

ORIGINAL

IN THE SUPREME COURT OF OHIO

In re:

:

:

Shawn Javon Brown
Attorney Reg. No. 0079331

:

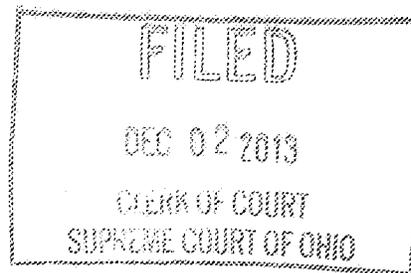
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13-1885

ENTRY OF DEFAULT

Richard A. Dove (0020256)
Board of Commissioners on Grievances and Discipline
65 South Front Street
Fifth Floor
Columbus, Ohio 43215
(614) 387-9370
richard.dove@sc.ohio.gov

Shawn Javon Brown (0079331)
1460 Ansel Road
Cleveland, Ohio 44106



IN THE SUPREME COURT OF OHIO

In re: :
Complaint against :
Shawn Javon Brown :
Respondent : **CERTIFICATION**
Cleveland Metropolitan Bar Association : **Gov. Bar R. V, Section 6a(A)**
Relator :

Pursuant to Rule V, Section 6a, of the Supreme Court Rules for the Government of the Bar of Ohio, I hereby certify that the respondent in the above-captioned matter has failed to file an answer to the formal complaint certified to the Board of Commissioners on Grievances and Discipline on September 11, 2013.

Attached to this certification is an affidavit setting forth the attempts to serve the complaint on the respondent and copies of documents referenced in the affidavit.



RICHARD A. DOVE
Secretary, Board of Commissioners
on Grievances and Discipline of
the Supreme Court of Ohio

and marked "Return to Sender-Not Deliverable as Addressed-Unable to Forward."

11. As of the date of this affidavit, the notice referenced in ¶9 has not been returned to the Board from the address reflected in ¶3. The respondent has not filed an answer to the formal complaint pending before the Board or otherwise responded to the certification of the complaint or the notice of intent to certify his default.
12. Attached to this affidavit are true and accurate copies of the following documents contained in the case file that is maintained in the Board offices:
 - a. The formal complaint certified to the Board on September 11, 2013 and sent to the respondent at his residence address via certified mail on that date;
 - b. The envelope sent to the respondent by certified mail at the address reflected in ¶3 of this affidavit and returned as undeliverable to the Board by the United States Postal Service on September 30, 2013;
 - c. The envelope sent to the respondent by certified mail at the address reflected in ¶5 of this affidavit and returned as undeliverable to the Board by the United States Postal Service on October 22, 2013;
 - d. The correspondence sent to Kent Shimeall on October 22, 2013;
 - e. The certification received from Kent Shimeall on October 25, 2013;
 - f. The notice of intent to certify the respondent's default sent to the respondent's residence and employer address on October 28, 2013; and
 - g. The envelope sent to the respondent at the address reflected in ¶5 of this affidavit and returned as undeliverable to the Board by the United States Postal Service on November 4, 2013.

FURTHER AFFIANT SAYETH NAUGHT.



Richard A. Dove (0020256)
Secretary, Board of Commissioners
on Grievances and Discipline

Sworn to before me and subscribed in my presence this 2nd day of December, 2013.



Notary Public



MICHELE PENNINGTON
Notary Public, State of Ohio
My Commission Expires 10/10/17

STATE OF OHIO

)

)

ss:

)

COUNTY OF FRANKLIN

AFFIDAVIT

I, Richard A. Dove, having been duly sworn according to the laws of Ohio, hereby depose and say:

