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IN THE COURT OF APPEALS OF THE STATE OF
WASHINGTON, DIVISION THREE

No. 36799-1-III

STATE OF WASHINGTON,

Plaintiff/Respondent,

vs.

Vernon Joseph Bogar III,

Defendant/Appellant

Respondent's Brief

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TABLE OF CONTENTS

I. IDENTITY OF RESPONDENT	1
II. STATEMENT OF RELIEF SOUGHT	1
III. STATEMENT OF THE CASE	1
IV. ARGUMENT	10
a. <u>The State satisfied the business records exception establishing that the amount of property stolen exceeded \$5,000</u>	10
b. <u>There was an abundance of evidence sufficient to establish that the value of the items stolen exceeded \$5,000</u>	13
c. <u>Even if a hearsay objection would have been sustained, the evidence was overwhelmingly sufficient to establish the crimes of theft and burglary, and Appellant can show no prejudice from the admission of the value of the items stolen</u>	16
V. CONCLUSION.....	18

TABLE OF AUTHORITIES

State Cases

<i>In re Welfare of J.M.</i> , 130 Wn.App. 912, 125 P.3d 245 (2005)...	11
<i>State v. Brown</i> , 50 Wn.App. 873, 751 P.2d 331 (1998).....	18
<i>State v. DeVries</i> , 149 Wn.2d 842, 72 P.3d 748 (2003).....	15
<i>State v. Ellard</i> , 46 Wn. App. 242, 730 P.2d 109 (1986), <i>review denied</i> , 108 Wn.2d 1011 (1987).....	18
<i>State v. Freidrich</i> , 4 Wash. 204, 29 P. 1055 (1892)	18
<i>State v. Gilbert</i> , 68 Wn.App. 379, 842 P.2d 1029 (1993)	17, 18
<i>State v. Green</i> , 94 Wn.2d 216, 616 P.2d 628 (1980)	15
<i>State v. Joy</i> , 121 Wn.2d 333, 851 P.2d 654 (1993).....	14
<i>State v. Lillie</i> , 60 Wash. 200, 110 P. 801 (1910)	18
<i>State v. Partin</i> , 88 Wn.2d 899, 567 P.2d 1136 (1977).....	15
<i>State v. Powell</i> , 126 Wn.2d 244, 893 P.2d 615 (1995).....	13
<i>State v. Robbins</i> , 68 Wn.App. 873, 846 P.2d 585 (1993).....	18
<i>State v. Rutherford</i> , 66 Wn.2d 851, 405 P.2d 719 (1965)	10, 11
<i>State v. Salinas</i> , 119 Wn.2d 192, 829 P.2d 1068 (1992).....	15
<i>State v. Thompson</i> , 151 Wn.2d 793, 92 P.3d 228 (2004)	13
<i>State v. Ziegler</i> , 114 Wn.2d 533, 789 P.2d 79 (1990)	10

Statutes

RCW 5.45.020..... 10

Court Rules

RAP 12.2..... 17

Other Authorities

Tegland, Courtroom Handbook on Washington Evidence
(2018-2019 ed.) §§ 803:20 803:22..... 11

I. IDENTITY OF RESPONDENT

The State of Washington appears through the Kittitas County Prosecuting Attorney's Office.

II. STATEMENT OF RELIEF SOUGHT

The State respectfully requests that this Court uphold Petitioner Mr. Vernon Bogar's conviction for Theft in the First Degree and deny his motion for a new trial.

III. STATEMENT OF THE CASE

On Sunday, February 21, 2016, Kittitas County Sheriff's Office Deputy Mark McBride responded to a report of a burglary at the Fish Hatchery run by the Yakima Indian Nation in Cle Elum, Washington.¹ RP 54. Upon arrival at approximately 10:45 a.m. Sunday morning, Deputy McBride contacted Anthony Lewis, an employee at the hatchery. RP 55. Mr. Lewis had noticed the burglary when he entered the

¹ Complex manager, Charlie Strom, testified that the name of the facility was the "Cle Elum Supplementation and Research Facility," which is operated by the Yakima Nations Fisheries Department. RP 128. Throughout the course of the trial however, it was referred to as the "fish hatchery," or the "Cle Elum fish hatchery," as it is in the Respondent's brief. No disrespect is intended by using the colloquial term.

shop area that morning, and observed a water pump, flow jack, and bolt cutters right in front of the main door to the shop. RP 112.

Mr. Lewis testified that, on Wednesday through Sunday nights, employees would rotate to secure and lock up the hatchery facility. RP 104, 121. All doors and gates were to be locked, and the facility itself was to be locked down. RP 105. To get to the shop, one would need to enter through the main gate, using either the keypad or an automatic opener, then proceed through a side gate which was a double gate with a padlock, and then enter the locked shop. RP 107-108.

