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COURT OF APPEALS
STATE OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,

Respondent,

-against-

JOSE VELEZ,

No. 18

Appellant.

20 Eagle Street
Albany, New York
February 12, 2020

Before:

CHIEF JUDGE JANET DIFIORE
ASSOCIATE JUDGE JENNY RIVERA
ASSOCIATE JUDGE LESLIE E. STEIN
ASSOCIATE JUDGE EUGENE M. FAHEY
ASSOCIATE JUDGE MICHAEL J. GARCIA
ASSOCIATE JUDGE ROWAN D. WILSON
ASSOCIATE JUDGE PAUL FEINMAN

Appearances:

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Sharona Shapiro
Official Court Transcriber



1 CHIEF JUDGE DIFIORE: The next appeal on this
2 afternoon's calendar is appeal number 18, the People of the
3 State of New York v. Jose Velez.

4 MS. SHIVERS: Good afternoon, Your Honors. My
5 name is Yvonne Shivers. I represent Jose Velez.

6 I'd like to request two minutes for rebuttal.

7 CHIEF JUDGE DIFIORE: You may.

8 MS. SHIVERS: Thank you. Much of what I would
9 cover has been covered by the first case, but I wanted to
10 point out something about the - - - the proposition that
11 the electropherogram is the equivalent of the raw data for
12 any purpose counsel could use it for.

13 One thing defense counsel specifically stated in
14 his motion was that: "Given its scale, it would be
15 impossible to tell from the printed electropherogram
16 whether information that ought to have been labeled an
17 allele was not labeled an allele."

18 That's one more clear indication that getting the
19 electropherogram would not be enough for an expert to
20 evaluate whether or not the findings were mistaken,
21 incorrect, or there were significant problems with it.

22 JUDGE GARCIA: Counsel, if you were to get the
23 raw data - - - let's say it's now, and you got the raw
24 data, would that cure any confrontation violation under
25 Sean John?



1 MS. SHIVERS: Um - - -

2 JUDGE GARCIA: Because Sean John says, you know,
3 you need to have an analyst up there who's comparing the -
4 - - the final product to the raw data. So if the defense
5 has the raw data and can cross on it, does that cure the
6 confrontation problem?

7 MS. SHIVERS: No, not necessarily. I mean, in
8 this case the analyst who - - - the criminalist who
9 testified had not examined the raw data. And if you look
10 at her testimony, which is something that - - -

11 JUDGE STEIN: Is that because if she had then the
12 expert could cross-examine her on - - - you know, now you
13 have dueling experts, so you've got a credibility issue,
14 right?

15 MS. SHIVERS: Right.

16 JUDGE STEIN: And so you - - -

17 MS. SHIVERS: So - - -

18 JUDGE STEIN: Right? And you - - -

19 MS. SHIVERS: Yes, and it's important for the
20 expert, the defense expert, to be able to not only have
21 their own expert, perhaps, present it, but also to cross-
22 examine the person who examined the raw data.

23 In this case it's clear, just going - - - sort of
24 jumping over to the Sean John issue, that the analyst did
25 not examine the raw data. In fact, her testimony was a lot



1 like the criminalist in John. The criminalist in John said
2 that she looked to everything that had been done, reviewed
3 the results of the editing, to make sure she agreed that
4 the artifacts should have been taken out. The criminalist
5 here testified that she reviewed each and every portion of
6 the testimo - - - of the testing that occurred in this
7 case. That's basically what she said.

8 Now, the People contend that - - - that what this
9 means, based on a case they cited called Corey, is that she
10 sort of redid everything when in fact that wasn't her
11 testimony. That was the testimony of the criminalist in
12 Corey. The criminalist in Corey specifically said I redid
13 it, the testing of the raw data. And that's completely
14 distinguishable from this case in which the analyst did not
15 do that. So on that basis alone, the - - - the defendant
16 was deprived of his confrontation rights.

17 JUDGE FEINMAN: Didn't she also testify that,
18 with respect to the defendant's oral swab, she developed a
19 full DNA profile from the sample? Isn't that the record at
20 151? And if so, what does that tell us?

21 MS. SHIVERS: She developed a full DNA profile
22 from the sample? I believe she testified that someone did,
23 but that she personally did not.

