Case No. S124179

IN THE

SUPREME COURT OF CALIFORNIA

B. BIRGIT KOEBKE, et al.,

Plaintiffs and Appellants,

vs.

BERNARDO HEIGHTS COUNTRY CLUB,

Defendant and Respondent.

After a Decision by the Court of Appeal,
Fourth Appellate District, Division One,
Case No. D041058

APPELLANTS' REPLY BRIEF ON THE MERITS

Service on the California Solicitor General required by Cal. Civ. Code § 51.1

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I. INTRODUCTION

Reflecting the same profound disrespect for same-sex and other committed, unmarried couples as the spouse-only privileges policy of Respondent Bernardo Heights Country Club ("Respondent"), Respondent's Answer Brief on the Merits ("RAB") treats Appellants B. Birgit Koebke and Kendall E. French ("Appellants") – who have been in a committed relationship for more than a decade (see Clerk's Transcript ("CT") 278, 336, 441) – as if they were no more than casual friends.[1] What Respondent fails to appreciate is that California prohibits businesses from treating couples differently based on whether or not they are married. Respondent also fails to accept that, so long as same-sex couples cannot marry in California, Respondent's policy has the direct and clearly intentional result of discriminating based on sexual orientation and sex as well. As a consequence, this Court should reverse the grant of summary judgment against Appellants on their claims that Respondent's policy facially discriminates on the basis of marital status, sexual orientation, and sex in violation of the Unruh Civil Rights Act. (Civ. Code § 51) (also referred to as "the Unruh Act," "Unruh," and "the Act").

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[1] See RAB 5 (asserting that "there are legitimate reasons for private clubs to extend privileges to a member's immediate family that are not extended to an unmarried members' *friends*") (emphasis added) 35, and 39 (likewise contrasting spousal benefits with giving benefits to "friends"); see also RAB 7 and 36 (asserting that Respondent is a "*family* oriented organization" and that exclusion of same-sex and other unmarried, committed partners furthers a "legitimate goal of creating a *family*–friendly environment" (emphasis added), as if only those who are married form families).

II. APPELLANTS STATED A CLAIM FOR MARITAL STATUS DISCRIMINATION.

For the first time, Respondent now urges that Appellants' claim somehow is not one for marital status discrimination because "plaintiffs are not complaining about discrimination against single people" but instead are objecting that they, as a couple, are not allowed the same benefits Respondent affords couples who are married. (RAB 2-4.)[2] Even if this new argument could be considered at this late date, it simply is incorrect.

In *Smith v. Fair Employment and Housing Commission* (1996) 12 Cal.4th 1143 [51 Cal.Rptr.2d 700, 913 P.2d 909], this Court reviewed an agency ruling that a landlord engaged in prohibited marital status discrimination "by refusing to rent an apartment to an unmarried couple" because they were not married to one another. (*Id.*, 12 Cal.4th at pp. 1150, 1152.) Rejecting the argument that bans on marital status discrimination only cover discrimination against *individuals* who are single or married, the Court held that such bans *also* prohibit treating unmarried couples differently than couples who are married. (*Id.* at p. 1156; see also *id.* at p. 1160 (noting that the Legislature "repeatedly has used the words 'marital status' to refer to the presence or absence of the marital relationship between two individuals.").)

This is precisely the claim made by Appellants. Like the landlord who wrongly would not rent to a couple because they were not married to one

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[2] This was not Respondent's argument below. (See CT 61-62 (twice referring to Appellants' claim as "at best, a claim for marital status discrimination"); Respondent's Brief to the Court of Appeal 2-3, 16-19 (arguing that marital status discrimination is not prohibited under Unruh, rather than that Appellants' claim is not one for marital status discrimination) and 28 (referring to what is at issue in this case as "a policy that limits benefits based on marital status").)

another, Respondent refuses to provide benefits to Appellants because they are not married to one another. As this Court held in *Smith*, this *is* a claim for marital status discrimination.[3]

Respondent's further argument that no marital status discrimination occurred because "unmarried people are as free to join the club as married people" (RAB 3), "as Koebke did and French was invited to do" (RAB 4), ignores the fact that the Unruh Act prohibits not only exclusion, but also improperly charging some people more than others for the same services. (See Civ. Code § 51 (entitling all persons to "equal ... services" in all businesses in California); *Koire v. Metro Car Wash* (1985) 40 Cal.3d 24, 34 [219 Cal.Rptr. 133, 707 P.2d 195] (holding Unruh violated by charging males more than females).) Here, Appellants were told to pay twice as much as a married couple for membership in Respondent's club, were limited in how frequently they could use it together in ways married couples are not, were charged extra fees from which married couples are exempt, and were denied inheritance rights available to married couples. This is marital status discrimination.

