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7  
8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
9 STATE OF CALIFORNIA

10  
11 In the Matter of:

FPPC Case No. 16/19903

12 BROOKE ASHJIAN,

STIPULATION, DECISION AND ORDER

13  
14 Respondent.

15  
16 INTRODUCTION

17 Brooke Ashjian (“Ashjian” or “Respondent”) was a trustee on the board (the “Board”) of the  
18 Fresno Unified School District (the “District”) from 2014 to 2018.

19 The conflict of interest provisions of the Political Reform Act (the “Act”)<sup>1</sup> prohibit a public  
20 official from making, participating in making, or attempting to use his official position to influence a  
21 governmental decision in which the official knows or has reason to know he has a financial interest.  
22 Although the Enforcement Division found no evidence that Ashjian intended to conceal, deceive, or  
23 mislead the public, Ashjian violated the Act by voting on items before the Board in which he had a  
24 financial interest. Further, Ashjian violated the Act by failing to timely disclose source of income and  
25 real property interests, some related to the conflicted decisions, on his Assuming Office, 2015 Annual,

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28 <sup>1</sup> The Political Reform Act is contained in Government Code §§ 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in §§ 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

1 and 2016 Annual Statements of Economic Interests (“SEI”).

## 2 **SUMMARY OF THE LAW**

3 All legal references and discussions of law pertain to the Act’s provisions as they existed at the  
4 time of the applicable violations.

### 5 Need for Liberal Construction and Vigorous Enforcement of the Political Reform Act

6 When enacting the Act, the people of California found and declared that previous laws regulating  
7 political practices suffered from inadequate enforcement by state and local authorities.<sup>2</sup> For this reason,  
8 the Act is to be construed liberally to accomplish its purposes.<sup>3</sup>

9 There are many purposes of the Act. One purpose is to ensure that the assets and income of public  
10 officials be disclosed and public officials are disqualified from certain matters in order that conflicts of  
11 interest may be avoided.<sup>4</sup> Another is to provide adequate enforcement mechanisms so that the Act will be  
12 “vigorously enforced.”<sup>5</sup>

### 13 Statements of Economic Interests

14 The Act requires every local agency to adopt and promulgate a conflict of interest code, and any  
15 violation of such a code is deemed a violation of the Act.<sup>6</sup> An agency’s conflict of interest code must  
16 specifically designate the positions within the agency required to file SEIs and identify what economic  
17 interests must be disclosed by officials in those positions.

18 Pursuant to the District’s Conflict of Interest Code, members of the Board must file SEIs that  
19 disclose interests in real property located entirely or partly within District boundaries, or within two  
20 miles of District boundaries, or of any land owned or used by the District. Members of the Board must  
21 also disclose investments or business positions in or income, including gifts, loans, and travel payments,  
22 from sources which: 1) are engaged in the acquisition or disposal of real property within the District; 2)  
23 are contractors or subcontractors which are or have been within the last two years engaged in work or  
24 services of the type used by the District; or 3) manufacture or sell supplies, books, machinery, or

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26 <sup>2</sup> Section 81001, subd. (h).

27 <sup>3</sup> Section 81003.

28 <sup>4</sup> Section 81002, subd. (c).

<sup>5</sup> Section 81002, subd. (f).

<sup>6</sup> Section 87300.

1 equipment of the type used by the District.

2 A source of income includes the filer's pro rata share of income received by any business entity in  
3 which the filer has a ten percent or greater ownership interest.<sup>7</sup> In addition, filers must disclose the names  
4 and sources of income to a business entity if the filer's pro rata share of the gross income from a single  
5 reportable source was \$10,000 or more during the reporting period.<sup>8</sup>

6 Conflicts of Interest

7 A public official may not make, participate in making, or attempt to use his official position to  
8 influence a governmental decision in which he knows, or has reason to know, he has a financial interest.<sup>9</sup>

9 A public official has a financial interest in a decision if it is reasonably foreseeable that the decision will  
10 have a material financial effect, distinguishable from its effect on the public generally, on any source of  
11 income aggregating \$500 or more in value provided or promised to, received by, the public official  
12 within 12 months prior to the time when the decision is made; or any real property in which the public  
13 official has a direct or indirect interest worth \$2,000 or more.<sup>10</sup>

