

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)	
v.)	Crim. No. 2:19-CR-176-GZS
NELSON DION, Defendant)	

**MR. DION’S MOTION TO DISMISS INDICTMENT WITH INCORPORATED
MEMORANDUM OF LAW**

BACKGROUND

This matter is before the Court on the Government’s Two-Count Indictment of Mr. Dion for Interstate Violation of a Protection Order.¹ *2:19-cr-00176-ECF #41*. Both Counts of that Indictment charge Mr. Dion, in relevant part, with traveling from Maine to New Hampshire, with the intent to engage in conduct that would violate a protection order against him that provided protection to T.N. *Id.* The Government alleges that the ‘protection order’ violated was a bail order that prevented contact with T.N. *Id.*

¹ 18 U.S.C. 2262(a)(1)

RELEVANT FEDERAL STATUTES

18 U.S.C. §§ 2262(a)(1) provides:

A person who travels in interstate or foreign commerce, or enters or leaves Indian country or is present within the special maritime and territorial jurisdiction of the United States, with the intent to engage in conduct that violates the portion of a protection order that prohibits or provides protection against violence, threats, or harassment against, contact or communication with, or physical proximity to, another person or the pet, service animal, emotional support animal, or horse of that person, or that would violate such a portion of a protection order in the jurisdiction in which the order was issued, and subsequently engages in such conduct, shall be punished as provided in subsection

18 U.S.C. §§ 2266(5)(A) and (B) defines ‘protection order’ and provides:

(A)

any injunction, restraining order, or any other order issued by a civil or criminal court for the purpose of preventing violent or threatening acts or harassment against, sexual violence, or contact or communication with or physical proximity

to, another person, including any temporary or final order issued by a civil or criminal court whether obtained by filing an independent action or as a pendente lite order in another proceeding so long as any civil or criminal order was issued in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection; and

(B)

any support, child custody or visitation provisions, orders, remedies or relief issued as part of a protection order, restraining order, or injunction pursuant to State, tribal, territorial, or local law authorizing the issuance of protection orders, restraining orders, or injunctions for the protection of victims of domestic violence, sexual assault, dating violence, or stalking.

ISSUES PRESENTED

1) Does a ‘bail order’ qualify as a ‘protection order’ under 18 U.S.C. §§ 2266(5)(A) and (B)?

A. Specifically, is the bail order in this case a temporary ... order issued by a ... criminal court ... in response to a complaint ... filed by or on behalf of a person seeking protection? *Id.*

2) Did notice in this matter comport with necessary due process requirements?

A. Did the temporary order, in this case, issued by a ... criminal court ... in response to a complaint ... filed by or on behalf of a person seeking

protection provide the necessary notice requirements for Mr. Dion to be aware of the statute and the consequences of a violation?

STATEMENT OF UNCONTESTED FACTS

- 1) On April 6, 2016, Mr. Dion was alleged to have committed Aggravated Assault in a matter involving T.H. *Complaint dated 04/19/2016* (codified in Docket Record as Exhibit A²).
- 2) Mr. Dion appeared via video before Hon. Peter Goranites on April 19, 2019 with the Lawyer of the Day. The Court read oral conditions of bail. At the conclusions of those readings, Judge Goranites advised Mr. Dion that failure to abide by such conditions could lead to his arrest. At no point during this was Mr. Dion advised that failure to abide by the conditions could lead to him being charged with a crime (either federal or state). *Audio of initial appearance dated 04/20/2016* (to be provided to the Court at the Court's direction).
- 3) The only Court Order signed by Judge Goranites related to bail did not have the 'no contact' provision with T.N. checked. This is the only bail related matter signed by the Court. *Bail Bond dated 04/19/2016* (Exhibit B).

² It should be noted that Exhibit A is a docket record. It is not provided to the Defendant.

- 4) T.N. never filed for, nor obtained, a Protection From Abuse Order in Maine under 19-A M.R.S. §4001-4007 or New Hampshire under N.H. R.S.A. 173-B.
- 5) Mr. Dion had no further Court appearances in this matter. *Exhibit A*.
- 6) The State matter was dismissed in August of 2016 after T.N. committed suicide on June 30, 2016. *Dismissal dated 08/10/2016* (codified in Exhibit A).
- 7) The Government alleges that Mr. Dion and T.N. had contact during the period between April 16-June 30, 2016.³ ECF #41.