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[3] Respondent further asserts that Appellants' marital status discrimination claim is asking for "special rights" for registered domestic partners or other same-sex, unmarried couples. (RAB 2-3.) This too is untrue. Appellants' position is that it is marital status discrimination for a business to treat any unmarried couple worse than a married couple would have been treated, regardless of whether the unmarried couple is a different-sex couple (as in *Smith*) or a same-sex couple (as here), and regardless of whether the unmarried couple are registered as domestic partners.

III. THE UNRUH ACT SHOULD BE FOUND TO PROHIBIT DISCRIMINATION BASED ON MARITAL STATUS.

A. Respondent's Legislative Acquiescence Argument is Unavailing.

Respondent's principal argument seems to be that, because the Legislature amended the Unruh Act in 2000 without overturning a Court of Appeal decision that declined to be the "first" court to hold that Unruh prohibits marital status discrimination (*Beaty v. Truck Insurance Exchange* (1992) 6 Cal.App.4th 1455, 1462 [8 Cal.Rptr.2d 364]), the Legislature must be found to have acquiesced in that court's interpretation of Unruh. (RAB 13-17.)

As this Court repeatedly has stated, "legislative inaction is a weak indication of intent at best." (*People v. Anderson* (2002) 28 Cal.4th 767, 780 [122 Cal.Rptr.2d 587, 50 P.3d 368] (rejecting ruling of lone intermediate appellate decision as grounds for legislative acquiescence, where there was no longstanding, consistent series of judicial rulings on point); see also *People v. Escobar* (1992) 3 Cal.4th 740, 751 [12 Cal.Rptr.2d 586, 837 P.2d 1100]; ("Legislative silence after a court has construed a statute gives rise at most to an arguable inference of acquiescence or passive approval... But something more than mere silence is required before that acquiescence is elevated into a species of implied legislation") (citations and internal quotes omitted); *Moradi-Shalal v. Fireman's Fund Ins. Companies* (1988) 46 Cal.3d 287, 301 [250 Cal.Rptr. 116, 758 P.2d 58] (this Court is free to reexamine even its own holdings when the Legislature has not expressly or impliedly adopted a case's holding).)

Most dispositively, however, at the time of the supposed legislative acquiescence on which Respondent relies, the *Beaty* decision no longer represented an authoritative statement of California law. Four years before the

legislation on which Respondent relies, this Court made clear that the issue of whether marital status discrimination is prohibited by the Unruh Act was an open question, not foreclosed by the *Beaty* opinion. (See *Smith*, *supra*, 12 Cal.4th at p. 1160, fn. 11 (declining then to decide whether Unruh prohibits marital status discrimination, and comparing *Beaty*'s conclusion with this Court's dicta to the contrary in *Marina Point Ltd. v. Wolfson* (1982) 30 Cal.3d 721, 736 [180 Cal.Rptr. 496, 640 P.2d 115] and similar statements in *Frantz v. Blackwell* (1987) 189 Cal.App.3d 91, 95 [234 Cal.Rptr. 178].) Thus, the most that can be said is that the Legislature acquiesced to this Court's conclusion in *Smith* that, at that time, whether the Unruh Act barred marital status discrimination was unresolved. As a result, that question cannot be answered through reliance on the weak reed of legislative acquiescence.[4]

B. Respondent's "Comparison with Other Statutes" Argument Conflicts with this Court's Decision in *Harris*.

Respondent devotes considerable energy to demonstrating that marital status expressly is included in a large number of California's anti-

