

**IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT**

No. _____

COMMONWEALTH OF PENNSYLVANIA,

Respondent,

v.

RAHSAAN MAY,

Petitioner.

**Brief of Amici Curiae the ACLU of Pennsylvania and the Interbranch
Commission for Gender, Racial, and Ethnic Fairness in Support of
Rashaan May's Petition for Allowance of Appeal**

Petition for Allowance of Appeal from the February 15, 2022 Order of the
Superior Court of Pennsylvania at No. 139 EDA 2021, affirming the Judgment of
Sentence Entered at No. CP-23-CR-0004281-2018

Andrew Christy
Pa. I.D. No. 322053
Stephen A. Loney, Jr.
Pa. I.D. No. 202535
AMERICAN CIVIL LIBERTIES UNION
OF PENNSYLVANIA
P.O. Box 60173
Philadelphia, PA 19102
(215) 592-1513 x138
achristy@aclupa.org

Counsel for Amici Curiae

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Statement of Interest of Amici Curiae

The **American Civil Liberties Union** (“ACLU”) is a nationwide, nonprofit, nonpartisan organization dedicated to preserving and defending the principles of individual liberty and equality embodied in the United States Constitution and civil rights laws. The ACLU of Pennsylvania has particular expertise with respect to the law and practice governing assessment and collection of fines, costs, and restitution in criminal cases. Owing fines carries significant collateral consequences, but those outcomes are not foregone conclusions if trial courts consider each defendant’s ability to pay those fines at sentencing.

The **Pennsylvania Interbranch Commission for Gender, Racial, and Ethnic Fairness** (“Interbranch Commission”) was established by the Pennsylvania Supreme Court and the other two branches of Pennsylvania government in 2005. Its mission is to implement recommendations from a 2003 study by the Supreme Court Committee on Racial and Gender Bias in the Justice System. As such, the Interbranch Commission works to eliminate bias or invidious discrimination within the legal profession and all three branches of government in the Commonwealth of Pennsylvania. One of the most consequential areas of work the Interbranch Commission has engaged in is reform of the criminal justice process, particularly the incarceration of criminal defendants for inability to pay costs, fines, and restitution. The consequences of imposing unaffordable financial obligations on

individuals, particularly those who are poor, can be catastrophic and include loss of jobs, public benefits such as food stamps for their families, car license privileges, and even custody of their children. Moreover, because people of color comprise a disproportionate share of the indigent and incarcerated population, the impact of this broken system is mainly shouldered by them.¹

Introduction

This Court has already ruled in *Commonwealth v. Ford*, 217 A.3d 824 (Pa. 2019), that trial courts are prohibited from imposing unaffordable discretionary fines, and it is considering the same issue with respect to both discretionary and mandatory court costs in *Commonwealth v. Lopez*, 27 EAP 2021. This case is a natural companion and raises the same issue with respect to so-called “mandatory” fines: whether a fine is actually mandatory under statutory and constitutional grounds if it is unaffordable and constitutes disproportionate punishment in light of the defendant’s individual circumstances.

For more than 45 years, Pennsylvania law has clearly and unequivocally prohibited sentencing courts from imposing unaffordable fines. This requirement, codified in 42 Pa.C.S. § 9726 (c) and (d), originates from the 1962 Model Penal Code with the reasoning that “a defendant of very limited assets . . . may be

¹ No other person or entity authored or paid in whole or in part for the preparation of this brief.

devastated by even a small fine that causes economic hardship both to him and to his family out of proportion to the gravity of the offense.” Model Penal Code and Commentaries, American Law Institute (1985) at 240.² This Court recently called Section 9726 an “unambiguous statutory command requiring record evidence of the defendant’s ability to pay.” *Ford*, 217 A.3d at 829.

Yet as this case demonstrates, the Superior Court continues to allow trial courts to impose unaffordable fines on indigent defendants based on its conclusion that any statute that says a defendant “shall” pay a fine makes that fine “mandatory” and renders Section 9726 a nullity. This holding unfortunately disregards the requirements in 1 Pa.C.S. §§ 1932 and 1933 that statutes must be read together to give effect to all provisions unless they are irreconcilable; the court has never attempted to comply with that mandate. Worse, the court has also disregarded Mr. May’s well-developed arguments that the Excessive Fines Clause of the Eighth Amendment to the U.S. Constitution also requires consideration of an individual’s financial circumstances when imposing a fine, lest a sentencing court impose a fine that is excessive for that individual. Because of the importance of these issues of statutory and constitutional interpretation, they are also the