AUTHORITY

Indictments are governed by Federal Rule of Criminal Procedure 7(c), which require that an indictment contain a "plain, concise and definite written statement of the essential facts constituting the offense charged." *Id.* An indictment is sufficient if it, first, contains the elements of the offense charged and, second, fairly informs a defendant of the charge against which he must defend, and, third, enables him to plead an acquittal or conviction. *Hamling v. United States*, 418 U.S. 87 (1974). An indictment, or a portion thereof, may be dismissed if it is otherwise defective or subject to a defense that may be decided solely on issues of law." *United States v. Mubayyid*, 476 F.Supp.2d 46, (1st Cir. 2007).

³ A Motion for Bill of Particulars has been filed related to those dates. ECF #57.

An indictment must charge a crime "with sufficient precision to inform the defendant of the charges he must meet and with enough detail that he may plead double jeopardy in a future prosecution based on the same set of events. *Id.* Mr. Dion is cognizant that when evaluating a motion to dismiss an indictment under Fed. Crim. P. 12(3)(B), the Court must treat the allegations in the indictment as true. See *Boyce Motor Lines v. United States*, 342 U.S. 337, 343 n.16 (1952). Therefore, for purposes of evaluating this Motion, Mr. Dion is aware that the indictment is taken as fact, and the sole issue is whether, as a matter of law, Mr. Dion's violation of a 'bail order' qualifies as a violation of a 'protection order' as defined by 18 U.S.C. §§ 2266(5) and if it does, whether he was properly 'on notice' as to the conditions and consequences. The Court should conclude a 'bail order' is not a protection order and therefore, the Government has not properly stated an offense under 18 U.S.C. §§ 2262(a)(1) and the matter should be dismissed. In the alternative, the Court should conclude that Mr. Dion was not properly on notice as to the consequences of violating the bail order, and therefore, in the interest of due process, the matter should be dismissed.

MEMORANDUM OF LAW

I. A BAIL ORDER IS NOT A PROTECTION ORDER UNDER 18 U.S.C. §§ 2266(5).

In the First Circuit, the legal principles applicable to a motion to dismiss an indictment are that it must "attack the facial validity of the indictment" and not merely "challenge the government's substantive case." *United States v. Ngige*, 780 F.3d 497 (1st Cir.2015). A legal challenge to an indictment may be considered if, as a matter of law, the statements in the indictment have no validity. See *United States v. Lee*, 833 F.3d 56, 67-68 (2nd Cir. 2016) (stating that an indictment's failure to allege an element of the charged offense is a constitutional violation).

Another means of challenging an indictment is when the statute is ambiguous or is not meant to apply to the matter before the Court. *Id.* When interpreting a statute, the well-established rules of statutory construction instruct that "the inquiry begins with the plain language of the statute and 'where the statutory language provides a clear answer, it ends there as well. " *Hughes Aircraft Co. v. Jacobson*, 525 U.S. 432, 438 (1999). Courts must read congressional enactments according to their plain meaning unless such reading would lead to an absurd result. *Id.* Where no definition is provided for a term in the statute, courts first "consider the ordinary, commonsense meaning of the words." *United States v. Dauray*, 215 F.3d 257, 260 (2nd Cir. 2000).

Under 18 U.S.C. §§ 2262(a)(1), the Government must show that Mr. Dion violated a protection order to sustain a guilty verdict. *ECF #18*. The protection order, as alleged in

this matter, was an order by the York County Superior Court in Maine that prevented contact between Mr. Dion and T.N.⁴ *Exhibit B and Audio of initial appearance dated 04/20/2016*. For the Government to be able to show the applicability of 18 U.S.C. §§ 2266(5), it must show that a bail order is “any injunction, restraining order, or any other order issued by a civil or criminal court for the purpose of preventing violent or threatening acts or harassment against, sexual violence, or contact or communication with or physical proximity to, another person, including any temporary or final order issued by a civil or criminal court whether obtained by filing an independent action or as a pendente lite order in another proceeding so long as any civil or criminal order was issued in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection; and any support, child custody or visitation provisions, orders, remedies or relief issued as part of a protection order, restraining order, or injunction pursuant to State, tribal, territorial, or local law authorizing the issuance of protection orders, restraining orders, or injunctions for the protection of victims of domestic violence, sexual assault, dating violence, or stalking. 18 U.S.C. §§ 2266(5)(A) and (B).

