claimed and adequately supported by the moving party are admitted to exist without controversy." L.R. 56-3. Even so, the Court has reviewed the entire record and its decision is unaffected by Claimant's omission.

For the reasons set forth below, the Government's Motion is **GRANTED** and the Government is entitled to judgment as a matter of law. All right, title, and interest of Claimant Ronnie Shahar to Defendant 5 Crates of Counterfeit Coins is condemned and forfeited to the United State of America.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES—GENERAL

**Case No. CV 20-08487-MWF (RAO)**

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**I. BACKGROUND**

On September 16, 2020, the Government filed a civil forfeiture action against the Defendant 5 Crates of Counterfeit Coins (the “Coins”), alleging that the Coins are subject to forfeiture pursuant to 19 U.S.C. § 1595a(c)(1)(C) as being introduced or attempted to be introduced into the United States in violation of 49 U.S.C. § 80302(b). (See Complaint (Docket No. 1)).

The Coins were shipped in five cases by ocean vessel from Hong Kong, China to Long Beach, California. (Complaint ¶ 9). Zhang Yongjun and Bingli Lin were listed as the ultimate consignees for the cases, and Claimant was listed as the importer and shipper on the entry summary form (CBP Form 3461). (*Id.*). Claimant also provided a FinCEN Form 105 Report of International Transportation of Currency or Monetary Instrument that claimed the shipment was \$132,000 in U.S. coins. (*Id.*).

The Government tested a random sample of the Coins that were representative of the entire shipment, analyzing the Coins using physical, chemical, and electromagnetic testing. (*Id.* ¶ 11). The Government’s test revealed that the coins are not authentic U.S. Mint products. (*Id.*). Based on the test results, the Government concluded that the Coins were contraband and filed this forfeiture action. (*Id.* ¶ 12).

On November 18, 2020, Claimant filed a claim to the Coins and an answer to the Complaint. (Docket Nos. 23, 26). Pursuant to Local Rule 7-3, on November 24, 2021, the government notified Claimant of its intent to file the Motion, which Claimant acknowledged on the same day, and again on November 28, 2021. (Motion at 1). No other parties filed claims or answers in this matter.

**II. LEGAL STANDARD**

In deciding a motion for summary judgment under Rule 56, the Court applies *Anderson*, *Celotex*, and their Ninth Circuit progeny. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986); *Celotex Corp. v. Catrett*, 477 U.S. 317 (1986). “The court shall grant summary judgment if the movant shows that there is no genuine dispute as

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

## CIVIL MINUTES—GENERAL

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to any material fact and the movant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(a).

The Ninth Circuit has defined the shifting burden of proof governing motions for summary judgment where the non-moving party bears the burden of proof at trial:

The moving party initially bears the burden of proving the absence of a genuine issue of material fact. Where the non-moving party bears the burden of proof at trial, the moving party need only prove that there is an absence of evidence to support the non-moving party's case. Where the moving party meets that burden, the burden then shifts to the non-moving party to designate specific facts demonstrating the existence of genuine issues for trial. This burden is not a light one. The non-moving party must show more than the mere existence of a scintilla of evidence. The non-moving party must do more than show there is some "metaphysical doubt" as to the material facts at issue. In fact, the non-moving party must come forth with evidence from which a jury could reasonably render a verdict in the non-moving party's favor.

*Coomes v. Edmonds Sch. Dist. No. 15*, 816 F.3d 1255, 1259 n.2 (9th Cir. 2016) (quoting *In re Oracle Corp. Sec. Litig.*, 627 F.3d 376, 387 (9th Cir. 2010)).

“A motion for summary judgment may not be defeated, however, by evidence that is ‘merely colorable’ or ‘is not significantly probative.’” *Anderson*, 477 U.S. at 249–50. “When the party moving for summary judgment would bear the burden of proof at trial, ‘it must come forward with evidence which would entitle it to a directed verdict if the evidence went uncontested at trial.’” *C.A.R. Transp. Brokerage Co. v. Darden Rests., Inc.*, 213 F.3d 474, 480 (9th Cir. 2000) (quoting *Houghton v. South*, 965 F.2d 1532, 1536 (9th Cir. 1992)).

