

FILED

APR 18 2010

BEFORE THE DEPARTMENT OF REAL ESTATE

DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

By K. Contreras

* * * * *

In the Matter of the Accusation of)	No. H-36062 LA
)	L-2009080024
GARRETT BRADLEY TODD,)	
)	
)	
Respondent.)	
_____)	

DECISION

The Proposed Decision dated March 15, 2010, of the Administrative Law Judge of the Office of Administrative Hearings, is hereby adopted as the Decision of the Real Estate Commissioner in the above-entitled matter.

The Decision suspends or revokes one or more real estate licenses, but the right to a restricted license is granted to Respondent.

The right to reinstatement of a revoked real estate license or to the reduction of a suspension is controlled by Section 11522 of the Government Code. A copy of Section 11522 and a copy of the Commissioner's Criteria of Rehabilitation are attached hereto for the information of respondent.

This Decision shall become effective at 12 o'clock noon on May 10, 2010.

IT IS SO ORDERED 4/1/2010

JEFF DAVI
Real Estate Commissioner

Barbara J. Bigby

BY: Barbara J. Bigby
Chief Deputy Commissioner

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of
GARRETT BRADLEY TODD,
Respondent.

Case No. H-36062 LA
OAH No. 2009080024

PROPOSED DECISION

Nancy Beezy Micon, Administrative Law Judge with the Office of Administrative Hearings, heard this matter on January 20, 2010, in Los Angeles, California.

James A. Demus, Staff Counsel, represented Deputy Real Estate Commissioner Joseph Aiu (Complainant).

Frank M. Buda, Attorney at Law, represented Garrett Bradley Todd (Respondent). Respondent was present at the hearing.

The record was held open until February 3, 2010, for Respondent to submit additional evidence, and until February 10, 2010, for Complainant to raise objections to the receipt of the evidence. Respondent timely submitted a February 1, 2010 cover letter with an attached court document concerning the modification of an outstanding warrant in Superior Court, County of San Diego, case number M987253, marked collectively as Exhibit E. No objections were filed to the admissibility of Exhibit E, which was admitted in evidence.

The parties submitted the matter for decision on February 10, 2010.

FACTUAL FINDINGS

Jurisdiction and Background

1. On August 31, 2009, Complainant, in his official capacity, filed the Accusation against Respondent. Respondent filed the Notice of Defense on July 6, 2009.
2. Complainant contends Respondent's felony criminal conviction is grounds to revoke or suspend his real estate salesperson license and license rights, pursuant to Business and Professions Code sections 490 and 10177, subdivision (b). Respondent does not dispute

the conviction, but offered evidence in mitigation and rehabilitation. He contends the conviction does not merit revocation of his license.

3. Respondent is, and at all relevant times, was, licensed by the Department of Real Estate as a real estate salesperson. Respondent was originally licensed with a conditional salesperson license on February 20, 2008. The conditional salesperson license expired on August 20, 2009. The salesperson license will expire on February 19, 2012, unless renewed.

The Conviction

4. On May 28, 2008, following a guilty plea, the San Diego County Superior Court, in case number CD212260, convicted Respondent of violating Vehicle Code section 2800.2, subdivision (a) (reckless driving while evading a police officer), a felony. The superior court suspended imposition of Respondent's sentence and placed him on formal probation for three years.

5. The terms and conditions of Respondent's probation included serving 180 days in county jail with credit for one day served. The court stayed the jail sentence pending Respondent's completion of a work furlough program. The probationary terms and conditions also required Respondent to pay \$1,180 in fines and fees.

6. Respondent remains on probation through May 27, 2011. He is in compliance with the terms of his probation. He has paid his fines and fees.

