

1 STEFAN D. CASSELLA  
2 Asset Forfeiture Law, LLC  
3 10609 Rachel Yates Court  
4 Laurel, MD 20723  
5 Telephone: 240-338-0724  
6 [Cassella@AssetForfeitureLaw.us](mailto:Cassella@AssetForfeitureLaw.us)  
7 *Amicus Curiae*

8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,	)	No. CR 13-106(A)-DOC
10 Plaintiff,	)	
11 vs.	)	<b>BRIEF OF STEFAN D. CASSELLA</b>
12 MONGOL NATION,	)	<b>AS AMICUS CURIAE</b>
13 An unincorporated association,	)	
14 Defendant.	)	

15  
16 Stefan D. Cassella, appearing at the invitation of the court as *amicus curiae*,  
17 respectfully submits the following Memorandum of Points and Authorities  
18 regarding two of the issues that the court has invited *amici* to address.

19 **PROCEDURAL BACKGROUND**

20 This case involves the criminal forfeiture of the intangible rights and  
21 privileges associated with certain federally-registered collective membership marks  
22 (“the Marks”) bearing words and images associated with Defendant Mongol  
23 Nation, an unincorporated association of persons interested in riding motorcycles.

24 In 2010, the court ordered the forfeiture of the Marks as part of the sentence  
25 imposed on Ruben Cavazos who had been convicted under the RICO statute, 18  
26 U.S.C. § 1962, of conducting the affairs of the association through a pattern of  
27 racketeering activity, including drug trafficking, murder and attempted murder.  
28 *United States v. Cavazos*, CR08-1201-DOC, Preliminary Order of Forfeiture (Dkt.

1 3854). Defendant Mongol Nation, however, intervened in the criminal proceeding  
2 pursuant to 18 U.S.C. § 1963(l), asserting that the Marks belonged to it and not to  
3 the individual defendant.

4 After conducting an evidentiary hearing, the court found that the Marks did  
5 not belong to the individual defendant. To the contrary, the court held that “the  
6 club maintains exclusive ownership of the Marks” and that because Mongol Nation  
7 was not named as a defendant in the criminal case and was not convicted of any  
8 offense, its ownership interest in the marks was not forfeitable in those  
9 proceedings. *Cavazos* (Dkt. 4481), quoted in *United States v. Mongol Nation*, 132  
10 F. Supp.3d 1207, 1215-16 (C.D. Cal. 2015). Accordingly, the court vacated the  
11 forfeiture order without addressing the First Amendment or trademark issues “that  
12 might have been raised if the club itself had been indicted in the *Cavazos* case.”  
13 132 F. Supp.3d at 1216.

14 Thereafter, Defendant Mongol Nation was itself indicted on the RICO  
15 charges and was convicted by a jury. In particular, the jury found Defendant guilty  
16 of a conspiracy under Section 1962(d) to engage in a pattern of racketeering acts  
17 that included multiple murders, other acts of physical violence, and the distribution  
18 of quantities of cocaine and methamphetamine. Moreover, on January 11, 2019,  
19 the jury returned a special verdict finding *inter alia* that the Marks were subject to  
20 forfeiture in connection with the RICO conspiracy pursuant to 18 U.S.C. §§  
21 1963(a)(1), (2) and (3).

22 Based on the conviction and the jury’s special verdict, the Government has  
23 moved pursuant to Rule 32.2(b) for a preliminary order of forfeiture regarding the  
24 Marks. (Dkt. 354) Defendant Mongol Nation has opposed the entry of that order,  
25 raising First Amendment objections on behalf of itself and its members. (Dkt.  
26 362). On January 17, 2019, the court issued an order inviting *amicus curiae* to  
27 submit briefs discussing on any or all of four issues. (Dkt. 358) The undersigned  
28 *amicus* respectfully submits the following with regard to two of those issues:

1           1.     Whether criminal forfeiture of any and all legal and equitable rights of  
2 any kind or nature associated with or appurtenant to a collective membership mark  
3 violates the First Amendment to the United States Constitution; and

4           2.     Whether criminal forfeiture of a collective membership mark is  
5 feasible under intellectual property law.