² The Commentary to the 1962 Model Penal Code was revised in 1985.

subject of petitions for allowance for appeal in *Commonwealth v. DiNardo*, 174 WAL 2021 and *Commonwealth v. Wright*, 230 MAL 2021.³

This Court should grant review on this issue of first impression to restore those statutory and constitutional mandates.⁴ See Pa.R.A.P. 1114(b)(3). Mr. May’s case is an ideal one to review, as the record is unambiguous that the trial court imposed a fine of \$1,000, the lowest that it believed was “consistent with the statute,” after hearing that, while employed, Mr. May nevertheless had to live with his mother and provides support for a minor child. (N.T. Nov. 23, 2020 at 11). Indeed, the trial court believed it was *prohibited* from considering Mr. May’s ability to pay. This is not a case about discretion—it is an appeal that involves pure questions of law.

Rather than repeating the well-reasoned argument put forth by Mr. May and other Amici regarding the Superior Court’s legal errors, Amici here address the broader impact of that court’s decision, which substantially narrows protections for indigent Pennsylvanians and is an important issue impacting the thousands of indigent defendants are punished with unaffordable fines that have lasting

³ Those petitions have been held pending resolution of *Lopez*. However, while *Lopez* will address the meaning of Pa.R.Crim.P. 706(C), it will not address the statutory or constitutional arguments set forth here, which apply to fines and not the costs at issue in *Lopez*.

⁴ In *Ford*, this Court addressed “non-mandatory” fines, as the Commonwealth only appealed from the Superior Court its loss on the issue of those discretionary fines. See *Ford*, 217 A.3d at 827-28 (explaining in the procedural background portion of the opinion that the Superior Court panel distinguished between “mandatory” and discretionary fines, but only the discretionary fines were appealed to this Court). The Court has never addressed the issues presented here.

repercussions for years and even decades. *See* Pa.R.A.P. 1114(b)(4). An analysis of court data from the Administrative Office of Pennsylvania Courts (“AOPC”) shows that most public defender clients still owe such court debt even *ten years* after sentencing, long after most defendants who have employed private counsel (and generally have more means) have paid their debt in full.⁵ Indeed, AOPC’s own website shows that only 45% of the nearly \$57 million in fines imposed in 2012 has been collected to date.⁶ Collection rates are so low not because most defendants disregard their financial obligations, but because most defendants are low-income or indigent and already struggle to meet their basic life needs, such as housing, food, medical care, transportation, and dependent care. While their fines remain unpaid, those defendants face arrest, incarceration, probation revocation, driver’s license suspension, and the denial of certain forms of public assistance.

The ACLU of Pennsylvania urges this Court to restore the protections in Section 9726 and the Excessive Fines Clause to prohibit imposing disproportionate punishment on indigent Pennsylvanians.

⁵ Jeffrey Ward et al., ACLU of Pennsylvania, “Imposition and Collection of Fines, Costs, and Restitution in Pennsylvania Criminal Courts: Research in Brief” at 5-7 (2020) [hereinafter “ACLU Report”].

⁶ Administrative Office of Pennsylvania Courts, “Collection Rates Over Time,” <http://www.pacourts.us/news-and-statistics/research-and-statistics/dashboard-table-of-contents/collection-rate-of-payments-ordered-by-common-pleas-courts>.

Argument

A. Data from AOPC shows that courts are imposing unaffordable fines that undermine the public policy goals behind Section 9726 and the Excessive Fines Clause.

Put simply, public defender clients are largely unable to afford the fines imposed upon them. Courts of common pleas imposed \$28 million in fines on defendants in 2020, but AOPC’s data shows that most of the fines imposed on public defender clients will never be paid. The practice of imposing uncollectable fines on indigent defendants sets up a cycle of futility that harms defendants and forces courts to waste resources chasing after bad debts.

