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DEC 09 2024

Wheatfield Town Court

County of Niagara
Town of Wheatfield Court

People of the State of New York)
)
)
 -vs-)
)
)
 Kevin Riford)

**MOTION TO DISMISS THE CHARGE OF
CRIMINAL MISCHIEF (PENAL LAW 145.00)
PURSUANT TO CPL § 170.30 & SUPPRESS
EVIDENCE PURSUANT TO CPL § 710.20**

Docket No.: 24100028

Kevin Riford, Pro Se Defendant in the above-captioned matter, respectfully submits this Motion to Dismiss the charge of criminal mischief (145.00) against him pursuant to CPL § 170.30 and to suppress evidence pursuant to § 710.20. In support of this motion, the defendant states the following:

I. BACKGROUND

1. On October 7, 2024, the Defendant was initially charged with Criminal Mischief in the Third Degree, a felony under Penal Law § 145.05, based on allegations that he damaged property. The Niagara County Sheriff information states “the male flipped over a dining room table, broke a couch, and broke a large amount of china dishes.”¹
2. On November 12, 2024, while in the Town of Wheatfield Court, the charge was reduced to Criminal Mischief in the Fourth Degree, a misdemeanor under Penal Law § 145.00, in order to retain jurisdiction according the Court.
3. Law enforcement officers are alleged to have obtained evidence, including photographs and video of the interior of the Defendant’s residence and video evidence of statements made by the Defendant’s sister, without a warrant, consent, or exigent circumstances justifying entry or the subsequent search.
4. The People are expected to rely on this evidence to support their case, but it was obtained in violation of the Defendant’s constitutional rights.

II. GROUNDS FOR DISMISSAL

A. PROCEDURAL DEFICIENCY IN THE ACCUSATORY INSTRUMENT

1. **Absence of a Supporting Deposition:** A misdemeanor or felony information must be supported by non-hearsay allegations establishing every element of the offense charged (*People v. Alejandro*, 70 N.Y.2d 133 (1987)). The lack of a sworn supporting deposition from the Defendant’s mother or sister renders the accusatory instrument jurisdictionally defective.

1 EXHIBIT A – Niagara County Sheriff Accusation, Facts, & Notice PL 145.05– 1 pg.

2. **Improper Basis for Jurisdictional Reduction:** Reducing the charge to retain jurisdiction in the Town of Wheatfield Court does not remedy the evidentiary deficiencies. Procedural decisions cannot substitute for substantive evidence necessary to sustain the charge (*People v. Inserra*, 4 N.Y.3d 30 (2004)). The jurisdictional reduction cannot cure the substantive evidentiary issues, as the accusatory instrument lacks the necessary factual foundation to support the charge.

B. LACK OF PROBABLE CAUSE

The Defendant submits that the initial search and seizure, as well as any subsequent charges based on the evidence obtained, were made without probable cause, and therefore any evidence resulting from such actions should be suppressed.

The police report mentions a suspicion of a disturbance, but there was no clear evidence of a crime being committed at the time. The alleged statement made by Katie L. Riford ("He needs help") suggests the officers were responding to a welfare concern rather than a crime.² The officers had no reasonable suspicion to detain the defendant.

The police officers did not have probable cause to arrest the defendant. According to *People v. DeBour*, 40 N.Y.2d 210 (1976), police must have reasonable suspicion or probable cause to justify an arrest. Given the absence of clear evidence to establish a crime, any alleged arrest was unlawful, and the charges stemming from this unlawful alleged arrest should be dismissed.

C. UNLAWFUL ARREST

The Defendant asserts that his alleged arrest was made without a warrant and without reasonable suspicion or probable cause, thereby violating his rights under the Fourth Amendment and CPL § 170.30. Defendant asserts that he was told he was being detained, not arrested.

D. LACK OF SPECIFIC FACTS FOR THE ELEMENTS OF CRIMINAL MISCHIEF

While the accusatory instrument alleges that the Defendant intentionally caused damage to the property, it fails to provide sufficient detail regarding the nature of that intent. The document does not specify whether the damage was done out of anger, recklessness, drunkenness, or some other factor. Under Penal Law § 145.00, the act of damaging property intentionally must be established in a clear and detailed manner, including the context of the Defendant's actions. The lack of such context undermines the sufficiency of the allegations and leaves the Defendant without fair notice of the charge.