14 A material financial effect is reasonably foreseeable when the financial interest is explicitly  
15 involved in the governmental decision, such as being the named party or is the subject of a governmental  
16 decision before the official or the official's agency.<sup>11</sup> A financial interest is the subject of a proceeding if  
17 the decision involves the issuance, renewal, approval, denial or revocation or any license, permit, or other  
18 entitlement, or contract with, the financial interest. When the official receives income in exchange for the  
19 sale of goods or services, the financial effect is material if the source is a claimant, applicant, respondent,  
20 contracting party, or is otherwise named or identified as the subject of the proceeding.<sup>12</sup>

21 A financial effect need not be likely to be considered reasonably foreseeable. In general, if the  
22 financial effect can be recognized as a realistic possibility and more than hypothetical or theoretical, it is  
23 reasonably foreseeable. If the financial result cannot be expected absent extraordinary circumstances not  
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25 <sup>7</sup> Section 82030, subd. (a).

26 <sup>8</sup> Regulation 18730, subd. (b)(7)(C)(2), incorporated by reference in the District's Conflict of Interest Code.

27 <sup>9</sup> Section 87100.

28 <sup>10</sup> Section 87103, subs. (b) and (c).

<sup>11</sup> Regulation 18701, subd. (a).

<sup>12</sup> Regulation 18702.3, subdivision (a)(1).

1 subject to the public official's control, it is not reasonably foreseeable. In determining whether a  
2 governmental decision will have a reasonably foreseeable financial effect on a financial interest that is  
3 not explicitly involved in the governmental decision, the following factors should be considered: (1) The  
4 extent to which the occurrence of the financial effect is contingent upon intervening events, not including  
5 future governmental decisions by the official's agency, or any other agency appointed by or subject to the  
6 budgetary control of the official's agency; (2) Whether the public official should anticipate a financial  
7 effect on his or her financial interest as a potential outcome under normal circumstances when using  
8 appropriate due diligence and care; (3) Whether the public official has a financial interest that is of the  
9 type that would typically be affected by the terms of the governmental decision or whether the  
10 governmental decision is of the type that would be expected to have a financial effect on businesses and  
11 individuals similarly situated to those businesses and individuals in which the public official has a  
12 financial interest; (4) Whether a reasonable inference can be made that the financial effects of the  
13 governmental decision on the public official's financial interest might compromise a public official's  
14 ability to act in a manner consistent with his or her duty to act in the best interests of the public;  
15 (5) Whether the governmental decision will provide or deny an opportunity, or create an advantage or  
16 disadvantage for one of the official's financial interests, including whether the financial interest may be  
17 entitled to compete or be eligible for a benefit resulting from the decision; (6) Whether the public official  
18 has the type of financial interest that would cause a similarly situated person to weigh the advantages and  
19 disadvantages of the governmental decision on his or her financial interest in formulating a position.<sup>13</sup>

20 When the financial interest is real property, the financial effect is material whenever the  
21 governmental decision involves property located 500 feet or less from the financial interest unless there  
22 is clear and convincing evidence that the decision will not have any measurable impact on the official's  
23 property.<sup>14</sup>

#### 24 **SUMMARY OF THE FACTS**

25 Ashjian was elected to the Board in the November 4, 2014 General Election. He did not seek re-  
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28 <sup>13</sup> Regulation 18701, subd. (b).

<sup>14</sup> Regulation 18702.2, subd. (a)(7).

1 election in 2018, and is no longer on the Board.

2 **Failure to Timely Report on SEIs**

3 Ashjian timely filed his original Assuming Office and 2015 SEIs. However, Ashjian failed to  
4 timely report certain economic interests on those SEIs. In particular, Ashjian failed to report certain “pass  
5 through” source of income interests of \$10,000 or more related to his business investment/source of  
6 income interest in a company called Witbro Inc., dba Seal Rite Paving (“Witbro”).<sup>15</sup> Specifically,  
7 Ashjian failed to timely report the following single sources of income on his SEIs:

8 <b>SEI</b>	<b>Source of Income</b>
9 Assuming Office	Todd Companies
10 Assuming Office	Valley Steel
11 Assuming Office	City of Fresno
12 Assuming Office	Fresno Heart Hospital
13 Assuming Office	Wawona Foods
14 Assuming Office	Clark Bros
15 Assuming Office	Robert Hemseth
16 Assuming Office	Doug Jensen
17 Assuming Office	Ginder Development
18 Assuming Office	Fresno Unified School District
19 Assuming Office	Mark Wilson Const.
20 Assuming Office	LC Nelson
21 Assuming Office	Zumwalt Construction
22 Assuming Office	RMC Construction
23 Assuming Office	Harris Construction
24 Assuming Office	Bernards
25 Assuming Office	Central Unified School District
26 2015	Bernards

27  
28 <sup>15</sup> Ashjian has a greater than 10 percent interest in Witbro. Ashjian also serves as CEO of Witbro.

2015	Central Unified School District
2015	City of Fowler
2015	City of Fresno
2015	David Bush Construction Inc.
2015	Floyd Harlan
2015	Fresno County
2015	Ginder Development
2015	Hoback LLC
2015	Howe Electric
2015	Annex Kitchen
2015	The Ryan Company
2015	Seals-Biehle Inc.
2015	Spadier Construction
2015	Stockbridge General
2015	Valley Steel Construction
2015	Vulcan Construction

On September 1, 2016, Ashjian filed amendments to his Assuming Office and 2015 Annual SEIs that disclosed the aforementioned source of income interests.

Ashjian also failed to timely report certain real property interests on his SEIs. In particular, Ashjian held an interest in certain parcels of real property through the entity Saltwater Croc Inc.,<sup>16</sup> in which he held a business investment and source of income interest. Ashjian failed to timely report the following real property interests on his SEIs:

<b>SEI</b>	<b>Description of Real Property</b>
Assuming Office	406-101-10 GWIB Apartments

<sup>16</sup> Saltwater Croc Inc. is wholly owned by “Tere Brooke Ashjian and Gina M. Ashjian, Co-Trustees of the Ashjian Family Trust dated 6/19/01, as amended.”

Assuming Office	416-060-34 1429 W. Morris Ave.
Assuming Office	425-272-07 4691 N. Fruit Ave.
Assuming Office	435-041-09 715 W. Dakota Ave.
Assuming Office	444-243-10 1675 N. Teilman Ave.
Assuming Office	452-081-12 252 E. Clay Ave.
Assuming Office	453-224-16 4409 E. Hedges Ave.
Assuming Office	453-292-25 4135 E. Olive Ave. A-B
Assuming Office	454-022-01 3254 E. Olive Ave.
Assuming Office	454-022-03 3272 E. Olive Ave.
Assuming Office	454-033-11 1027 N. 5th St.
Assuming Office	454-051-30 3925 E. Clay Ave.
Assuming Office	454-051-33 3935 E. Clay Ave.
Assuming Office	454-203-09 3786 E. Thomas Ave.
Assuming Office	461-165-22 302 S. Chestnut Ave.

On May 18, 2017, Ashjian filed an amendment to his Assuming Office SEI that disclosed 14 of the 15 aforementioned parcels. On September 14, 2017, Ashjian filed an additional amendment to his Assuming Office SEI that disclosed the remaining real property interest.

Ashjian also failed to timely report one real property interest owned directly by Ashjian on his Assuming Office SEI, one real property interest owned by his business GWIB, Inc. on his 2016 Annual SEI, and one real property interest owned by his business Enter the Dragon, LLC on his Assuming Office

1 and 2015 Annual SEIs. These interests were also later disclosed on amendments.

2 **Conflicts of Interest**

3 As provided above, Ashjian held certain source of income financial interests in “pass-through”  
4 customers of his business, Witbro, and real property interests. In 2015, 2016, and 2018, as a member of  
5 the Board, Ashjian participated in certain governmental decisions involving these financial interests.

6 June 3, 2015 Decision re: Bank of the West

7 At a public meeting on June 3, 2015, the Board voted to approve a three-year renewal of a  
8 banking services agreement with Bank of the West. The item appeared on the consent agenda, which  
9 Ashjian voted approval of.