1. I am the Secretary to the Board of Commissioners on Grievances and Discipline of the Supreme Court of Ohio ("Board"). Pursuant to Rule V of the Supreme Court Rules for the Government of the Bar of Ohio, I am responsible for serving certified disciplinary complaints on the parties and maintaining the records of cases certified to the Board.
2. On September 11, 2013, a formal complaint was certified to the Board in the matter of *Cleveland Metropolitan Bar Association v. Shawn Javon Brown*, Board Case No. 2013-049.
3. On September 11, 2013, a notice and copy of the certified complaint were sent via certified mail to respondent at 1460 Ansel Road, Cleveland, Ohio 44113. The address to which the certified mail was sent is the respondent's residence address as reflected in the attorney registration records maintained by the Supreme Court of Ohio, Office of Attorney Services.
4. On September 30, 2013, the certified mail referenced in ¶3 was returned to the Board from the United States Postal Service and marked "Return to Sender-Attempted-Not Known-Unable to Forward-Return to Sender."
5. On October 2013, a notice and copy of the certified complaint were sent via certified mail to respondent at 2189 Professor Avenue, Cleveland, Ohio 44113. The address to which the certified mail was sent is the respondent's employer address as reflected in the attorney registration records maintained by the Supreme Court of Ohio, Office of Attorney Services.
6. On October 22, 2013, the certified mail referenced in ¶5 was returned to the Board from the United States Postal Service and marked "Return to Sender-Unable to Forward-Return to Sender."
7. On October 22, 2013, a notice and copy of the certified complaint were sent to Kent Shimeall, Clerk of the Supreme Court of Ohio, requesting that the Clerk accept service on behalf of the respondent pursuant to Gov. Bar R. V, Section 11(B).
8. On October 25, 2013, the Board received certification from Kent Shimeall acknowledging receipt of the documents referenced in ¶7.
9. On October 28, 2013, a notice of intent to certify the respondent's default was sent to the respondent at the addresses in ¶¶3 and 5.
10. On November 4, 2013, the notice referenced in ¶9 was returned to the Board from the United States Postal Service from the respondent's address referenced in ¶5

BEFORE THE BOARD OF COMMISSIONERS

ON GRIEVANCE AND DISCIPLINE

OF

THE SUPREME COURT OF OHIO

RECEIVED

AUG 14 2013

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

FILED

SEP 11 2013

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

In re:

Complaint against:

SHAWN J. BROWN (Reg. No. 0079331)
1460 Ansel Road
Cleveland, Ohio 44113

Case No:

13-049-2

Respondent,

CLEVELAND METROPOLITAN
BAR ASSOCIATION
1301 East Ninth Street - Second Level
Cleveland, Ohio 44114-1253

Complaint and Certificate
(Rule V of the Supreme Court
Rules for the Government of the
Bar of Ohio)

Relator.

Now comes Relator, the Cleveland Metropolitan Bar Association, and alleges that Shawn J. Brown, an attorney at law, duly admitted to the practice of law in this State of Ohio is guilty of the following misconduct:

Shawn J. Brown, Ohio Supreme Court Attorney Registration Number 0079331, hereinafter "Respondent", was admitted to the practice of law in Ohio on November 7, 2005, and as such is subject to the Supreme Court Rules for the Government of the Bar of Ohio and the Rules of Professional Conduct.

On November 3, 2009, Respondent was suspended from the practice of law for failing to register for the 2009-2011 Attorney Registration Biennium. On October 13,

2011, Respondent was indefinitely suspended for misconduct including failing to keep a client informed, failing to promptly deliver funds that a client was entitled to receive, and engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation. *See, Cleveland Metro. Bar Assn. v. Brown*, 130 Ohio St.3d 147 (2011). Despite his suspensions, Respondent continued to practice law by making court appearances in at least four Ohio counties and collecting fees of \$5,650 between January 2012 and August 2012.

COUNT I – KYLE T. ALLEN

1. On May 24, 2012, Respondent filed a notice of appearance on behalf of Kyle T. Allen (“Mr. Allen”), in a criminal matter pending before the Chardon Municipal Court in Geauga County.
2. Respondent also filed a motion requesting that the court continue a pretrial/preliminary hearing set for the following day.
3. In requesting the continuance, Respondent cited a personal conflict that he was unable to rectify because he had been hired on short notice – the previous day.
4. On May 30, 2012, Respondent appeared in Chardon Municipal Court and waived Mr. Allen’s preliminary hearing.
5. Respondent’s conduct violates the Rules of Professional Conduct: 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT II – DARNELL BOYKIN