Mr. Lewis stated that on the previous night of February 20, 2016, he had performed his normal rounds at approximately 9:30 p.m., proceeding from the office to the incubation room to the shop, and had not noticed anything out of the ordinary as he locked up. RP 105.

Neither Mr. Lewis nor Deputy McBride noticed any damage to the keypad, any fencing, the padlock to the side gate, or any doors or windows at the facility. RP 65-66, 109-110. Deputy McBride was unable to determine the point of entry for

the burglary, and after taking pictures of the scene, concluded his involvement with the investigation of the case. RP 66.

Deputy McBride also testified about employee housing at the hatchery which consisted of approximately seven homes. RP 55-56. Appellant, Vernon Bogar, was an employee of the hatchery at the time, and lived on site. RP 75, 106, 293. Mr. Lewis told Deputy McBride that on the night before the burglary, he had noticed a red pickup which he had never seen before parked in front of the Appellant's home. RP 106, 108-109. At trial, Mr. Lewis estimated that the Appellant's home was located some 400 yards from the shop.

Eventually Appellant's brother, Robert Bogar, pawned items taken from the hatchery. RP 72, 277, 285. Detective Andrea Blume of the Kittitas County Sheriff's Office learned of this from a law enforcement pawned items data base. RP 72. With this information, some eight months after the burglary, on October 20, 2016, Detective Blume contacted Charlie Strom, the complex manager at the Cle Elum Supplementation and Research Facility, to ask if he had recently seen Robert Bogar at the hatchery. *Id.* Charlie Strom indicated that he had, and Detective Blume verified that Mr. Robert Bogar had

outstanding warrants for his arrest for financial obligations on past matters. RP 72, 80, 95.

Based on his conversation with Detective Blume, Charlie Strom made contact with his nephew, Theodore Strom. RP 162-163. At the time that he contacted his nephew, Charlie Strom was unaware of Theodore Strom's involvement with what would turn out to be two burglaries at the hatchery. RP 162. Soon after that contact, Theodore Strom's brother drove him to a pancake house on Snoqualmie Summit where, while Charlie Strom and Theodore Strom's brother sat at another table, Theodore Strom told Detective Blume about the two burglaries within a few day period that he and Robert Bogar had committed at the hatchery with Vernon Bogar's assistance. RP 240, 260. Theodore Strom testified that he had confessed to his part in the burglaries to his uncle, Charlie Strom, because he felt guilty that he had stolen from family. RP 234, 246.

Theodore Strom testified that at the time of the burglaries, he lived about a block from Robert Bogar, who lived at his father's house in Toppenish. RP 219. Theodore Strom saw Robert Bogar almost every day and had suggested that they

make a “quick lift,” or “quick lick,” in which they would commit a burglary and theft of either a home or business. RP 220, 250. Robert Bogar said that it didn’t need to be done in Toppenish, and that they could go to the hatchery where his brother, Vernon, worked. RP 222. Robert Bogar told Theodore Strom that his brother, Vernon Bogar, knew when the people who were on watch were around, and had access to the facility’s keys. RP 222.

Theodore Strom testified that just prior to the first burglary of the hatchery, Robert Bogar placed a call to Vernon Bogar. RP 223-224. Theodore Strom and Robert Bogar then made the hour and a half trip to the hatchery in a white Pathfinder. RP 223, 285. When they arrived, they called Vernon Bogar, who provided them with the code for the outer gate. RP 224. The two men, Theodore Strom and Robert Bogar, stayed at Vernon Bogar’s home for about 10-15 minutes before Vernon Bogar told them where the keys were located hanging up near the refrigerator. RP 224-225. The two men told Vernon Bogar that they were going to get all “this stuff,” and that they would ante up with him, giving him a third of all the proceeds they made from selling the items. RP 225-226. According to

Theodore Strom, Vernon Bogar nodded his head in response to this statement. RP 226.

Theodore Strom and Robert Bogar then went to the hatchery shop where they started putting the most expensive items by the door, which they eventually took back to Toppenish, and to the home of Robert and Vernon's parents. RP 227.

After the first burglary, the two men went back to Vernon Bogar's house to return the keys. RP 227. Robert Bogar entered the home for a few minutes while Theodore Strom remained outside. *Id.*

A day or two later, the two men returned for another burglary because, as Theodore Strom testified, "...it was that easy to do it. It was easy – you know, the key is just basically handed to you." RP 229. The second time they drove a red S10 pickup, entered Vernon Bogar's home, got high, got the keys, and again committed a theft within the facility. RP 229-230. During the second burglary, they also entered the office, and the incubator, as well as the shop, and took multiple items. RP 231. Again, the two men returned to Vernon Bogar's home and talked about the same split. RP 232.

