



John Parker Sweeney, President of DRI – Voice of the Defense Bar

Testimony Before

**Subcommittee on the Constitution and Civil Justice
The U.S. House of Representatives**

February 27, 2015

**“The State of Class Actions Ten Years After the Enactment of
the Class Action Fairness Act”**

John Parker Sweeney, President of DRI – Voice of the Defense Bar
Testimony Before The
U.S. House of Representatives Subcommittee on the Constitution and Civil Justice
February 27, 2015
“The State of Class Actions Ten Years After the Enactment of the Class Action Fairness Act”

Good morning, Mr. Chairman, Mr. Cohen, and members of the subcommittee. I am John Parker Sweeney, president of DRI – The Voice of the Defense Bar. I will summarize my statement and ask that my full statement be included in the record.

I want to first thank the subcommittee for allowing us to appear here today. With 22,000 members, DRI is the largest association of lawyers defending American businesses – large and small – in court. Over the past four years, we have submitted 23 amicus briefs to the Supreme Court in cases involving class actions. We also conduct the nation’s only annual national opinion poll devoted exclusively to the civil justice system.

I would also like to express our appreciation for the time and skill that went into the enactment of the Class Action Fairness Act of 2005. This legislation brought increased fairness and efficiency to the civil justice system. The importance of CAFA is highlighted by the Supreme Court’s significant decisions over the past ten years in the areas of class and collective actions.

Representative actions such as class actions and collective actions are exceptions “to the usual rule that litigation is conducted by and on behalf of the individual named parties only.” *Califano v. Yamasaki*, 442 U.S. 682, 700-701 (1979). Exceptional litigation can create exceptional problems and calls for exceptional treatment and the enactment of CAFA helped address some of the exceptional problems inherent in aggregate litigation. As with most important legislation, the passage of time and the accrual of practical experience reveal

opportunities that would make the law more effective, as well as address the vulnerabilities that threaten its purposes.

Although there are a number of areas of concern to DRI's members, we would like to highlight today three areas we believe merit further study and reform:

- 1) No-injury class actions;
- 2) The use of the *cy pres* doctrine to increase the cost of class action settlements; and
- 3) Continued issues with removal of class actions to federal court.

Each of these areas presents unique challenges and each impacts the very concerns that led to the enactment of CAFA in the first place. We believe CAFA's reforms have worked and our discussion here is intended to highlight issues that warrant further review.

I. NO-INJURY CLASS ACTIONS

Article III standing is an “irreducible constitutional minimum,” *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560 (1992), and an individual lacks standing unless he has been affected “in a personal and individual way.” *Id.* at 560 n.1. A plaintiff cannot rely on any injury others may have suffered to satisfy this requirement. *See Warth v. Seldin*, 422 U.S. 490, 501 (1975) (“[T]he plaintiff . . . must allege a distinct and palpable injury to himself . . .”). In other words, the plaintiff must have suffered an “injury in fact.”

Yet defendants today face abstract claims that threaten to undermine the civil justice system: suits brought by plaintiffs who admittedly have not been harmed on behalf of a proposed class of similarly unharmed individuals. In these no-injury class actions, plaintiffs ask the courts to ignore the requirement of harm, often by seeking to recover some fixed amount or range of statutory damages without any showing of an injury.

Much of our concern over “no-injury” classes involve suits brought under state law, such as deceptive trade practices or consumer protection statutes that provide for a measure of damages untethered to any actual harm sustained by a person. With respect to such “statutory damages,” one commentator has explained:

Several states provide that private litigants may recover statutory damages, which are the greater of actual damages or an amount ranging from \$25 in Massachusetts to \$2,000 in Utah. State laws allow plaintiffs to receive the statutory minimum without proving actual damages. Nebraska law allows the court, in its discretion, to increase the award ‘to an amount which bears a reasonable relation to the actual damages’ up to \$1,000 when ‘damages are not susceptible of measurement by ordinary pecuniary standards.’

Victor E. Schwartz & Cary Silverman, *Common-Sense Construction of Consumer Protection Acts*, 54 Kan. L. Rev. 1, 22-23 (October, 2005).

