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7 **IN THE OFFICE OF ADMINISTRATIVE HEARINGS**

9 In the Matter Of,

No. 13F-CF20120001-MCAO

10 TOM HORNE, Tom Horne for Attorney
11 General Committee (SOS Filer ID 2010
12 00003); KATHLEEN WINN, Business
13 leaders for Arizona (SOS Filer ID 2010
14 00375)

**LIST OF EXHIBITS, WITNESSES
AND LEGAL POSITION FOR
ARIZONA AND KATHLEEN
WINN**

Tammy L. Eigenheer
Administrative Law Judge

15 Respondents Business Leaders for Arizona and Kathleen Winn submit this List of Exhibits,
16 Witnesses and Legal Points pursuant to the Order Setting Pre-Hearing Conference dated November
17 20, 2012.

18 **A. LIST OF WITNESSES AND EXPECTED TESTIMONY**

19 1. Kathleen Winn. Ms. Winn will testify as to various aspects of her actions on behalf of Business
20 Leaders for Arizona and to the lack of coordination between Business Leaders for Arizona and Tom
21 Horne for Attorney General, and all facts that pertain to this lack of coordination. Some specificity
22 on these subjects are supplied in her Affidavits, which are attached and incorporated by reference in
23 this paragraph.
24

1 2. Tom Horne. General Horne s expected to testify on the nature of his contact with Kathleen Winn
2 and to the lack of coordination between Business Leaders for Arizona and Tom Horne for Attorney
3 General, his campaign for Attorney General, and all facts that pertain to this lack of coordination.

4 3. George Wilkinson. Mr. Wilkinson is expected to testify as to his involvement with Business
5 Leaders for Arizona, including his role in helping to effectuate the goals of that political committee.
6

7 4. Mark Goldman. Mr. Goldman is expected to testify as to his relationship with Business Leaders
8 for Arizona and Tom Horne for Attorney General and his knowledge of laws regulating independent
9 expenditure committees.

10 5. Dennis Wilenchik. Mr. Wilenchik is expected to testify as to his contacts with Kathleen Winn and
11 his efforts to direct her to potential donors to Business Leaders for Arizona.
12

13 6. Brian Murray. Mr. Murray is expected to testify as to his activities related to Business Leaders for
14 Arizona, his contacts with Kathleen Winn, and his contacts or lack thereof with other relevant
15 persons.

16 7. Brett Mecum. Mr. Mecum is expected to testify as to his activities related to Business Leaders for
17 Arizona, his contacts with national Republican groups, and other contacts, if any, with relevant
18 individuals, and also about any assistance he provided to Kathleen Winn or Business Leaders for
19 Arizona.
20

21 8. Jim Drake. Mr. Drake is expected to testify as to the vagueness of Arizona laws pertaining to
22 what constitutes “coordination” between an independent expenditure committee and a candidate’s
23 campaign committee, and that Arizona election officials follow the federal guidelines and federal
24 pertaining to what constitutes “coordination.”

1 9. Amy Chan. Ms. Chan is expected to testify as to the vagueness of Arizona laws pertaining to what
2 constitutes “coordination” between an independent expenditure committee and a candidate’s
3 campaign committee, and that Arizona election officials follow the federal guidelines and federal
4 pertaining to what constitutes “coordination.”

5 10. Vanessa Martin (formerly Deatherage). Ms. Martin is expected to testify as to matters related to
6 the Tom Horne for Attorney General Committee, including lack of evidence of coordination of this
7 committee with Kathleen Winn and Business Leaders for Arizona.
8

9 11. Wendy Miller. Ms. Miller is expected to testify as to matters related to the Tom Horne for
10 Attorney General Committee, including lack of evidence of coordination of this committee with
11 Kathleen Winn and Business Leaders for Arizona.

12 12. Jim Waring. Mr. Waring is expected to testify as to matters related to the Tom Horne for
13 Attorney General Committee, including lack of evidence of coordination of this committee with
14 Kathleen Winn and Business Leaders for Arizona.
15

16 13. Expert from Verizon wireless, expected to testify as to interpretation of phone records and length
17 of telephone calls.