## 6 **CRIMINAL FORFEITURE PROCEDURE**

7           Once a defendant has been convicted of a RICO offense and the court or  
8 jury has found that its property is subject to forfeiture in accordance with the RICO  
9 statute, the entry of a forfeiture order is mandatory. *Alexander v. United States*,  
10 509 U.S. 544, 562 (1993) (“a RICO conviction subjects the violator not only to  
11 traditional, though stringent, criminal fines and prison terms, but also mandatory  
12 forfeiture under [section] 1963”); *United States v. Newman*, 659 F.3d 1235, 1240  
13 (9th Cir. 2011) (“When the Government has met the requirements for criminal  
14 forfeiture, the district court must impose criminal forfeiture, subject only to  
15 statutory and constitutional limits”). *See United States v. Blackman*, 746 F.3d 137,  
16 143 (4<sup>th</sup> Cir. 2014) (28 U.S.C. § 2461(c) makes criminal forfeiture mandatory in all  
17 cases; “The word ‘shall’ does not convey discretion . . . The plain text of the statute  
18 thus indicates that forfeiture is not a discretionary element of sentencing. . . .  
19 Insofar as the district court believed that it could withhold forfeiture on the basis of  
20 equitable considerations, its reasoning was in error.”).

21           Accordingly, unless there is a constitutional objection to the entry of the  
22 order, the court must enter a preliminary order of forfeiture forfeiting to the United  
23 States all rights and interests in the property that the jury has found to be subject to  
24 forfeiture under Section 1963(a), and must make the order part of the defendant’s  
25 sentence. *See* Rule 32.2(b)(2)(A) and (b)(4); *United States v. Nava*, 404 F.3d  
26 1119, 1124 (9th Cir. 2005) (“At sentencing, the district court must order forfeiture  
27 of the property in addition to imposing any other sentence”).

28           Defendant Mongol Nation has objected that there is a constitutional

1 objection to the entry of the forfeiture order that the Government has requested:  
2 that the forfeiture would violate the First Amendment rights of Defendant and its  
3 members. For the following reasons, the undersigned *amicus* submits that that  
4 there is no such bar to the entry of the forfeiture order.

5 **WHOSE FIRST AMENDMENT RIGHTS ARE AT ISSUE?**

6 As a threshold matter, the court must determine if it is concerned only with  
7 the impact of the proposed forfeiture on the First Amendment rights of Defendant  
8 Mongol Nation, an unincorporated association, or also with its impact on the First  
9 Amendment rights of the individual members of that association.

10 Defendant asserts that it is objecting to entry of the preliminary order of  
11 forfeiture on behalf of itself and its members. Defendant's Opp. at 2. It is well-  
12 established, however, that a defendant cannot object to the entry of a forfeiture  
13 order on the ground that the property to be forfeited belongs to a third party, or that  
14 the forfeiture would violate the rights of a third party. *See United States v.*  
15 *Ayika*, 837 F.3d 460, 475 n.24 (5th Cir. 2016) (defendant cannot object to the  
16 forfeiture of property traceable to his offense on the ground that third parties have  
17 an interest in the property, citing Rule 32.2(b)(2)(A) and collecting cases); *United*  
18 *States v. Rivers*, 60 F.Supp.3d 1262, 1265 (M.D. Fla. 2014) (“any objection [the  
19 defendant] may have on the basis that a third party holds an interest in forfeitable  
20 property is not his objection to make”); Rule 32.2(b)(2)(A) (providing that a court  
21 must enter a preliminary order of forfeiture without regard to the interests of third  
22 parties, and that issues regarding a third party's interest in the property must be  
23 deferred to the ancillary proceeding).

24 If a third party objects to the entry of the forfeiture order, he or she must do  
25 so independently by filing a claim at the appropriate time in the ancillary  
26 proceeding. *See United States v. Brown*, 2006 WL 898043, \*5 (E.D.N.Y. 2006)  
27 (defendant cannot object to the forfeiture of real property involved in a money  
28 laundering offense on the ground that the property belongs to his wife; the proper

1 procedure is for the court to enter a preliminary order of forfeiture as to the  
2 property and allow the wife to file a claim in the ancillary proceeding).

3 Thus, while Defendant may object to the entry of the forfeiture order on its  
4 own behalf, it may not invoke the rights of its members to do so.