Federal statutes also contain statutory damages provisions. For example, the Fair and Accurate Transaction Act of 2003 (“FACTA”) requires retailers to truncate credit card information on electronically printed receipts given to customers. 15 U.S.C. § 1681c(g). A part of the Fair Credit Reporting Act, (“FCRA”), 15 U.S.C. §§ 1681 et seq., FACTA incorporates the statutory damages provision of the FCRA, which can range from \$100 to \$1,000 per violation. 15 U.S.C. § 1681n. Copyright law also contains statutory damages provisions. 17 U.S.C. § 504(c), as does the Fair Debt Collections Practices Act. 15 U.S.C. § 1692k(a)(2) (providing for statutory damages but limiting amount recoverable in class actions to \$500,000 or 1% of the violator’s net worth). The Telephone Consumer Protection Act also provides for statutory damages in lieu of actual damages for violations of its provisions. 47 U.S.C. §§ 227(b)(3) and 277(c)(5).

Our experience with statutory damages class actions under both state and federal law is that while few if any of the putative class members have suffered any actual harm, the sheer

number of potential class members creates significant exposure to the defendant. Two justifications typically advanced for statutory damage awards are: (1) the actual damages sustained for a particular violation are difficult to measure or prove and statutory damages provide some measure of compensation to the plaintiff; and (2) to punish a defendant and to deter others from committing similar acts in the future. See, Ben Sheffner, *Due Process Limits on Statutory Civil Damages*, Washington Legal Foundation Legal Backgrounder, Vol. 25, No. 27 at 1 - 2 (August 6, 2010) (discussing proffered justifications for statutory damages in copyright cases). As noted below, when the plaintiff and the putative class have admittedly suffered no harm, there is nothing compensatory about such awards.

When these statutory damage provisions are combined with the aggregate power of the class action device, however, defendants can face significant and potentially ruinous exposure for conduct that admittedly harmed no one. See e.g., *In re Trans Union Corp. Privacy Litig.*, 211 F.R.D. 328, 350 (N.D. Ill. 2002) (denying certification of a nationwide statutory damages class because while “certification should not be denied solely because of the possible financial impact it would have on a defendant, consideration of the financial impact is proper when based on the disproportionality of a damage award that has little relation to the harm actually suffered by the class, and on the due process concerns attended upon such an impact”). In fact, a recent certiorari petition identified 19 lawsuits (14 of them putative class actions) involving alleged technical violations of ten different federal statutes where the plaintiff suffered no economic or other harm. Petition For A Writ of Certiorari, at 9 – 12, *First National Bank of Wahoo v. Charvat*, (No. 13-679). The Court denied that petition and while it had previously granted certiorari in a case raising a similar issue, it ultimately dismissed that writ as improvidently granted. *First American Financial Corp. v. Edwards*, 132 S.Ct. 2536, 2537 (2012).

In a typical case, the plaintiff contends the defendant committed wide-spread technical violations of some statute. She admits that she and the class she seeks to represent sustained no economic or other actual harm as a result of the violation. She then seeks to have the court award aggregate damages based on some formulaic calculation drawn from a range of penalties recoverable under the statute allegedly violated. In other cases, the claims are brought by state attorneys general under a *parens patrie* theory. The relief sought in many class actions or in *parens patrie* actions brought by state attorneys general is based not on the actual harm suffered by any individual person, but rather on some legislatively-defined statutory damage amount set for each violation. Under this scenario, even an unwitting defendant can face catastrophic liability for inadvertent and technical violations when sued in a class action or state AG action. Although some statutes, such as the Truth in Lending Act – recognize the gross unfairness of imposing a statutory damages penalty where aggregate treatment is sought – most statutes do not contain such language and a number of courts have refused to consider the unfairness of the relief sought in making their certification decision.