18 14. All witness listed by the Maricopa County Attorney’s Office and Tom Horne for Attorney
19 General Committee.
20

21 **B. LIST OF EXHIBITS**

22 1. CD/transcript of the press conference by Maricopa County Bill Montgomery of October 1, 2012 in
23 which he announced he was pursuing a civil enforcement action against Respondent and Tom Horne.
24

- 1 2. Notebook kept by Kathleen Winn (pages 960 to 1079 of the FBI documents released by Maricopa
2 County Attorney's Office).
- 3 3. All campaign finance filings submitted by Business Leaders for Arizona.
4
- 5 4. Letter of September 20, 2012 from Arizona Secretary of State Ken Bennett to Bill Montgomery.
6
- 7 5. Letter of September 18, 2012 from Bill Montgomery to Ken Bennett.
8
- 9 6. Secretary of State's reasonable cause finding of September 20, 2012.
10
- 11 6. Tape recording or transcript of FBI interview with Greg Tatham.
12
- 13 7. Bank records of Business Leaders for Arizona.
14
- 15 8. Phone records of Kathleen Winn and Tom Horne
16
- 17 9. Wire of funds from Richard Newman to Business Leaders for Arizona.
18
- 19 10. Minute entry of November 28, 2012 in the matter of *Committee for Justice and Fairness v.*
20 *Arizona Secretary of State*, LC2011-000734-001DT.
21
- 22 11. Arizona Daily Star article of October 6, 2010, "Pueblo Politics: State Dems file complaint against
23 Brewer."
24
12. Various newspaper articles indicating coordination between the Barack Obama, his campaign
and independent expenditure committee(s) supporting President Obama's bid for re-election, and
indicating coordination between Mitt Romney, his campaign and independent expenditure
committee(s) supporting his bid for the Presidency.

1 13. Various documents related to Tom Horne real estate closing in late October, 2012.

2 14. Relevant pages of the FBI policy book which includes rules on how FBI agents are required to
3 discharge their duties.

4
5 15. Kathleen Winn's affidavits of March 30 and May 30, 2012.

6 16. Secretary of State's notice of violation in the matter of Protect Voter's Rights/Save Phoenix
7 Taxpayers, organizations formed in 2011 to try to recall Phoenix City Councilman Sal DiCiccio, as
8 well as documents from the Attorney General's action indicating they were declining to institute an
9 enforcement action.

10
11 17. All Exhibits listed by Maricopa County Attorney's Office and Tom Horne for Attorney General.

12 **C. LAWS, RULES OR POLICIES SUPPORTING RESPONDENT'S POSITION**

13
14 **1. Summary of legal position of Respondents stated previously**

15 Respondent hereby incorporates the laws, rules, facts and policies raised in their initial
16 response dated October 19, 2012 to the order of the Maricopa County Attorney's Office and the
17 additional laws, rules, facts or policies cited in her supplemental filing of November 2, 2012. Those
18 points are as follows:

19 a. Lack of coordination between Tom Horne for Attorney General and Tom Horne and Business
20 Leaders for Arizona and Kathleen Winn.

21
22 The Maricopa County Attorney's Office will not be able to prove coordination between
23 Business Leaders for Arizona and Tom Horne for Attorney General because there was no
24

1 coordination.

2
3 In addition, the right to participate in an independent expenditure campaign is a First
4 Amendment right. *Buckley v. Valeo*, 424 U.S. 1, 96 S. Ct. 612, 46 L. Ed. 2d 659 (1976); *Citizens*
5 *United v. Fed. Election Comm'n*, 130 S. Ct. 876, 896, 175 L. Ed. 753 (2010). As the court stated in
6 *Federal Election Commission v. The Christian Coalition*, “I take from *Buckley* and its progeny the
7 directive to tread carefully, acknowledging that considerable coordination will convert an expressive
8 expenditure into a contribution but that the spender should not be deemed to forfeit First Amendment
9 protections for her own speech merely by having engaged in some consultations or coordination with
10 a federal candidate.” 52 F. Supp. 2d 45, 91 (D.D.C. 1999). Allowing a government agency to cobble
11 together isolated instances which the government agency claims constitute “coordination”, together
12 with conjecture by the government agency, is not consistent with the protection of Respondent’s First
13 Amendment rights.