6. On April 26, 2012, Respondent filed a notice of appearance and several motions on behalf of Darnell Boykin (“Mr. Boykin”), in a criminal matter pending before the Erie County Court of Common Pleas.
7. That same day, Respondent appeared at Mr. Boykin’s arraignment before Judge Roger Binette.
8. While the case was pending, Respondent requested multiple continuances of pre-trials but made appearances at others.
9. On August 6, 2012, Respondent attempted to file yet another motion for continuance.
10. Respondent’s conduct violates the Rules of Professional Conduct: 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT III – MICHAEL PERRYMAN

11. On January 24, 2012, Respondent filed a notice of appearance and a motion for continuance on behalf of civil defendants Michael Perryman (“Mr. Perryman”) and Hannah’s Child Development Center (“HCDC”) in the Cuyahoga County Court of Common Pleas.
12. Mr. Perryman had paid Respondent a \$2,000 retainer for the representation.

13. Respondent ignored discovery requests from Plaintiff's counsel which caused 63 requested stipulations to be deemed admitted.
14. By the time Mr. Perryman retained new counsel, the court had granted summary judgment against both defendants.
15. Respondent's conduct violated the Rules of Professional Conduct: 1.3 [failing to act with reasonable diligence and promptness in representing a client]; 1.5(a) [collecting an *illegal* or clearly excessive fee]; 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT IV – KRISTIE BAKER

16. In June 2012, Kristie Baker ("Ms. Baker") hired Respondent to represent her in her divorce which was pending in Lorain County, Ohio.
17. Ms. Baker paid Respondent a \$1,400 retainer for the representation.
18. On behalf of Ms. Baker, Respondent filed a notice of appearance, request for continuance, and an Answer to the Complaint for Divorce.
19. However, Respondent failed to appear at a case management conference and a hearing on temporary orders.
20. Respondent also failed to serve opposing counsel with a copy of Ms. Baker's Answer.
21. Ms. Baker also paid \$750 to Respondent to represent her friend, Matthew McCann, in a criminal matter – discussed below in Count VI.

22. Respondent's conduct violated the Rules of Professional Conduct: 1.3 [failing to act with reasonable diligence and promptness in representing a client]; 1.5(a) [collecting an *illegal* or clearly excessive fee]; 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT V – DEBORAH BROSKI

23. On March 29, 2012, Deborah Broski ("Ms. Broski") met Respondent in a coffee shop on Cleveland's West Side.

24. Ms. Broski paid Respondent a \$550 retainer for a deed transfer of her late mother's property.

25. Respondent promised that the work would be completed in 30 days.

26. Respondent did not transfer the deed or do any other work for Ms. Broski.

27. After months of getting the run-around from Respondent, Ms. Broski discovered, via the Internet, that Respondent was suspended from the practice of law.

28. Respondent's conduct violated the Rules of Professional Conduct: 1.3 [failing to act with reasonable diligence and promptness in representing a client]; 1.5(a) [collecting an *illegal* or clearly excessive fee]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT VI – MATTHEW McCANN

29. In July 2012, Matthew McCann (“Mr. McCann”) hired Respondent to defend him in a criminal case pending in the Rocky River Municipal Court.

30. Mr. McCann’s friends, Kristie Baker and Kenneth Zebracki, split the \$1,500 retainer with each paying \$750 to Respondent.

31. Respondent appeared in court with Mr. McCann about three times, but did not show for a fourth hearing.

32. Respondent’s conduct violated the Rules of Professional Conduct: 1.3 [failing to act with reasonable diligence and promptness in representing a client]; 1.5(a) [collecting an *illegal* or clearly excessive fee]; 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT VII – CHRISTINE HERDMANN

33. On or about August 20, 2012, Christine Herdmann (“Ms. Herdmann”) hired Respondent to defend her on an OVI charge pending against her in Lakewood Municipal Court.

34. Ms. Herdmann paid Respondent \$200 toward a total fee of \$800.

35. On August 27, 2012, Respondent appeared in court with Ms. Herdmann.

36. Respondent’s conduct violated the Rules of Professional Conduct: 1.5(a) [collecting an *illegal* or clearly excessive fee]; 5.5(a) [practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction]; 8.4(c) [engaging in

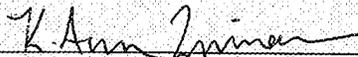
conduct involving dishonesty, fraud, deceit, or misrepresentation]; 8.4(d) [engaging in conduct prejudicial to the administration of justice]; 8.4(h) [engaging in conduct adversely reflecting upon his fitness to practice law].