The accusatory instrument fails to adequately inform the Defendant of the specific facts regarding the intentional nature of the damage caused. Without a description of whether the damage was motivated by anger, recklessness, or some other factor, the Defendant is left to speculate about the charge against him. This vagueness violates the Defendant's right to due process and impairs his ability to prepare a defense.

2 SEE EXHIBIT B - Niagara County Sheriff Arrest Report – (1 page)

Under Penal Law § 145.00, intent is a critical element, and the accusatory instrument should set forth more than just the bare claim of intent. The document lacks any explanation of the Defendant's motive or the specific circumstances surrounding the damage, thus failing to provide a sufficient factual foundation to establish the required intent for Criminal Mischief. This lack of clarity results in an insufficient and vague accusation that cannot form the basis for a criminal charge.

E. VAGUE ALLEGATION AND LACK OF SPECIFICITY

The accusatory instrument does allege that the Defendant acted with intent and that the damaged property allegedly belonged to his mother. However, it still fails to provide adequate details regarding the circumstances under which the alleged damage occurred. For example, the instrument states that the Defendant "broke a large amount of china dishes," but it does not specify:

- How the damage occurred (e.g., were the dishes broken accidentally, possibly due to alcohol consumption, or another factor?).
- Whether the Defendant's alleged actions were motivated by anger, frustration, or another factor
- The instrument does not explain whether the Defendant deliberately caused harm or if the damage could have been a result of other circumstances that would not constitute criminal intent.

This lack of specificity regarding the context and nature of the Defendant's actions prevents him from fully understanding the charges against him and impedes his ability to prepare a proper defense. Without clear and detailed facts about how the damage occurred, the charge remains insufficiently detailed to allow for a meaningful defense.

F. LEGAL INSUFFICIENCY UNDER CPL § 170.30

Under CPL § 170.30, an accusatory instrument can be challenged if it is legally insufficient to establish each element of the charge. The instrument must provide specific factual allegations that describe the criminal act in enough detail to support a conviction.

- The non-specific allegations in the accusatory instrument prevent it from meeting the legal standard required to proceed with the case. A vague or unclear description of the crime makes it impossible for the court to conclude that the charge has been properly established, and it also prevents the defendant from being fully informed of the charges against him.

G. DUE PROCESS CONCERN AND FAIR NOTICE

The Due Process Clause of the U.S. Constitution requires that a defendant be provided with fair notice of the charges against them. A charge must be described with sufficient detail to allow the defendant to understand what they are being accused of and to prepare an adequate defense.

While the accusatory instrument alleges that the property damaged belonged to the Defendant's mother and that the Defendant acted with intent, the allegations remain vague and fail to describe the specifics of how the damage occurred. Specifically, the instrument does not explain the circumstances surrounding the Defendant's actions, such as whether the damage was done out of anger, recklessness, or other factors. The absence of these crucial details leaves the Defendant unclear about the full scope of the charges and how to properly defend against them.

Examples of Defective Allegations:

The accusatory instrument states: "The defendant broke a large amount of china dishes." While the accusatory alleges that the property belonged to the Defendant's mother, it does not explain:

- Whether it could have been accidental or a result of other factors, such as alcohol consumption.
- How the damage occurred (e.g., were the dishes thrown or smashed deliberately, or was it a result of other circumstances?).
- Similarly, the instrument states: "The male flipped over a dining room table and broke a couch." While it does allege that the property belonged to the Defendant's mother and that the damage was intentional, it does not explain how these actions occurred. The Defendant is left without adequate detail regarding the circumstances of these actions (e.g., were they done out of anger, frustration, or recklessness?).

The lack of specific detail regarding the context and circumstances of the damage makes it difficult for the Defendant to fully understand the charges and prepare an adequate defense, thereby violating the Defendant's right to due process.

Request for Dismissal Based on Legal Insufficiency

While the accusatory instrument does specify the alleged ownership of the property and alleges that the Defendant acted with intent, it still fails to provide sufficient factual details to establish all necessary elements of Criminal Mischief under Penal Law § 145.00. The instrument does not clearly explain the circumstances under which the damage occurred (e.g., whether it was done out of anger, recklessness, or due to external factors such as alcohol consumption). This lack of clarity regarding the context of the alleged damage makes it difficult for the Defendant to fully understand the charge and adequately prepare a defense.

Given the absence of critical factual details that are necessary to support a conviction, the accusatory instrument does not meet the required legal standard under CPL § 170.30. Therefore, the Defendant respectfully requests that the charge be dismissed on the grounds of legal insufficiency, as the allegations are too vague and incomplete to support a valid prosecution.