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[4] Respondent's further argument that, if legislative acquiescence is not applied to resolve this case, this Court should reverse its holding in *Harris v. Capital Growth Investors XIV* (1991) 52 Cal.3d 1142 [278 Cal.Rptr. 614, 805 P.2d 873] that Unruh applies beyond the Act's listed categories (RAB 26-28) – which would mean, among other things, holding that sexual orientation and familial status discrimination are permissible in California, after decades of case law to the contrary – is alarming, but hard to take seriously. The reasons for legislative acquiescence in *Harris* were much stronger than here, involving numerous cases that had held over many years that Unruh applied beyond its textual list. (See *Harris, supra,* 52 Cal.3d at pp. 1155-59.) Moreover, even aside from the legislative acquiescence issue, this Court concluded in *Harris* that the arguments that might be made to confine the scope of Unruh to its specified classifications do "not afford a sufficiently compelling reason to overrule the holdings" of the numerous prior cases to the contrary. (*Id.*, at p. 1155.)

discrimination laws (RAB 18-23), as support for its assertion that the Legislature intended not to include marital status as a prohibited form of discrimination under Unruh. Such an argument proves far too much. If it were correct, then neither family status nor sexual orientation could be prohibited grounds of discrimination under the Unruh Act,[5] yet this Court expressly concluded in *Harris* that they are. (See 52 Cal.3d at p. 1155.)[6]

But more importantly, Respondent's argument cannot be squared with this Court's reasoning in *Harris*. In deciding that economic status should not be found to be among the categories of discrimination Unruh prohibits, this Court noted that wealth generally is not treated similarly to the categories the Legislature explicitly listed in Unruh. (52 Cal.3d at p. 1142, fn. 9.) This Court then relied on this *exclusion* from other anti-discrimination laws as a reason to conclude that such discrimination is not prohibited by the Act. (*Id.*) By contrast, Respondent's long list of statutes in which marital status explicitly is *included* as a prohibited ground of discrimination is a reason to find that marital status discrimination is forbidden under Unruh, rather than the reverse.

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[5] For example, at the time *Harris* was decided, discrimination based on family status expressly was prohibited by Ed. Code § 230 and discrimination based on sexual orientation expressly was prohibited by Gov. Code § 18500, Health & Saf. Code § 1365.5, and Ins. Code § 10140, but neither of these characteristics was listed expressly in Civil Code § 51.

[6] In reality, California's anti-discrimination laws are a patchwork in which a particular characteristic's inclusion in any one statute rarely reflects more than the date that statute was adopted and the Legislature's growing sensitivity to the harms caused by forms of discrimination as to which the Legislature previously had not focused. (See, e.g., Stats. 2004, ch. 788 [AB 2900], attempting to standardize, after many years of inconsistencies, the list of prohibited grounds of discrimination in 36 state employment discrimination laws.)

C. Respondent Has Misstated and Misapplied the Test this Court Enunciated in *Harris* Which, When Followed, Compels the Conclusion that the Unruh Act Bars Marital Status Discrimination.

While Respondent accurately describes this Court's decision in *Harris* initially (see RAB 5, 11-12), Respondent thereafter repeatedly distorts and misapplies the three-part test that *Harris* has been understood to have crafted for deciding when a ground of discrimination not listed outright in Unruh's text nonetheless is barred by the Act. (See *Harris*, *supra*, 52 Cal.3d at pp. 1159-69; *Hessians Motorcycle Club v. Flanagans* (2001) 86 Cal.App.4th 833, 836 [103 Cal.Rptr.2d 552].) As shown below, a proper application of *Harris* necessarily leads to the conclusion that Unruh prohibits marital status discrimination.

1. Marital status is similar to Unruh's listed grounds of prohibited discrimination.

The first prong of *Harris*'s test is whether a particular form of discrimination involves a "personal characteristic" similar to the Act's enumerated categories. (*Harris*, *supra*, 52 Cal.3d at pp. 1159-62.) Respondent argues that marital status is not a personal characteristic because it is a legal status; is not fixed or immutable but instead involves conduct and choice; has not been treated as a suspect classification for equal protection analysis purposes; and has not been a vehicle for social stigmatization. (RAB 28-32.) None of these arguments is sound.