7. The facts underlying the convictions are that, on March 2, 2008, Respondent drove in a reckless manner in San Diego County, California, in order to evade arrest by police officers. Respondent explained that, at the time, his place of employment was going out of business and his life was in shambles because he was an alcoholic. Therefore, when he was driving home at 3:00 a.m. after consuming alcohol with a suspended driver's license and an open beer can in the passenger seat of his vehicle, Respondent decided to flee in his vehicle for several miles when police officers put on their lights and sirens to pull him over for a traffic violation. Respondent ran several red lights during the pursuit and reached speed levels that were more than double the speed limit. After being pulled over, Respondent refused to exit his vehicle. When one of the police officers told respondent he could be shot if he did not exit the vehicle, Respondent responded: "Go ahead and fucking shoot me. Just fucking shoot me." Respondent was eventually shot with a taser because the police officers were concerned Respondent may again put the car in gear and attempt to flee. Respondent initially provided a false name and birth date to arresting officers. At hearing, Respondent was candid about the incident. He admitted he had consumed alcohol before driving his car.

8. Respondent described the incident in writing as follows: "I unlawfully evaded a peace officer's vehicle while driving in a willful and wanton disregard for the safety of persons and property." Respondent wrote this statement on April 29, 2008, on the sentencing court's criminal plea form. The form included Respondent's and Respondent's criminal attorney's signatures.

Conviction Pled In Aggravation

9. On August 24, 2006, following a guilty plea, the San Diego County Superior Court, in case number M987253, convicted Respondent of violating Vehicle Code section 23152, subdivision (a) (driving under the influence of alcohol), a misdemeanor. The superior court suspended imposition of Respondent's sentence and placed him on summary probation for five years. Complainant pled this conviction as a matter in aggravation.

10. The terms and conditions of Respondent's probation included payment of \$1,756 in fines and fees, restriction of his driver's license, completion of a first offender conviction program, completion of ten days of a public service work program, with credit for one day completed, and agreement that Respondent would not drive without a valid license and liability insurance, not drive with any measurable amount of alcohol or drugs in his blood, and would submit to chemical testing upon demand by any law enforcement officer. On November 13, 2008, Respondent's probation was revoked. Respondent explained at hearing that the revocation occurred because his compliance with a court order had not been recorded by the person responsible for recording it. Respondent requested that the record be held open in this matter because he had scheduled a court appearance, which was to take place after the hearing date, to clear up the outstanding warrant that had resulted from the matter. On January 26, 2010, the warrant was recalled and Respondent's probation was reinstated on the same terms.

11. The facts underlying the conviction are that, on March 4, 2006, Respondent drove while under the influence of alcohol in San Diego County, California. At hearing, Respondent explained that he fell asleep in his car, with his car keys in his pocket, after drinking at a fraternity party.

12. On August 16, 2006, Respondent described the incident in writing as follows: "Drove a vehicle while under the influence of alcohol." Respondent wrote this statement on the sentencing court's criminal plea form. The form included Respondent's and Respondent's criminal attorney's signatures.

Substantial Relationship

13. The crime which led to the May 28, 2008 conviction is substantially related to a real estate salesperson's qualifications, functions and duties by reason of California Code of Regulations, title 10, section 2910, subdivision (a)(8), in that it involved the commission of an unlawful act with the intent or threat of doing substantial injury to the person or property of another. Respondent's 2006 and 2008 crimes both involved Respondent driving after consuming alcohol. Driving under the influence of alcohol is an unlawful act that can so readily injure another that by doing it, the perpetrator does so "with the intent or threat of doing substantial injury to the person or property of another." (Cal. Code Regs., tit. 10, § 2910, subd. (a)(8).) Respondent's 2008 crime is also substantially related to a real estate salesperson's qualifications, functions, and duties by reason of California Code of Regulations, title 10, section 2910, subdivisions (a)(2) and (a)(4) because it involved

Respondent uttering false information when asked to provide his identity during the arrest. Additionally, two other criteria for a substantial relationship were met. Respondent's crime and conviction established a pattern of repeated and willful disregard of law. Respondent had drunk alcohol before driving in both the 2006 and 2008 crimes and each time, Respondent suffered significant criminal penalties. Therefore, the crime at issue in this case, Respondent's felony reckless driving while evading an officer conviction, constitutes a pattern of repeated and willful disregard of the law and two or more convictions involving driving and the consumption of alcohol. (Cal. Code Regs., tit. 10, § 2910, subs. (a)(10) & (a)(11).)