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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**III. DISCUSSION**

Coins of United States currency that are “forged, altered, or counterfeit” are defined as “contraband.” *See* 49 U.S.C. § 80302(a). When contraband is introduced into the United States contrary to law, it “shall be seized and forfeited.” 19 U.S.C. § 1595a.

The Government argues that the Defendant Coins are *per se* contraband, for which there is no exception at law to legally transport or possess. For example, under both 18 U.S.C §§ 485 and 492, possession of counterfeit coins is prohibited and forfeiture is required. *See also United States v. Simmons*, No. CV F 96-5948 AWISWS, 2000 WL 33138083, at \*3 (E.D. Cal. Dec. 14, 2000) (“Counterfeit coins are contraband *per se*, their mere possession is illegal, and they must be forfeited to the United States.”).

To seize the Coins, the Government must establish probable cause that the Coins are subject to forfeiture. “If probable cause is established, the burden of proof then shifts to the claimant, who must prove through a preponderance of the evidence that forfeiture is not appropriate.” *United States v. Approximately \$1.67 Million (US) in Cash, Stock & Other Valuable Assets Held by or at 1) Total Aviation Ldt.*, 513 F.3d 991, 998 (9th Cir. 2008) (applying standard in suit where CAFRA does not apply); *See* 18 U.S.C § 983(i)(2)(A) (providing that forfeiture actions brought under title 19 are not subject to CAFRA’s burden of proof standards).

The Government has met its probable cause burden here. The uncontested facts show that no less than four federal agencies investigated the shipment and concluded that the Coins are indeed counterfeit. As the Government explains, an expert with the United States Mint determined with 99.9% confidence that the tested samples were counterfeit United States currency. (Motion at 11).

Therefore, the burden shifts to Claimant to prove, by a preponderance of the evidence, that forfeiture is not appropriate. Because the law is clear that possession of counterfeit coins is prohibited and forfeiture is required, Claimant can only show that

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forfeiture is not appropriate by proving that the Coins are not counterfeit. In Claimant's Opposition, however, he makes no such showing.

The Opposition contains countless rhetorical questions that appear to inject doubt into the sufficiency of the Government's testing procedures, but Claimant fails to offer any relevant evidence to meet his preponderance of the evidence burden. Claimant argues that summary judgment should be denied in favor of more discovery and the appointment of a neutral expert. (Opp. at 6). But as the Court stated previously, the fact discovery deadline passed on November 5, 2021, and the expert discovery deadline passed on February 4, 2022. Claimant must show "good cause" to modify these deadlines, which he has failed to do. (Order Re: Motion for Enlargement of Time to File Opposition to Govt Motion for Summary Judgment and Appoint Neutral Expert and Compel Document Discovery (Docket No. 50)).

Accordingly, the Motion is **GRANTED** and the Government is entitled to judgment as a matter of law. All right, title, and interest of Claimant Ronnie Shahar and all other potential claimants to Defendant 5 Crates of Counterfeit Coins is condemned and forfeited to the United State of America. The Coins shall be disposed of in accordance with law.

IT IS SO ORDERED.

This Order shall constitute notice of entry of judgment pursuant to Federal Rule of Civil Procedure 58. Pursuant to Local Rule 58-6, the Court **ORDERS** the Clerk to treat this Order, and its entry on the docket, as an entry of judgment.

1 TRACY L. WILKISON  
2 United States Attorney  
3 SCOTT M. GARRINGER  
4 Assistant United States Attorney  
5 Chief, Criminal Division  
6 JONATHAN GALATZAN  
7 Assistant United States Attorney  
8 Chief, Asset Forfeiture Section  
9 KATHARINE SCHONBACHLER (CalBar #222875)  
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20 Attorneys for Plaintiff  
21 UNITED STATES OF AMERICA

