

WASHINGTON STATE  
OFFICE OF ADMINISTRATIVE HEARINGS

MAY 09 2019

RECORDS

In the matter of:

Docket No. 11-2018-GMB-00075

Benny P. Cho,

**INITIAL ORDER GRANTING WASHINGTON STATE  
GAMBLING COMMISSION STAFF'S MOTION FOR  
SUMMARY JUDGMENT**

Appellant.

License No. 68-11070

Agency: Gambling Commission  
Program: Washington State Gambling Commission  
Agency No. CR 2018-01299

## Chinese Simplified

本文件包含有关您听证会的重要信息。如果您没有出席或采取其他措施，您可能会失去重要权利。如果您在理解本文件方面需要帮助，请致电1-800-845-8830。

## Chinese Traditional

本檔案包含有關您聽證會的重要資訊。如果您沒有出席或採取其他措施，您可能會失去重要權利。如果您在理解本檔案方面需要幫助，請致電1-800-845-8830。

**1. ISSUES:**

- 1.1. Whether a genuine dispute of material fact exists as to whether the Appellant, Benny P. Cho, failed to timely disclose, within 30 days, of being charged with Assault in the Second Degree-Domestic Violence, a Class B felony, to the Gambling Commission, in violation of Revised Code of Washington (RCW) 9.46.075(7) and Washington Administrative Code (WAC) 230-06-085(1)?
- 1.2. Whether a genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, knowingly and willfully violated a court order, in violation of RCW 9.46.075(9) and/or WAC 230-03-085(3)?
- 1.3. Whether a genuine issue of a material fact exists as to whether the Appellant, Benny P. Cho, can demonstrate qualification for licensure by 'clear and convincing evidence', in accordance with RCW 9.46.075(8) and/or RCW 9.46.153(1)?
- 1.4. If so, whether the Appellant, Benny P. Cho's Public Card Room License should be revoked by the Washington State Gambling Commission, in accordance with RCW 9.46.075(1),(7),(8) & (9) and WAC 230-03-085(1), (3), (8) & (9)(a) and WAC 230-06-085(1)?

[Continued]

**2. ORDER SUMMARY:**

- 2.1. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, failed to disclose, within 30 days, being charged with Assault in the Second Degree-Domestic Violence, a Class B Felony, to the Washington State Gambling Commission, in violation of RCW 9.46.075(7) and WAC 230-06-085(1). The Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.
- 2.2. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, knowingly and willfully violated a 'No Contact Order' in violation of RCW 9.46.075(9) and/or WAC 230-03-085(3). The Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.
- 2.3. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, can prove by 'clear and convincing evidence' he is qualified for licensure, in accordance with RCW 9.46.075(8) and RCW 9.46.153(1). The Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.
- 2.4. Based on the granting of the Gambling Commission Staff's Motion for Summary Judgment, in accordance with RCW 9.46.075(1), (7), (8) & (9) and WAC 230-03-085(1), (3), (8) & (9)(a) and WAC 230-06-085(1), the Appellant, Benny P. Cho's Public Card Room License is **REVOKED**.

**3. GAMBLING COMMISSION STAFF'S MOTION FOR SUMMARY JUDGMENT:**

- 3.1. Oral Argument Date: No oral argument occurred.
- 3.2. Administrative Law Judge: TJ Martin
- 3.3. Appellant: Benny P. Cho ('Appellant'/'Cho')
  - 3.3.1. Representative: The Appellant represented himself.
- 3.4. Agency: Gambling Commission Staff ('Commission Staff')
  - 3.4.1. Representative: Kellen Wright, Assistant Attorney General

[Continued]

- 3.5. Documents Considered: The undersigned administrative law judge considered the following, relevant documents relating to the Washington State Gambling Commission Staff's Motion for Summary Judgment:

Doc. No.	Document Name	Document Received	No. Pages
1	Washington State Gambling Commission Summary Suspension	09/10/2018	5
2	Washington State Gambling Commission's Notice of Administrative Charges with Case Report Attachment	09/11/2018	27
3	Benny P. Cho's Appeal of Summary Suspension and Notice of Administrative Charges	09/19/2018	3
4	Office of Administrative Hearings (OAH) Prehearing Conference Order	12/18/2018	8
5	Washington State Gambling Commission's First Amended Notice of Administrative Charges	01/24/2019	5
6	Washington State Gambling Commission Staff's Motion for Summary Judgment	02/01/2019	8
7	Declaration of Special Agent Julie Sullivan in Support of Commission Staff's Motion for Summary Judgment with Exhibits 1 through 9	02/01/2019	49
8	OAH Motion Hearing Order, Dispositive Motion Briefing Schedule and <u>Amended</u> Prehearing Conference Order	02/06/2019	6
9	OAH Order Requesting Appellant Response and <u>Amended</u> Dispositive Motion Briefing Schedule	03/26/2019	3
10	Washington State Gambling Commission Staff's Reply in Support of Motion for Summary Judgment	04/10/2019	5
11	Two-page letter from Appellant	04/12/2019	2