In this matter, specifically the Government must show that the ‘bail order’ was issued as temporary order, after the initiation of the criminal complaint against Mr. Dion on behalf or by T.N. *Id.* The Government cannot do so.

⁴ There are three components in this matter that could be construed as a ‘bail order.’ The first is the audio of the initial appearance, the second is the bail order from Judge Goranaites, and the third is the bail bond signed by a bail commissioner. For purposes of simplicity, Mr. Dion argues that none of these qualify as a ‘protective order’ as defined under 18 U.S.C. §§ 2266(5). How these each are examined under due process and notice is discussed *infra*.

A. The plain language in 18 U.S.C. §§ 2266(5) does not include ‘bail order’ or ‘conditions of release.’

In reading the plain language of the definition of ‘protection order,’ nowhere is the word ‘bail’ referenced. *Id.*; *Hughes Aircraft Co.*, 525 U.S. 432. The words ‘injunction’ and ‘restraining order’ are specifically used, but not bail. *Id.* The Government will certainly argue⁵ that ‘bail order’ is incorporated into ‘any other order’ but if Congress had intended all orders from a criminal court, why would it have added ‘injunction’ or ‘restraining order?’ This could not have been an accidental omission from Congress as Congress is plainly aware of the term and use of ‘bail.’ See Act of June 22, 1966 (Bail Reform Act of 1966), Public Law 89-465, 80 STAT 214, (which revised existing bail practices in courts of the United States); 18 U.S.C. 3142(e) (1982 ed., Supp. III)(commonly called the ‘Bail Reform Act of 1984.’); 34 U.S.C. § 20911 et seq.(commonly called the ‘Adam Walsh Act.’)⁶ Even if Congress intentionally omitted bail, had it intended 18 U.S.C. §§ 2266(5) to apply to criminal release, it would have added the language from 18 U.S.C. §3148 (‘conditions of release or ‘release conditions’) rather than or in addition to protection order. *Id.* Because Congress specifically used the term ‘protection order’ and referenced ‘restraining order’ and ‘injunction’ and did not include ‘bail’ or ‘conditions of release’ in the definition of ‘protection order,’ the

⁵ In fact, they have no choice.

⁶ It is worth mentioning that the *U.S.Const. amend. VIII* specifically references ‘bail.’

statutory language provides a clear answer that a ‘bail order’ does not apply. *Hughes Aircraft Co. at 438*. Therefore, the matter must be dismissed.

B. If there is any ambiguity, then the rule of lenity applies.

If, despite the failure of the Statute to reference ‘bail order,’ the Court is uncertain as to the intention of Congress regarding 18 U.S.C. §§ 2266(5), then the Statute is ambiguous.⁷ See, e.g., *Black's Law Dictionary* 79 (7th ed. 1999) ("An uncertainty of meaning or intention, as in a... statutory provision."). The rule of lenity requires that genuine ambiguities affecting a criminal statute's scope be resolved in favor of the defendant. *United States v. Jalbert*, 242 F.Supp.2d 44, (D. ME. 2003) citing *United States v. Lanier*, 520 U.S. 259, 266, 117 S.Ct. 1219, 137 L.Ed.2d 432 (1997)); *United States v. Nippon Paper Indus. Co.*, 109 F.3d 1, 7 (1st Cir. 1997)(under the rule of lenity, if a statute is ambiguous, courts must draw all inferences in favor of the defendant).