The place to start understanding the problem is with collection rates over the past decade. This table, comprised of figures from AOPC’s website, shows the financial obligations imposed in 2012 and 2017, and the percentages collected to date:⁷

Year	Fines Imposed	Percent Collected	Costs Imposed	Costs Collected	Restitution Imposed	Restitution Collected
2012	\$57 million	45%	\$239 million	58%	\$134 million	26%
2017	\$43 million	38%	\$263 million	51%	\$105 million	24%

These collection rates, even ten years after sentencing, are abysmal. Most of the money is collected within the first five years of sentencing, and fines only trickle in

⁷ Administrative Office of Pennsylvania Courts, “Collection Rates Over Time,” <http://www.pacourts.us/news-and-statistics/research-and-statistics/dashboard-table-of-contents/collection-rate-of-payments-ordered-by-common-pleas-courts>.

after that. A decade after sentencing, approximately \$235 million in fines, costs, and restitution remains unpaid—with restitution to victims lagging far behind the collection of fines and costs. *Id.*

While those statistics show overall collections, the ACLU of Pennsylvania recently purchased 10 years of complete case data from AOPC to dive into the wealth-based inequities attendant to the imposition and collection of fines and costs. With help from data scientists at Temple and Rutgers Universities, our statistical analysis shows that the defendants who actually pay their fines in full are those with private counsel, which we used as a proxy for relative wealth compared to defendants who have public defenders or other court-appointed counsel.

The outcomes are stark. Courts impose larger fines on defendants with private counsel than those with public defenders: the median amounts are \$700 versus \$300, respectively (well below the \$1,000 fine imposed on Mr. May). ACLU Report at 5. Within five years, most defendants with private counsel had entirely paid their fines. But even after *ten years*, most defendants represented by public defenders still had outstanding fines. *Id.* Indeed, for cases adjudicated in 2008, by mid-2019 more than half of public defender cases with fines—57%—still had an outstanding balance. *Id.* at 7.

These figures highlight how the criminal justice system is imposing debilitating, decades-long financial burdens on the poorest Pennsylvanians while

letting better-resourced people off comparatively lightly. But this analysis also provides critical information about how this Court—by ensuring faithful compliance with Section 9726 and the Excessive Fines Clause at sentencing—can improve the balance and promote fairness for indigent defendants.

The Superior Court’s flawed approach to statutory interpretation, and its indifference to the Excessive Fines Clause, is only exacerbating these inequities. Fines are imposed in less than 40% of cases with public defender clients. ACLU Report at 4. The likely reason for this is that in *most* cases the only fines are discretionary, and both *Ford* and the Superior Court’s progenitors have made clear that courts must consider a defendant’s ability to pay those discretionary fines at sentencing under Section 9726. The remaining cases in which fines are imposed against public defender clients are likely cases with specific fines, such as here, in which the Superior Court’s mistaken interpretation of Section 9726 has *prohibited* trial courts from considering ability to pay. This saddles indigent defendants with an unaffordable debt that follows most of them into a second decade after sentencing.

B. Defendants who are assessed unaffordable amounts of fines face the ongoing and continuous risk of punishment for as long as they owe those fines.

Mr. May and other indigent defendants who cannot afford to pay face significant consequences for as long as they owe them. The reality is that indigent

defendants in the criminal justice system cannot handle even comparatively minor financial emergencies, let alone significant fines: approximately 40% of adults, for example, would not be able to pay an unexpected \$400 expense out of pocket,⁸ and in Delaware County—where Mr. May lives—9.3% of the population is below the federal poverty level.⁹ Accordingly, a fine on an individual like Mr. May has a substantially different impact for a far longer period of time than a fine imposed on a person for the same offense who has significant financial resources.

It was the legislature’s concern about disproportionate punishment that led to the adoption of Section 9726, putting strict limitations on the imposition of such fines in a manner that is also consistent with and codifies constitutional limitations. While there is no direct legislative history addressing Section 9726(c) and (d), Pennsylvania’s legislature adopted it verbatim from Section 7.02 of the 1962 Model Penal Code. The Commentary to the Code thus provides valuable insight into the central role that Section 9726 plays in protecting indigent defendants from unaffordable fines and ensuring equal justice regardless of wealth. The American Law Institute noted that “to a very large extent the impact” of using fines “turns on the means of the defendant”:

⁸ Board of Governors of the Federal Reserve, Report on the Economic Well-Being of U.S. Households in 2018, at 21 (2019), <https://bit.ly/3c6SOfD>.

⁹ U.S. Census Bureau, QuickFacts: Delaware County, Pennsylvania, <https://www.census.gov/quickfacts/delawarecountypennsylvania>. The 2021 Federal Poverty Guideline for a single-person household is \$12,880. *See* 86 FR 7733.

a defendant of wealth is often unaffected by a fine and may be more than willing to treat the fine as an acceptable cost of engaging in prohibited conduct; a defendant of very limited assets, however, may be devastated by even a small fine that causes economic hardship both to him and to his family out of proportion to the gravity of the offense.