[Continued]

#### 4. FACTS FOR PURPOSES OF SUMMARY JUDGMENT:

##### *Jurisdiction-*

- 4.1. On September 10 & 11, 2018, Washington State Gambling Commission issued 'Notice of Administrative Charges' and 'Summary Suspension Order' against the Appellant, Benny P. Cho.
- 4.2. The Gambling Commission's charging documents alleged on July 31, 2018, Cho was charged with one count of Assault in the Second Degree- Domestic Violence, a Class B felony, and one count of Assault in the Fourth Degree- Domestic Violence, a gross misdemeanor.
- 4.3. The Gambling Commission Staff asserted on August 10, 2018, Cho reported the gross misdemeanor, but not the felony, filed against him.
- 4.4. Based on the 'Notice of Administrative Charges' and 'Summary Suspension', the Gambling Commission requested revocation of the Appellant's Public Card Room Employee license, pursuant RCW 9.46.075(1),(7),(8) & (9), WAC 230-03-085(1), (3), (8) & (9)(a) and WAC 230-06-085(1).
- 4.5. On September 19, 2018, Cho requested an administrative hearing regarding the Washington State Gambling Commission's 'Notice of Administrative Charges' and 'Summary Suspension'.
- 4.6. On January 24, 2019, the Washington State Gambling Commission issued a 'First Amended Notice of Administrative Charges' against Cho. The Amended Charges included an allegation the Appellant willfully violated a 'No Contact Order', as a part of his pending two, pending criminal cases.
- 4.7. Based on the 'First Amended Notice of Administrative Charges', the Gambling Commission requested revocation of the Appellant's Public Card Room Employee license, pursuant RCW 9.46.075(1),(7),(8) & (9), WAC 230-03-085(1),(3), (8) & (9)(a) and WAC 230-06-085(1).

##### ***Gambling Commission Staff's Motion for Summary Judgment-***

- 4.8. On February 1, 2019, the Washington State Gambling Commission Staff filed a Motion for Summary Judgment, along with the 'Declaration of Special Agent Julie Sullivan in Support of Commission Staff's Motion for Summary Judgment' (with Exhibits 1 through 9).
- 4.9. On February 6, 2019, Administrative Law Judge TJ Martin issued a 'Motion Hearing Order, Dispositive Motion Briefing Schedule and Amended Prehearing Conference Order'. The Order established a briefing schedule regarding the Gambling Commission Staff's dispositive motion.

- 4.10. On March 26, 2019, due to confusion as to whether the Appellant needed to file a response to the Gambling Commission Staff's Motion for Summary Judgment, Administrative Law Judge TJ Martin issued 'Order Requesting Appellant Response and Amended Dispositive Motion Briefing Schedule'.
- 4.11. The Amended Dispositive Order requested the Appellant file a response, if he wished to do so, and the timeframe in which to file such a response. The Appellant was given until Friday, April 5, 2019, to file a response.
- 4.12. On April 10, 2019, the Washington State Gambling Commission Staff filed a Reply in Support of Motion for Summary Judgment.
- 4.13. On April 12, 2019, one week after the deadline to file his response, the Appellant filed an unsworn, two-page letter alleging his version of the events.

***Appellant Cho failed to disclose felony and for violation of a 'No Contact Order'-***

- 4.14. No dispute of fact exists in the present case. The undisputed facts are as follows:
- 4.15. Since 2000, Cho has held a Public Card Room License issued the Washington State Gambling Commission. *Exhibit (Ex.) 2; Page (Pg.) 3.*
- 4.16. On July 26, 2018, an altercation occurred involving Cho and his domestic partner, Kyong Min. During the incident, Cho allegedly tried to repeatedly strangle Min, as well as struck her twice, resulting in visible injury. *Ex. 2; Pg. 3 and Exs. 4-7.*
- 4.17. On July 27, 2018, the King County District Court issued a Domestic Violence 'No Contact Order' protecting Min from Cho. *Ex. 9.*
- 4.18. On July 30, 2018, Cho contacted Min, in violation of the 'No Contact Order'. *Exs 4-7.*
- 4.19. On July 31, 2018, Cho was charged with Assault in the Second Degree-Domestic Violence, a Class B felony, and Assault in the Fourth Degree-Domestic Violence, a gross misdemeanor. *Exs. 4-7.*
- 4.20. On August 10, 2018, the Gambling Commission received a handwritten, one-page letter, signed by Cho, disclosing being charged with 'Assault 4<sup>th</sup> DV'. *Ex. 3.*
- 4.21. Cho's August 10, 2018 letter failed to mention he also being charged with Assault in the Second Degree-Domestic Violence, a felony. *Ex. 2; Pg. 3 and Ex. 3.*