24 JUDGE FEINMAN: Okay. I may have misread the
25 record. That's why I'm asking.



1 MS. SHIVERS: Yeah, I think the record clearly
2 shows that she did not take part in any of the tests or any
3 of the editing of the raw data with respect to the DNA
4 report that was generated from the defendant's buccal - - -
5 buccal swab in this case. All she did was some sort of a
6 review that she doesn't make clear, from her testimony, was
7 a redoing of the tests.

8 JUDGE FAHEY: Let me ask this. If we go through
9 the same analysis on - - - analysis on mandatory disclosure
10 that we were talking about in the other case, in other
11 words, a product prepared at the request of the
12 prosecution, is it necessary for us to reach those other
13 issues? You had two other issues, the - - - the Sean John
14 issue and then a due-process issue.

15 MS. SHIVERS: If - - - it depends on how this
16 court sees its - - - the remedy for - - -

17 JUDGE FAHEY: I see.

18 MS. SHIVERS: - - - the first - - - the discovery
19 issue.

20 JUDGE FAHEY: Okay. Because the disclosure in
21 this case was a little bit more developed than it was in
22 some of the other cases. I understood here that the judge
23 denied a subpoena but said you could bring it back under
24 certain circumstances.

25 MS. SHIVERS: Correct.



1 JUDGE FAHEY: And then there wasn't a subsequent
2 subpoena requested; is that right?

3 MS. SHIVERS: Correct.

4 JUDGE FAHEY: So - - - so your argument is then
5 the 240.20(1)(c) is a separate analysis from what applies
6 under the subpoena section of 240.20(2)?

7 MS. SHIVERS: Correct.

8 JUDGE FAHEY: Right.

9 MS. SHIVERS: And - - - and with respect to the
10 subpoena, what the court was asking counsel to do was meet
11 an - - - an extraordinary or much greater - - -

12 JUDGE FAHEY: You know, with respect to the
13 court, it - - - it seemed that it conflated the Brady
14 applications with other applications. And she said it on
15 her decision. But there's no reason for us to go into that
16 at any great length, just that there was a subpoena process
17 here that subsequently was tried.

18 JUDGE STEIN: So just to be clear, and I want to
19 make sure I understand you, are you saying that if we were
20 to agree that you are entitled to the discovery, and
21 reverse and send it back for a new trial, then we don't
22 need to get to the confrontation clause issue, but if we
23 only use the DaGata remedy, then we do need to get to the
24 confrontation clause issue? Is that what you're saying?

25 MS. SHIVERS: Partly yes.



1 JUDGE STEIN: Okay.

2 MS. SHIVERS: I would urge the court not - - -
3 even if it only found that the discovery should have been
4 turned over, I would urge the court to still reverse and
5 grant a new trial.

6 The reason this is different from DaGata is that
7 in this case counsel's motion was made pre-trial. And in
8 DaGata that was a, I believe, 330 motion after a verdict
9 had already been rendered, and therefore the remedy should
10 be different.

11 JUDGE STEIN: But here we - - -

12 MS. SHIVERS: I would argue that here - - -

13 JUDGE STEIN: - - - have a verdict also, right?

14 MS. SHIVERS: I'm sorry?

15 JUDGE STEIN: Here we have a verdict also.

16 MS. SHIVERS: We have a verdict, but the motion
17 for the discovery was made pre-trial and - - -

18 JUDGE FEINMAN: You also have just - - - I mean,
19 330 is just not applicable here.

20 MS. SHIVERS: Granted, but my argument is that
21 the defendant should be returned to the position he was
22 pre-trial and then, you know, give them the discovery and
23 be able to use whatever - - -

24 JUDGE GARCIA: If we reverse on confrontation
25 grounds and send it back for a new trial, you would apply



1 the new discovery rule, right?