10 Witbro received \$9,121 in payments from Bank of the West in the 12 months prior to the June 3,  
11 2015 decision. The payments were related to sealing work done at bank branches in Fresno and Clovis.

12 Given that Ashjian had a financial interest in Witbro, Ashjian also had a source of income  
13 financial interest in Bank of the West since Witbro received payments of \$500 or more in the 12 months  
14 prior to the decision.

15 Since Ashjian’s financial interest, Bank of the West, was explicitly involved in the subject  
16 governmental decision as a contracting party, it was presumed reasonably foreseeable that the decision  
17 would have a material financial effect on the interest, resulting in a conflict of interest.

18 February 10, 2016 Decision re: Mark Wilson Construction

19 At a public meeting on February 10, 2016, the Board voted to approve a bid, in the amount of  
20 \$2,530,869, from Mark Wilson Construction for a modernization project related to Addicott Elementary  
21 School. The item was pulled from the consent agenda for further discussion. Although he did not speak  
22 on the matter, Ashjian voted to approve the bid.

23 Witbro received \$3,968 in payments from Mark Wilson Construction in the 12 months prior to  
24 the February 10, 2016 decision. The payments were related to sealing work done for Mark Wilson  
25 Construction at Sierra Vista School in Clovis.

26 Given that Ashjian had a financial interest in Witbro, Ashjian also had a source of income  
27 financial interest in Mark Wilson Construction since Witbro received payments of \$500 or more in the 12  
28 months prior to the decision.



1 Since Ashjian’s financial interest, Mark Wilson Construction, was explicitly involved in the  
2 subject governmental decision as a contracting party, it was presumed reasonably foreseeable that the  
3 decision would have a material financial effect on the interest, resulting in a conflict of interest.

4 June 1, 2016 Decision re: Bush Construction

5 At a public meeting on June 1, 2016, the Board voted to approve a bid, in the amount of  
6 \$9,287,000, from David A. Bush Inc. (Bush Construction) for a school classroom building addition  
7 project related to Figarden Elementary School (“Item A-7”). The item appeared on the consent agenda,  
8 which Ashjian voted approval of.

9 Witbro received \$904,730 in payments from Bush Construction in the 12 months prior to the June  
10 1, 2016 decision. The payments were related to paving work done for Bush Construction in conjunction  
11 with projects for the Kings Canyon Unified School District.

12 Given that Ashjian had a financial interest in Witbro, Ashjian also had a source of income  
13 financial interest in Bush Construction since Witbro received payments of \$500 or more in the 12 months  
14 prior to the decision.

15 Since Ashjian’s financial interest, Bush Construction, was explicitly involved in the subject  
16 governmental decision as a contracting party, it was presumed reasonably foreseeable that the decision  
17 would have a material financial effect on the interest, resulting in a conflict of interest.

18 Ashjian contends that he mistakenly voted on Item A-7 and that, having realized the error, he  
19 thereafter, during the same meeting, requested that the vote be amended by Board Secretary Jennifer  
20 Aguilar to reflect his abstention due to a potential conflict of interest.

21 At a public meeting on June 15, 2016, the Board voted to approve a version of the minutes of the  
22 June 1, 2016 meeting, with certain corrections incorporated. In particular, during the June 15, 2016  
23 meeting, Ashjian claimed that he abstained from voting on Item A-7. The approved version of the June 1,  
24 2016 meeting minutes shows that Item A-7 was removed from the consent agenda for a separate vote,  
25 and that Ashjian abstained from that vote after no discussion on the item. However, this version of events  
26 contradicts the video of the meeting.

27 March 21, 2018 Decision re: Rata High School

28 At a public meeting on March 21, 2018, the Board voted to approve a bid, in the amount of

1 \$5,210,000, from BVI Construction, Inc. for a modernization project related to Rata High School. The  
2 item appeared on the consent agenda, which Ashjian voted approval of.

3 Ashjian has a real property interest in residential property at 1440 W. Morris Avenue, APN 416-  
4 060-31 (the "Property"). The Property is owned by Ashjian directly. The Property is located 377 feet  
5 from Rata High School.