According to Theodore Strom, the two brothers gave each other “daps,” basically shaking each other’s hand, or engaging in a “fist bump.” RP 232-233.

The next day Robert Bogar called Theodore Strom and told him that Vernon Bogar’s home and the Bogars’ parents’ home were going to be searched and that they needed to get rid of all the stuff. Robert Bogar and Theodore Strom then loaded up two vehicles. RP 233.

When he spoke with Detective Blume at the pancake house, Theodore Strom specifically told her which items had been taken during each burglary, and identified as also taken a paint chipper, air compressors, and Kraft tools that neither she nor Charlie Strom had known about. Plaintiff’s Exhibit 38², RP 243-244, 262.

Mr. Charlie Strom, the complex manager at the hatchery since 2002, testified that at the time of the discovered February burglary, he had noticed the absence of some belt sanders, chop saws, four generators, two sets of waders and rain gear, and bolt cutters from the shop. RP 128, 141, 168-

² In addition to identifying which items were taken during each of the specific burglaries, Plaintiff’s Exhibit 38 contains handwritten notes that appear to have been incorporated into Plaintiff’s Exhibit 27.

170. He stated that they had not been immediately aware of all the items which had been taken. RP 139-142. In regard to the maintaining of equipment business record, he stated:

So what we have to do -- when we buy equipment, we have to get a purchase order; we get the equipment; Yakima Nation Property will either tag the equipment at the main office in Toppenish or they will come up to our main facility in Cle Elum and tag that piece of equipment so that's linked back to our -- the Yakima Nation's property inventory list. RP 128, 147.

He also testified that he was familiar with the Yakima Nation property list (Plaintiff's Exhibit 30) which was updated annually and turned in when they submitted their annual budget. RP 155-156.

Mr. Charlie Strom stated that the Yakima Nation property list inventory sheets included property held by all of the Yakima Nations facilities, not just the Cle Elum hatchery. RP 156.

From a page by page inventory process utilizing the Yakima Nation property list, Charlie Strom provided the information to law enforcement of those items which were missing as a result of the burglaries. RP 144. Based on his information, the Sheriff's Office prepared a list, (Plaintiff's

Exhibit 27) which Mr. Charlie Strom testified was a true and accurate representation of the information he had given the Sheriff's Office about items that had been taken from the hatchery. RP 144, 147, 150, 153, 155-160. Mr. Charlie Strom testified that the dollar amounts which had been provided to him, had been arrived at by linking the item back to the Yakima Nation property tag, and serial number, looking at what the value given for that piece of equipment was, and allowing for depreciation of the item. RP 148. Mr. Charlie Strom, who had worked at the hatchery since 1997, and had been the complex manager since 2002, testified that he had initially "ballparked" the amount of items taken to be at least \$5,000. RP 128, 146. He also testified that the list of items and values that they compiled was provided to the insurance company, which paid some monies to the facility after they had satisfied what he believed to be their \$5,000 deductible. RP 150-151.

IV. ARGUMENT

- a. The State satisfied the business records exception for establishing that the amount of property stolen exceeded \$5,000.

RCW 5.45.020 provides that:

[a] record of an act, condition or event, shall in so far as relevant, be competent evidence if the custodian or other qualified witness testifies to its identity and the mode of its preparation, and if it was made in the regular course of business, at or near the time of the act, condition or event, and if, in the opinion of the court, the sources of information, method and time of preparation were such as to justify its admission.

Under RCW 5.45.020, also known as the Uniform Business Records Act, business records are presumptively reliable if made in the regular course of business and there was no apparent motive to falsify. *State v. Ziegler*, 114 Wn.2d 533, 538, 789 P.2d 79 (1990) (citing *State v. Rutherford*, 66 Wn.2d 851, 405 P.2d 719 (1965)). The trial court is not required to examine the person who actually made a record to admit the record under the business record exception.

This act (the Uniform Business Records Act) contemplates that such a record is presumptively reliable if it was made in the regular course of business and there was no apparent motive to falsify. Implicit in it is the presumption that an employee will do his duty. It does not require that the record should have been made by the

person actually doing the act, but only that it should have been made in the regular course of business, under circumstances which the court finds rendered it trustworthy. *Rutherford*, 66 Wn.2d at 853.

As stated in Tegland, “[t]he exception to the hearsay rule is based upon the belief that a business has a strong incentive to keep accurate records of its own transactions and activities.