COUNT VIII – RESPONDENT’S FAILURE TO COOPERATE

37. During Relator’s investigation of the grievances against Respondent, Relator made at least fourteen attempts to contact Respondent in person or by mail and made attempts to reach him by telephone.
38. At least one letter sent certified mail was signed for and several other letters sent regular mail were not returned.
39. On October 6, 2012, Respondent was personally served with a package containing copies of all the grievances against him and requesting his written response to the allegations.
40. Respondent did not respond.
41. Respondent’s conduct violated Gov. Bar R. V(4)(G) and Prof. Cond. Rule 8.1(b) [failing to respond to a demand for information from a disciplinary authority].

WHEREFORE, Relator respectfully requests that Respondent be appropriately sanctioned for his misconduct.

Respectfully submitted,

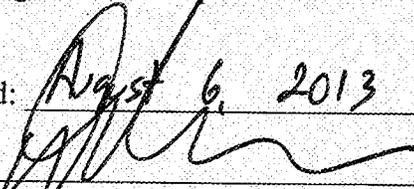

K. ANN ZIMMERMAN (0059486)
Cleveland Metropolitan Bar Assn.
1301 E. Ninth Street – Second Level
Cleveland, OH 44114-1253
(216) 696-2535 x4002 – Telephone
(216) 696-2129 – Facsimile
kaz@clemetrobar.org
Bar Counsel
Cleveland Metropolitan Bar Association


HEATHER M. ZIRKE (0074994)
Cleveland Metropolitan Bar Assn.
1301 E. Ninth Street – Second Level
Cleveland, Ohio 44114-1253
(216) 696-2535 x4006 – Telephone
(216) 696-2129 – Facsimile
hzirke@clemetrobar.org

CERTIFICATE

The undersigned **DARRELL A. CLAY, CHAIRPERSON** of the **CLEVELAND METROPOLITAN BAR ASSOCIATION'S CERTIFIED GRIEVANCE COMMITTEE** hereby certifies that **K. ANN ZIMMERMAN, ESQ.** and **HEATHER M. ZIRKE, ESQ.** are duly authorized to represent Relator in the premises and have accepted the responsibility of prosecuting the complaint to its conclusion. After investigation, Relator believes reasonable cause exists to warrant a hearing on such complaint.

Dated: August 6, 2013



DARRELL A. CLAY, Chairperson

**(Rule V of the Supreme Court Rules for the Government of the Bar of Ohio.)
Section (4)**

(4) (I) (8) The Complaint; Where Filed; By Whom Signed. A complaint shall mean a formal written complaint alleging misconduct or mental illness of one who shall be designate as the Respondent. Six (6) copies of all such complaints shall be filed in the office of the Secretary of the Board. Complaints filed by a Certified Grievance Committee shall not be accepted for filing unless signed by one or more members of the Bar of Ohio in good standing, who shall be counsel for the Relator, and supported by a certificate in writing signed by the President, Secretary or Chairman of the Certified Grievance Committee, which Certified Grievance Committee shall be deemed the Relator, certifying that said counsel are duly authorized to represent said Relator in the premises and have accepted the responsibility of prosecuting the complaint to conclusion. It shall constitute the authorization of such counsel to represent said Relator in the premises as fully and completely as if designated and appointed by order of the Supreme Court of Ohio with all the privileges and immunities of an officer of such Court. The complaint may also, but need not, be signed by the person aggrieved.

Complaints filed by the Disciplinary Counsel shall be filed in the name of Disciplinary Counsel as Relator.

Upon the filing of a complaint with the Secretary of the Board, Relator shall forward a copy thereof to Disciplinary Counsel, to the Certified Grievance Committee of the Ohio State Bar Association, to the local bar association and to any Certified Grievance Committee serving the county or counties in which the Respondent resides and maintains his office and for the county from which the complaint arose.