H. VIOLATION OF RIGHT TO COUNSEL (CPL § 170.30(1)(a))

The Defendant asserts that his constitutional right to counsel was violated during pre-arrangement proceedings, thereby rendering any subsequent statements or evidence inadmissible under the Sixth Amendment and CPL § 170.30.

I. VIOLATION OF THE DEFENDANT'S RIGHT TO A FAIR TRIAL (DUE PROCESS)

The Defendant asserts that the procedural defects in the handling of this case, including the admission of illegally obtained evidence, deprive him of his right to a fair trial under the Due Process Clause of the Fourteenth Amendment.

J. INSUFFICIENT EVIDENCE TO SUSTAIN THE CHARGE

There is insufficient evidence to establish that the Defendant acted with the requisite intent to commit Criminal Mischief under Penal Law § 145.00. While the accusatory instrument claims the Defendant intentionally damaged property, it fails to specify the nature of that intent or provide details about the circumstances surrounding the damage. The instrument does not explain whether the Defendant's actions were driven by anger, recklessness, or any other factor, nor does it describe whether the damage was done with the purpose of causing harm or damage.

The alleged acts of damaging property (flipping a table, breaking a couch, and breaking dishes) may have been accidental, impulsive, or even influenced by external factors such as alcohol consumption. There is no clear evidence establishing that the Defendant acted with the specific intent required to prove Criminal Mischief under Penal Law § 145.00. The vague and incomplete nature of the allegations regarding intent undermines the sufficiency of the charge, and without clear and convincing evidence of purposeful damage, the charge cannot stand.

K. INSUFFICIENCY OF EVIDENCE REGARDING PROPERTY OWNERSHIP

- The accusatory instrument alleges that the Defendant damaged a dining room table, a couch, and a large number of china dishes, but does not clarify how the ownership of the property was verified. The charge presumes that the property belongs to the Defendant's mother, but no inquiry or evidence exists in the record to confirm this.
- The prosecution failed to directly inquire or substantiate the ownership of the property at the time of the investigation. If ownership was not confirmed through any investigation or direct evidence, the People's allegations about the ownership of the property are speculative and unsubstantiated.
- Without any evidence or inquiry confirming the ownership of the property, the accusations are based on assumption and lack the factual foundation necessary to proceed with a criminal mischief charge under Penal Law § 145.00.
- Given the absence of critical factual details that are necessary to support a conviction, the accusatory instrument does not meet the required legal standard under CPL § 170.30. Therefore, the Defendant respectfully requests that the charge be dismissed on the grounds of legal insufficiency, as the allegations are too vague and incomplete to support a valid prosecution.

L. AFFIDAVIT FROM MOTHER

Defendant has provided an affidavit from his mother, Joanne Riford, confirming the condition of the alleged damaged property.³ The affidavit confirms the condition of the alleged damaged property with photos. Even if Dishware/Glassware/Kitchenware like “china dishes” were damaged by Defendant, this property belonged to himself. Given the affidavit (and photos) confirm no damage was sustained, and the ownership of Dishware/Glassware/Kitchenware is confirmed to be Defendant, Defendant requests that the charge be dismissed on ground of legal insufficiency, as property was either not damaged or owned by Defendant himself.

III. REQUEST TO SUPPRESS EVIDENCE

A. Suppression of Photographs and Video Evidence

The Defendant moves to suppress the photographs and video evidence taken inside his residence for the following reasons:

1. Violation of Fourth Amendment Rights:

- The photographs and video evidence were obtained without a valid warrant. The Fourth Amendment protects against unreasonable searches and seizures, and any search of a home without a warrant or consent is presumptively unconstitutional (*Payton v. New York*, 445 U.S. 573 (1980)).
- Law enforcement officers did not have a valid search warrant at the time they entered the Defendant’s residence and obtained the evidence.

2. No Exigent Circumstances or Consent:

- There is no indication that exigent circumstances existed to justify the warrantless entry into the Defendant’s home. Exigent circumstances require a pressing need, such as the imminent destruction of evidence or a danger to life, neither of which is alleged in this case.
- The Defendant and resident occupants did not provide consent for the officers to enter or photograph the interior of their home. Without consent, any evidence obtained during their presence is inadmissible (*Georgia v. Randolph*, 547 U.S. 103 (2006)).

