

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

STEPHEN MICHAEL BROWN,
(CRD No. 1221582),

Respondent.

Disciplinary Proceeding
No. 2011027616701

Hearing Officer – David R. Sonnenberg

DEFAULT DECISION

August 16, 2013

Respondent is barred from associating with any FINRA member firm in any capacity for failing to provide information, documents, and testimony in violation of FINRA Rules 8210 and 2010.

Appearances

For the Department of Enforcement, Complainant: William Brice La Hue, Esq., and David B. Klafter, Esq.

For Stephen Michael Brown, Respondent: no appearance.

DECISION

Stephen Michael Brown was formerly registered with FINRA as a General Securities Principal and General Securities Representative at Best Direct Securities, LLC (“Best Direct” or the “Firm”), a currently inactive FINRA member firm, from November 2010 through May 2010. The Firm discharged Brown for failing to disclose civil litigation brought against him by a customer. Before working at Best Direct, Brown was employed by five other FINRA member firms including, from July 1989 through May 2009, LPL Financial LLC (“LPL”).

After receiving a Form U5 and an amended Form U5 filed on Brown’s behalf by Best Direct and LPL, respectively, disclosing potential outside business activities by Brown, FINRA staff began an investigation into those activities. In connection with that investigation, Brown

failed to respond to staff requests for information, documents and testimony pursuant to FINRA Rule 8210.

As a result, Enforcement filed a Complaint with the Office of Hearing Officers, charging Brown with violating FINRA Rules 8210 and 2010. FINRA Rule 8210 grants FINRA staff the right to require a person subject to FINRA's jurisdiction to provide information with respect to any matter involved in an investigation, complaint, examination, or proceeding. FINRA Rule 2010 requires persons associated with FINRA member firms to observe high standards of commercial honor and just and equitable principles of trade.

Brown did not answer or otherwise respond to the Complaint. Accordingly, Enforcement filed a motion for entry of a default decision. The motion is supported by the Declaration of William Brice La Hue¹ and four exhibits.

For the reasons discussed below, the Hearing Officer grants Enforcement's motion.

I. Jurisdiction

Brown is not currently registered with a FINRA member firm. However, FINRA has jurisdiction over this proceeding pursuant to Article V, Section 4 of FINRA's By-Laws² because (1) the Complaint was filed within two years after Brown's last registrations with FINRA terminated,³ and (2) the Complaint charges him with failing to respond to requests for information that FINRA staff issued during the two-year period after which he ceased to be registered or associated with a FINRA member.

¹ Hereinafter referred to as "Decl."

² See Article V, Sec. 4(a), FINRA By-Laws, available at www.finra.org/rules (then follow "FINRA Manual" hyperlink to "Corporate Organization: By-Laws").

³ The Complaint was filed on April 12, 2013. FINRA terminated Brown's last registrations on May 5, 2011. CX-1, at 4.

II. Enforcement's Motion for Entry of a Default Decision Is Granted

Enforcement filed the attached Complaint with the Office of Hearing Officers on April 12, 2013. On that day, Enforcement served Brown with a copy of the Notice of Complaint and Complaint by certified mail at his last known residential address as reflected in the Central Registration Depository ("CRD Address") and at two additional addresses: one in Plano, Texas ("Plano Address") and another in Richardson, Texas ("Richardson Address") (collectively, "the Additional Addresses").⁴ The mailing sent to the CRD Address was returned marked "return to sender, not deliverable as addressed, unable to forward."⁵ The mailing sent to the Plano Address was returned marked "return to sender, refused, unable to forward."⁶ And the mailing sent to the Richardson Address was not returned.⁷

Brown did not respond to the Complaint by May 10, 2013, the date specified in the Notice of Complaint.⁸ Accordingly, on May 13, 2013, Enforcement served Brown with a Second Notice of Complaint and Complaint by certified mail at his CRD Address and the Additional Addresses.⁹ The certified mailing sent to the CRD Address was returned marked "return to sender, unclaimed, unable to forward."¹⁰ The mailing sent to the Plano Address was not

⁴ Decl. ¶ 7.

⁵ Decl. ¶ 7; CX-1, at 1; CX-3, at 4.

⁶ Decl. ¶ 7; CX-3, at 2.