Rehabilitation and Other Factors

14. Respondent is 24-years-old. He works as a loan officer. He has held this profession for several years. Respondent claims he has never been intoxicated while performing his job duties. Respondent has been recognized as an outstanding loan officer by his employers. He has received awards for his excellent job performance.

15. Respondent was raised as a strict Roman Catholic. He attends Saint Monica's church in Santa Monica.

16. In 2007, Respondent suffered a driving under the influence conviction. The 2007 conviction was not pled in the Accusation as a basis for discipline or aggravation.

17. Respondent has been an active member of Alcoholics Anonymous (AA) for approximately six years. Respondent was embarrassed and remorseful about his actions that led to his convictions. He feels he now understands the gravity of his drinking problem and accepts that he can never drink alcohol. Respondent described: "I know I must take the AA pill or I will die." He attends AA five times per week. He credits AA with giving him his life back. Respondent is a panelist for AA. He appears in front of groups of people to share his story with others who are battling their own alcohol and drug addictions. He realizes that in each instance where he was convicted, he began drinking as a way to cope with personal stress. He understands that he must deal with his stress without using alcohol. Respondent was not required to participate in AA as a term of his current probation. Respondent explained the March 2, 2008 incident, which led to his May 2008 conviction, was his wake up call that he was in extreme need of help. Respondent approached his neighbor, Mark King, who he knew was an AA member, to ask for his help. Respondent has been sober since March 7, 2008.

18. Respondent presented two letters from his AA sponsors. Mark King, who became Respondent's AA sponsor after Respondent asked for his help after Respondent's March 2, 2008 arrest, described that Respondent went to meetings every day after his arrest, even though Respondent was also working full-time. In his January 5, 2010 letter, King writes: "He is an example of the program and what it can do for people." Steve Feig, Respondent's current sponsor, in a letter also dated January 5, 2010, described Respondent's dedication to the AA program. Feig writes: "I have sponsored people for over 20+ years,

and he ranks among one of the best and most responsible people I have sponsored.” Shonty Spatola, an accountant and AA member, appeared at the hearing to describe Respondent’s active participation in the AA program. Respondent and Spatola speak with each other every day and see each other frequently at AA meetings. Spatola would use Respondent as his real estate agent.

19. Joseph Hendizadeh, a real estate broker who is Respondent’s current employer, testified at the hearing. He is aware of Respondent’s convictions and is willing to supervise Respondent should he be granted a restricted license. Hendizadeh described Respondent as reliable, hardworking, honest, and trustworthy. Hendizadeh is aware of Respondent’s daily involvement in Alcoholics Anonymous. According to Hendizadeh, Respondent is aware of his past mistakes and tries to better himself each day. Hendizadeh explained that Respondent now exercises at a gym as a healthy outlet and, at company events, Respondent is the person who volunteers to be the designated driver.

LEGAL CONCLUSIONS

1. Cause exists to revoke or suspend Respondent’s real estate salesperson license, pursuant to Business and Professions Code sections 490 and 10177, subdivision (b), in that Respondent’s felony conviction was for a crime substantially related to the qualifications, functions, and duties of a real estate licensee, as set forth in factual finding numbers 4-13, and legal conclusion numbers 2, 3 and 4.

2. Business and Professions Code section 490 states:

[A] board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.

3. Business and Professions Code section 10177 states in pertinent part:

The commissioner may suspend or revoke the license of a real estate licensee . . . who . . . has done any of the following:

[¶] . . . [¶]

(b) Entered a plea of guilty or nolo contendere to, or been found guilty of, or been convicted of, a felony, or a crime substantially related to the qualifications, functions, or duties of a real estate licensee, and the time for appeal has elapsed or the judgment of conviction has been affirmed on appeal, irrespective of an order granting probation following that conviction, suspending the imposition of sentence, or of a subsequent order under Section 1203.4 of the Penal Code allowing that licensee to withdraw his or her plea of

guilty and to enter a plea of not guilty, or dismissing the accusation or information.