Tegland, *Courtroom Handbook on Washington Evidence* (2018-2019 ed.) §§803:20-803.22. Generally, the notion is that the hearsay exception for business records was designed for objective, virtual, clerical records, and does not include reports reflecting the exercise of skill, judgment, and discretion. *In re Welfare of J.M.*, 130 Wn.App. 912, 125 P.3d 245 (2005).

Mr. Charlie Strom testified that he had been the complex manager at the hatchery for at least 13 years at the time that the post-burglaries inventory was conducted and had provided the specific information of stolen items to the Sheriff’s Office. Regarding Plaintiff’s Exhibit 30, the Yakima Nation property list, his testimony was that it was a compilation of all the property owned by the Yakima Nation, and that the inclusion

of an item occurred upon its purchase. Mr. Charlie Strom testified that every item they bought was tagged by the Yakima Nation and had a property number, which was then linked to its serial and model number. All the items from all of the facilities were listed on those inventory sheets which were updated annually and were annually submitted as part of the budget process. Charlie Strom's testimony about Plaintiff's Exhibit 30 being a compilation of all purchased property utilized as part of the budget process and subject to annual update would establish the document as a record made in the regular course of business.

Although Plaintiff's Exhibit 27 was prepared for the specific purpose of aiding the investigation of the burglary as argued by Appellant, Plaintiff's Exhibit 30 from which it was derived, was not.

Because the State laid the foundation (albeit, in somewhat of an awkward manner) for the business records exception, the information in Plaintiff's Exhibit 27 which was distilled from Plaintiff's Exhibit 30 was not hearsay and satisfied the requirement that the value of the items stolen be over \$5,000.

- b. There was an abundance of evidence sufficient to establish that the value of the items stolen exceeded \$5000.

When an error, such as improperly admitted hearsay evidence, deprives the defendant of the right to confrontation, the State must show that the error was harmless beyond a reasonable doubt. *State v. Powell*, 126 Wn.2d 244, 267, 893 P.2d 615 (1995). An error is harmless beyond a reasonable doubt if untainted evidence properly admitted at trial was so overwhelming that it necessarily leads to a finding of guilt. *State v. Thompson*, 151 Wn.2d 793, 808, 92 P.3d 228 (2004).

Plaintiff's Exhibit 27, which was compiled from the Yakima Nation property list, as well as the additional information provided by Theodore Strom, identified the following as items stolen in the two hatchery burglaries committed by Theodore Strom, Robert Bogar, and Vernon Bogar:

- One Dewalt 14.4 volt cordless drill
- Two trash pumps
- One Miter Saw
- One Honda 5.5 horsepower water pump
- One drill saw
- One 18 volt Skill cordless drill
- One chainsaw
- One dual range variable speed reciprocating saw
- Four Honda generators
- One portable Sawzall
- Two Milwaukee drills
- One Dewalt ½ inch XRP drill and driver

One toolkit containing two batteries, a LED flashlight, and an Impact Driver Hammer Drill
One Dewalt chop saw
One Milwaukee saw kit
One Air Mechanic rolling tool kit
Four five-gallon gas cans full of gas
Five sets of Cabela's insulated neoprene waders
Five camo bibs and jackets
Six sets of various sizes of bolt cutters
One Craftsman air compressor
One Panasonic Toughbook
One Landa pressure washer
One Rigid tap and die set
One unknown brand portable air compressor
Loose hand tools

Testifying about the first burglary, Theodore Strom stated that they put all the "expensive stuff" by the door. Charlie Strom testified that when he first learned of what had been taken, he "ballparked" the amount of loss at \$5,000, and that the insurance company paid after what he believed was the deductible of \$5,000 had been satisfied.

Evidence is sufficient to support a conviction if, when viewed in the light most favorable to the State, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt. *State v. Joy*, 121 Wn.2d 333, 338, 851 P.2d 654 (1993). "When the sufficiency of the evidence is challenged in a criminal case, all reasonable inferences from the evidence must be drawn in favor of the

State and interpreted most strongly against the defendant.”
State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992).
Moreover, “[a] claim of insufficiency admits the truth of the
State’s evidence and all inferences that reasonably can be
drawn therefrom.” *Id.* See also *State v. Green*, 94 Wn.2d 216,
221, 616 P.2d 628 (1980), *State v. DeVries*, 149 Wn.2d 842,
849, 72 P.3d 748 (2003), *State v. Partin*, 88 Wn.2d 899, 906-
907, 567 P.2d 1136 (1977).