6 Given the realistic possibility that the modernization of a nearby school would impact the value of  
7 the Property, the financial effect of the decision was reasonably foreseeable. Since Rata High School is  
8 located within 500 feet of the Property, a financial interest of Ashjian, the reasonably foreseeable  
9 financial effect of the decision is presumed material, resulting in a conflict of interest.

### 10 VIOLATIONS

#### 11 Counts 1 and 2: Failure to Timely Disclose Source of Income and Real Property Interests on 12 Statements of Economic Interests

13 Ashjian failed to timely disclose source of income and real property interests on his Assuming  
14 Office, 2015 Annual, and 2016 Annual Statements of Economic Interests, in violation of Sections 87300,  
15 87206, and 87207.

#### 16 Count 3: Conflict of Interest – Made Governmental Decision in Which Public Official Had 17 Financial Interest

18 By voting to approve a three-year renewal of a banking services agreement with Bank of the  
19 West, a source of income financial interest, on June 3, 2015, Ashjian, a public official, made a  
20 governmental decision in which he knew, or had reason to know, he had a financial interest, in violation  
21 of Section 87100.

#### 22 Count 4: Conflict of Interest – Made Governmental Decision in Which Public Official Had 23 Financial Interest

24 By voting to approve a bid from Mark Wilson Construction, a source of income financial interest,  
25 for a school modernization project, on February 10, 2016, Ashjian, a public official, made a  
26 governmental decision in which he knew, or had reason to know, he had a financial interest, in violation  
27 of Section 87100.

28 ///



1 The Commission also considers penalties in prior cases involving similar violations. Recent  
2 similar cases involving a failure to timely report interests on SEIs and/or conflict of interest violations  
3 include the following:

4 • *In the Matter of Juanita Perea*; FPPC No. 17/1310. Respondent, the executive director of a  
5 charter school, made payments to a landscaping business that was her spousal source of income from  
6 2015 to 2017, in violation of Section 87100. In July 2019, the Commission approved a penalty of \$4,000  
7 on each of three counts.

8 • *In the Matter of Joshua Mitchell*; FPPC No. 14/1333. Respondent, a mayor, failed to timely  
9 disclose a source of income interest on his 2012 and 2013 Annual SEIs, in violation of Section 87207;  
10 and voted twice on items that had a reasonably foreseeable material financial effect on a subdivision,  
11 which served as a source of income to the respondent via two landscaping businesses, thereby resulting  
12 in prohibited conflicts of interest, in violation of Section 87100. In June 2019, the Commission approved  
13 penalties of \$2,000 on one SEI non-reporter count, and \$4,000 on one conflict of interest count.

14 As to Counts 1 and 2, Ashjian is deserving of per count penalties higher than that approved in the  
15 *Mitchell* case. Similar to *Mitchell*, Ashjian here failed to timely report source of income interests on  
16 multiple SEIs, and (at least some of) those interests were related to governmental decisions made by him.  
17 Further, Ashjian failed to timely report various real property interests. In *Mitchell*, however, only one  
18 interest was at issue. Here, Ashjian failed to timely report a total of 29 different source of income  
19 interests and 18 different real property interests. As a result, it is appropriate to charge the SEI non-  
20 reporter violations across two counts, with higher penalties for each.

21 As to Counts 3 through 5, these violations are deserving of per count penalties higher than what  
22 was approved in the two recent comparable cases. Although the charged counts in the *Perea* and *Mitchell*  
23 cases included more discrete governmental decisions, the financial impact of the subject decisions here,  
24 in the aggregate, is higher than those at issue in the comparable cases.

25 As to Count 6, a penalty similar to those awarded in the *Perea* and *Mitchell* cases is justified.  
26 Although the value of the subject project is high, Ashjian's financial interest was not explicitly involved  
27 in the decision.

28 In aggravation of Count 6, Ashjian committed additional violations of the Act's conflict of

1 interest provisions by making other governmental decisions in which he knew (or should have known) he  
 2 had a real property financial interest. Ashjian owns a multitude of residential properties in Fresno County  
 3 through his business Salt Water Croc, Inc. Ashjian made five different governmental decisions between  
 4 2015 and 2018 that had a reasonably foreseeable material financial effect on those real property interests.  
 5 With each decision, Ashjian voted to approve construction, improvements, etc. related to schools within  
 6 500 feet of his real property interests. In the interest of settlement, however, these additional violations  
 7 are not charged separately herein.