3. Fruits of the Poisonous Tree Doctrine:

- Any evidence obtained as a result of the initial illegal entry is inadmissible under the “fruits of the poisonous tree” doctrine (*Wong Sun v. United States*, 371 U.S. 471 (1963)). This includes the photographs, any observations made by the officers, and the video evidence obtained during or after the unlawful entry.

4. Violation of CPL Article 710:

- Under CPL § 710.20, evidence must be suppressed if it was obtained in violation of constitutional protections against unlawful searches and seizures. The photographs and video evidence fall within this category and must be excluded from trial.

IV. RELIEF REQUESTED

For the reasons set forth above, the Defendant respectfully requests that the Court:

1. Issue an Order dismissing the charge of Criminal Mischief in the Fourth Degree (PL 145.00) pursuant to CPL § 170.30 and 100.40.
2. Issue an Order suppressing:
 - a. All photographs taken inside the Defendant's residence;
 - b. Any video evidence obtained inside the Defendant's residence;
 - c. Any evidence derived from the officers' warrantless entry or subsequent search of the residence.
3. Grant such other and further relief as the Court deems just and proper.

WHEREFORE, defendant respectfully requests that the Court grant this Motion to Dismiss and take such other and further actions as the Court deems just and proper.

AFFIRMATION IN SUPPORT OF MOTION TO DISMISS

I, Kevin Riford, the defendant in the above-captioned matter, hereby affirm as follows:

1. I am the Defendant in this case and am making this affirmation in support of my Motion to Dismiss the charge of Criminal Mischief (PL 145.00) and to suppress evidence pursuant to CPL § 710.20.
2. The facts set forth in the accompanying Motion to Dismiss and supporting documentation are true to the best of my knowledge, information, and belief. I submit this affirmation in support of the Motion to Dismiss and respectfully request that the Court dismiss the charge and suppress evidence as outlined in the Motion.

AFFIRMATION OF EXHIBITS

I, Kevin Riford, affirm that the attached Exhibits are true and accurate representations of the materials I am submitting in support of my Motion to Dismiss.

1. **Exhibit A – Police Information (PL 145.05):** The attached police information (Exhibit A) is a true and accurate copy of the report I received from the prosecution during the discovery process. I affirm that this report has not been altered or modified in any way and is being submitted as received.

2. **Exhibit B –Police Report:** The attached police report (Exhibit B) is a true and accurate copy of the report I received from the prosecution during the discovery process. I affirm that this report has not been altered or modified in any way and is being submitted as received.
3. **Exhibit C – Joanne Riford Affidavit:** The attached affidavit (Exhibit C) is a true and accurate copy of the affidavit I received from Joanne Riford. I affirm that this affidavit has not been altered or modified in any way and is being submitted as received.

DATED: November 29, 2024

Wheatfield, New York

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kevin Riford", is written over a horizontal line.

Kevin Riford
Defendant Pro Se
3038 Michael Drive, North Tonawanda, NY 14120

EXHIBIT A

STATE OF NEW YORK

COUNTY OF NIAGARA

TOWN

COURT

TOWN

of WHEATFIELD

Defendant: NA

Alleged Victim: NA

(Relationship to alleged victim)

(Relationship to defendant)

THE PEOPLE OF THE STATE OF NEW YORK

--VS--

Date of Birth

KEVIN M RIFORD

11/30/1989

Defendant(s)

BE IT KNOWN THAT, by this FELONY COMPLAINT, GUY FRATELLO,
 as the Complainant herein, STATIONED at NIAGARA CO. SHERIFF,
 accuses the above mentioned Defendant(s), with having COMMITTED the FELONY,
 of CRIM MISCHIEF 3:PROPERTY> \$250 In violation of Section 145.05,
 Subdivision 02 of the PENAL Law of the State of New York.
 That on or about 10/07/2024 at about 09:06 PM
 In the TOWN of WHEATFIELD, County of NIAGARA, the defendant(s)
 did intentionally, knowingly and unlawfully commit the felony of CRIMINAL MISCHIEF 3RD: DAMAGE ANOTHER PERSON'S PROPERTY- AMOUNT > \$250. A person is guilty of criminal mischief in the third degree when, with intent to damage property of another person, and having no right to do so nor any reasonable ground to believe that he or she has such right, he or she:2. damages property of another person in an amount exceeding two hundred fifty dollars. Criminal mischief in the third degree is a class E felony.