While marital status may be a legal status, this also is true of familial status, a form of discrimination that this Court has found Unruh to prohibit. (*Marina Point*, *supra*, 30 Cal.3d at pp. 736-41; *Harris*, *supra*, 52 Cal.3d at p. 1155). Likewise, while marital status may not be fixed or immutable and may involve conduct and choice, this again is true of familial status, and also is true

of religion, a ground of discrimination Unruh expressly bars. (See Civ. Code § 51(b).)[7] As for being a suspect classification, disability (among other grounds of discrimination prohibited by Unruh) has not been held to be a "suspect" or even "quasi-suspect" form of discrimination either. (See *Cleburne v. Cleburne Living Center* (1985) 473 U.S. 432, 435 [105 S.Ct. 3249, 87 L.Ed.2d 313].) Finally, it simply is not true that those who are unmarried have not been "broadly stigmatized by the wider society." (RAB 31.)[8]

Contrary to Respondent's arguments, marital status is a personal characteristic that is quite similar to the other arbitrary grounds of discrimination the Unruh Act already is understood to prohibit. (See Appellants' Opening Brief on the Merits ("AOB") 26-29.) Like those characteristics, it is a way in which people regularly describe themselves and

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[7] It likewise may be true of unconventional dress or physical appearance, which this Court also has concluded is a forbidden ground of discrimination under Unruh. (*In re Cox*, (1970) 3 Cal.3d 205, 217-18 [90 Cal.Rptr. 24, 474 P.2d 992; *Harris*, *supra*, 52 Cal.3d at p. 1155.) The "immutability" of other characteristics listed in Civ. Code § 51 also has been called into doubt. (See *Watkins v. U.S. Army* (9th Cir. 1989) 875 F.2d 699, 711, 726 (Norris, J., concurring).)

[8] Individuals (like Appellants) who live together outside of marriage, long have encountered widespread bias and discrimination. (See, e.g. *Smith*, *supra*; 12 Cal. 4th at pp. 1155-60 (collecting cases); L.A. City Attorney Consumer Task Force on Marital Status Discrimination, Final Report: "Unmarried Adults: A New Majority Seeks Consumer Protection" (1990) at p. vi (discrimination against unmarried couples is "widespread," sometimes is "quite blatant," and is "pervasive in many industries"); Conlin, *UnMarried America* (Oct. 20, 2003) Business Week, at p. 106 (describing ongoing discrimination in employment, housing, insurance, credit, public accommodations, and government benefits against those who are unmarried).) Indeed, laws criminalizing unmarried cohabitation, which once were commonplace, still remain on the books in some states. (See Fla. Sta. Ann. § 798.02; Mich. Comp. Laws Ann. § 750.335.)

are classified by others, yet it is not at all related to ability to be a responsible consumer. (*Id.*) As a result, the Legislature, state agencies that enforce the Unruh Act, and commentators long have believed the Unruh Act prohibits marital status discrimination. (*Id.* at pp. 23-26.)[9] Marital status thus clearly meets the first prong of *Harris*'s test.

2. Respondent has not established any legitimate "business" interests to justify marital status discrimination.

In a not very deft sleight of hand, Respondent initially correctly states that the second prong of the *Harris* test is whether there is a legitimate "business" interest in drawing distinctions on that basis among customers (RAB 5), but, when it proceeds to discuss that prong, Respondent drops the word "business" (RAB 6) and launches into a discussion of interests that have nothing to do with legitimate commercial concerns, such as "creating a family-friendly environment by welcoming the immediate family of married

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[9] Respondent's argument that Gov. Code §§ 12955(d) and 12995(a)(3) do not evince the Legislature's understanding that the Unruh Act prohibits marital status discrimination, despite the references in those code sections to marital status as one of the bases of discrimination that Unruh prohibits, is not at all persuasive. Notwithstanding Respondent's contention that these code sections cannot be read in this way because Section 12955(d) includes "source of income," which Respondent asserts *Harris* held was not covered by Unruh (RAB 26), *Harris* dealt with a policy that discriminated based on a person's "level" of income, not its source. (52 Cal.3d at pp. 1150, 1163). Similarly, the ruling in *Beaty* – which Respondent admits has been subject to "scathing criticism" (RAB 17) – presents no obstacle because it was not decided until midway through the year these provisions were enacted (see Stats. 1992, ch. 182 §§ 7, 23) and thus was unlikely to have influenced the Legislature's understanding of Unruh's scope. Finally, if these code sections meant what Respondent argues (see RAB 25-26), they instead would have been worded "or any basis prohibited by the Unruh Act." (See, e.g., analogous phrasing in Ed. Code § 220.)

members." (RAB 36.)