Model Penal Code and Commentaries at 240. Accordingly “the court is not permitted to impose a fine on a defendant who is unable to pay it at the time of sentence and who will not be able to pay a deferred fine in installments or a lump sum.” *Id.* By barring unaffordable fines, the only cases where fines are unpaid should be those where “an error as to the application of this criterion has been made (in which case the fine should be set aside) or cases in which the defendant could pay the fine but has refused to do so.” *Id.*

Unfortunately, the disproportionate harm that motivated the legislature decades ago remains real for too many Pennsylvanians today. Certainly the consequences of owing unaffordable fines still include the risk of contempt hearings and incarceration. *See, e.g., Commonwealth v. Mauk*, 185 A.3d 406, 411-12 (Pa. Super. Ct. 2018) (defendant illegally held in contempt and jailed without consideration of individual circumstances); *Commonwealth v. Sneeringer*, 1344 MDA 2019, 2020 WL 996900 (Pa. Super. Ct. Mar. 2, 2020) (unpublished) (same). But the harms that indigent defendants suffer go well beyond that and lead to a variety of collateral consequences, including:

- Arrest for “failure to pay” bench warrants, even if the defendant has not missed a court hearing;¹⁰
- Driver’s license suspension;¹¹
- Denial of Temporary Assistance for Needy Families (“TANF”);¹²
- Denial of food stamps through the Supplemental Nutrition Assistance Program (“SNAP”);¹³ and
- Denial of the ability to apply for a pardon.¹⁴

As is evident from this list, owing fines makes it *far* more difficult for defendants to rehabilitate and become productive members of society. They lose their jobs because they are arrested and detained. They cannot get to work because the court suspended their driver’s license, something that occurs in tens of thousands of cases every year in Pennsylvania.¹⁵ An open warrant for missing payments means they cannot obtain food stamps to feed themselves and their family members. They are perpetually on probation. Some of these consequences, such as driver’s license suspension or denial of access to TANF, should—in

¹⁰ Pa.R.Crim.P. 706 Explanatory Comment.

¹¹ 75 Pa.C.S. § 1533

¹² 62 P.S. § 432(9); Pennsylvania Department of Human Services, SNAP Handbook ch. 503 app. B, http://services.dpw.state.pa.us/oimpolicymanuals/snap/503_General_Information/503_Appendix_B.htm (explaining that a defendant must have paid all fines, costs, or restitution, or be on a court-approved payment plan to receive benefits).

¹³ SNAP Handbook at ch. 503 app. B (explaining that an open warrant for violating a term of probation, which includes falling behind on payments, prevents eligibility for SNAP).

¹⁴ The Pennsylvania Board of Pardons will not advance pardon applications that have unpaid fines. *See* Pennsylvania Board of Pardons, “Legal Financial Obligations,” <https://www.bop.pa.gov/Pages/Fines-and-Costs.aspx>.

¹⁵ Joshua Vaughn, “A Trap of Low-Level Drug Arrests and Court Debt in Pittsburgh,” *The Appeal* (Sept. 18, 2019), <https://theappeal.org/alleggheny-county-drug-arrests/> (explaining that in 2017, over 120,000 driver’s licenses were suspended for either nonpayment of fines and costs or for failure to respond to a traffic ticket).

theory—never occur because courts are supposed to put defendants on payment plans that they can afford. That, too, remains more of an aspirational goal in many courts; in *Commonwealth v. Diaz*, for example, the Superior Court invalidated a \$100-per-month payment plan that the trial court imposed on an indigent defendant without considering the defendant’s ability to pay. 191 A.3d 850, 866 (Pa. Super. Ct. 2018). Payment plans of \$5—or \$0, if the defendant can afford nothing more, at least temporarily—are legally required but rarely permitted by trial courts.

In 2017, the Interbranch Commission reported that many individuals who owe court debt in Pennsylvania are incarcerated, prevented from being eligible for probation or parole, denied access to Accelerated Rehabilitative Disposition, or kept on probation until they pay all of their court costs.¹⁶ One Cumberland County judge described in the report “prefer[red]” that defendants “appear in court before their probation expires so he can extend their probation,” despite such a practice being unlawful. Interbranch Report at 15. Penalizing probationers because they cannot pay court debt in full is unfortunately a problem throughout the Commonwealth. See *Commonwealth v. Hudson*, 231 A.3d 974 (Pa. Super. Ct.

¹⁶ Pa. Interbranch Comm’n for Gender, Racial, and Ethnic Fairness, *Ending Debtors’ Prisons in Pennsylvania: Current Issues in Bail and Legal Financial Obligations: A Practical Guide for Reform* 15 (2017), http://www.pa-interbranchcommission.com/commit_criminal-justice.php [“Interbranch Report”].