⁷ Decl. ¶ 7. The United States Postal Service ("USPS") online tracking service lists the mailing as having arrived but "[n]o further information is available. Additional information for this item is stored in files off line" and could be retrieved upon request. Decl. ¶ 7; CX-3, at 3. The record is silent as to whether the staff made a retrieval request.

⁸ Decl. ¶ 8.

⁹ *Id.*

¹⁰ Decl. ¶ 9; CX-4, at 1.

returned.¹¹ And the staff received a return receipt signed “Steve Brown” for the mailing sent to the Richardson Address.¹²

Brown did not respond to the Complaint by May 30, 2013, the date specified in the Second Notice of Complaint and, to date, has not filed an answer (or any other response) to the Complaint.¹³ Therefore, on July 10, 2013, Enforcement filed a motion for entry of default decision with the Office of Hearing Officers. Brown did not respond to the motion.

The Hearing Officer concludes that Brown received valid constructive service of this proceeding in accordance with the provisions of FINRA Rules 9134(a)(2) and (b)(1), and he therefore defaulted by failing to answer the Complaint. Accordingly, the Hearing Officer grants Enforcement’s motion for entry of a default decision.

III. Findings of Fact

The Hearing Officer treated the allegations in the attached Complaint as admitted pursuant to FINRA Rules 9215(f) and 9269(a).

A. Stephen Michael Brown

Brown began his career in the securities industry in September 1983.¹⁴ Over the course of that career, he was employed by six FINRA member firms.¹⁵ In November 2010, he became registered as a General Securities Representative and General Securities Principal with Best

¹¹ Decl. ¶ 9. The USPS online tracking service reflects that the mailing left the USPS facility for delivery on May 15, 2013, but contains no further information. Decl. ¶ 9; CX-4, at 2.

¹² Decl. ¶ 9; CX-4, at 3.

¹³ Decl. ¶ 10.

¹⁴ CX-1, at 4, 8.

¹⁵ CX-1, at 4–8.

Direct.¹⁶ Brown remained registered there until May 5, 2011, when the Firm discharged him for failing to disclose a pending litigation matter filed against him by a customer.¹⁷ Thereafter, he has not been registered with a FINRA member.¹⁸

**B. Brown Failed to Provide Information, Documents, and On-The-Record
Testimony as Requested by FINRA Staff**

On May 5, 2011, Best Direct filed a Form U5 on Brown's behalf with FINRA. The form disclosed a civil action brought against Brown by one of his customers. The suit, which resulted in a civil judgment against Brown, related to a private real estate investment that Brown had recommended outside the scope of his employment with Best Direct.¹⁹ Three months later, on August 7, 2011, LPL filed an amended Form U5 on Brown's behalf with FINRA. The amended Form U5 disclosed an additional court action against Brown, filed by other customers of Brown, alleging that he solicited them to make investments with him directly, rather than through LPL.²⁰ Thereafter, FINRA staff began an investigation into the allegations disclosed in the Form U5 and amended Form U5.²¹

During the course of the investigation, FINRA staff sent numerous requests for information to Brown pursuant to FINRA Rule 8210.²² Brown failed to respond to those requests.²³ Consequently, in May 2012, FINRA sent him a Notice of Suspension, pursuant to Rule 9552,

¹⁶ CX-1, at 4.

¹⁷ CX-1, at 4; CX-2, at 2-8, 12-16.

¹⁸ Decl. ¶ 6; CX-1, at 4.

¹⁹ Decl. ¶¶ 5, 12; CX-2, at 2-8.

²⁰ Decl. ¶¶ 5, 12; CX-2, at 11-16.

²¹ Compl. ¶ 5; Decl. ¶ 12.

²² Compl. ¶ 6; Decl. ¶ 14.

²³ Compl. ¶ 6; Decl. ¶ 14.

informing Brown that he would be suspended unless he responded by June 15, 2012.²⁴ Before the deadline expired, Brown responded by submitting a statement as requested by the Notice.²⁵ Deciding that it needed additional information from Brown to complete its investigation, the staff sent him additional requests for information, documents, and testimony.²⁶ Brown failed to respond to those additional requests and his failure serves as the basis for the instant disciplinary proceeding.