F A C T S
The defendant did knowingly, unlawfully and intentionally commit the crime of criminal mischief 3rd when he intentionally damage his mother's property inside the home. The male flipped over a dining room table, broke a couch, and broke a large amount of china dishes. This was an evidence base domestic arrest and the estimated cost of the items is in excess of 1500 dollars

The above allegations of fact are made by the Complainant herein on DIRECT KNOWLEDGE

N O T I C E
 In a written instrument, any person who knowingly makes a false statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under penalty of perjury

this 07 TH day of OCTOBER, 2024

--OR--

Subscribes and sworn to before me this _____ day of
20 _____

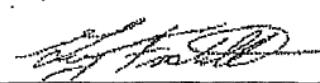

 COMPLAINANT -

EXHIBIT B


**NIAGARA COUNTY SHERIFF
ADULT ARREST INFO REPORT**

CASE# 2024-00045965

ARRESTEE INFO							
PRISONER NAME: RIFORD, KEVIN, MICHAEL ALIAS: TYPE: - ADDRESS: 3038 MICHAEL DR NORTH TONAWANDA, NY 14120 DOB: 11/30/1989 34 AGE: M SEX: White RACE: HEIGHT: 6' 1 WEIGHT: 180 EYE: Brown HAIR COLOR: Black ETHNICITY: Non Hispanic RESIDENCE STATUS: Arrest - Resident CONDITION: App to be Impaired w/ Alcohol COMPLEXION: Olive GLASSES: No BUILD: Medium MARITAL STATUS: Single PLACE OF BIRTH: BUFFALO CITIZENSHIP: U.S. Citizen RELIGION: None EDUCATION LEVEL: High School Graduate EMPLOYED: No OCCUPATION: Unemployed MILITARY SERVICE: None SCHOOL OR EMPLOYER: UNEMPLOYED PHONE: - SEARCH MARKS TATTOOS (CODE-TYPE-LOCATION-DESC)							

ARREST INFORMATION							
WARRANT		SEARCHED BY		SEARCH DATE		SEARCH TIME	
No						None	
ARRAIGNMENT COURT		ARRAIGNMENT JUDGE		ARRAIGNMENT DATE AND TIME			
Niagara County CAP		Presiding		10/08/2024 09:00			
RETURN COURT		RETURN JUDGE		RETURN DATE AND TIME		ARRESTEE STATUS	
Wheatfield Town Court		Wheatfield - Strenkoski				Held	
ADDRESS OF CRIME		DATE/TIME OF CRIME		ADDRESS OF ARREST		DATE/TIME OF ARREST	
3038 michael DR NORTH TONAWANDA, NY 14120		10/07/2024 21:06		3038 michael DR NORTH TONAWANDA, NY 14120		10/07/2024 21:15	
ARREST TYPE		ARRESTING OFFICER #1		ARRESTING OFFICER #2			
Crime in Progress		Fratello, Guy 0096					
# OF OFFENDERS		# OF VICTIMS		ON COMPLETED		WEAPON(S) AT ARREST	
1		1		Yes		Cutting Instrument	
ARREST FOR OTHER AGENCY						FINGERPRINTED	
						No	

CHARGES		
COUNTS	ATTEMPT/COMMIT	STATUTE
1	Completed	PL 145.10 DF2 CRIMINAL MISCHIEF - 2ND
COUNTS	ATTEMPT/COMMIT	STATUTE
1	Completed	PL 195.05 AM2 OBSTRUCT GOVERNMENTL ADMIN 2ND
COUNTS	ATTEMPT/COMMIT	STATUTE
1	Completed	PL 205.30 AM0 RESISTING ARREST
COUNTS	ATTEMPT/COMMIT	STATUTE

ASSOC PERS		NAME		RELATIONSHIP		ADDRESS		PHONE #	

REMARKS		On 10-08-2024 at approximately 2106 hrs I responded to 3038 Michael Drive for a check 911 call. Upon arrival I rang the Ring door bell. I could hear through the door, what sounded like there was some type of Disturbance going on. Katie L. Riford, then opened the door. Katie stated "he needs help". Her brother Kevin M. Riford came up behind her and said everything was okay and slammed the door. I then observed a black knife with a sleeve on it in the grass just to the left of the porch steps. I started to knock on the door again and yelled for someone to open the door. I called for Zone 11 and zone 12 to respond due to the history at the residence and the unknown situation inside. Deputy Ross arrived on scene first. Kevin Riford opened the door and was refusing to let us investigate what was going on inside the residence. It became apparent that there was some type of Disturbance going on inside. After repeated verbal commands, Kevin was taken down on the front porch and placed into handcuffs							
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EXHIBIT C