2020) (Philadelphia judge illegally revoked probation and incarcerated indigent defendant for 1 ½ to 3 years because he had not paid financial obligations in full).

The data on the harm to defendants and their families continues to accumulate. In 2020, the Philadelphia Office of Community Empowerment and Opportunity, a city agency, surveyed currently and formerly incarcerated Philadelphians and their loved ones to quantify the impact of prison fees and court fines and fees. 72% of the respondents reported that this court debt led to financial and other consequences.¹⁷ The most common consequences reported were bench warrants, late fees, arrest warrants, and reincarceration. CEO Report at 5. More than half had to borrow money from family or friends, or fell behind on household bills to pay the court, which is unsurprising, given that of those who reported any income, 64% reported household income of \$25,000 a year or less. *Id.* This criminal court debt acutely affects the lives of defendants and their families. In the words of one survey participant, “They put a burden on already burdened individuals.” *Id.*

There is a real risk of increased recidivism, as well, as defendants find it more difficult to successfully reenter society if they face barriers to work and

¹⁷ City of Philadelphia Office of Community Empowerment and Opportunity, “The Impact of Criminal Court and Prison Fines and Fees in Philadelphia,” at 2 (May 5, 2021), <https://www.phila.gov/documents/the-impact-of-criminal-court-and-prison-fines-and-fees-in-philadelphia/> [“CEO Report”].

housing because they cannot receive pardons or expungements of their records if they owe fines. Interbranch Report at 16. In other words, from “seeking and maintaining employment and housing, to obtaining public benefits, to meeting financial obligations such as child support, to exercising the right to vote, criminal justice debt is a barrier to individuals seeking to rebuild their lives after a criminal conviction.”¹⁸

The better course of action is reflected in the American Bar Association’s *Ten Guidelines on Court Fines and Fees*.¹⁹ As the ABA explains, “consideration of a person’s ability to pay at each stage of proceedings is critical to avoiding what are effectively ‘poverty penalties’” in the form of additional fees or jailing.²⁰ The Guidelines—which, incidentally, highlight a docket sheet from Cambria County, Pennsylvania as the primary exhibit of excessive assessments—reflect the fact that imposing unaffordable financial obligations on defendants harms us all:

The effect is that poor people are punished because of their poverty This harms us all. When people are jailed, or their driver’s licenses are suspended, because they cannot afford to pay court fines or fees, they face heightened barriers to employment and education, disrupting families and undermining community stability. Similarly, requiring fees to access diversion or treatment programs, such as “drug courts,” creates a two-tiered system of justice—one for

¹⁸ Alicia Bannon et al., “Criminal Justice Debt: A Barrier to Reentry,” Brennan Center for Justice (Oct. 4, 2010) at 27, <https://www.brennancenter.org/publication/criminal-justice-debt-barrier-reentry>.

¹⁹ ABA, “Resolution 114 Adopting Guidelines on Court Fines and Fees,” (2018), <https://www.americanbar.org/content/dam/aba/images/abanews/2018-AM-Resolutions/114.pdf> [“ABA Guidelines”].

²⁰ *Id.* at PDF page 4.

the rich and one for the poor. These effects detract from public trust in our justice system, including our law enforcement officials and our courts.²¹

All of these downstream, collateral consequences can be avoided if courts do not impose fines that are beyond the defendant's means. Not only is this good public policy, but it is also required by Section 9726 and the Excessive Fines Clause.

Conclusion

For the foregoing reasons, this Court should grant Mr. May's Petition for Allowance of Appeal and restore the prohibition against unaffordable fines that is required by the Excessive Fines Clause and the legislature wisely codified in Section 9726.

Respectfully submitted,



Andrew Christy
PA ID No. 322053



Stephen A. Loney, Jr.
Pa. I.D. No. 202535

²¹ *Id.* at PDF page 22.

AMERICAN CIVIL LIBERTIES UNION
OF PENNSYLVANIA
P.O. Box 60173
Philadelphia, PA 19102
215-592-1513 x138
achristy@aclupa.org

Date: March 17, 2022

Counsel for Amici Curiae

CERTIFICATE OF COMPLIANCE WITH WORD LIMIT

I certify pursuant to Pa.R.A.P. 531 that this brief does not exceed 4,500 words.

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the parties via PACFile.

Dated: March 17, 2022

/s/ Andrew Christy
Andrew Christy