14 b. The law prohibiting “coordination” between a candidate committee and an independent
15 expenditure committee applies only to expenditures, and not to raising contributions for the
16 independent expenditure committee.

17 This is clearly the standard under state law. *See* A.R.S. § 16-901(14)(referring to
18 “coordination” in the context of “expenditures” but not “contributions”).

19
20 It is also clearly the standard under federal law. This is shown by the wholesale, obvious
21 participation by President Obama and Mitt Romney in fundraising efforts for Super PAC’s that were
22 formed for the undeniable purpose of running independent expenditure campaigns to bolster their
23 candidacies. *See, e.g.*, “Obama, Romney Getting Cozier With Super PACs,” Real Clear Politics,
24 February 14, 2012.

1 [http://www.realclearpolitics.com/articles/2012/02/14/obama_romney_getting_cozier_with_super_pac](http://www.realclearpolitics.com/articles/2012/02/14/obama_romney_getting_cozier_with_super_pacs_113120.html)
2 [s_113120.html](http://www.realclearpolitics.com/articles/2012/02/14/obama_romney_getting_cozier_with_super_pacs_113120.html). This article describes attendance by Mitt Romney at a fundraiser for the Super PAC
3 running an independent expenditure campaign on his behalf, and chief Obama campaign advisor
4 David Axelrod's attendance at a fundraiser for a Super PAC supporting Obama with independent
5 expenditures!

6
7 It is also shown by the Federal Election Commission's "Three-Prong Coordination Test"
8 which makes it clear that without coordination of expenditures there is no coordination under federal
9 law, and thus an independent expenditure committee remains independent and legal: "FEC
10 regulations establish a three-prong test to determine whether a communication is coordinated. All
11 three prongs of the test—payment, content and conduct—must be met for a communication to be
12 deemed coordinated and thus an in-kind contribution."

13 (<http://www.fec.gov/pages/brochures/indexp.shtml>). The guidelines clearly show that the
14 coordination prong goes to coordination on the expenditure side, not the contribution side. *Id.*

15
16 And of course, the Secretary of State's Office, which issued the reasonable cause finding of a
17 violation in this matter, has averred that it follows the FEC's guidelines, and the document cited
18 above in particular, on what constitutes coordination¹.

19 c. The statutes the Maricopa County Attorney's Office relies on have been found to be

20
21 ¹ According to the FBI report dated May 25, 2012, which summarizes a conversation between FBI agents and
22 Assistant Secretary of State Jim Drake and State Elections Director (who also works for the Secretary of State)
23 Amy Chan, "When asked what constituted "coordination" Drake and Chan advised that the definition is vague
24 and that there is no clear Arizona standard...The SOS (Secretary of State) follows the guidelines set forth by
the federal government and the Federal Election Committee [sic]. Drake provided a copy of the Coordinated
Communications and Independent Expenditures, Federal Election Commission. Published in June 2007,
(Updated February 2011 brochure (FEC's brochure). Drake noted the "Three-Prong Coordination Test which
is outlined started [sic] on page 2 and consists of: payment, content and conduct."

1 unconstitutional by a Maricopa County Superior Court judge.

2 Judge Crane McClennan ruled on November 28, 2012 that the definition of “expressly
3 advocates” is unconstitutionally broad under Arizona law. *Committee for Justice and Fairness v.*
4 *Arizona Secretary of State*, LC2011-000734-001DT, Maricopa County Superior Court. The portion
5 that the judge has struck out means that the ads that Business Leaders for Arizona ran are not even
6 “express advocacy.” In order to meet the definition of “independent expenditure” an ad must
7 constitute “express advocacy.” Thus, under the judge’s rulings, the ads run by Business Leaders for
8 Arizona are not even subject to regulation by the state, and cannot form the basis for illegal
9 coordination regardless of the actions of any of the people involved with Tom Horne for Attorney
10 General or Business Leaders for Arizona.

11
12 Further, “First Amendment clarity demands a definition of ‘coordination’ that provides the
13 clearest possible guidance to candidates and constituents.” *Federal Election Commission v. Christian*
14 *Coalition*, 52 F. Supp. 2d 45, 91 (D.D.C. 1999). But the Secretary of State’s Office has already
15 admitted that “definition [of coordination] is vague.” FBI report, May 25, 2012. The Arizona
16 statute’s vagueness cannot be squared with the requirements of clarity to protect this critical First
17 Amendment right of free speech. *Cf. Id.*

18 d. The Maricopa County Attorney’s Office lacks jurisdiction to bring this action.