AFFIDAVIT OF JOANNE RIFORD

State of New York)
County of Erie) ss.:

I, Joanne Riford being duly sworn, depose and state the following:

- 1.) I am over the age of 18, competent to testify to the matters contained in this affidavit, and I am the home owner of 3038 Michael Drive, North Tonawanda, NY 14120.
- 2.) I am executing this affidavit to provide clarification regarding items allegedly damaged by Kevin Riford, as claimed by the Niagara County Sheriff's Office in connection with an incident on October 7, 2024 at my residence, located at 3038 Michael Drive, North Tonawanda, NY 14120.
- 3.) The Niagara County Sheriff's Office alleges that certain items were damaged by Kevin Riford. However I affirm the following:
 - a.) The Niagara County Sheriff's Office alleges that the table inside my residence was damaged. The table and chairs are **NOT** damaged and are fully functional. The heat stain on the table top has been there for atleast five years. **SEE PHOTO A**
 - b.) The Niagara County Sheriff's Office alleges that the couch inside my residence was damaged. The couch is **NOT** damaged and is fully functional. **SEE PHOTO B, C**
 - c.) The Niagara County Sheriff's Office alleges that kitchen cabinets inside my residence were damaged. The kitchen cabinets were **NOT** damaged and are fully functional. **SEE PHOTO D, E, F, G**
 - d.) The Niagara County Sheriff's Office alleges that knickknacks & family photos inside my residence were damaged. Knickknacks or family photos were **NOT** damaged, just displaced/misplaced. The Niagara County Sheriff failed to identify which specific knickknacks or family photos were allegedly damaged, as such it is impossible to identify with specificity of each and every knickknack and family photos they are alleging to be damaged.
 - e.) The Niagara County Sheriff's Office alleges that a cellphone inside my residence was damaged. Kevin Riford was **NOT** responsible for any damage to a cellphone.

f.) Dishware/Glassware/Kitchenware (glasses, cups, dishes, mugs, bowls, kitchenware): All of the dishware, glassware, kitchenware, cups, mugs, and bowls are owned by Kevin Riford. Most of these items he purchased. The rest were inherited by Kevin Riford in the year 2020 from myself.

g.) Butler push cart: This item is **NOT** damaged and is in working condition. **SEE PHOTO H**

h.) On October 7, 2024 a Niagara County Sheriff Officer stated to me inside my residence, "we have to charge him [Kevin] with something", despite not confirming ownership of the items with me.

i.) I, Joanne Riford, did **NOT** give consent for any law enforcement, including the Niagara County Sheriff's Office to enter my home, take photos inside my home, or take video inside my home.

j.) I, Joanne Riford was **NOT** asked at any point in time on October 7, 2024 or after by the Niagara County Sheriff's or any law enforcement regarding whom maintained ownership of any of the alleged damaged items.