C. A Maine state ‘bail order’ is distinct from a ‘protection order.’

In Maine, a bail order issues in a criminal proceeding pursuant to 15 M.R.S. §1026. *Id.* The Maine Legislature knows that ‘bail orders’ are distinct from a protection order issued pursuant to a civil complaint. *Id.* compare to 19-A M.R.S. §4001-4007. A

⁷ Undersigned counsel is cognizant that Legislative history could be of assistance in this matter. According to the Library of Congress, Title IV, sec. 40001-40703 of the Violent Crime Control and Law Enforcement Act, H.R. 3355)(commonly called the ‘Violence Against Women Act’) contains a massive amount of history, much of which is not available online. Counsel will continue to research this issue and supplement any information that might be of assistance to the Court.

civil protection order in Maine would, by Statute, fall squarely within the purview of “any injunction, restraining order, or any other order issued by a civil or criminal court for the purpose of preventing violent or threatening acts or harassment against, sexual violence, or contact or communication with or physical proximity to, another person, including any temporary or final order issued by a civil or criminal court whether obtained by filing an independent action or as a pendente lite order in another proceeding so long as any civil or criminal order was issued in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection” 18 U.S.C. §§ 2266(5). States that have created mechanisms⁸ to comport with 18 U.S.C. §§ 2266(5) have also ensured that there is clear and unequivocal language providing the requisite protections for the defendant. See Exhibit C.⁹ For example, the Colorado Mandatory Protection Order (Exhibit C) specifically provides the following warnings / protections:

“A knowing violation of a Protection Order is a crime A violation may subject you ... to fines ... and jail.

If you violate this Order thinking that a victim or witness has given you permission, you are wrong, and can be arrested and prosecuted.

You may apply at any time for the modification and dismissal of this Protection Order.” *Id.*¹⁰

⁸ States almost uniformly refer to these mechanisms as ‘protection orders.’

⁹ A Colorado mandatory protection order pursuant to COLO. REV. STAT. Â§ 18-1-1001(1).

¹⁰ The only case that appears to challenge 18 U.S.C. §§2266(5) is *United State v. Daniel Wilson Cline*, EP-19-CR-1018-DB where the Court upheld the Constitutionality of COLO. REV. STAT. Â§ 18-1-1001(1) which defines the circumstances and issuance of a “mandatory protection order.”

Other States have adopted the same or similar language for their own restraining orders or the enforcement of foreign orders to comport with 18 U.S.C. §§ 2266(5).¹¹

See Maryland Family Law § 4-508.1 (“{i}n this section, "order for protection" means a temporary or final order or injunction that: is issued for the purpose of preventing violent or threatening acts or harassment against, contact or communication with, or physical proximity to another person; is issued by a civil court in response seeking protection or by a criminal court; and is obtained by filing an independent action or as a pendente lite order in another proceeding”); *Mich. Rev. Act of 1961* (“{f}oreign protection order” means an injunction or other order issued by a court of another state, Indian tribe, or United States territory for the purpose of preventing a person's violent or threatening acts against, harassment of, contact with, communication with, or physical proximity to another person. Foreign protection order includes temporary and final orders issued by civil and criminal courts (other than a support or child custody order issued pursuant to state divorce and child custody laws, except to the extent that such an order is entitled to full faith and credit under other federal law), whether obtained by filing an independent action or by joining a claim to an action, if a civil order was issued in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection.”); *2017 ORS 24.190* (“{r}estraining order” includes temporary and final orders, other than support or child custody orders, issued by a civil or criminal court regardless of whether the order was obtained by filing an independent action or as a pendente lite order in

¹¹ Or vice-versa, Congress adopted language in to comport with State laws.

another proceeding. However, for a civil order to be considered a restraining order, the civil order must have been issued in response to a complaint, petition or motion filed by or on behalf of a person seeking protection”); *Ohio Title XXIX Crim.Pro. 919.27*(“a}s used in this section, “protection order issued by a court of another state” means an injunction or another order issued by a criminal court of another state for the purpose of preventing violent or threatening acts or harassment against, contact or communication with, or physical proximity to another person, including a temporary order, and means an injunction or order of that nature issued by a civil court of another state, including a temporary order and a final order issued in an independent action or as a pendente lite order in a proceeding for other relief, if the court issued it in response to a complaint, petition, or motion filed by or on behalf of a person seeking protection”);