5 Defendant nevertheless argues that it has "associational standing" to assert  
6 the rights of members of its association who "would otherwise have standing to sue  
7 on their own behalf." Defendant's Opp. at 1. Specifically, it contends that because  
8 "individual members of Mongol Nation would have standing to assert their  
9 Constitutional rights," Mongol Nation has standing to assert those rights on its  
10 members' behalf by opposing the forfeiture order.

11 Whatever merit the concept of associational standing would have in another  
12 case, it has no application here, for it presumes that the members have a legal  
13 interest in the Marks that the government is seeking to forfeit. Unfortunately for  
14 Defendant, the law of the case is to the contrary.

15 On two occasions, the court has already found that Mongol Nation and its  
16 members are separate juridical entities, and that because the Marks belong only to  
17 Mongol Nation, they could not be forfeited in the criminal case in which the  
18 individual members were convicted. *See United States v. Mongol Nation*, 132 F  
19 Supp.3d 1207, 1216 (C.D. Cal. 2015) (noting that Judge Wright held that the  
20 Marks could not be forfeited in the case against the individual defendant members  
21 of Mongol Nation because "the club maintains exclusive ownership of the Marks"  
22 and the individual members "did not have ownership interest in the Marks");  
23 *Rivera v. Carter*, No. 2:09cv2435-FMC (C.D. Cal. July 31, 2009) (ECF No. 975-1)  
24 at 11 (holding that the government exceeded its authority under Section 1963 by  
25 "seeking forfeiture of property belonging entirely to a third party non-defendant"  
26 – viz., Mongol Nation), quoted in *United States v. Rosga*, 864 F. Supp.2d 439, 447  
27 n.7 (E.D. Va. 2012).

28 Defendant's contention that its members have a legal interest in the Marks

1 for the purpose of opposing the entry of the preliminary forfeiture order, and the  
2 court's prior holdings that the Marks belong exclusively to Defendant and not to  
3 the individual members, cannot both be true. If the reason the Marks could not be  
4 forfeited in the case in which the individual members of the association were  
5 convicted was that the Marks belonged "entirely to a third party" -- that is, to  
6 Mongol Nation -- then the individual members lack standing to contest the  
7 forfeiture now. So, if as Defendant has argued, its "associational standing" to raise  
8 objections to the forfeiture is premised on a showing that its members "would  
9 otherwise have standing to sue on their own behalf," then its attempt to assert the  
10 rights of its members must fail, for the individual members have no such standing.<sup>1</sup>

11 Accordingly, the only issue with which this court is concerned is whether the  
12 forfeiture of the Marks would violate the First Amendment rights of Mongol  
13 Nation.<sup>2</sup>

#### 14 **THE FORFEITURE OF INTANGIBLE PROPERTY**

15 The forfeiture of intangible property rights is expressly authorized by both  
16 the RICO statute and other provisions of federal law. *See* 18 U.S.C. § 1963(b)(2)  
17 (defining property subject to forfeiture to include "tangible and intangible personal

---

18 <sup>1</sup> The standing of motorcycle gang members to object to the forfeiture of gang  
19 insignia based on a "collective" or "communal" interest was rejected in two other  
20 cases involving the mirror image of the facts in this case. In *United States v.*  
21 *Bowser*, 834 F.3d 780, 784 (7<sup>th</sup> Cir. 2016), the court held that where only the  
22 individual members of the Outlaws Motorcycle Club were convicted and only their  
23 personal property was forfeited, the unindicted members of the club had no  
24 collective interest in the property that would allow them to contest its forfeiture.  
25 Similarly, in *United States v. Rosga*, 864 F. Supp.2d 439, 447 & n.7 (E.D. Va.  
26 2012), the court overruled constitutional and other challenges to the forfeiture of  
27 the personal property of club members on the ground that unindicted members had  
28 no communal or collective interest in the forfeited property.

<sup>2</sup> The following discussion assumes *arguendo* that an unincorporated association  
has First Amendment rights – an issue on which the undersigned *amicus* takes no  
position.

1 property, including rights, privileges, interests, claims and securities”); 21 U.S.C. §  
2 853(b) (containing identical language). Indeed, the forfeiture of such intangible  
3 rights and privileges is fairly common.