4. California Code of Regulations, title 10, section 2910 states in pertinent part:

(a) When considering whether a license should be denied, suspended or revoked on the basis of the conviction of a crime . . . the crime . . . shall be deemed to be substantially related to the qualifications, functions or duties of a licensee of the Department within the meaning of Sections 480 and 490 of the Code if it involves:

[¶] . . . [¶]

(2) Counterfeiting, forging or altering on of an instrument or the uttering of a false statement.

[¶] . . . [¶]

(4) The employment of bribery, fraud, deceit, falsehood or misrepresentation to achieve an end.

[¶] . . . [¶]

(8) Doing of any unlawful act with the intent of conferring a financial or economic benefit upon the perpetrator:

(9) Contempt of court or willful failure to comply with a court order.

(10) Conduct which demonstrates a pattern of repeated and willful disregard of law.

(11) Two or more convictions involving the consumption or use of alcohol or drugs when at least one of the convictions involve driving and the use or consumption of alcohol or drugs.

(c) If the crime or act is substantially related to the qualifications, functions or duties of a licensee of the department, the context in which the crime or act were committed shall go only to the question of the weight to be accorded to the crime or acts in considering the action to be taken with respect to the applicant or licensee.

///

///

5. California Code of Regulations, title 10, section 2912 states in pertinent part:

The following criteria have been developed by the department pursuant to Section 482(b) of the Business and Professions Code for the purpose of evaluating the rehabilitation of a licensee against whom an administrative disciplinary proceeding for revocation or suspension of the license has been initiated on account of a crime committed by the licensee.

(a) The passage of not less than two years from the most recent criminal conviction that is "substantially related" to the qualifications, functions or duties of a licensee of the department. (A longer period will be required if there is a history of criminal convictions or acts substantially related to the qualifications, functions or duties of a licensee of the department.)

[¶] . . . [¶]

(e) Successful completion or early discharge from probation or parole.

(f) Abstinance from the use of controlled substances or alcohol for not less than two years if the criminal conviction was attributable in part to the use of a controlled substance or alcohol.

(g) Payment of any fine imposed in connection with the criminal conviction that is the basis for revocation or suspension of the license.

(h) Correction of business practices responsible in some degree for the crime or crimes of which the licensee was convicted.

(i) New and different social and business relationships from those which existed at the time of the commission of the acts that led to the criminal conviction.

(j) Stability of family life and fulfillment of parental and familial responsibilities subsequent to the criminal conviction.

(k) Completion of, or sustained enrollment in, formal education or vocational training courses for economic self-improvement.

(l) Significant and conscientious involvement in community, church or privately-sponsored programs designed to provide social benefits or to ameliorate social problems.

(m) Change in attitude from that which existed at the time of the commission of the criminal acts in question as evidenced by any or all of the following:

(1) Testimony of applicant.

(2) Evidence from family members, friends or other persons familiar with the licensee's previous conduct and with subsequent attitudes and behavioral patterns.

[¶] . . . [¶]

(5) Absence of subsequent felony or misdemeanor convictions that are reflective of an inability to conform to societal rules when considered in light of the conduct in question.

6. Respondent met some regulatory criteria of rehabilitation. He has abstained from the use of alcohol for the past two years. (Cal. Code Regs., tit. 10, § 2912, subd. (f).) He has timely complied with the payment of all court-imposed fines. (Cal. Code Regs., tit. 10, § 2912, subd. (g).) At hearing, Respondent demonstrated a change in attitude from that which existed at the time of the crime. (Cal. Code Regs., tit. 10, § 2912, subd. (m).)