15 V.S.A. § 1101(“a "protection order" means any injunction or other order issued for the purpose of preventing violent or threatening acts or harassment against, or contact or communication with or physical proximity to, another person, including temporary and final orders issued by civil and criminal courts, other than support or child custody orders, whether obtained by filing an independent action or as a pendente lite order in another proceeding so long as any civil order was issued in response to a complaint, petition or motion filed by or on behalf of a person seeking protection”); *39 ID. St. 63 §39-6303*(“a “{p}rotection” order means any order issued for the purpose of preventing violent or threatening acts or acts of harassment against, or contact or communication with, or physical proximity to, another person, where the order was issued:(a) Pursuant to this chapter; (b) In another jurisdiction pursuant to a provision similar to section 39-6306,

Idaho Code; or (c) In any criminal or civil action, as a temporary or final order (other than a support or child custody order), and where the order was issued in a response to a criminal complaint, petition or motion filed by or on behalf of a person seeking protection, and issued after giving notice and an opportunity to respond to the person being restrained.”)

As shown by the various statutes and Exhibit C, there is specific language mirroring 18 U.S.C. §§ 2266(5) and /or placing a Defendant on notice regarding a violation of a protection order but is not contained in 15 M.R.S. §1026(5). The reason is simple. The Maine Bail Code was never intended to be a ‘protection order’ for purposes of 18 U.S.C. §§ 2266(5). As such, the bail order is not a protection order and this matter should be dismissed.

II. THE NOTICE REQUIREMENTS FOR A VIOLATION OF A MAINE BAIL ORDER FOR PURPOSES OF 18 U.S.C. §§2262(a)(1) DO NOT COMPORT WITH DUE PROCESS

To withstand a Constitutional challenge to the proscribed violation, the Government must show that Mr. Dion reasonably understood that the violation of bail conditions could lead to a Federal charge and penalties. *United States v. Nat'l Dairy Prods. Corp.*, 372 U.S. 29, 32-33 (1963). This means all elements of the offense, including that violating the bail conditions would be akin to violating a ‘protection order’ as defined under 18 U.S.C. §§ 2266(5) are both defined with “sufficient definiteness” in general and in this particular case so that Mr. Dion could “understand what conduct is

prohibited” and the possible penalties attached. *Kolender v. Lawson*, 461 U.S. 352, 357 (1983).

The Due Process Clause "requires that statutes or regulations be sufficiently specific to provide fair notice of what they proscribe." *Kittery Motorcycle, Inc. v. Rowe*, 320 F.3d 42, 50 (1st Cir. 2003). To determine whether or not a statute or regulation meets that requirement, the court should look first to the language of the statute or regulation. See *United States v. Duran*, 596 F.3d. 1283 (11th Cir. 2010). As discussed *supra*, there is not only a general lack of notice that a violation of a bail condition is a violation of 18 U.S.C. §§2262(a)(1)¹², but there was a breathtaking failure of notice in this particular case.

D. Proper notice of the conditions and potential sanctions in this matter did not comport with necessary requirements under due process.

Mr. Dion appeared with a lawyer of the day by video on April 19, 2019. *Facts* #2. At that hearing, the Court advised Mr. Dion that failure to abide by conditions (including the ‘no contact’ of T.N.) could lead to his arrest. *Id.* At no time was he advised as to any other potential consequences of violation of bail. *Id.* Under 15 M.R.S. §1026(5), the Judicial Officer shall:

A. Include a written statement that sets forth all the conditions to which the release is subject in a manner sufficiently clear and specific to serve as a guide for the defendant's conduct; and
[PL 1987, c. 758, §20 (NEW).]

B. Advise the defendant of:

- (1) The penalties if the defendant fails to appear as required; and
- (2) The penalties for and consequences of violating a condition of release, including the immediate issuance of a warrant for the defendant's arrest.

¹² See Section I(C). The notice provisions of the Maine Bail Code were never intended to apply to a violation of 18 U.S.C. §2262(a)(1).

Id.