- 4.22. On his August 10, 2018 letter, Cho acknowledged a 'No Contact Order' condition was ordered by the King County District Court, as a condition of his release. Cho was also ordered not to have any new law violations, possess no weapons and pay a surety bond of \$1,500. *Ex. 3.*
- 4.23. In his April 12, 2019 letter, Cho asserts from July 26, 2018, the day of his arrest, until August 14, 2018, he was incarcerated in King County Jail. *Appellant's April 12, 2019 letter.*
- 4.24. Further, Cho also asserts from August 14, 2018 to August 30, 2018, he was 'transferred to Seattle Court House for "Work Relief Order"'. *Appellant's April 12, 2019 letter.*
- 4.25. No evidence exists in the record establishing Cho contacted the Gambling Commission regarding his felony charge after being released from jail.
- 4.26. On August 24, 2018, Gambling Commission Special Agent Julie Sullivan conducted a 'Suitability Investigation on Individual Licensee- Criminal History' regarding Cho. *Ex. 2.*
- 4.27. Special Agent Sullivan determined Cho disclosed the Assault Fourth Degree- Domestic Violence, gross misdemeanor charge, but failed to disclose the Assault Second Degree- Domestic Violence, felony charge. *Ex. 2; Pg. 3.*
- 4.28. On September 11, 2018, the Washington State Gambling Commission issued a 'Notice of Administrative Charges' (Notice) against Cho.
- 4.29. The Notice alleged Cho was charged with a felony and gross misdemeanor stemming from a July 26, 2018 domestic violence incident. However, Cho failed to report the felony criminal charge. As a result, the Gambling Commission requested revocation of Cho's Public Card Room License. *Exhibit (Ex.) 1.*
- 4.30. On December 28, 2018, the Appellant plead guilty to violation of a 'No Contact Order'. *Ex. 8.*
- 4.31. On January 24, 2019, Washington State Gambling Commission issued a 'First Amended Notice of Administrative Charges', which included Cho's willful violation of the 'No Contact Order'.

[Continued]

## 5. CONCLUSIONS OF LAW:

Based upon the facts above, the undersigned administrative law judge makes the following conclusions:

### ***Jurisdiction-***

- 5.1. The Office of Administrative Hearings (OAH) has jurisdiction over the persons and subject matter of this case under Revised Code of Washington (RCW) 9.46.140(4), Washington Administrative Code (WAC) 230-17-001(2), WAC 230-17-025(1) and Chapters 34.05 and 34.12 RCW.

### ***Summary Judgment-***

- 5.2. "A motion for summary judgment may be granted and an order issued if the written record shows no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law." WAC 10-08-135.
- 5.3. "Summary judgment is appropriate 'if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law.' Civil Rule (CR) 56(c)." *American Legion Post #149 v. Washington State Dept. of Health*, 164 Wn.2d 570, 584, 192 P.3d 306 (2008).
- 5.4. "The facts and reasonable inferences therefrom are construed most favorably to the nonmoving party." *Korslund v. Dycorp Tri-Cities Services, Inc.*, 156 Wn.2d 168, 177, 125 P.3d 119 (2005) (citations omitted).