8 In aggravation of all counts, Ashjian committed additional violations of the Act that are not being  
 9 charged herein, in the interest of settlement. In particular, on his Assuming Office and 2015 Annual SEIs,  
 10 Ashjian failed to disclose that Witbro does business as “Seal Rite Paving.” This additional information  
 11 was added later on amendments to his SEIs filed on September 1, 2016.

12 In mitigation, Ashjian was fully cooperative during the investigation in this case.

13 Based on the foregoing, the following penalties are recommended:

Count	Violation	Proposed Penalty
1	Failure to Timely Disclose Source of Income and Real Property Interests on Statements of Economic Interests	\$3,000
2	Failure to Timely Disclose Source of Income and Real Property Interests on Statements of Economic Interests	\$3,000
3	Conflict of Interest – Made Governmental Decision in Which Public Official Had Financial Interest	\$4,500
4	Conflict of Interest – Made Governmental Decision in Which Public Official Had Financial Interest	\$4,500
5	Conflict of Interest – Made Governmental Decision in Which Public Official Had Financial Interest	\$4,500
6	Conflict of Interest – Made Governmental Decision in Which Public Official Had Financial Interest	\$4,000
<b>TOTAL:</b>		<b>\$23,500</b>

26  
 27 **CONCLUSION**

28 Complainant, the Enforcement Division of the Fair Political Practices Commission, and

1 Respondent, Brooke Ashjian, hereby agree as follows:

2 1. Respondent violated the Act as described in the foregoing pages, which are a true and  
3 accurate summary of the facts in this matter.

4 2. This stipulation will be submitted for consideration by the Fair Political Practices  
5 Commission at its next regularly scheduled meeting—or as soon thereafter as the matter may be heard.

6 3. This stipulation resolves all factual and legal issues raised in this matter—for the purpose  
7 of reaching a final disposition without the necessity of holding an administrative hearing to determine the  
8 liability of Respondent pursuant to Section 83116.

9 4. Respondent has consulted with his attorneys, Charles H. Bell, Jr. and Sarah Lang, Bell,  
10 McAndrews & Hiltachk, LLP, and understands, and hereby knowingly and voluntarily waives, all  
11 procedural rights set forth in Sections 83115.5, 11503, 11523, and Regulations 18361.1 through 18361.9.  
12 This includes, but is not limited to, the right to appear personally at any administrative hearing held in  
13 this matter, to be represented by an attorney at Respondent’s own expense, to confront and cross-examine  
14 all witnesses testifying at the hearing, to subpoena witnesses to testify at the hearing, to have an impartial  
15 administrative law judge preside over the hearing as a hearing officer, and to have the matter judicially  
16 reviewed.

17 5. Respondent agrees to the issuance of the decision and order set forth below. Also,  
18 Respondent agrees to the Commission imposing against him an administrative penalty in the amount of  
19 \$23,500. One or more payments totaling this amount, to be paid to the General Fund of the State of  
20 California, is/are submitted with this stipulation as full payment of the administrative penalty described  
21 above, and they will be held by the State of California until the Commission issues its decision and order  
22 regarding this matter.

23 6. If the Commission declines to approve this stipulation—then this stipulation shall become  
24 null and void, and within fifteen business days after the Commission meeting at which the stipulation is  
25 rejected, all payments tendered by Respondent in connection with this stipulation shall be reimbursed to  
26 Respondent. If this stipulation is not approved by the Commission, and if a full evidentiary hearing  
27 before the Commission becomes necessary, neither any member of the Commission, nor the Executive  
28 Director, shall be disqualified because of prior consideration of this Stipulation.



1 The foregoing stipulation of the parties “In the Matter of Brooke Ashjian,” FPPC Case No. 16/19903 is  
2 hereby accepted as the final decision and order of the Fair Political Practices Commission, effective upon  
3 execution below by the Chair.

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5 IT IS SO ORDERED.

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7 Dated: \_\_\_\_\_

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9 Richard C. Miadich, Chair  
10 Fair Political Practices Commission  
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