2 MS. SHIVERS: Um-hum, yes.

3 JUDGE GARCIA: You would get the discovery?

4 MS. SHIVERS: That's correct.

5 JUDGE FAHEY: So that would solve the problem?

6 MS. SHIVERS: That would.

7 JUDGE FAHEY: Yes, okay.

8 CHIEF JUDGE DIFIORE: Thank you, counsel.

9 MS. SHIVERS: Thank you.

10 CHIEF JUDGE DIFIORE: Counsel?

11 MR. YI: I just want to speak briefly on the
12 remedy because I didn't speak on that in the prior case.
13 So the remedy is laid out in DaGata. If this court does
14 reverse, the case should be sent back so that they can make
15 a showing that this is going to create some reasonable
16 probability of a more favorable result on retrial. Just
17 sending it back for a new trial, without knowing that, the
18 - - - the trial could end up as, you know, they don't even
19 use the raw data at all. So it really could result in an
20 unjustified windfall.

21 JUDGE FEINMAN: So basically, order the discovery
22 to be turned over and then let them figure out whether they
23 want to bring a 440 motion.

24 MR. YI: Basically. I mean, I don't think it
25 matters whether it's, you know, the 330.30 in DaGata or



1 440, right.

2 JUDGE FEINMAN: We're past 330. We're - - -

3 MR. YI: Right.

4 JUDGE FEINMAN: - - - post-judgment - - -

5 MR. YI: Right.

6 JUDGE FEINMAN: - - - of conviction.

7 MR. YI: That's - - - that's their distinction.

8 I was just saying that that distinction I don't think
9 matters.

10 JUDGE RIVERA: But counsel, do you disagree that,
11 if the court finds that there is indeed a confrontation,
12 defendant's confrontation rights were violated, that we
13 need not answer this question because, under the new - - -
14 as Judge Garcia has pointed out, under the new discovery
15 statute, they will have the opportunity to request that raw
16 data and you have to turn it over, right?

17 MR. YI: That - - - that sounds like the way it -
18 - - the way it would go, yeah. If this court reverses on
19 the confrontation - - - I mean - - -

20 JUDGE GARCIA: Counsel, you don't - - -

21 MR. YI: - - - you know, I - - -

22 JUDGE GARCIA: I'm sorry; finish answering. I'm
23 sorry; I didn't mean to interrupt you.

24 MR. YI: No, just - - - just briefly, I mean, but
25 you know, what - - - what I really find ironic, though,



1 about both these cases is that we're dealing with
2 confrontation. And yet they had experts before them that
3 were involved in the actual editing process, the most
4 important stage, and yet they asked nothing about that.
5 They didn't ask about the allele cools, they didn't ask
6 about the edits. So - - -

7 JUDGE GARCIA: Well, this case took place before
8 Sean John, right, was decided?

9 MR. YI: Correct; this is a pre-Sean John
10 decision.

11 JUDGE GARCIA: So if - - - if we were to reverse,
12 it goes back - - - it goes back under - - - you're not
13 suggesting that, if we find a confrontation clause
14 violation here, there's a harmless-error way out of this
15 for you, right?

16 MR. YI: Oh, no, we make a - - - a harmless-error
17 argument because it was based - - -

18 JUDGE GARCIA: It was the only evidence in the
19 case, right, the DNA evidence? I mean, what would the
20 harmless-error analysis be?

21 MR. YI: Well, being that she worked on the crime
22 scene sample; that was the first link in the chain that
23 linked the defendant to this crime. She was - - -

24 JUDGE GARCIA: That was - - -

25 MR. YI: - - - the analyst - - -



1 JUDGE GARCIA: - - - Austin, right?

2 MR. YI: Excuse me?

3 JUDGE GARCIA: I mean, that was Austin, wasn't
4 it? I mean, Austin was a cold hit - - -

5 MR. YI: Right.

6 JUDGE GARCIA: - - - then confirmed by a - - - a
7 swab, a known sample later, and that didn't save the
8 verdict in Austin, right?

9 MR. YI: Well, I mean, the - - - the People in
10 Austin didn't rely upon the cold hit. They - - - they
11 relied upon the later testing.

12 JUDGE GARCIA: So that seems - - -

13 MR. YI: And here you did have the cold hit.

14 JUDGE GARCIA: They - - - they did, but you - - -
15 I think it's clear from this record that, as testimony, you
16 relied on the known sample for the link.