### ***A. Failure to Disclose Felony-***

- 5.5. Revised Code of Washington (RCW) 9.46.075 establishes:

*The commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein:*

*(7) Makes a misrepresentation of, or fails to disclose, a material fact to the commission;*

- 5.6. WAC 230-06-085(1) provides:

*Licensees must report to us in writing within thirty days all criminal actions filed against the licensee, any manager of the licensed gambling activity, the business organization, or any person holding a substantial interest in the business organization.*

- 5.7. In the present case, on July 31, 2018, the Appellant, Benny P. Cho, was criminally charged with 'Assault in the Second Degree- Domestic Violence', a felony, and 'Assault in the Fourth Degree- Domestic Violence', a gross misdemeanor.
- 5.8. On August 10, 2018, Cho provided a one-page, hand-written and signed letter, disclosing to the Gambling Commission he had been charged with 'Assault in the Fourth Degree- Domestic Violence', a gross misdemeanor. However, the letter failed to mention he had also been charged with 'Assault in the Second Degree- Domestic Violence', a felony.
- 5.9. In his two-page summary judgment response letter, filed on April 12, 2019, outside the deadline provided, Cho asserted his brother 'forgot to the mention' the additional charge to the Gambling Commission while Cho was incarcerated.
- 5.10. The undersigned administrative law judge does not find Cho's assertion material and inconsistent with prior evidence. Namely, Cho's August 10, 2018 letter to the Gambling Commission discloses his 'Assault in the Fourth Degree' charge, but fails to mention his 'Assault in the Second Degree' charge. Cho, not his brother, either inadvertently forgot, or purposely failed to disclose, his felony charge. No genuine issue of material fact is raised.
- 5.11. For this reason, the undersigned administrative law judge concludes the Appellant, Benny P. Cho, failed to notify the Gambling Commission of his felony charge within 30 days of being criminally charged.
- 5.12. The Appellant, Benny P. Cho, has raised no genuine issue of material fact regarding his failure to timely disclose, within 30 days, of being charged with a Class B felony to the Gambling Commission in violation of RCW 9.46.075(7) and WAC 230-06-085(1). Since no genuine issue of material fact is raised, the Gambling Commission Staff's Motion for Summary Judgment regarding this issue is **GRANTED**. Therefore. The Appellant's violation is **AFFIRMED**.

**B. Willful Violation of Court Order-**

- 5.13. Revised Code of Washington (RCW) 9.46.075 establishes:

*The commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein:*

- (9) *Is subject to current prosecution or pending charges, or a conviction which is under appeal, for any of the offenses included under subsection (4) of this section;...*

[Continued]

5.14. WAC 230-03-085 provides:

*We [gambling commission] may deny, suspend, or revoke any application, license or permit, when the applicant, licensee, or anyone holding a substantial interest in the applicant's or licensee's business or organization:*

*(3) Has demonstrated willful disregard for complying with ordinances, statutes, administrative rules, or court orders, whether at the local, state, or federal level;*

5.15. In the present case, on July 27, 2018, King County District Court issued a 'No Contact Order', ordering the Appellant, Benny P. Cho, not to have any contact with Kyong Min, the alleged victim in Cho's two assault charges. Despite the 'No Contact Order', three days later, on July 30, 2018, Cho contacted Min. On December 28, 2018, Cho plead 'guilty' to violating the 'No Contact Order'.

5.16. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, on July 30, 2018, knowingly and willfully violated the King County District Court 'No Contact Order' in violation of RCW 9.46.075(9) and/or WAC 230-03-085(3). Since no genuine issue of material fact exists, the Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.

### **C. Failure to Establish 'Clear and Convincing Evidence' of Licensure-**

5.17. RCW 9.46.075(8) provides:

*The commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein:*

*(8) Fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of this chapter;*

5.18. Further, RCW 9.46.153(1) establishes:

*It shall be the affirmative responsibility of each applicant and licensee to establish by clear and convincing evidence the necessary qualifications for licensure of each person required to be qualified under this chapter, as well as the qualifications of the facility in which the licensed activity will be conducted;*

5.19. In the present case, the Appellant has failed to establish, by 'clear and convincing evidence', he remains qualified for licensure by the Washington State Gambling Commission. The Appellant, Benny Cho, has two domestic violence assault charges pending, a gross misdemeanor and the other felony. He failed to timely report the felony charge to the Gambling Commission. In addition, he knowingly violated a court-issued 'No Contact Order' and plead guilty to the charge.

5.20. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, can prove by 'clear and convincing evidence' he is qualified for licensure, in accordance with RCW 9.46.075(8) and RCW 9.46.153(1). Since no genuine issue of material fact exists, the Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.

**D. Revocation of the Appellant's Gambling License-**

5.21. RCW 9.46.075(1), (8), and (9) establishes the Gambling Commission can suspend or revoke a licensee's license for failing to comply with the applicable statutes and regulations within RCW 9.46 and WAC 230-03 and WAC 230-06. In addition, the burden is on a licensee to prove by 'clear and convincing evidence' he is qualified for licensure.