19
20 The statutes are clear on how the law is enforced when it comes to alleged violations of
21 campaign finance laws in statewide campaigns. See A.R.S. § 16-924(A)(“if the filing officer for
22 campaign finance reports designated pursuant to section 16-916, subsection A has reasonable cause to
23 believe that a person is violating any provision of this title, except for violations of chapter 6, article
24 2, the secretary of state shall notify the attorney general for a violation regarding a statewide office or

1 the legislature, the county officer in charge of elections shall notify the county attorney for that
2 county for a violation regarding a county office or the city or town clerk shall notify the city or town
3 attorney for a violation regarding a city or town office. The attorney general, county attorney or city
4 or town attorney, as appropriate, may serve on the person an order requiring compliance with that
5 provision...”(Emphasis added). This provision makes no mention of the Secretary of State being
6 permitted to pick its own counsel to send a reasonable cause notice to.

7
8 Similarly, A.R.S. § 16-1021 states that “In any election for state office, members of the
9 legislature, justices of the supreme court, judges of the court of appeals or statewide initiative or
10 referendum the attorney general may enforce the provisions of this title through civil and criminal
11 actions.” The statute goes on to confer this authority on the County Attorney for county campaign
12 violations only.

13 In instances of a conflict, the Attorney General would send this to an independent law
14 enforcement officer. There are no statutory grounds to bypass this process.

15 The law that the Secretary of State cited in its letter is unavailing. (Laws 2012, Chapter 361,
16 Section 25). That bill states in relevant part that “Notwithstanding section 41-192, Arizona Revised
17 Statutes, the secretary of state may hire independent counsel in place of the attorney general through
18 December 31, 2014.” The statute that the bill references, A.R.S. § 41-192 covers the duties of the
19 Attorney General to serve as legal advisor to state agencies. It does not mention the Attorney
20 General’s enforcement duties under Title 16.

21
22 In fact, when acting to enforce the provisions of Title 16, the Attorney General does not serve
23 as the Secretary of State’s *counsel* and he does not take direction from the Secretary of State. Rather,
24 under A.R.S. §§ 16-924 and 16-1021, he is free to disagree with the Secretary of State and not

1 proceed with an enforcement action. In fact, that has occurred multiple times recently. (See, for
2 example, the Secretary of State's notice of violation in the matter of Protect Voter's Rights/Save
3 Phoenix Taxpayers, organizations formed in 2011 to try to recall Phoenix City Councilman Sal
4 DiCiccio.)

5
6 The Maricopa County Attorney's Office, in its September 18, 2012 letter to the Secretary of
7 State, cites A.R.S. § 41-192(E) as justification for its continued involvement in this matter as the
8 enforcer of civil campaign finance laws². But this law does not confer power on the Secretary of
9 State to send this matter to the Maricopa County Attorney's Office for similar reasons. A.R.S. § 41-
10 192(E) states: "If the attorney general determines that he is disqualified from providing judicial or
11 quasi-judicial legal representation or legal services on behalf of any state agency in relation to any
12 matter... the state agency is authorized to make expenditures and incur indebtedness to employ
13 attorneys to provide the representation or services." (Emphasis added).

14 Again, when enforcing the civil penalty provisions of Title 16, the Attorney General is not
15 providing legal representation or legal services on behalf of a state agency. Claiming that would be
16 akin to claiming that when the Maricopa County Attorney's Office prosecutes a criminal case
17 submitted by the Phoenix Police Department the County Attorney is providing legal services to or
18 legal representation of the Phoenix Police Department. But they are not. Instead, as with the
19 Attorney General, they are exercising a separate law enforcement function independently, and in
20 doing so they technically represent the people, not any particular agency. *See Darwin M. v. Jacobs*,
21 69 N.Y.2d 957, 964, 509 N.E.2d 336, 340 (N.Y. 1987)("Under our State's system, it is the District

22
23 ² It is also worth noting that according to their correspondence with each other, the Secretary of State and the
24 Maricopa County Attorney's Office do not agree on which law gives the County Attorney authority to pursue
this civil enforcement matter. The Maricopa County Attorney's Office cites A.R.S. § 41-192(E) but the
Secretary of State subsequently cited Laws 2012, Chapter 361, Section 25.