17 MR. YI: Well, as Your Honor, I believe, noted in
18 your dissent in Austin, that's really just redundant or - -
19 -

20 JUDGE GARCIA: So I believe in Austin - - -

21 MR. YI: - - - duplicative, I - - - I don't
22 remember the words you used, but that - - - that's
23 basically what you were going for. It all started with
24 that crime scene sample. That's what initially linked him
25 to this crime. So this is a classic, I think, cold hit



1 case. And that's why I would submit that any error would
2 be harmless.

3 JUDGE GARCIA: But I think, again, the
4 distinction that was drawn in Austin, and this was
5 discussed in those two opinions, was there was a cold hit
6 in Austin, same type of cold hit that happened here. It
7 was a crime scene DNA developed, put into the system, it
8 hits.

9 In Austin, they didn't do the match in a way that
10 was - - - there was no foundation laid for it linking the
11 crime scene sample to the database sample. And as I read
12 this record, that's the same thing that happened here. I
13 mean, while there might have been a little more discussion
14 that there was some type of hit in a database system, there
15 was no scientific testimony saying this was a known sample
16 of the defendant, and the foundation for that in this
17 database that we then compared to. So there was no
18 independent analysis - - - as I read the transcript, and
19 correct me if I'm wrong - - - of that cold hit, you know,
20 that's - - -

21 MR. YI: You're talking about this case now,
22 Judge?

23 JUDGE GARCIA: Yeah.

24 MR. YI: Independent analysis - - -

25 JUDGE GARCIA: And I think it's the same as



1 Austin in that way, it seems.

2 MR. YI: Well, I mean, in Austin - - - but still,
3 in Austin they didn't use that. They used the next round
4 of testing. So here we had substantive evidence of that
5 cold hit presented.

6 JUDGE STEIN: But I thought that was only
7 admitted to show how they - - - why they went after - - -

8 MR. YI: You're talking about this case now?

9 JUDGE STEIN: In this case.

10 MR. YI: Okay.

11 JUDGE STEIN: This defendant not for - - - and
12 that the foundation wasn't laid to actually use it to
13 compare.

14 JUDGE GARCIA: In the Sean John sense of linking
15 this defendant to this crime - - -

16 JUDGE STEIN: Right.

17 JUDGE GARCIA: - - - it was the swab, the known
18 sample - - -

19 JUDGE STEIN: Right.

20 JUDGE GARCIA: - - - that was used.

21 MR. YI: Well, I don't think there was any
22 limiting language at trial saying this isn't being admitted
23 for its truth. You know, it - - - it was admitted as a - -
24 - just for - - - for what it was, for its truth.

25 Now - - - now if your question is about the state



1 DNA database hit, I mean - - - I mean, is that where you're
2 going with that in terms of in the - - -

3 JUDGE GARCIA: Well, that was a cold hit, right?
4 The cold hit is the database hit, isn't it?

5 MR. YI: Right.

6 JUDGE GARCIA: So it seems to me there was no
7 independent comparison with a proper foundation, and in
8 Austin the problem they had was they didn't bring an
9 analyst down who could authenticate, essentially, the
10 sample that was in the database, as I recall, for whatever
11 reasons, objections by the defendant or logistical
12 problems.

13 So in this case I think they talk about the fact
14 that the three things match, but the actual comparison
15 that's done, linking this defendant to the crime scene, is
16 done between the crime scene DNA profile and the swab
17 profile, the known sample they took after the arrest.

18 MR. YI: But also a significant difference is
19 that this court found in Austin that the analyst who
20 testified had basically nothing to do with anything. Even
21 - - - even the trial court referred to the analyst not as
22 an analyst but as a parrot. He was just parroting the
23 testimony of - - - or rather, just parroting the results
24 that were, you know, come to by other analysts. So - - -
25 so I think that's a very significant difference here.



1 And just - - - just to touch upon the subpoena in
2 Velez, you know, the trial court made a very clear ruling
3 which they didn't comply with. All the trial court wanted
4 was some type of affidavit from an expert showing that, you
5 know, you can do something with this that might go
6 somewhere.