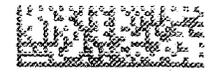
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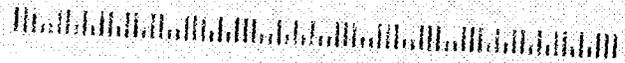
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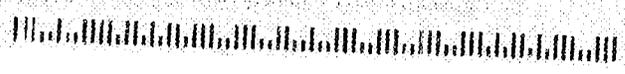
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UNABLE TO FORWARD
UNABLE TO FORWARD
RETURN TO SENDER



NOREC 441135042-1N 10/09/13



Shawn Javon Brown
Minshell Law Offices
2189 Professor Ave
Cleveland, OH 44113

RECEIVED

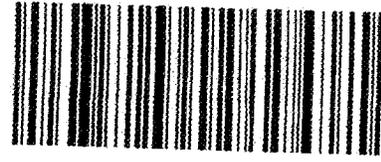
OCT 22 2013

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

CERTIFIED MAIL

The Supreme Court of Ohio

BOARD OF COMMISSIONERS ON GRIEVANCES AND DISCIPLINE
65 SOUTH FRONT STREET-5TH FLOOR, COLUMBUS, OHIO 43215-3431



7160 3901 9849 1365 2192

RETURN RECEIPT REQUESTED

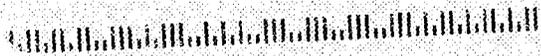
RECEIVED

SEP 30 2013

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

XIE 441135017-1N 09/22/13

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
RETURN TO SENDER



Shawn Javon Brown
1460 Ansel Road
Cleveland, OH 44113

Handwritten signature

The Supreme Court of Ohio

BOARD OF COMMISSIONERS ON GRIEVANCES & DISCIPLINE

65 SOUTH FRONT STREET, 5TH FLOOR, COLUMBUS, OH 43215-3431

RICHARD A. DOVE
SECRETARY

Telephone: 614.387.9370
Fax: 614.387.9379
www.supremecourt.ohio.gov

MICHELLE A. HALL
SENIOR COUNSEL

October 22, 2013

Kent Shimeall
Clerk of the Court
Supreme Court of Ohio
65 South Front Street, 8th Floor
Columbus, Ohio 43215

RE: Cleveland Metropolitan Bar Association v. Shawn Javon Brown, Case No. 2013-049

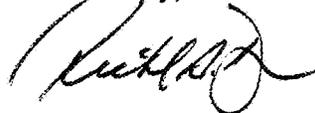
Dear Mr. Shimeall:

Enclosed please find a Complaint and Certificate, an Entry and Notice to Respondent of Filing of Complaint, which the Board has been unable to serve on the above named Respondent. On September 11, 2013, we attempted certified mail service at 1460 Ansel Road, Cleveland, Ohio 44106, which is the residence address listed on attorney registration. On September 30, 2013, we received returned mail marked "return to sender, attempted-not known, unable to forward, and return to sender." On October 2013, we attempted certified mail service at 2189 Professor Avenue, Cleveland, Ohio 44113, which is the employer address listed on attorney registration. On October 22, 2013, we received returned mail marked "return to sender, unable to forward, and return to sender."

Please accept service on behalf of the above Respondent and issue a Certificate to that effect for our file.

Thank you for your help in this matter.

Sincerely,



Richard A. Dove

Enclosure

The Supreme Court of Ohio

CERTIFICATION

FILED

OCT 25 2013

BOARD OF COMMISSIONERS
ON GRIEVANCES & DISCIPLINE

I, Kent M. Shimeall, certify that I was served on the twenty third day of October 2013, with a copy of the Notice to Respondent of Filing of Complaint, a copy of the Complaint and Certificate, and a copy of an Entry, issued in the case of In re: Shawn Javon Brown, Respondent v. Cleveland Metropolitan Bar Association, Relator (Case No. 13-049).

I received true and attested copies of the documents set forth above, addressed to the Respondent at his last known address, from the Secretary of the Board of Commissioners on Grievances and Discipline in conformity with Rule V, Section 11(B) of the Rules for the Government of the Bar.