1. The November 6 and 26, 2012, Information and Document Requests

On November 6, 2012, pursuant to FINRA Rule 8210, FINRA staff issued a written request to Brown to provide information and documents concerning, among other things, investments sold to customers, bank statements, and tax returns.²⁷ The request, which was sent to Brown's CRD Address and Additional Addresses, set a response deadline of November 20, 2012.²⁸ When Brown did not respond by the deadline, FINRA staff sent him another request, pursuant to Rule 8210, on November 26, 2012, seeking the same information as the November 6

²⁴ Compl. ¶ 7; Decl. ¶ 15.

²⁵ Compl. ¶ 8; Decl. ¶ 16.

²⁶ Compl. ¶¶ 8–9; Decl. ¶¶ 16–17.

²⁷ Compl. ¶ 10; Decl. ¶ 18.

²⁸ Compl. ¶ 10; Decl. ¶ 18.

request.²⁹ This request was also sent to Brown's CRD Address and Additional Addresses and required him to respond by December 10, 2012.³⁰ But, again, Brown failed to do so.³¹

2. The November 6 and November 27, 2012, Requests for Testimony

In addition to sending Brown a request for information and documents on November 6, 2012, the staff also sent him a request on that date, pursuant to Rule 8210, to appear for testimony at FINRA's Atlanta District Office on November 27, 2012.³² The Rule 8210 request was sent to Brown's CRD Address and Additional Addresses.³³ He failed to appear for testimony as requested on November 27, 2012.³⁴ FINRA staff then sent Brown another request, on that date, pursuant to Rule 8210, to appear for testimony at FINRA's Atlantic District Office on December 11, 2012.³⁵ The staff sent the request to Brown's CRD Address and Additional Addresses.³⁶ Again, he failed to appear and testify as requested.³⁷

IV. Conclusions of Law

FINRA Rule 8210 requires FINRA members and their associated persons to cooperate with FINRA investigations by providing information when requested by FINRA staff. Pursuant to Rule 8210, FINRA may require an associated person "to provide information orally, in writing, or electronically . . . and to testify at a location specified by FINRA staff, under oath or

²⁹ Compl. ¶¶ 11–12; Decl. ¶¶ 19–20.

³⁰ Compl. ¶¶ 11–12; Decl. ¶¶ 19–20.

³¹ Compl. ¶ 13; Decl. ¶ 21.

³² Compl. ¶ 18; Decl. ¶ 26.

³³ Compl. ¶ 18; Decl. ¶ 26.

³⁴ Compl. ¶ 19; Decl. ¶ 27.

³⁵ Compl. ¶ 20; Decl. ¶ 28.

³⁶ Compl. ¶ 20; Decl. ¶ 28.

³⁷ Compl. ¶ 21; Decl. ¶ 29.

affirmation” in connection with any investigation. The Rule is crucial to FINRA’s ability to oversee and regulate member firms and associated persons because FINRA does not have subpoena power. Instead, FINRA must depend on member firms and associated persons to cooperate fully and promptly with requests for information.³⁸ Further, a failure to cooperate in an investigation frustrates FINRA’s ability to detect misconduct and protect investors and markets.³⁹ It is well established that a violation of the duty to cooperate and provide information pursuant to Rule 8210 also violates Rule 2010.⁴⁰

In this case, pursuant to FINRA Rule 8210, FINRA staff sent Brown requests for information and documents on November 6 and 26, 2012, and requests for on-the-record testimony on November 6 and 27, 2012. All four requests were sent to his CRD Address and Additional Addresses. Accordingly, the Hearing Officer concludes that Brown is deemed to have received the requests pursuant to Rule 8210(d). Brown failed to respond to any of the requests. By failing to provide information and documents, and by failing to appear for an on-the-record interview, he violated FINRA Rules 8210 and 2010.

V. Sanctions

The Sanction Guidelines provide that, for violating Rule 8210, a bar is appropriate when an individual provides a partial but incomplete response unless the person demonstrates that the

³⁸ See, e.g., *Dep’t of Enforcement v. Valentino*, No. FPI010004, 2003 NASD Discip. LEXIS 15, at *12 (NAC May 21, 2003), *aff’d*, 2004 SEC LEXIS 330 (Feb. 13, 2004) (“It is well established that because NASD [FINRA’s predecessor] lacks subpoena power over its members, a failure to provide information fully and promptly undermines NASD’s ability to carry out its regulatory mandate.”) (citation omitted). See also *Morton Bruce Erenstein*, 316 Fed. App’x 865, 871, 2008 U.S. App. LEXIS 19746, at *13 (11th Cir. Sept. 16, 2008) (“[I]t is critically important to the self-regulatory system that members and associated persons cooperate with NASD investigations, especially because the NASD lacks subpoena power.”).