22 UNITED STATES DISTRICT COURT  
23 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
24 WESTERN DIVISION

25 UNITED STATES OF AMERICA,

26 No. 2:20-CV-08487-MWF (RAOx)

27 Plaintiff,  
28 v.  
29 FIVE CRATES OF COUNTERFEIT  
30 COINS,  
31 Defendants.

32 NOTICE OF ERRATA RE:  
33 LABORATORY REPORT, EXHIBIT 10.

34 Date: January 24, 2022  
35 Time: 10:00 a.m.  
36 Location: Courtroom 5A  
37 Before: Hon. Michael W. Fitzgerald

38 RONNIE SHAHAR,  
39 Claimant.

The United States of America (“the government”) gives notice that during the electronic filing process, the digital signature was inadvertently removed from Exhibit 10, the laboratory report issued by the United States Mint, Manufacturing Directorate, Anti Counterfeit Division for U.S. Mint Case No. 2019-00017 dated November 10, 2021. Exhibit 10 was attached to the Declaration of J. B. Christian, Process Development Engineer at the U.S. Mint. ECF 42.2, Page ID No. 432-436.

The corrected, signature-intact, version of the laboratory report, Exhibit 10, is hereby attached to this Notice of Errata.

Dated: December 10, 2021

Respectfully submitted,

TRACY L. WILKISON  
United States Attorney  
SCOTT M. GARRINGER  
Assistant United States Attorney  
Chief, Criminal Division  
JONATHAN GALATZAN  
Assistant United States Attorney  
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KATHARINE SCHONBACHLER  
Assistant United States Attorney

/s/ James E. Dochterman  
JAMES E. DOCHTERMAN  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

United States Mint  
Manufacturing Directorate, Anti Counterfeit Division  
151 N Independence Mall E, Philadelphia PA 19106  
215-408-0122

## LABORATORY REPORT

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<b>Case Number:</b> U.S. Mint Case 2019-00017	<b>Report Date:</b> November 10, 2021
<b>Submitter:</b> Customs and Border Protection, CBPO Griffith	<b>Request:</b> Coin Authentication
<b>Date Received:</b> 12/27/2019	
<b>Sample Description:</b> Coins, U.S. Quarters and Dimes	<b>Total in Question:</b> \$133,000
<b>Comments:</b>	

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### REQUEST

U.S. Customs and Border Protection (CPB) has requested the U.S. Mint to determine if submitted coins are authentic.

### CHAIN OF CUSTODY

In this case, U.S. Customs and Border Protection asked the U.S. Mint to review a representative sample of Questioned coins. Analysis of coins was performed cooperatively with the U.S. Mint Coin Test Lab (USML) and the CBP-Chicago LSS Lab (CBPL). The coins were initially received at the United States Mint Philadelphia and assigned a case number USM 2019-00017.

On or around 6/20/2019 U.S. Customs detained a shipment of coins, potentially valued at \$133,000. The U.S. CBP contacted the U.S. Mint requesting authentication. A 14.6 pound representative sample of coins was collected and shipped to the US Mint in evidence bag A4610928, custody form No. 908823. These Questioned coins are under study in this report.

### TESTING OVERVIEW

The U.S. Mint Coin Test Lab has conducted an evaluation of 4190 coins from the above case(s) consisting of 3415 dimes and 775 quarters. Testing included measurement of electromagnetic properties, chemical properties, and analysis of the struck image and accompanying surface features.

This laboratory report (including any attached files or information) is provided for official use only and its disclosure to unauthorized persons is prohibited. Results contained in this laboratory report relate only to the items tested. The laboratory report may contain information that is exempt from public release under the Freedom of Information Act (5 U.S.C. § 552) (FOIA) and/or sensitive law enforcement information, and its contents may not be reproduced without the written permission of the United States Mint. Disclosure of the information is expected to risk circumvention of the law. All FOIA or any other requests for information pertaining to this report must be directed to the originator, the United States Mint, for review.

## AUTHENTICATION OF COIN

Testing was performed between December 27, 2019 and September 11, 2020.

Pieces from a random sample of the coin shipment under study were analyzed using physical analysis, chemical analysis, and electromagnetic testing. Multiple attributes in each category were evaluated. Physical analysis includes physical weight, dimensions and visual analysis of the struck image. Chemical analysis by X-Ray Fluorescence measures the chemical composition of the coin at the excitation depth for each element detected. Electromagnetic testing uses a commercial coin sorter with data logging capability to collect conductivity data on individual coins. All test results are compared to coins drawn from circulation for the same test, and also to U.S. Mint practices for physical analysis. All three test categories revealed clear inconsistencies across multiple tests within those categories.