Kent M. Shimeall
Clerk of the Court

The Supreme Court of Ohio

BOARD OF COMMISSIONERS ON GRIEVANCES & DISCIPLINE

65 SOUTH FRONT STREET, 5TH FLOOR, COLUMBUS, OH 43215-3431

RICHARD A. DOVE
SECRETARY

Telephone: 614.387.9370
Fax: 614.387.9379
www.supremecourt.ohio.gov

MICHELLE A. HALL
SENIOR COUNSEL

October 28, 2013

Shawn Javon Brown
2189 Professor Avenue
Cleveland, OH 44113

Re: Cleveland Metropolitan Bar Association v. Shawn Javon Brown, Case No. 2013-049

Dear Mr. Brown:

On September 11, 2013, the Board of Commissioners on Grievances and Discipline certified a formal complaint naming you as the respondent in the above-captioned disciplinary matter. A copy of the enclosed complaint was sent to you via certified mail to 1460 Ansel Road, Cleveland, Ohio 44106 and service was returned as undeliverable. On October 2013, a copy of the enclosed was sent to you via certified mail to 2189 Professor Avenue, Cleveland, Ohio 44113 and service was returned as undeliverable. Pursuant to Gov. Bar R. V, Section 11, the complaint was served on the Clerk of the Supreme Court, and the Clerk accepted service on October 25, 2013. As of the date of this letter, the Board has not received your answer to the formal complaint or a motion to extend the time for filing an answer.

Pursuant to Gov. Bar R. V, Section 6a, you are hereby notified that the Board will certify your default to the Supreme Court thirty days from the date of this letter. To avoid certification of default, you must file an answer to the formal complaint with the Board prior to the expiration of the thirty-day period. No extension of time to file an answer is authorized by the rule.

Please note that the certification of default may result in your immediate suspension from the practice law by the Supreme Court of Ohio.

If you have questions regarding this matter, please contact the Board of Commissioners on Grievances and Discipline at (614) 387-9370.

Sincerely,

Richard A. Dove

Enclosure

cc: K. Ann Zimmerman, Bar Counsel
Heather M. Zirke, Assistant Bar Counsel
Darrell A. Clay, Esq.

The Supreme Court of Ohio

BOARD OF COMMISSIONERS ON GRIEVANCES & DISCIPLINE

65 SOUTH FRONT STREET, 5TH FLOOR, COLUMBUS, OH 43215-3431

RICHARD A. DOVE
SECRETARY

Telephone: 614.387.9370
Fax: 614.387.9379
www.supremecourt.ohio.gov

MICHELLE A. HALL
SENIOR COUNSEL

October 28, 2013

Shawn Javon Brown
1460 Ansel Road
Cleveland, Ohio 44106

Re: Cleveland Metropolitan Bar Association v. Shawn Javon Brown, Case No. 2013-049

Dear Mr. Brown:

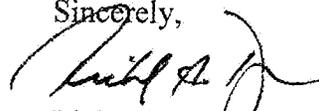
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Sincerely,



Richard A. Dove

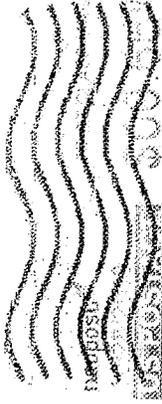
Enclosure

cc: K. Ann Zimmerman, Bar Counsel
Heather M. Zirke, Assistant Bar Counsel
Darrell A. Clay, Esq.

The Supreme Court of Ohio

BOARD OF COMMISSIONERS ON GRIEVANCES AND DISCIPLINE
65 SOUTH FRONT STREET, 5TH FLOOR, COLUMBUS, OHIO 43215-3481

COLUMBUS OH 431
28 OCT 2013 PM 8:11



ZIP 43215
041L11228780

RECEIVED

NOV 04 2013

Shawn Javon Brown
2189 Professor Ave
Cleveland, OH 44112

BOARD OF COMMISSIONERS
ON GRIEVANCES AND DISCIPLINE

NOV 04 2013 0011/01/13

NOT DELIVERABLE AS ADDRESSED
RETURN TO SENDER
UNABLE TO FORWARD

BC: 43215343199 *Z473-13558-28-39

43215343199