³⁹ *PAZ Sec., Inc.*, 2008 SEC LEXIS 820, at *13 (Apr. 11, 2008), *petition for review denied sub nom. Paz Sec. v. SEC*, 566 F.3d 1172, 2009 U.S. App. LEXIS 11500 (D.C. Cir. May 29, 2009).

⁴⁰ See *CMG Inst. Trading, LLC*, Exchange Act Rel. No. 59325, 2009 SEC LEXIS 215, at *30 (Jan. 30, 2009).

information provided substantially complied with all aspects of the request.⁴¹ The Guidelines further provide that where mitigation exists, the adjudicator can consider a suspension of up to two years.⁴² Finally, the Guidelines identify several Principal Considerations when the respondent has provided a partial but incomplete response—the importance, from FINRA’s perspective, of the information not provided; whether the information provided was relevant and responsive to the request; the number of requests the staff made; the time respondent took to respond; the degree of regulatory pressure required to obtain a response; and whether the respondent gave valid reasons for the response’s deficiencies.⁴³

Applying the relevant considerations to this case, a bar is the appropriate sanction. Before it sent Brown the four requests at issue here, FINRA staff sent him numerous requests for information. He failed to respond to those requests, prompting the staff to issue him a Notice of Suspension. After receiving the Notice of Suspension, Brown provided a response. Those initial requests, and Brown’s response, were part of the same investigation that resulted in the instant disciplinary proceeding. Therefore, the Hearing Officer concludes that the Sanction Guidelines governing partial but incomplete responses are applicable to Brown’s Rule 8210 violations.⁴⁴

According to FINRA staff, the information, documents and testimony sought by the four requests were material to the investigation, and Brown’s failures to comply prevented FINRA from investigating fully the potential violations at issue.⁴⁵ Additionally, though he provided some

⁴¹ *FINRA Sanction Guidelines* 33 (2011), available at www.finra.org/sanctionguidelines.

⁴² *Id.*

⁴³ *Id.*

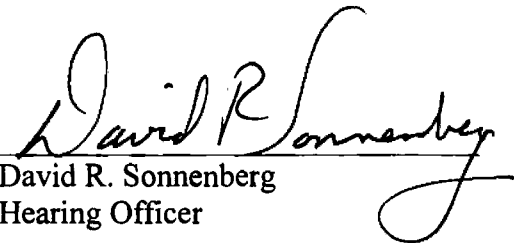
⁴⁴ See *Kent M. Houston*, Exchange Act Rel. No. 66014, 2011 SEC LEXIS 4491, at *24–26 (Dec. 20, 2011), modified on remand sub nom. *Dep’t of Enforcement v. Houston*, No. 2006005318801, 2013 FINRA Discip. LEXIS 3 (NAC Feb. 22, 2013), appeal docketed, SEC Admin. Proceeding No. 3-14175r (Mar. 25, 2013).

⁴⁵ Decl. ¶¶ 22–23; 30–31.

information, he only did so after the staff had to exert pressure by issuing him a Notice of Suspension for failing to respond to earlier requests. Finally, no mitigation exists that warrants a sanction less than a bar. Accordingly, the Hearing Officer concludes that the appropriate sanction is a bar.

VI. Order

Stephen Michael Brown is barred from associating with any member firm in any capacity for failing to provide information, documents, and testimony, in violation of FINRA Rules 8210 and 2010. The bar shall become effective immediately if this Default Decision becomes FINRA's final action in this disciplinary proceeding.


David R. Sonnenberg
Hearing Officer

Copies to:

Stephen Michael Brown (via overnight courier and first-class mail)
William Brice La Hue, Esq. (via electronic mail and first-class mail)
David B. Klafter, Esq. (via electronic mail)
Mark P. Dauer, Esq. (via electronic mail)
Jeffrey D. Pariser, Esq. (via electronic mail)

**FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)
OFFICE OF HEARING OFFICERS**

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

STEPHEN MICHAEL BROWN,
(CRD No. 1221582)

Respondent.