5.22. WAC 230-03-085(1), (3) (8), and (9)(a) further allows the Gambling Commission to suspend or revoke a licensee's gaming license for failing to comply with applicable statutes and regulations and being subject to felony and/or misdemeanor charges.

5.23. Since the Appellant has established no genuine dispute of material fact, the Gambling Commission Board Staff is entitled to summary judgement in its favor, as a matter of law, in accordance with WAC 10-08-135.

5.24. Based on the granting of the Gambling Commission Staff's Motion for Summary Judgment, in accordance with RCW 9.46.075(1),(7),(8) & (9) and WAC 230-03-085(1), (8) & (9)(a) and WAC 230-06-085(1), the Appellant, Benny P. Cho's Public Card Room License is **REVOKED**.

5.25. Based on the granting of the Gambling Commission Board Staff's Motion for Summary Judgment, any future evidentiary hearing is **STRICKEN**.

**6. INITIAL ORDER:**

**IT IS HEREBY ORDERED THAT:**

6.1. The Appellant, Benny P. Cho, has raised no genuine issue of material fact regarding his failure to timely disclose, within 30 days, of being charged with a Class B felony to the Gambling Commission, in violation of RCW 9.46.075(7) and WAC 230-06-085(1). Since no genuine issue of material fact is raised, the Gambling Commission Staff's Motion for Summary Judgment regarding this issue is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.

6.2. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, knowingly and willfully violated a 'No Contact Order' in violation of RCW 9.46.075(9) and WAC 230-03-085(3). Since no genuine issue of material fact

exists, the Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.

- 6.3. No genuine issue of material fact exists as to whether the Appellant, Benny P. Cho, can prove by 'clear and convincing evidence' he is qualified for licensure, in accordance with RCW 9.46.075(8) and RCW 9.46.153(1). Since no genuine issue of material fact exists, the Gambling Commission Staff's Motion for Summary Judgment is **GRANTED**. Therefore, the Appellant's violation is **AFFIRMED**.
- 6.4. Based on the granting of the Gambling Commission Staff's Motion for Summary Judgment, in accordance with RCW 9.46.075(1),(7),(8) & (9) and WAC 230-03-085(1), (3), (8) & (9)(a) and WAC 230-06-085(1), the Appellant, Benny P. Cho's Public Card Room License is **REVOKED**.
- 6.5. Based on the Gambling Commission Board Staff's Motion for Summary Judgment being granted, any future evidentiary hearing is **STRICKEN**.

**SIGNED** at Tacoma, Washington on the date of mailing.



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TJ Martin  
Administrative Law Judge  
Office of Administrative Hearings

## PETITION FOR REVIEW

Any party to this proceeding may file a Petition for Review of this initial order. The written petition for review must be mailed to the Washington State Gambling Commission at:

Washington State Gambling Commission  
PO Box 42400  
Olympia, WA 98504

The petition for review must be received by the Commission within twenty (20) days from the date this initial order was mailed to the parties. A copy of the petition for review must be sent to all parties of record. The petition for review must specify the portions of the initial order with which the party disagrees, and must refer to the evidence in the record which supports the party's position. The other party's reply must be received at the address above, and served on all parties of record, within thirty (30) days from the date the petition for review was mailed.

Any party may file a cross appeal. Parties must file cross appeals with the Washington State Gambling Commission within ten days of the date the petition for review was filed with the Washington State Gambling Commission. Copies of the petition or cross appeal must be served on all other parties or their representatives at the time the petition or appeal is filed.

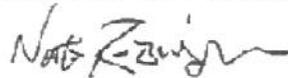
**CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 11-2018-GMB-00075**

I certify that true copies of this document were served from Tacoma, Washington via Consolidated Mail Services upon the following as indicated:

<p>Benny P. Cho 10904 SE 219<sup>th</sup> PI Kent, WA 98031 <b>Appellant</b></p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail: <a href="mailto:bennycho2010@hotmail.com">bennycho2010@hotmail.com</a></p>
<p>Kellen Wright, AAG Office of the Attorney General MS: 40100 PO Box 40100 Olympia, WA 98504 <b>Agency Representative</b></p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail: <a href="mailto:kellen.wright@atg.wa.gov">kellen.wright@atg.wa.gov</a></p>
<p>Ashlie Laydon Washington State Gambling Commission MS: 42400 PO Box 42400 Olympia, WA 98504 <b>Agency Contact</b></p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>

Date: Wednesday, May 08, 2019

OFFICE OF ADMINISTRATIVE HEARINGS



Nathan Robinson  
Legal Assistant 3

**WSGC**

**MAY 09 2019**

**RECORDS**