There was no dispute that in the course of these two
burglaries, there were over 40 items taken which were
presumably in working condition since they were being used
at the hatchery and located primarily in the shop area.
Between the amount provided for after depreciation by the
tribe, the testimony of Theodore Strom, the testimony of
Charlie Strom, and the testimony regarding the insurance
reimbursement, the evidence establishes a loss in the amount
of \$5000 or more beyond reasonable doubt.³

³ It is also worth noting that Robert Bogar who testified that his brother, Vernon Bogar had had no involvement in either burglary, testified that in the course of the second burglary, “[w]e loaded up what was most *valuable* and left.” (Emphasis added). RP 274-276, 278-279, 284-285. Robert Bogar pled guilty to Trafficking in Stolen Property, Burglary in the Second Degree and Theft in the First Degree. RP 271.

- c. Even if a hearsay objection had been sustained, the evidence was overwhelmingly sufficient to establish the crimes of theft and burglary, and Appellant can show no prejudice from the admission of the value of the items stolen.

Mr. Bogar's trial counsel concentrated on a general denial defense and argued that Vernon Bogar had not been involved in either burglary. Had he contested the amount more adamantly, it might have been perceived by the jury as a tacit admission of Vernon Bogar's involvement. It is difficult to conceive how any challenge on counsel's part to the alleged value of the items stolen would have negated the jury's eventual finding that Vernon Bogar had in fact acted as an accomplice. It is also difficult to conceive how counsel's failure to object to the admission of the list of stolen items led to prejudice towards him. Vernon Bogar's brother and co-defendant, Robert Bogar, acknowledged that he himself had been involved in both burglaries and thefts, but denied that Vernon Bogar had been involved in either, or had had any knowledge of the burglaries as they were occurring. His other co-defendant, Theodore Strom, acknowledged that both burglaries and thefts had occurred, but testified that it was Vernon Bogar's assistance that had made the two burglaries

possible. There was no factual dispute about the burglaries and thefts having occurred, the question for the jury was whether Vernon Bogar had participated.

Appellant's argument seems to essentially goes to the degree of theft rather than the fact of the theft itself. If this Court were to reverse Appellant's conviction, double jeopardy would preclude the refiling of any theft charge stemming from the two 2016 burglaries committed at the fish hatchery. The Court in *State v. Gilbert*, 68 Wn.App. 379, 842 P.2d 1029 (1993), noted that "[t]he appellate court may reverse, affirm, or modify the decision being reviewed and take any other action as the merits of the case and the interest of justice may require." RAP 12.2. In *Gilbert*, the Court went on to state:

We are aware of the Supreme Court's admonishment that "[i]n general, a remand for simple resentencing on a 'lesser included offense' is only permissible when the jury has been explicitly instructed thereon. However, that statement was dictum and unsupported by any citation to authority. Nor has our research revealed any authority which supports that proposition. Logically, in fact, the dispositive issues should *not* be whether the jury was instructed on the lesser included offense, but rather whether the jury necessarily found each element of the lesser included offense in reaching its verdict on the crime charged.

Gilbert 68 Wn.App at 384-385 (cites omitted, emphasis in original).

See also *State v. Brown*, 50 Wn.App. 873, 878-879, 751 P.2d 331 (1998); accord, *State v. Ellard*, 46 Wn. App. 242, 730 P.2d 109 (1986), review denied, 108 Wn.2d 1011 (1987) where Division Two vacated convictions on two counts of first degree theft and remanded for sentencing on one count of each of second and third degree theft based on insufficiency of the evidence for first degree theft. *State v. Freidrich*, 4 Wash. 204, 29 P. 1055 (1892), defendant's conviction for first degree murder remanded for entry of judgment for second degree murder; *State v. Lillie*, 60 Wash. 200, 204, 110 P. 801 (1910), defendant's conviction for second degree assault remanded for entry of judgment for simple assault; *State v. Robbins*, 68 Wn.App. 873, 877, 846 P.2d 585 (1993), defendant's conviction for possession of cocaine with intent to deliver remanded for entry of judgment for simple possession inherent in the jury's verdict.

V. CONCLUSION

For the reasons as stated, the verdict of the jury should be affirmed. Reversal of Appellant's conviction for Theft in the

First Degree would be contrary to the plethora of evidence which sustains that finding. Should this Court not agree with that assessment, the State would respectfully request that it exercise its discretion to remand the matter to amend the judgment as this Court deems appropriate.

Respectfully submitted this 4th day of March, 2020.



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PROOF OF SERVICE

I, Emma Holden, do hereby certify under penalty of perjury that on Wednesday, March 4, 2020, I mailed to the following by U.S. Postal Service first class mail, postage prepaid, or provided e-mail service by prior agreement (as indicated), a true and correct copy of Respondent's Brief:

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