4 For example, in *United States v. Dicter*, 198 F.3d 1284, 1290 (11<sup>th</sup> Cir.  
5 1999), the Eleventh Circuit upheld the forfeiture of a state medical license used by  
6 a doctor to distribute controlled substances. The license, the court said, confers  
7 “the right to practice medicine,” which is one of the intangible property rights  
8 expressly made subject to forfeiture by Section 853(b). *See United States v. Singh*,  
9 390 F.3d 168, 190 (2<sup>nd</sup> Cir. 2004) (same; following *Dicter*).

10 Other examples include a pharmacist’s license that was used to distribute  
11 illegal drugs, *United States v. \$7708.78 in U.S. Currency*, 2011 WL 3489835, \*3  
12 (S.D. Miss. Aug. 9, 2011), a liquor license used to run a business where cocaine  
13 was distributed, *United States v. Carrie*, 206 Fed. Appx. 920, 921 (11<sup>th</sup> Cir. 2006),  
14 and the defendant’s share of a winning lottery ticket that was used as the vehicle  
15 for laundering the proceeds of organized crime, *United States v. One-Sixth Share*  
16 *of James J. Bulger in . . . Mass Millions Lottery Ticket*, 326 F.3d 36, 37 (1<sup>st</sup> Cir.  
17 2003).

18 Indeed, such forfeitures have survived a variety of constitutional challenges.  
19 *See Dicter*, 198 F.3d at 1291 (rejecting Tenth Amendment objection to forfeiture  
20 of state medical license); *Singh*, 390 F.3d at 190 (same); *Carrie*, 206 Fed. Appx. at  
21 924 (holding that third party lacked standing to raise objection to forfeiture of  
22 liquor license under the Twenty-First Amendment).

23 There is no conceptual or practical difference between the forfeiture of the  
24 rights and privileges associated with a medical, pharmacist or liquor license and  
25 the rights and privileges to which the registered owner of a trademark is entitled.  
26 Accordingly, to answer the court’s second question, there is no bar to the forfeiture  
27 of the Marks on the ground that they constitute intangible intellectual property.

## 28 **THE FIRST AMENDMENT ISSUES**

1 We turn then to the First Amendment issues raised by Defendant’s  
2 opposition to the forfeiture of the Marks.

3 It is well-established that tangible personal property that would be used to  
4 engage in expressive conduct may be forfeited if the reason for the forfeiture is  
5 unrelated to the content of the intended speech. For example, in *United States v.*  
6 *Any and All Radio Station Transmission Equipment*, 223 Fed. Appx. 600 (9<sup>th</sup> Cir.  
7 2007), the Ninth Circuit upheld the forfeiture of radio broadcast equipment that the  
8 defendant used and intended to use to engage in radio broadcasts without a license  
9 to do so. The forfeiture of the equipment, the court said, does not implicate the  
10 First Amendment if the reason for the forfeiture was the violation of the licensing  
11 requirement, and not the content of the intended speech. 223 Fed. Appx. at 601.

12 Indeed, it is also well-established that tangible personal property that itself  
13 contains expressive content otherwise protected by the First Amendment may be  
14 forfeited if the forfeiture is based not on the content of the property, but on the  
15 connection between the property and another crime.

16 The leading case on that point is the Supreme Court’s decision in *Alexander*  
17 *v. United States*, 509 U.S. 544 (1993). In *Alexander*, a bookseller was convicted of  
18 a RICO offense and ordered to forfeit his interest in, or property affording him a  
19 source of influence over, the RICO enterprise. Defendant objected because the  
20 forfeited property included books and other materials that were protected by the  
21 First Amendment with regard to their content. The Court held, however, that the  
22 forfeiture did not offend the First Amendment.

23 The RICO forfeiture statute, the court said, “calls for the forfeiture of assets  
24 because of the financial role they play in the operation of the racketeering  
25 enterprise,” not because of the expressive or non-expressive nature of the assets.  
26 509 U.S. at 551. “[B]ooks, sports cars, narcotics, and cash are all forfeitable alike  
27 under RICO.” *Id.*

28 “[T]he First Amendment does not prohibit . . . forfeiture of expressive



1 materials as punishment for criminal conduct,” the Court said. 509 U.S. at 555.  
2 Accordingly, as long as the books were forfeited because of their role in the  
3 commission of the RICO offense, and not because of their content, there was no  
4 First Amendment bar to the forfeiture.