These cases implicate Article III standing requirements – both for the putative class representatives and for the absent class members. They also implicate broad policy concerns over the appropriateness of using the civil justice system to punish defendants for what are at most technical violations. And punishment it is. Because the class members are by definition unharmed, there is nothing compensatory about the process. Permitting aggregated actions by unharmed individuals places enormous pressure on defendants to settle claims that would be valueless if tried on an individual basis. With little or no interest on the part of absent class members in participating in these settlements, they implicate the same concerns the 109th

Congress had with coupon settlements that it attempted to address with CAFA. We believe this is an area in need of further study and reform.

Congress passed the Rules Enabling Act, 28 U.S.C. § 2072, to prevent the use of procedural rules to abridge or enlarge substantive rights. Permitting suits on behalf of unharmed absent class members who lack Article III standing (as several courts have held) contravenes this important Congressional mandate. Likewise, because some courts permit aggregation while others do not – despite the fact that the same statutory provisions and same procedural rules are at issue – the current environment is utterly and unnecessarily unpredictable for our members and our clients. In addition, permitting litigation by and on behalf of unharmed parties impairs the ability of the civil justice system to efficiently adjudicate the claims more properly before it. As an organization devoted to improving the civil justice system, we believe a hard look at addressing the problem of no injury class actions is warranted.

And we are not alone in this belief.

For the past three years, we have conducted the DRI National Opinion Poll on the Civil Justice System. We've asked class action questions on each of our polls. On the question of "harm" in our 2013 poll, 68% said they would require plaintiffs to show actual harm, rather than potential harm, to join a class action.

This year, we took it a step further. We asked if the respondent would support a law requiring a person to show that they were actually harmed by a company's products, services, or policies rather than just showing the potential for harm. Seventy-eight percent would support such a law; just 19% would oppose it. Large majorities supporting this reform occur across 11 demographic categories. Men, women, Republicans (86%), Democrats (71%), Liberals (73%),

Conservatives (85%). We believe these results further support a probing examination of the question of permitting no-injury class actions to proceed.

II. THE INCREASING USE OF *CY PRES* PAYMENTS IN CLASS ACTIONS

As Judge Posner recently noted, “*Cy pres* (properly *cy près comme possible*, an Anglo-French term meaning "as near as possible") is the name of the doctrine that permits a benefit to be given other than to the intended beneficiary or for the intended purpose because changed circumstances make it impossible to carry out the benefactor's intent. A familiar example is that when polio was cured, the March of Dimes, a foundation that had been established in the 1930s at the behest of President Roosevelt to fight polio, was permitted to redirect its resources to improving the health of mothers and babies.” *Pearson v. NBTY, Inc.*, 772 F.3d 778, 784 (7th Cir. 2014). Over the last decade, courts have increasingly used the *cy pres* doctrine to disperse settlement or judgment funds that remain unclaimed after attempted distribution to class members. That practice is coming under growing criticism. See, e.g., Jennifer Johnston, Comment, *Cy Pres Comme Possible to Anything is Possible: How Cy Pres Creates Improper Incentives in Class Action Settlements*, 9 J.L. Econ. & Pol'y 277 (2013); Sam Yospe, Note, *Cy Pres Distributions in Class Action Settlements*, 2009 Colum. Bus. L. Rev. 1014. We believe that criticism is worth considering.

In some instances, settlements made for the ostensible benefit of class members go entirely to *cy pres* recipients because it is infeasible or otherwise difficult to provide benefits directly to class members. Attorneys' fees are often calculated on the gross amount of class settlement. The availability of *cy pres* awards skews the entire process by increasing the size of settlement (and potentially class counsel's fees) while providing no direct benefit to the class members on whose behalf the suit was purportedly brought and whose rights are impacted by the

action. This ad hoc and unlegislated expansion of the class action device calls for specific reform to prohibit or strictly limit its use. Reforms here could be addressed through more rigorous application of the existing civil procedure rules, by the adoption of more explicit rules, and by the enactment of statute specifically addressing it.