While Respondent identifies certain legitimate business concerns, such as not having too many people using the golf course at once and raising adequate revenues, Respondent does not provide *any* business reason for denying benefits to committed couples who are not married when it provides them to couples who are. Although giving "additional privileges to the immediate family of married members [does make] it *more likely* that married persons will join as members" (RAB 36) (emphasis in original), giving those same privileges to the committed partners of unmarried members makes it *more likely* that those who are in an unmarried relationship also will seek to join, which there is no legitimate business reason to prevent.[10] Likewise, although clubs may need to "ration playing time" (RAB 35), that is no more a legitimate business reason to charge unmarried couples twice as much for membership (or limit their inheritance rights) than it would be to impose similar disadvantages on interracial couples or couples of a particular religion or nationality.

Thus, because Respondent has failed to show how denying unmarried

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[10] Respondent attacks Appellants' position as importing a constitutional "least restrictive means" test (RAB 37-38), which Appellants nowhere suggest. Appellants' position is that the Unruh Act should be found to prohibit a business from treating unmarried couples worse than married ones, just as is required under the housing laws at issue in *Smith*. That hardly means that businesses always must treat one person and two identically or treat all two people the same. How the Unruh Act might apply to different treatment of *couples and individuals* is not presented by the present case. Furthermore, while Appellants did suggest that there were various ways in which businesses can and do confirm that a couple is a couple (like requiring proof in the form of a marriage license, domestic partner registration, joint home title or the like) (see AOB at 30, fn. 37), Appellants are not asserting that any particular means of confirmation either is or is not permissible, only that a means cannot be used that keeps unmarried couples as a class from getting the benefits available to all married couples.

couples benefits given to married ones "bears a reasonable relation to commercial objectives appropriate to an enterprise serving the public" (*Harris*, *supra*, 53 Cal.3d at p. 1165), marital status should be found also to meet the second prong of *Harris*'s test.

3. There would be no adverse consequences of holding that marital status discrimination is prohibited by Unruh.

As for the third prong of the *Harris* test, in contrast to requiring courts or businesses to make microeconomic or individualized credit determinations about which this Court was concerned were income level to be found a banned form of discrimination (see *Harris*, supra, 42 Cal.3d at p. 1166), prohibiting businesses from denying unmarried couples benefits provided married ones would have no adverse consequences. As shown below, a majority of country clubs in San Diego provide comparable benefits to married and unmarried couples (CT 277, 461, 467, 692) without the difficulties about which Respondent speculates. (RAB 39.) Furthermore, providing such benefits would not violate current California public policy. Indeed, rather than being a reason *not* to find marital status discrimination prohibited by Unruh (RAB 45-47), California's domestic partner laws (which are not the basis for Appellants' claims[11]) show that California's public policy seeks to support *both* the

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[11] For this reason, this Court need not be concerned about Respondent's erroneous assertions regarding AB 205. Nonetheless, it should be noted that the legislative history of that law makes clear that the Legislature intended not to permit benefits available to spouses to be denied to domestic partners. (See, e.g., AB 205 Assembly Floor Analysis (June 4, 2003) at p. 3, available at <http:www.leginfo.ca.gov/pub/bill/asm/ab_0201-0250/ab_205_cfa_20030604_010218_asm_floor.html> (visited Oct. 25, 2004) (explaining that purpose of AB 205 included ensuring that benefits spouses receive become available to registered domestic partners).

relationships of different-sex and same-sex couples, rather than the provision of benefits exclusively to those who are married. (See Stats. 2003, ch. 421 , sec. 1(b).)

IV. BECAUSE SAME-SEX COUPLES CURRENTLY CANNOT MARRY IN CALIFORNIA, RESPONDENT'S DECISION TO LIMIT BENEFITS TO THOSE WHO ARE LEGALLY MARRIED ALSO CONSTITUTES INTENTIONAL DISCRIMINATION ON THE BASES OF SEXUAL ORIENTATION AND SEX, VIOLATING THE UNRUH ACT THROUGH USE OF A PROHIBITED PROXY.

Respondent continues to mischaracterize as an "adverse impact" claim Appellants' position that it is intentional discrimination based on sexual orientation and sex for Respondent to have decided to deny benefits to those in same-sex relationships by limiting benefits to married couples, at a time when the state does not allow lesbian and gay couples to marry. (See RAB 40, 42.)