Principal Component Analysis (PCA) was also applied to the assay results of the Questioned coins and also to two control groups of Example coins drawn from circulation. Principal Component Analysis is a multi-variate analysis method that can reduce n-dimensional data to its most important dimensions by finding an eigenvector of the covariance matrix of the data. The sources of variation are reduced to several principal components in an objective and unbiased method. In general the first three principal components account for about 60% of the total variation between the coins investigated. This is shown in Figure 1, which shows the contribution of each Dimension found in the data. A representative sample of 105 coins drawn at random represent the entire shipment at 95% confidence.

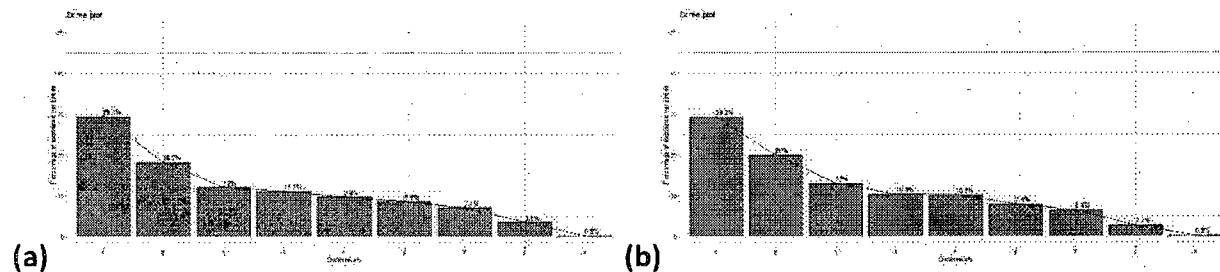


Figure 1 — PCA Scree Plots: Variance Captured - Control/Control and Questioned/Control

Scree plots show the calculated dimension and the amount of the total variation that it describes. Figure 1 (a) is for two control groups, Figure 1 (b) is for the Questioned and Control group. Both show similar amounts of variation are captured by successive dimensions.

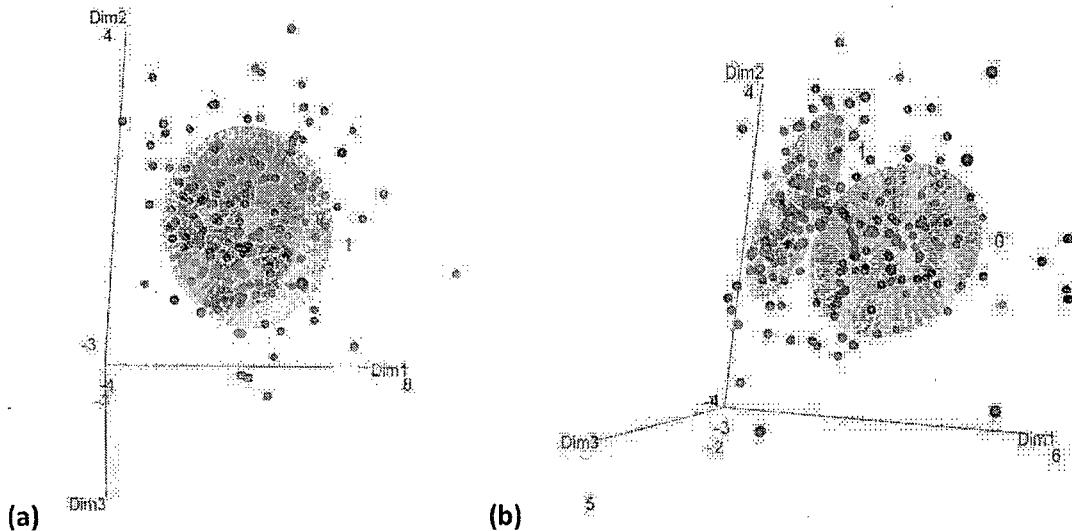


Figure 2 — PCA Analysis of Two Data Pairs: Control/Control and Questioned/Control

Each figure includes assay data for a 210 coin set. In Figure 2(a) 105 Example Coins analyzed in 2019 by CBPL and a second set of 105 Example Coins analyzed in 2020 by CBPL. Figure 2(b) shows 105 Questioned Coins and 105 Example Coins from 2020 CBPL. Both views are rotated to show the clearest view of the two sets. The PCA analysis is performed blind to the source. (a) shows two central data ellipsoids that overlap to a high degree in every dimension. (b) shows a clear difference on data ellipsoids. The red Questioned Coins show a different location as well as wider statistical variation. The red group is clearly inconsistent with U.S. Coin.