7. Respondent's crimes showed extremely poor judgment. However, the evidence did not prove, by clear and convincing evidence to a reasonable certainty, that the public would be endangered if Respondent were to retain his real estate salesperson license, despite the substantial relationship between his crimes and a licensee's qualifications, functions, and duties. While his crimes and convictions established his undeniable problem with alcohol, they did not establish a significant concern that Respondent would likely act in a fashion that could jeopardize the public safety in his work as a Department licensee. On the one hand, Respondent's actions in connection with his conviction for evading an officer with reckless driving militate against Respondent's integrity. However, on the other hand, Respondent candidly admitted his conduct. Furthermore, the evasion conviction appears to be an isolated incident that took place at a time when Respondent was despondent. There are no earlier similar convictions. Regarding Respondent's drunk driving, it is the case that those actions have never intersected his work within the real estate industry. He has retained a good reputation, despite his convictions, and has the support of his sponsors at AA and his current employer. Respondent is taking reasonable steps to deal with his alcohol problem and has remained sober since his arrest in March 2008. Though Respondent has not met several significant criteria of rehabilitation, namely, completion of probation, and the passage of significant time since the last conviction, the evidence did not prove that if licensed, in some fashion, Respondent would be a threat to the public safety as a Department licensee. Therefore, despite his criminal actions being substantially related to a real estate salesperson's qualifications, functions, and duties, the evidence supports a conclusion that the public would not be harmed by allowing Respondent to hold a restricted license. Given the number and recency of Respondent's crimes, it is appropriate to restrict Respondent's

license for a significant period of time, thereby ensuring Respondent remains committed to genuine rehabilitation on a permanent basis.

ORDER

All licenses and licensing rights of Respondent Garrett Bradley Todd under the Real Estate Law are revoked; provided, however, a restricted real estate salesperson license shall be issued to Respondent pursuant to Section 10156.5 of the Business and Professions Code if Respondent makes application therefor and pays to the Department of Real Estate the appropriate fee for the restricted license within 90 days from the effective date of this Decision. The restricted license issued to Respondent shall be subject to all of the provisions of Section 10156.7 of the Business and Professions Code and to the following limitations, conditions and restrictions imposed under authority of Section 10156.6 of that Code:

1. The restricted license issued to Respondent may be suspended prior to hearing by Order of the Real Estate Commissioner in the event of Respondent's conviction or plea of nolo contendere to a crime which is substantially related to Respondent's fitness or capacity as a real estate licensee.

2. The restricted license issued to Respondent may be suspended prior to hearing by Order of the Real Estate Commissioner on evidence satisfactory to the Commissioner that Respondent has violated provisions of the California Real Estate Law, the Subdivided Lands Law, Regulations of the Real Estate Commissioner or conditions attaching to the restricted license.

3. Respondent shall not be eligible to apply for the issuance of an unrestricted real estate license nor for the removal of any of the conditions, limitations or restrictions of a restricted license until five years have elapsed from the effective date of issuance of this Decision.

4. Respondent shall submit with any application for license under an employing broker, or any application for transfer to a new employing broker, a statement signed by the prospective employing real estate broker on a form approved by the Department of Real Estate which shall certify:

(a) That the employing broker has read the Decision of the Commissioner which granted the right to a restricted license; and

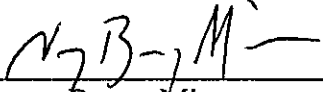
(b) That the employing broker will exercise close supervision over the performance by the restricted licensee relating to activities for which a real estate license is required.

5. Respondent shall, within nine months from the effective date of this Decision, present evidence satisfactory to the Real Estate Commissioner that Respondent has, since the most recent issuance of an original or renewal real estate license, taken and successfully

completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real estate license. If Respondent fails to satisfy this condition, the Commissioner may order the suspension of the restricted license until Respondent presents such evidence. The Commissioner shall afford Respondent the opportunity for a hearing pursuant to the Administrative Procedure Act to present such evidence.

6. Respondent shall notify the Commissioner in writing within 72 hours of any arrest by sending a certified letter to the Commissioner at the Department of Real Estate, Post Office Box 187000, Sacramento, California 95818-7000. The letter shall set forth the date of Respondent's arrest, the crime for which Respondent was arrested and the name and address of the arresting law enforcement agency. Respondent's failure to timely file written notice shall constitute an independent violation of the terms of the restricted license and shall be grounds for the suspension or revocation of that license.