Joanne Riford
Joanne Riford
3038 Michael Drive
North Tonawanda, NY 14120

Sworn to before me this 7 day of December 2024 by

Jesslin M. Kolacz
NOTARY PUBLIC FOR NEW YORK

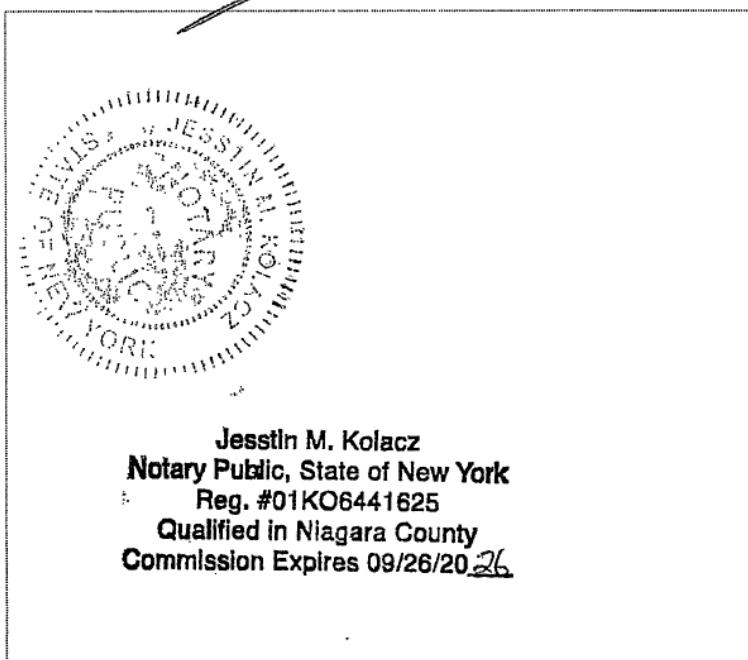


PHOTO A



Nov 23, 2024, 5:27 PM