PCA analysis clearly shows the Questioned Coins are in a different data space than two sets of Example Coins. This result clearly indicates that the Questioned Coins are not authentic U.S. Mint products.

In addition to principal component analysis, additional numerical analysis methods have also been performed on the results of physical, chemical, and electromagnetic tests that further characterize the Questioned coins as inconsistent with U.S. coin.

#### TESTING SUMMARY

Testing results are summarized in Table 1 below. This summarizes one or more tests in each category, the most conclusive test is reported for each category. Summary data is based on the observed rate and the finding (consistent/cannot determine/inconsistent) judged against coins drawn from circulation receiving the same test. The Confidence Level reported includes the lower limit and upper limit of potential sampling error using the Clopper-Pearson Binomial Exact method to ensure an appropriate number of pieces were tested and the test failure rate was reliably determined.

Test Category	Finding	Confidence Level
Visual	<i>Inconsistent</i>	99.9%
Chemistry	<i>Inconsistent</i>	99.9%
Physics	<i>Inconsistent</i>	99.9%

Table 1, Testing Results, USM 2019-00017 (dimes and quarters)

Three key test categories have been used, including visual (visual, microscopic, common physical tests such as size and weight), Chemical (chemical assay) and Physics (Electromagnetic eddy-current conductivity). Finding (consistent/cannot determine/inconsistent) is based on the failure rate and established ranges. Significance Level uses the Clopper-Pearson method to evaluate sample size and rate against the entire questioned amount for sampling size and result confidence. One category determined to be inconsistent is deemed inconsistent with U.S. coinage and therefore counterfeit. Additional categories determined to be inconsistent provide additional weight of evidence.

#### Methods:

Electromagnetic testing was performed aided by ASTM E703 - 20

Chemical assay was performed following CBPL 72-32/ASTM E1621

Failure rate analysis was performed aided by ASTM E2586 - 19

#### CONCLUSION

Pieces from a random sample of the coin shipment under study were analyzed using physical analysis, chemical analysis, and electromagnetic testing. All test categories revealed coin inconsistencies in multiple tests. As a result of this examination of the coins, the Questioned coins were classified to be inconsistent with U.S. Coin and deemed counterfeit. The analysis was performed on Questioned coins and they were compared to coins obtained from circulation and against U.S. Mint specifications and practices. While many pieces were within the (publicly accessible) specifications for U.S. coinage in terms of metallurgical composition and weight, the Mint can demonstrate that they were actually made by a manufacturer other than the United States Mint.

#### RESULTS OF EXAMINATION

Physics, Visual and Chemical examinations were conducted on the coins submitted.

Based on the examination, the tested coins are inconsistent with U.S. Coinage and therefore counterfeit.

## REMARKS

1. The results are opinions and interpretations formed using accepted scientific and professional practices.
2. Items or attributes that are "indistinguishable" or "within range" does not imply authenticity.
3. The terms "Coins", "Quarters" and "Dimes" does not imply authenticity.
4. This determination is for the coins provided to the U.S. Mint.  
Assuming the coins provided were randomly selected from the overall total in question, test sample quantity and evaluation criteria were selected for this evaluation to support this finding at a 95% confidence level for up to \$175,000 of value.

## REFERENCES

"Scientific Investigation of Copies Fakes and Forgeries", Craddock, Paul T., (2009). Butterworth-

Heinemann, Oxford, UK.

"Official Guide to Coin Grading and Counterfeit Detection, Second Edition", Professional Coin Grading Service, Edited by Scott A. Travers and Text by John W. Dannreuther, (2004), Random House, New York.

"Counterfeit Detection", Volumes 1 & 2, American Numismatic Association, (1983). American Numismatic Association, Colorado Springs, CO.