5 Similarly, in *United States v. Kaczynski*, 551 F.3d 1120 (9<sup>th</sup> Cir. 2009), the  
6 Ninth Circuit upheld the Government’s retention and sale of the original writings  
7 of Theodore Kaczynski, the “Unabomber,” which expressed his political views and  
8 which he intended to use to expound on those views in future writings.<sup>3</sup> The  
9 confiscation of the papers, the court said, did not offend the First Amendment  
10 because it was unrelated to their content. Rather, they were confiscated because of  
11 their connection to the crimes of violence of which the defendant was convicted,  
12 and because their sale could raise money to pay restitution to the victims of those  
13 offenses. 551 F.3d at 1126.

14 Finally, in *Ancient Coin Collectors Guild v. U.S. Customs and Border*  
15 *Protection*, 801 F. Supp.2d 383 (D. Md. 2011), the court rejected a First  
16 Amendment challenge to the forfeiture of coins taken from archaeological sites and  
17 imported into the United States in violation of the Customs laws. The plaintiffs  
18 argued that the forfeiture statute infringed upon their First Amendment rights to  
19 access the information conveyed by the ancient coins and to engage in cultural  
20 exchange with numismatists in other countries. But the court held that there was no  
21 First Amendment bar to the forfeiture as long as it was based on the illegal  
22 importation of the coins, and was motivated by the desire to combat “the pillage of  
23 archaeological or ethnological materials” and not the suppression of free  
24 expression. 801 F. Supp.2d at 411-12.

---

25 <sup>3</sup> The statute at issue in *Kaczynski* was not the forfeiture statute but a statute  
26 permitting the Government to retain seized evidence and to sell it, if it has  
27 commercial value, to raise money to satisfy an order to pay restitution to the  
28 victims of the defendant’s crime. The First Amendment issue, however, is the  
same.

1 To summarize, it is well-established that the Government may forfeit  
2 intangible rights and privileges, such as medical, pharmacist and liquor licenses,  
3 even in the face of constitutional challenges; that it may forfeit tangible property  
4 such as radio broadcast equipment that is intended to be used to engage in  
5 expressive conduct; and that it may forfeit tangible property containing expressive  
6 content, such as the defendant's books and papers, as long as the forfeiture is  
7 unrelated to the expressive conduct but instead is based on the connection between  
8 the property and the defendant's crime.

9 This case falls at the confluence of those three principles: it involves the  
10 forfeiture of *intangible* property (the Marks) that Defendant would like to use to  
11 engage in future expressive conduct (demonstrating its affiliation with other like-  
12 minded motorcycle enthusiasts), but which the Government seeks to forfeit not  
13 because of the content of the material or the substance of the intended expression,  
14 but because of the property's past use in the commission of the RICO offense of  
15 which Defendant stands convicted.

16 If tangible property that the defendant would use to engage in future  
17 protected speech may be forfeited, there is no reason why intangible property that  
18 the defendant would use for that purpose may not be forfeited as well. And there is  
19 no reason why the Supreme Court's holding in *Alexander* that the First  
20 Amendment does not prohibit the forfeiture of expressive materials as punishment  
21 for past criminal conduct, 509 U.S. at 555, does not apply equally to the forfeiture  
22 of intangible property.

23 In its opposition to the preliminary order of forfeiture, Defendant says, "It is  
24 beside the point whether any defendant used the Marks in furtherance of illegal or  
25 violent acts." Defendant's Opp. at 4. To the contrary, that is *exactly* the point.  
26 The reason the First Amendment presents no bar to the forfeiture of the Marks  
27 notwithstanding their expressive content is precisely because they were used to  
28 commit the RICO offense – the drug sales, murders and other violent acts that

1 Defendant conspired to commit – or in the technical parlance of the RICO statute,  
2 that they were interests “acquired or maintained” in violation of Section 1962, or  
3 constituted “property of any kind” affording the defendant a “source of influence”  
4 over the RICO enterprise. 18 U.S.C. §§ 1963(a)(1) and (2). If Alexander’s books  
5 could be forfeited because of their nexus to his RICO enterprise, then so may  
6 Defendant’s Marks.