1 Attorney's office which has been vested with the exclusive authority to represent the People, and its
2 duties may not be assumed nor its choice of priorities second-guessed by an administrative
3 agency...”)

4 e. The evidence gathered by the Maricopa County Attorney’s Office and Federal Bureau of
5 Investigation that they now seek to use against respondent was gathered illegally and cannot be used.
6

7 The FBI and the Maricopa County Attorney’s Office improperly used grand jury proceedings
8 to secure evidence for a civil enforcement action.

9 Respondent does not believe there was ever even a *prima facie* criminal case, and as such
10 these criminal investigative tools should not have been utilized. *Cf. United States v. Baggott*, 463
11 U.S. 476 (1983).

12 **2. Additional grounds not previously raised**

13 a. The Maricopa County’s Attorney’s Office bears the burden of proving the allegations in this civil
14 matter by a heightened burden and neither the Administrative Law Judge nor the Arizona courts
15 should grant any deference to the Maricopa County Attorney’s Office’s factual assertions or to its
16 statutory interpretations.
17

18 Under the Arizona Administrative Code Section R2-19-119(B)(1), the Maricopa County
19 Attorney’s Office bears the burden of proof as it relates to this administrative proceeding. However,
20 the reality is that to find Business Leaders for Arizona and Tom Horne for Attorney General in
21 violation of civil campaign finance laws and to seek to levy a fine for this violation, the County
22 Attorney’s Office need not convince this tribunal of anything because they are not at all bound by the
23 recommendation of the Judge in this matter.
24

1 In addition, there is a body of case law that discusses deference that should be given to
2 administrative agencies' factual assertions and statutory interpretations. See, e.g., *Gaveck v. Arizona*
3 *St. Bd. of Podiatry Exam.*, 222 Ariz. 433, 215 P.3d 1114, ¶ 11 (Ct. App. 2009) ("In reviewing an
4 administrative agency's decision, the superior court examines whether the agency's action was
5 arbitrary, capricious, or an abuse of discretion. The court must defer to the agency's factual findings
6 and affirm them if supported by substantial evidence. If an agency's decision is supported by the
7 record, substantial evidence exists to support the decision even if the record also supports a different
8 conclusion.")

9 Taken together, this raises the specter that the Maricopa County Attorney's Office can issue a
10 notice of violation and effectively play prosecutor, judge and jury because arguably its assertions
11 (both as to fact and law) will be given deference by Superior Court, thereby effectively relieving them
12 of their burden to prove the civil violation by a preponderance of the evidence.

13
14 This is a matter that this tribunal is without power to remedy, but we felt the need to raise this
15 as an issue at the administrative level. To summarize, to the extent the enforcement process instituted
16 by Arizona law attempts to allow the Maricopa County Attorney's Office the power to act as
17 prosecutor, judge and jury, it violates the Respondent's right to due process of law.

18 The fact that the Maricopa County Attorney's Office has indicated it has the power to levy a
19 fine in the millions of dollars against individual respondents is all the more reason that they should be
20 required to bear the burden, and not afforded deference that might relieve them of this burden. In fact,
21 given the harsh nature of the potential fine, they should be required to meet an elevated burden. See
22 *Stuart v. Stuart*, 112 Conn.App. 160 (2009)("clear and convincing proof of the actions alleged is
23 required in order to assess treble damages pursuant to statute..."); see also *Linthicum v. Nationwide*
24

1 *Life Ins. Co.*, 150 Ariz. 326, 332, 723 P.2d 675, 681 (1986)(holding that award of punitive damages
2 only permissible where proof is by clear and convincing evidence).

3 b. There is no basis for ordering a campaign or an individual to return monies.
4

5 No Arizona statute gives the Maricopa County Attorney's Office authority to order the return
6 of contributions. The remedies enumerated in the relevant portions of Title 16 are the exclusive
7 remedies available for a civil violation of campaign finance laws in Title 16.