"Detecting Counterfeit and Altered U.S. Coins", by J.P. Martin, (1996). American Numismatic Association, Colorado Springs, CO.

"A Guide Book of United States Coins 2020" by R. S. Yeoman, (2019), Whitman Publishing, Pelham, AL, USA.

Analyst: Joel B. Christian  Digitally signed by Joel B. Christian  
Date: 2021.12.01 13:17:04 -05'00'

Joel B. Christian, Process Development Engineer, United States Mint

Approval: Richard R. Robidoux  Digitally signed by Richard R. Robidoux  
Date: 2021.12.01 13:28:59 -05'00'

Richard R. Robidoux, Division Chief, Engineering, United States Mint

END OF REPORT

**PROOF OF SERVICE**

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, California 90012.

On December 10, 2021, I served a copy of: NOTICE OF ERRATA RE: LABORATORY REPORT, EXHIBIT 10 upon each person or entity named below:

X By Electronic Mail: By transmitting said document(s) to the email address(es) listed below.

Ronnie Shahar (pro se)  
3209 Sok  
MirDemir 5  
Bina 31, K3, D6  
Ciflikkoy, Yenisehir, Me 33150  
TURKEY  
shahar\_ronnie@yahoo.com (with written  
consent to receive service by email)

I declare under penalty of perjury under the laws of the United States of America that I am employed in the office of a member of the bar of this Court, at whose direction the service was made, and that the foregoing is true and correct.

Executed on **December 10, 2021** at Los Angeles, California.

Luis F. Chaves

**Luis F. Chaves**  
Paralegal, FSA

# Miscellaneous Filings (Other Documents)

2:20-cv-08487-MWF-RAO United States of America v. 5 Crates of Counterfeit Coins

ACCO,(RAOx),DISCOVERY,MANADR

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

## Notice of Electronic Filing

The following transaction was entered by Dochterman, James on 12/10/2021 at 11:37 AM PST and filed on 12/10/2021

**Case Name:** United States of America v. 5 Crates of Counterfeit Coins

**Case Number:** 2:20-cv-08487-MWF-RAO

**Filer:** United States of America

**Document Number:** 44

**Docket Text:**

**NOTICE OF ERRATA filed by Plaintiff United States of America. correcting NOTICE OF MOTION AND MOTION for Summary Judgment as to FORFEITURE [42] (Attachments: # (1) Exhibit and Proof of Service)(Dochterman, James)**

**2:20-cv-08487-MWF-RAO Notice has been electronically mailed to:**

James Edmund Dochterman james.dochterman@usdoj.gov, CaseView. ECF@usdoj.gov, FKoudsi@usa.doj.gov, Luis.Chaves@usdoj.gov, shannen.beckman@usdoj.gov, USACAC.Criminal@usdoj.gov

Katharine Schonbachler katie.schonbachler@usdoj.gov, CaseView. ECF@usdoj.gov, helen.wu@usdoj.gov, karine.aghababyan@usdoj.gov, paul.read@usdoj.gov, tara.vavere@usdoj.gov, USACAC.Civil@usdoj.gov

Mark Weidmann mweidmann@weidmannlaw.com, tedri@weidmannlaw.com, vayres@weidmannlaw.com

**2:20-cv-08487-MWF-RAO Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

5 Crates of Counterfeit Coins  
c o Ronnie Shahar  
Haganim 20-9  
Ramat, Hasharon, 64911  
ISRAEL

Ronnie Shahar  
3209 Sok, MirDemir 5, Bina 31, K3, D6  
Ciflikkoy, Yenisehir, Me, 33150  
Turkey

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** C:\fakepath\CAC.LA.CV2008487.20211210.JD.1-Ntc Errata.pdf

**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=12/10/2021] [FileNumber=33091757-0] [89a2419fe9aa1a1efe144aaa8e6b8427116dc5c76bedffa614dd853f7d08188df42bfc5e4b2134f403af3c2f642b703d29d833c220fe16beffbdaf52a814514]]

**Document description:**Exhibit and Proof of Service

**Original filename:**C:\fakepath\CAC.LA.CV2008487.20211210.JD.2-Exh 10 [signed].pdf

**Electronic document Stamp:**

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