Disciplinary Proceeding
No. 2011027616701

RECEIVED

**FINRA OFFICE OF
HEARING OFFICERS**

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. In connection with an investigation concerning possible private securities transactions and/or outside business activities, FINRA requested that Stephen Michael Brown (Brown) provide documents and information, and further appear and testify. Brown failed to provide the documents and information and also failed to appear and testify as requested, in violation of FINRA Rules 8210 and 2010.

RESPONDENT AND JURISDICTION

2. Brown entered the securities industry in September 1983, when he was employed by a FINRA member firm. Brown was first registered as a general securities representative with FINRA in December 1983. Brown was employed by three other FINRA member firms from September 1983 through October 2010. Brown was employed by LPL Financial, LLC (LPL) from July 1989 until May 2009. Brown was then employed by Best Direct Securities, LLC (BDS), where he remained until May 2011.

3. Brown is not currently registered with a FINRA member firm. FINRA retains jurisdiction over Brown through May 4, 2013. Although Respondent is no longer registered or associated with a FINRA member firm, he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because: (1) the Complaint was filed within two years after the date upon which Brown ceased to be associated with a FINRA member firm, and (2) the Complaint charges Brown with failing to respond to FINRA's requests for information and failing to appear for on-the-record testimony during the two-year period after the date upon which Brown ceased to be associated with a FINRA member firm.

**FIRST CAUSE OF ACTION
FINRA Rules 8210 and 2010
(Failure to Respond)**

4. The Department re-alleges and incorporates by reference paragraphs 1 through 3 above.
5. On May 5, 2011 FINRA received a Uniform Termination Notice for Securities Industry Registration (Form U5) filed by BDS on behalf of Brown. The Form U5 disclosed that a former customer had commenced litigation against Brown. In addition, on August 7, 2012, LPL filed an amended Form U5 on behalf of Brown. The amended Form U5 filed by LPL disclosed a separate complaint by another former customer of Brown. FINRA commenced an investigation into possible private securities transactions and/or outside business activities by Brown after receipt of the Form U5 filed by BDS, and further attempted to investigate the allegations disclosed by LPL on the amended Form U5.
6. During the course of its investigation, FINRA made numerous requests seeking information from Brown. These requests were made pursuant to FINRA Rule 8210, and Brown was

advised that failure to respond could result in disciplinary action. However, in spite of the numerous requests and admonitions, Brown failed to respond.

7. In May 2012, FINRA sent Brown a Notice of Suspension, pursuant to FINRA Rule 9552, which enclosed copies of several request letters issued by FINRA. The Notice of Suspension informed Brown that he would be suspended for his failure to respond to FINRA's requests for documents and information unless he responded by June 15, 2012.
8. In June 2012, Brown responded submitting a statement as requested by the Notice of Suspension. However, FINRA determined that it needed additional information from Brown to complete its investigation.
9. Thereafter, FINRA sent Brown additional request letters addressed to his residential address as listed in the Central Registration Depository (CRD) as well as to two alternate addresses located in Plano, Texas and Richardson, Texas, respectively.
10. Specifically, on November 6, 2012, FINRA sent Brown a letter, via first class and certified mail, addressed to his residential CRD address and to the two alternate addresses located in Plano, Texas and Richardson, Texas. The November 6, 2012 letter requested, pursuant to FINRA Rule 8210, that Brown provide certain specific documentation and information concerning, among other things, investments sold to customers, bank account statements and tax returns. The November 6, 2012 letter further requested that Brown respond to FINRA no later than November 20, 2012.
11. The November 6, 2012 letter sent to Brown's residential CRD address via first class mail was returned marked "forward time expired and return to sender." The November 6, 2012 letters sent to Brown at the alternate addresses via first class mail were not returned. The November 6, 2012 letter sent to Brown's residential CRD address via certified mail was returned

marked "forward time expired and return to sender." The November 6, 2012 letter sent via certified mail to Brown at the Richardson, Texas address was returned marked "unclaimed." A receipt for the November 6, 2012 letter sent via certified mail to Brown at the Plano, Texas address was returned indicating that it was delivered, but was signed by someone other than Brown. Brown failed to respond by the November 20, 2012 deadline.

12. On November, 26, 2012, FINRA sent another letter to Brown addressed to his residential CRD address and to the two alternate addresses. The November 26, 2012 letter was sent via first class and certified mail and requested, pursuant to FINRA Rule 8210, that Brown provide the information that was previously requested in the November 6, 2012 request letter. The November 26, 2012 letter further requested that the response be received by FINRA no later than December 10, 2012.