7 They had the FB reports at that time. They could
8 have had an expert review those FB reports and perhaps
9 substantiate - - - you know, provide some substantiation
10 for this claim that you can do something with this raw
11 data, that there's not enough in these FB reports to really
12 analyze everything. And they didn't do that, you know.240

13 And that also goes to the right to present a
14 defense claim. Again, they didn't cross-examine them about
15 any of this. There's no indication they sought an expert
16 out. So you know that, I think, really undermines the
17 entire premise of their claim, that they needed this raw
18 data to really present a defense. They had quite a bit in
19 front of them already, upon which they could have built a
20 defense, and they didn't do anything.

21 And this court ruled in Colavito that a
22 calculated lack of initiative should not be rewarded.
23 That's what you have in this case, a calculated lack of
24 initiative.

25 Just - - - just to - - - is my time - - -



1 CHIEF JUDGE DIFIORE: No, no, sir.

2 MR. YI: Oh, I'm sorry.

3 CHIEF JUDGE DIFIORE: You can - - -

4 MR. YI: Just - - - just to touch a little bit on
5 - - - on the - - - on the OCME and the control aspect of
6 all of this because in Velez they - - - they say something
7 in their reply brief that just isn't true. They - - - they
8 basically try to make the OCME out to be sort of like our
9 hand puppet, like, when - - - when we say jump, you know,
10 they say how high. And that's just simply not the case.

11 I can give numerous examples to this court of
12 testing that the OCME has refused to do for us. For
13 example, they refuse to test shell casings and cartridges
14 in most cases. No testing of vomit or excrement. No
15 testing of swabs from automobiles used in - - -

16 JUDGE STEIN: Is this in the record?

17 MR. YI: It's not in the record; it's based upon
18 my - - - we - - - we didn't have a chance to elaborate this
19 in our brief because they brought this up in their reply
20 brief. So I'm just - - - but - - - but no. No, it's not
21 in the actual appendix or anything like that. I - - - I'd
22 just like to provide some examples to the court to show
23 that the OCME's discretion doesn't mean that they're under
24 our control, that we have control of every single document
25 that they have in their - - -



1 JUDGE FAHEY: No, I think that's a fair - - - I
2 mean, it's a fair rhetorical statement. I mean, there's
3 nothing unfair about what you're saying. But the problem
4 is - - - is whether or not they're producing a document at
5 your request for your use in trial. And - - - and if
6 they're produce - - - and also to assist them in their
7 examination at trial. So that's - - - and how we view that
8 really, I think, goes to the mandatory disclosure question.
9 I - - - I'm not saying that you control OCME all the way.
10 I wouldn't - - -

11 MR. YI: Right, and this - - -

12 JUDGE FAHEY: I don't think that's correct.

13 MR. YI: Right, and that's what this court - - -

14 JUDGE FAHEY: But that doesn't - - -

15 MR. YI: Sorry.

16 JUDGE FAHEY: It still doesn't mean you don't
17 have to disclose - - - that they don't have to disclose
18 certain things.

19 MR. YI: I mean - - -

20 JUDGE FAHEY: That's what I'm talking about.

21 MR. YI: I mean, I'm just saying, as a practical
22 matter, even if you go with Your Honor's argument and call
23 it mandatory, if an outside agency, not a law enforcement
24 agency - - - agency has something, and we say, please give
25 it to us and they say, sorry, can't help you, we have too



1 many other cases, this is going to require an enormous - -
2 - it's - - - it's going to impose an enormous burden on us
3 to generate this data, it's going to take a month in every
4 case, you know, where - - - where does this mandatory
5 disclosure leave us then if we simply cannot get it? I
6 mean, we can't break into their offices and take the raw
7 data. I mean, it's just not something we have access to.

8 JUDGE RIVERA: Is that still the case?

9 MR. YI: No. No, now - - - now there's some sort
10 of computer portal where you can get this information - - -

11 JUDGE RIVERA: No, if we reverse and under the
12 new statute they have access, this would not take a month -
13 - -

14 MR. YI: No.

15 JUDGE RIVERA: - - - to produce - - -

16 MR. YI: No, I - - -

17 JUDGE RIVERA: - - - correct?

18 MR. YI: I don't know the exact time frame it
19 takes, but it's not - - - it's not a month anymore. Over
20 the years it started going down, if you see, you know,
21 decisions that came out after this case, but that doesn't
22 take away from the fact that, at the time these cases were
23 decided, this was the response they gave us.