There is no dispute that Mr. Dion was not advised of the ultimate penalty for violation of the any of the conditions. *Facts #2*; see *Custis v. United States*, 511 U.S. 485, 487, 496, 114 S.Ct. 1732, 128 L.Ed.2d 517 (1994)(Court found that plea was not knowingly and voluntary because Defendant had not been fully apprised of his rights). Thus, it is unquestioned that 15 M.R.S. §1026(5) was not followed by the Court. Additionally, the only bail order signed by the Court did not specifically ‘check’ the no-contact provision with T.N. *Exhibit B*; *Facts #3*. There is a bail bond signed by a bail commissioner and Mr. Dion however that bond is signed at 6:45 P.M. *Exhibit D*. There is no evidence that this bond was ever incorporated into a temporary ... order issued by a ... criminal court ... in response to a complaint ... filed by or on behalf of a person seeking protection. Further, Mr. Dion was not with counsel when this was signed. *Id.* Even if he was with counsel, “a defendant represented by an appointed lawyer for the day is in a different situation from {retained counsel}. Although we can impose upon attorneys who formally enter their appearance for defendants in criminal cases the burden of advising their clients of constitutional and other rights and procedures regarding the criminal case, we have not explicitly imposed the same on lawyers for the day. For that reason, we cannot presume ... that the attorney fulfilled the duty of notifying {Mr. Dion} about {his} constitutional rights... .” *State v. Ouellette*, 901 A.2d 800 (ME. 2006).

The Federal system is much more stringent about the requirements of advising a criminal defendant as to their release conditions and penalties as 18 U.S.C. §3142(h) provides:

(h)CONTENTS OF RELEASE ORDER.—In a release order issued under subsection (b) or (c) of this section, the judicial officer shall—

(1)include a written statement that sets forth all the conditions to which the release is subject, in a manner sufficiently clear and specific to serve as a guide for the person's conduct; and

(2)advise the person of—

(A)

the penalties for violating a condition of release, including the penalties for committing an offense while on pretrial release;

(B)

the consequences of violating a condition of release, including the immediate issuance of a warrant for the person's arrest; and

(C)

sections 1503 of this title (relating to intimidation of witnesses, jurors, and officers of the court), 1510 (relating to obstruction of criminal investigations), 1512 (tampering with a witness, victim, or an informant), and 1513 (retaliating against a witness, victim, or an informant).

Id.

It is unquestioned had Mr. Dion been a Defendant in a Federal matter and only advised that a violation of 18 U.S.C. §3142(h) could lead to his arrest and being held, while the only written document ran contrary to the oral statement, the Court could not find that the necessary notice requirements had been met. See *United States v. DiCaro*, 852 F.2d 259, 264, 265 (7th Cir. 1988) (“{t}he Bail Reform Act also provides that the releasing judge "shall" advise the person of "the penalties for violating a condition of release, including the penalties for committing an offense while on pretrial release." 18 U.S.C. Sec. 3142(h)(2)(A). Section 3142 does not specify the effect of failing to give this

notice on the court's ability to impose a sentence under Sec. 3147. We agree with the Fourth Circuit's decision in *United States v. Cooper*, 827 F.2d 991 (4th Cir. 1987) that the Bail Reform Act itself precludes the sentencing under Sec. 3147 of a person who was not advised at the time of release of the penalties for committing an offense while released on bond”)

Because there is no evidence that the general notice requirements under 15 M.R.S. §1026(5) comport with due process or that the requisite notice requirements occurred in this matter, the Court should dismiss the indictment.

WHEREFORE, Mr. Dion respectfully requests that the Court grant this Motion to Dismiss, or in the alternative, set the matter for a hearing and any and all other relief that this Honorable Court deems fit and just.

Dated this 6th day of December, 2019 at Portland, Maine.

Respectfully submitted,

/s/ David J. Bobrow, Esq.
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**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)	
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NELSON DION,)	
Defendant)	
)	

CERTIFICATE OF SERVICE

I, David J. Bobrow, Esq., hereby certify that I have caused to be served via ECF the Defendant's Motion to Dismiss Indictment on the following individuals:

1. McElwee, Darcie at Darcie.McElwee@usdoj.gov;
2. All other attorneys of record in this matter.

Dated this 6th day of December, 2019 at Portland, Maine.

Respectfully submitted,

/s/ David J. Bobrow, Esq.
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