13. The November 26, 2012 letter sent to Brown's residential CRD address via first class mail was returned marked "return to sender, not deliverable as addressed and unable to forward." The November 26, 2012 letters sent to the alternate addresses via first class mail were not returned. The November 26, 2012 letters sent to Brown's residential CRD address and to the Plano, Texas address via certified mail were returned marked "return to sender and not deliverable as addressed." A receipt for the November 26, 2012 letter sent by certified mail to the Richardson, Texas address was returned indicating that it was delivered, but was signed by someone other than Brown. Brown failed to respond by the December 10, 2012 deadline.

14. The documents and information requested by FINRA were material to FINRA's investigation of potential rule violations and were necessary for FINRA to complete its regulatory mandate to fully investigate potential rule violations.

15. Brown's failure to comply with FINRA's requests for documents and information impeded FINRA's investigation, and prevented FINRA from completing its regulatory responsibility to fully investigate potential rule violations.
16. Brown's failure to respond to the November 6, 2012 and November 26, 2012 requests for documents and information constitutes separate and distinct violations of FINRA Rules 8210 and 2010 by Respondent Brown.

**SECOND CAUSE OF ACTION
FINRA Rules 8210 and 2010
(Failure to Appear and Testify)**

17. The Department re-alleges and incorporates by reference paragraphs 1 through 16 above.
18. On November 6, 2012, FINRA sent Brown, via first class and certified mail, a second letter addressed to his residential CRD address and to two alternate addresses located in Plano and Richardson, Texas, respectively. The second November 6, 2012 letter requested, pursuant to FINRA Rule 8210 that Brown appear and testify at FINRA's Atlanta District Office on November 27, 2012.
19. The November 6, 2012 testimony letters sent by first class mail to Brown's residential CRD address and to the two alternate addresses were not returned. The November 6, 2012 testimony letter sent by certified mail to Brown's residential CRD address was returned marked "forward time expired and return to sender." A receipt for the November 6, 2012 testimony letter sent by certified mail to Brown at the Plano, Texas address was returned indicating that it was delivered, but was again signed by someone other than Brown. The November 6, 2012 testimony letter sent by certified mail to Brown at the Richardson, Texas address was returned marked "unclaimed." Brown failed to appear on November 27, 2012 and testify as requested.

20. On November 27, 2012 , FINRA sent Brown another request letter via first class and certified mail, addressed to Brown at his residential CRD address and to the two alternate addresses. The November 27, 2012 letter requested, pursuant to FINRA Rule 8210 that Brown appear and testify at FINRA's Atlanta District Office on December 11, 2012.
21. The November 27, 2012 letter sent by first class mail to Brown at his residential CRD address was returned marked "return to sender, not deliverable as addressed, and unable to forward." The November 27, 2012 letters sent by first class mail to Brown's alternate addresses were not returned. The November 27, 2012 letter sent by certified mail to Brown's residential CRD address and to the alternate addresses were all returned marked "return to sender and unable to forward." Brown failed to appear on December 11, 2012 and testify as requested.
22. Brown's failure to appear and testify as requested, impeded FINRA's investigation, and prevented FINRA from completing its regulatory responsibility to fully investigate potential rule violations.
23. Brown's failure to appear and testify on November 27, 2012 and December 11, 2012, as requested constitutes separate and distinct violations of FINRA Rules 8210 and 2010 by Respondent Brown.

RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

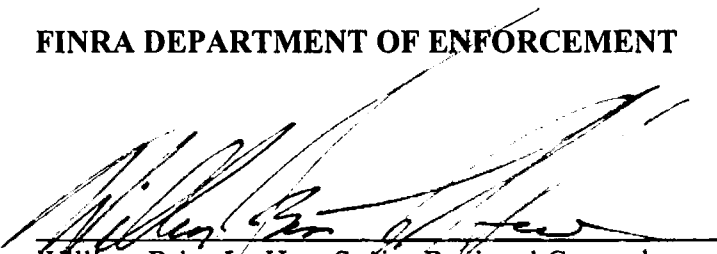
- A. Make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein.
- B. Order that one or more of the sanctions provided under FINRA Rule 8210(a), including monetary sanctions, be imposed.

C. Order that Respondent bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date:

April 12, 2013


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