7 Defendant also argues that the forfeiture of the Marks would constitute a  
8 “prior restraint” on its First Amendment rights because the forfeiture would  
9 prevent it from using the Marks to engage in expressive speech in the future.  
10 Defendant’s Opp. at 3. But that is precisely the “prior restraint” argument that the  
11 Supreme Court rejected in *Alexander*. Indeed, Justice Kennedy’s dissent in that  
12 case echoes Defendant’s prior restraint argument in virtually every particular. 509  
13 U.S. at 560-78 (Kennedy, J., dissenting.) But that is not the view that prevailed.

14 To the contrary, the Court, in the opinion authored by the Chief Justice, held  
15 that the forfeiture of a defendant’s expressive materials in connection with his  
16 RICO conviction does *not* constitute a prior restraint because it does not forbid him  
17 “from engaging in any expressive activities in the future.” 509 U.S. at 550-51.  
18 Rather, “[i]t only deprives him of specific assets that were found to be related to  
19 his previous racketeering violations.” 509 U.S. at 551.

20 Alexander, the Court explained, was not barred from opening a new  
21 bookstore and engaging in as much expressive activity as he likes; he just may not  
22 use the particular assets forfeited in connection with his RICO offense to do so. *Id.*  
23 Similarly, in *Kaczynski*, the Ninth Circuit held that the Unabomber was entitled to  
24 engage in whatever future expression of his political views he wanted, but could  
25 not use the confiscated original copies of his writings to do so. 551 F.3d at 1128-  
26 29. And coin collectors may continue to collect ancient coins and engage in  
27 cultural exchange with other numismatists; but they may not retain possession of  
28 the particular coins that were imported in violation of the Customs laws. *Ancient*

1 *Coin Collectors Guild*, 801 F. Supp.2d at 412.

2 Likewise, the forfeiture of the Marks in this case does not prevent Defendant  
3 from engaging in the recreational enjoyment of motorcycle riding, of affiliating  
4 with like-minded enthusiasts, or of creating a new patch, insignia or other  
5 accoutrements signaling that affiliation. It would only forbid the future use by  
6 Mongol Nation of the particular Marks that were used in furtherance of the drug  
7 offenses, murders and other acts of violence of which it has been convicted.

8 Prior to the Supreme Court's decision in *Alexander*, the Ninth Circuit had  
9 adopted a view similar to the one Defendant advances, challenging the forfeiture of  
10 expressive materials as a prior restraint. *Adult Video Ass'n v. Barr*, 960 F.2d 781,  
11 791 (9<sup>th</sup> Cir. 1992). When the Supreme Court remanded the case for  
12 reconsideration in light of *Alexander*, however, the Ninth Circuit concluded that its  
13 prior view could not stand. *See Adult Video Ass'n v. Reno*, 41 F.3d 503 (9<sup>th</sup> Cir.  
14 1994).

15 "In *Alexander*," the court said, "the Supreme Court makes clear that the  
16 scope of RICO's post-trial criminal forfeiture provisions does not offend the First  
17 Amendment. It held that those provisions are a punishment for past criminal  
18 conduct, and that such punishment is no more of a threat to the freedom of  
19 expression than a prison term or a large fine, both of which are clearly  
20 constitutional." 41 F.3d at 504.

21 Accordingly, the court concluded, "pursuant to *Alexander*, our First  
22 Amendment concerns as to the scope of RICO's post-trial criminal forfeiture  
23 provisions are misplaced." *Id.* at 505. *See also United States v. Investment*  
24 *Enterprises, Inc.*, 10 F.3d 263, 275-76 (5<sup>th</sup> Cir. 1993) (holding that under  
25 *Alexander*, a RICO forfeiture order that does not "forbid future expressive  
26 activities" but only forbids the possession or use of certain materials that were  
27 involved in past criminal acts, is not barred by the First Amendment).

28 For those reasons, Defendant's challenge to the forfeiture of the Marks in

1 this case is also misplaced. Because the Marks are intangible rights subject to  
2 forfeiture under Sections 1963(a) and (b), because the forfeiture is unrelated to the  
3 content of the expressive nature of the Marks, and because Defendant has the right  
4 to engage in future expressive conduct of the same nature, albeit without the use of  
5 the particular Marks that it used in the past to commit acts of racketeering, the  
6 forfeiture of the Marks is mandatory under RICO and is not barred by the First  
7 Amendment.

8  
9 Respectfully submitted,

10  
11 Stefan D. Cassella  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28