DATED: March 15, 2010



Nancy Beezy Micon
Administrative Law Judge
Office of Administrative Hearings

*Sacto
Hwy*

FILED

AUG 31 2009

JAMES DEMUS, Counsel (SBN 225005)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 576-6982
(Direct) (213) 576-6910

DEPARTMENT OF REAL ESTATE
BY: Jama B. Jim

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-36062 LA
)	L-2009080024
)	
)	<u>FIRST AMENDED</u>
GARRETT BRADLEY TODD,)	<u>ACCUSATION</u>
)	
Respondent.)	
)	

This Accusation amends the Accusation filed on June 17, 2009. The Complainant, Joseph Aiu, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against GARRETT BRADLEY TODD a.k.a. Garrett Boys Todd, ("Respondent") alleges as follows:

1.

The Complainant, Joseph Aiu, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in his official capacity.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the

1 California Business and Professions Code ("Code"), as a real
2 estate salesperson.

3 3.

4 On or about May 28, 2008, in the Superior Court of
5 California, County of San Diego, in case no. CD212260,
6 Respondent was convicted of violating California Vehicle Code
7 Section 2800.2(a) (evading officer with reckless driving), a
8 felony. Said crime bears a substantial relationship under
9 Section 2910, Title 10, Chapter 6, California Code of
10 Regulations to the qualifications, functions or duties of a real
11 estate licensee.

12 4.

13 In aggravation, on or about August 24, 2006, in the
14 Superior Court of California, County of San Diego, in case no.
15 M987253, Respondent was convicted of violating California
16 Vehicle Code Section 23152(a) (driving under the influence of
17 alcohol/drugs), a misdemeanor.

18 5.

19 The crime of which Respondent was convicted, as
20 described in Paragraph 3 above, constitutes cause under Sections
21 490 and 10177(b) of the Code for the suspension or revocation of
22 the license and license rights of Respondent under the Real
23 Estate Law.

24 ///

25 ///

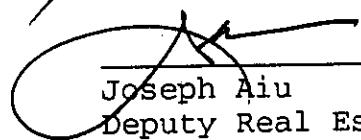
26 ///

27 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses and license rights of Respondent, GARRETT BRADLEY TODD, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California
this 14 day of August, 2009.



Joseph Aiu
Deputy Real Estate Commissioner

cc: GARRETT BRADLEY TODD
First Wholesale Lending Inc.
Frank M. Buda, Esq.
Joseph Aiu
Sacto.

facts
me

JAMES DEMUS, Counsel (SBN 225005)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 576-6982
(Direct) (213) 576-6910

FILED

JUN 17 2009

DEPARTMENT OF REAL ESTATE

BY: Laura B. Don

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-36062 LA
)	
GARRETT BRADLEY TODD,)	<u>A C C U S A T I O N</u>
)	
Respondent.)	
_____)	

The Complainant, Joseph Aiu, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against GARRETT BRADLEY TODD a.k.a. Garrett Boys Todd, ("Respondent") alleges as follows:

1.

The Complainant, Joseph Aiu, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

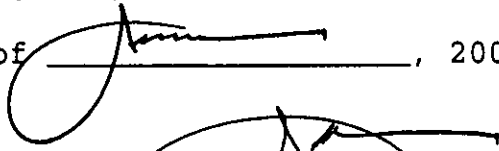
2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code"), as a real estate salesperson.

1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all the licenses and license rights of
5 Respondent, GARRETT BRADLEY TODD, under the Real Estate Law
6 (Part 1 of Division 4 of the Business and Professions Code) and
7 for such other and further relief as may be proper under other
8 applicable provisions of law.

9 Dated at San Diego, California

10 this 10 day of January, 2009.

11
12 
13 _____
14 Joseph Aiu
15 Deputy Real Estate Commissioner
16
17
18
19
20
21
22
23
24

25 cc: GARRETT BRADLEY TODD
26 First Wholesale Lending Inc.
27 Joseph Aiu
Sacto.