In light of Appellants' evidence of Respondent's specific intent to discriminate in this way (see CT 277, 333, 461-62, 467, 690), it was particularly inappropriate to grant summary judgment on Appellants' claim that Respondent's policy itself (and not just the unequal application of it to some unmarried different-sex couples) violated Unruh's ban on sexual orientation and sex discrimination. Indeed, Respondent *admits* that a business's use of criteria as a pretext for accomplishing discrimination prohibited under the Unruh Act "can be prohibited under existing law." (RAB 45.) Because that is precisely what Appellants assert in this case – that requiring couples to be married was a device employed by Respondent to exclude based on sexual orientation and being the same sex as one's partner – Appellants should not have had judgment entered against them on their facial challenge to Respondent's policy.

But, beyond that, Respondent is simply wrong that the argument here in substance is no different from the argument *Harris* rejected. (RAB 41.) *Harris* addressed a minimum income policy that allegedly adversely affected women because more women than men are poor. (52 Cal.3d at p. 1170.) Here, Respondent's policy is not simply more likely to affect those in same-sex relationships – it denies *all* of them the benefits available to the different-sex, heterosexual couples who can marry. Because California law currently does not permit any lesbian or gay couple to marry, limiting benefits to those who legally marry directly discriminates against *every* same-sex couple due to their sexual orientation and their being of the same sex as their partner. It similarly tells *every* lesbian and gay man who belongs to Respondent's club or might consider buying membership in it that Respondent will never provide them the benefits that heterosexuals may obtain by marrying. This is prohibited proxy discrimination. (See AOB 37-42.) If Unruh's bans on sexual orientation and sex discrimination are to provide protection to those who would form same-sex relationships, policies that provide benefits only to those who can marry cannot stand while California law prohibits same-sex couples from marrying.

V. CONCLUSION

The Unruh Act remains critically important to protecting "the rights of all persons to participate in a society free from arbitrary discrimination" (Buhai, *One Hundred Years of Equality: Saving California's Statutory Ban on Arbitrary Discrimination by Businesses* (2001) 36 U.S.F.L.Rev. 109, 110), rights which unmarried couples, and particularly those in same-sex relationships, continue to have denied. The issue is not just the greater costs those couples incur, but the inhumanity of having a business tell you that your kind is not wanted or that you have to pay more than others for the same

services, for no legitimate business reason. (See *Heart of Atlanta Motel v. U.S.* (1964) 379 U.S. 241, 250 (noting that the fundamental object of laws like the Unruh Act is to vindicate the deprivation of personal dignity that comes with public accommodations' denial of equal treatment).) The Legislature passed the Unruh Act to help fulfill the guarantee of "the equality of citizens" in California. *(Marina Point, supra*, 30 Cal.3d at 738.) This Court should not break that promise through a restrictive reading of the Act.

Rather, this Court should reverse the grant of summary judgment against Appellants on their claims that Respondent's policy facially discriminates on the basis of marital status, sexual orientation, and sex, by holding that the Unruh Act prohibits marital status discrimination against unmarried couples and that, so long as California does not allow same-sex couples to marry, the Act's prohibitions on sexual and sex discrimination also require that businesses not limit benefits to couples who are married.

Dated: October 25, 2004

Respectfully submitted,

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CERTIFICATE REGARDING LENGTH OF BRIEF

Pursuant to Rule 28.1(d)(1) of the California Rules of Court, I hereby certify that, excluding tables, permitted attachments, and this certificate, but including footnotes, the foregoing brief contains 4,200 words, based on the computer program used to prepare the brief.

Dated: October 25, 2004

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H. PAUL KONDRICK

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PROOF OF SERVICE BY U.S. MAIL

I, TITO GOMEZ, declare:

That I am a resident of the County of Los Angeles, California; that I am over eighteen (18) years of age and not a party to this action; that I am employed in the County of Los Angeles, California; and that my business address is 3325 Wilshire Blvd., Suite 1300, Los Angeles, CA 90010.

On October 25, 2004, I served a copy of the attached document, described as **APPELLANTS' REPLY BRIEF ON THE MERITS BY U.S. MAIL**, on the parties of record by placing true and correct copies thereof in sealed envelopes, with first-class postage thereon fully prepaid, addressed as follows:

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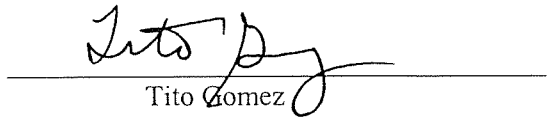
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 25, 2004



Tito Gomez