8 **D. IMPEACHMENT**
9

10 1. Records, summaries or transcripts of all interviews conducted by the FBI or the Maricopa County
11 Attorney's Office.

12 2. Merv Mason. Agent Mason may testify for impeachment purposes, and as to the interrogation and
13 other tactics used by the Federal Bureau of Investigation in interviewing various individuals with
14 relevant knowledge.

15 3. Brian Grehoski. Agent Grehoski is may testify for impeachment purposes, and as to the
16 interrogation and other tactics used by the Federal Bureau of Investigation in interviewing various
17 individuals with relevant knowledge.
18

19 **E. ADDITIONAL LAWS AND CASES SUPPORTING RESPONDENT'S POSITION**
20

21 1. U.S. Const. amend I.

22 2. U.S. Const. amend VIII.

23 3. Ariz. Const. art. II, § 6.
24

1 4. A.R.S. § 16-901, et seq.

2 5. A.R.S. § 16-901(14)(b).

3 6. A.R.S. § 16-901(7).

4 7. A.R.S. § 16-924.

5 8. A.R.S. §16-1021.

6 9. A.R.S. § 16-905(j).

7 10. *Nixon v. Shrink Missouri Gov't PAC*, 528 U.S. 377, 392 (2000).

8 11. *Fed. Election Comm'n v. The Christian Coalition*, 52 F. Supp. 2d 45 (D.D.C. 1999).

9 12. *Citizens United v. Fed. Election Comm'n*, 130 S. Ct. 876, 896, 175 L. Ed. 753 (2010).

10 13. *Buckley v. Valeo*, 424 U.S. 1, 96 S. Ct. 612, 46 L. Ed. 2d 659 (1976).

11 14. *Fed. Election Comm'n v. Nat'l Conservative Political Action Comm.*, 647 F. Supp. 987
12 (S.D.N.Y. 1986).

13 15. Coordinated Communications and Independent Expenditures, Federal Election Commission,
14 <http://www.fec.gov/pages/brochures/indexp.shtml>.

15 a. 11 C.F.R. 100.29

16 b. 11 C.F.R. 109.21, et. seq.

17 c. 11 C.F.R. 109.21(e)

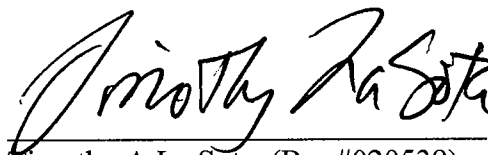
1 16. Arizona Administrative Code Section R2-19-119(B)(1) – Maricopa County Attorney’s Office
2 bears the burden of proof as it relates to the administrative hearing.

3 17. *Gaveck v. Arizona St. Bd. Of Podiatry Exam.*, 222 Ariz. 433, 215 P.3d 1114, ¶ 11 (Ct. App.
4 2009) – discusses deference that should be given to administrative agencies’ factual assertions
5 and statutory interpretations.

6
7 18. *Stuart v. Stuart*, 112 Conn. App. 160 (2009) – (“clear and convincing proof of the actions
8 alleged is required in order to assess treble damages pursuant to statute. . .”).

9 19. *Linthicum v. Nationwide Life Ins. Co.*, 150 Ariz. 326, 332, 723 P.2d 675, 681 (1986) (holding
10 that award of punitive damages only permissible where proof is by clear and convincing
11 evidence.)

12
13 DATED this 5th day of December, 2012.

14
15 

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20 ORIGINAL OF THE FOREGOING e-filed
21 This 5th day of December, 2012, to:

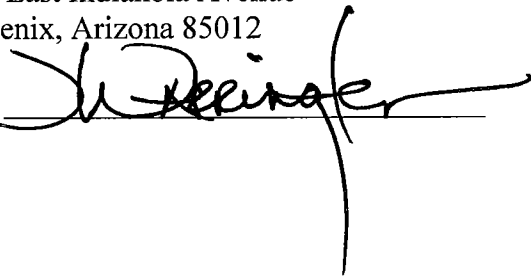
22 Honorable Tammy Eigenheer
23 Administrative Law Judge
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2
3 COPIES of the foregoing emailed
this 5th day of December, 2012, to:

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