PHOTO B

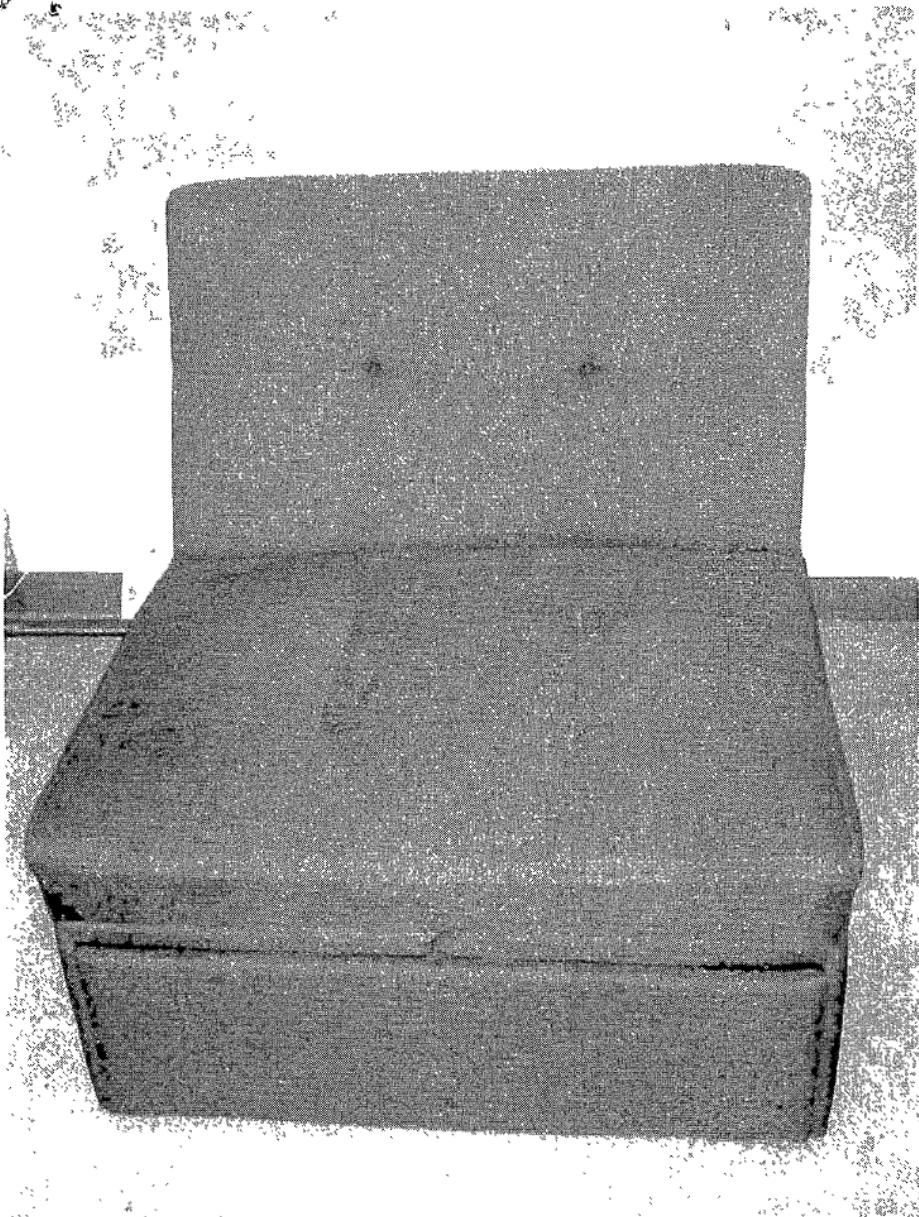


PHOTO C

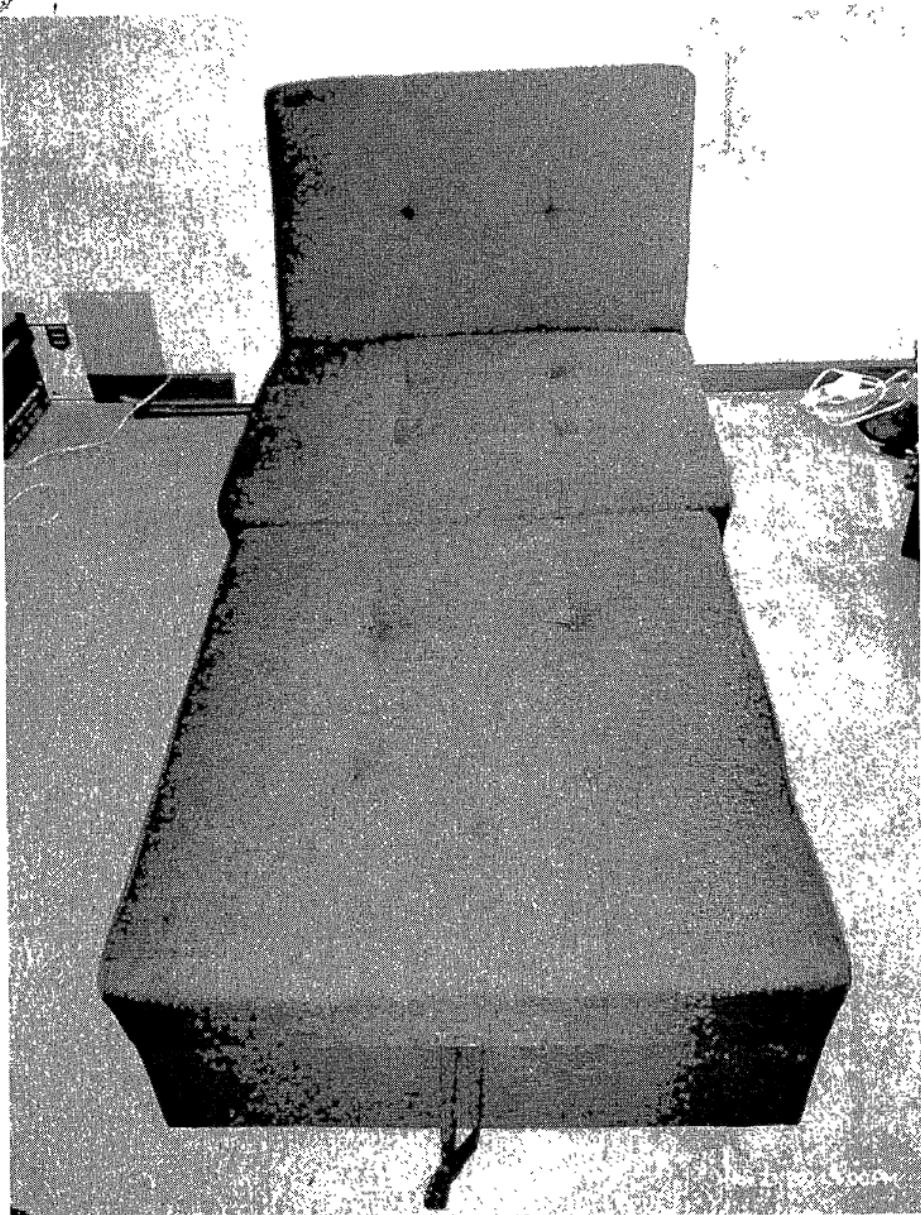


PHOTO D



Nov 23, 2024, 5:42 PM

PHOTO E



PHOTO F

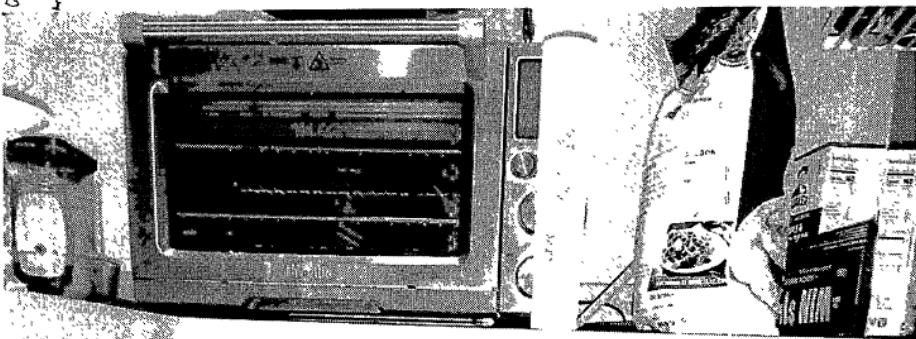


PHOTO G



PHOTO H



Nov 23, 2024, 5:37 PM

1
3