24 JUDGE FEINMAN: So in other words, somehow if
25 something is mandatory and discoverable and they're ordered



1 to produce it, you find a way.

2 MR. YI: They found a way. I don't know if the
3 technology existed or the, you know, computer code was
4 written to - - - I have no idea how this portal works. I
5 don't know why it couldn't be implemented back then, but it
6 wasn't. And - - -

7 JUDGE RIVERA: But in any event, you concede now
8 that the People do not have an argument that it's unduly
9 burdensome because they can do this now on a very short
10 timeframe.

11 MR. YI: Yeah, I - - -

12 JUDGE RIVERA: They will because - - -

13 MR. YI: I don't know what the time frame is, but
14 yeah, no, I mean, the - - - the burden argument doesn't
15 seem to apply anymore.

16 JUDGE RIVERA: Thank you.

17 CHIEF JUDGE DIFIORE: Thank you, counsel.

18 MR. YI: And I see my time is up, and I ask you
19 to uphold the lower court's decision. Thank you.

20 CHIEF JUDGE DIFIORE: Thank you.

21 Counsel?

22 MS. SHIVERS: Just briefly on the issue of undue
23 burden. First of all, it was mandatory that this be
24 produced, and the People made no showing that this was so
25 burdensome as in the case it cited, Sackett, that the OCME



1 would not have responded. And critically, the People did
2 not ask. They admit that in their brief. They admit they
3 didn't seek the data. Therefore it's unreasonable to argue
4 that OCME wouldn't have produced it.

5 Further, in response to the subpoena, the OCME
6 did not argue that it was unduly burdensome to produce it.
7 The OCME argued that defense counsel didn't establish that
8 it was both relevant and exculpatory.

9 And going to the respondent's claim that there
10 was a calculated lack of follow-up on the subpoena, the
11 reason counsel could not have followed up on its subpoena
12 is because he required the raw data in order to show
13 relevancy and exculpatory, which is why there's a discovery
14 statute, so that in discovering material that is
15 discoverable, counsel does not have to make these showings.

16 JUDGE RIVERA: Counsel, just - - -

17 MS. SHIVERS: Finally - - -

18 JUDGE RIVERA: I just want to make sure I - - -

19 MS. SHIVERS: I'm sorry.

20 JUDGE RIVERA: - - - I understand. In addition
21 to with the raw data, if you have your expert - - - expert
22 looking and - - - and making - - - making conclusions about
23 whether or not OCME's analysis is correct or has some
24 errors or has some concerns - - -

25 MS. SHIVERS: Um-hum.



1 JUDGE RIVERA: - - - your expert could have, or
2 the defendant's expert could have also run it themselves?
3 That expert could have done it themselves - - -

4 MS. SHIVERS: I think there was some - - -

5 JUDGE RIVERA: - - - and made decisions about
6 what to edit or not, or that is not what the defense was
7 seeking to do with an expert and the raw data?

8 MS. SHIVERS: Yes, if the expert was provided
9 with the raw data, the expert could run their own test,
10 right, and - - - and decide whether - - - not only whether
11 or not the tables provided by the People were correct but
12 just generally making an independent assessment.

13 JUDGE RIVERA: Okay. Thank you.

14 MS. SHIVERS: In terms of harmless error, I would
15 just say that the one - - - even if there were only
16 evidence of the - - - the hit on the state database, that
17 doesn't compare with the power of the criminalist testimony
18 that she took the oral swab from the defendant, she found
19 that it - - - the DNA profile was the same, and that it
20 would appear only in 1 in 6.8 trillion people, or I don't
21 remember how many earths. So clearly this - - - this was
22 not harmless error, and I would ask the court to reverse.
23 Thank you.

24 CHIEF JUDGE DIFIORE: Thank you, counsel.

25 (Court is adjourned)



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C E R T I F I C A T I O N

I, Sharona Shapiro, certify that the foregoing transcript of proceedings in the Court of Appeals of The People of the State of New York v. Jose Velez, No. 18 was prepared using the required transcription equipment and is a true and accurate record of the proceedings.

Sharona Shapiro

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