III. CONTINUED ISSUES WITH REMOVAL OF CLASS ACTIONS

As the Supreme Court recently noted, “Congress enacted CAFA in order to “amend the procedures that apply to consideration of interstate class actions” in part because “certain requirements of federal diversity jurisdiction had functioned to keep cases of national importance in state courts rather than federal courts.” *Mississippi ex rel. Hood v. AU Optronics Corp.*, 571 U.S., 134 S.Ct. 736, 739 (2014) (internal citations and quotations omitted). Even with CAFA, we have seen continued concerns with issues related to the amount in controversy requirements and inconsistent treatment of them by districts and appellate courts both with respect to class actions and to traditional diversity claims. Congress attempted to address this issue somewhat with the Federal Courts Jurisdiction and Venue Clarification Act of 2011, Public Law 112-63, which added 28 U.S.C. § 1446(c)(2)(B), which provides that removal is proper if the district court finds, “by the preponderance of the evidence, that the amount in controversy exceeds the amount specified in section 1332(a) [\$5,000,000].” But what evidence is required to allow the district court to make that finding, and when that evidence must be submitted, is the subject of on-going dispute.

The Supreme Court recently addressed a portion of these concerns in its recent decision in *Dart Cherokee Basin Operating Co. v. Owens*, 135 S. Ct. 547 (Dec. 15, 2014). There, it rejected a presumption against removal in CAFA cases and held that a defendant is not required to provide evidence as to the amount in controversy at the time of removal. In that case, the

evidence was essentially undisputed that the amount in controversy exceeded \$5,000,000. Although the defendant asserted such in its notice of removal, the district court held it could not consider post-removal evidentiary submissions supporting that assertion and remanded the case. A divided Tenth Circuit refused to consider the defendant's appeal. The Court granted the defendant's certiorari petition to consider a split between the Tenth Circuit and between five and seven other courts of appeal on the question and the majority agreed the defendant was not required to attach evidence at the time of removal.

Nonetheless, we still comprehend two concerns about the current treatment of the amount in controversy requirement in class action cases. First, we question whether imposing a \$5,000,000 amount in controversy requirement over class actions makes sense when, to use the language of the Senate Judiciary Committee's report on CAFA, "a citizen can bring a 'federal case' by claiming \$75,001 in damages for a simple slip-and-fall case against a party from another state." Senate Report No. 14, 109 Cong., 1st Sess., at 11 (2005). We believe that the Committee should consider whether putative interstate class actions involving minimally diverse parties should be subject to the same jurisdictional minimum as traditional diversity claims. This threshold would eliminate a considerable amount of procedural wrangling at the removal stage and place class action defendants on equal footing with other out-of-state defendants sued in state court.

The second issue we believe warrants study goes directly to the courts' treatment of the amount in controversy requirement and the inappropriate burdens some have placed on class action defendants seeking to remove cases to federal court. In particular, we believe a hard look at what "evidence" is required in order for a removing defendant to establish the requisite amount in controversy under 28 U.S.C. § 1446(c)(2)(B). We believe the approach taken by the

United States Court of Appeals for the Seventh Circuit in *Back Doctors Ltd. v. Metropolitan Property and Casualty Insurance Company*, 637 F.3d 827 (7th Cir. 2011) properly balances the amount in controversy issues and invite the Committee to consider whether the essence of its holding should be incorporated into unambiguous statutory language applicable to all diversity removals.

In *Back Doctors, Ltd.*, the court attempted to lay down a fairly simple test for determining whether a class action defendant had met the amount in controversy requirement. It began by noting that the Supreme Court had long-ago held that when a plaintiff initiates an action in federal court (and thus is the proponent of federal jurisdiction), its allegations regarding the amount in controversy must be accepted unless it is impossible for it to recover the jurisdictional minimum. 637 F.3d at 829 (citing *St. Paul Mercury Indemnity Company v. Red Cab Co.*, 303 U.S. 283 (1938)). The Seventh Circuit held, consistent with 28 U.S.C. § 1446(c)(2)(B), that the same rule applied where a removing defendant (as the proponent of federal jurisdiction), made allegations regarding the amount in controversy in the notice of removal. 637 F.3d at 830. The defendant alleged that the compensatory damages exceeded \$2,900,000 and that a potential punitive award in light of nature of the claims was sufficient to push the amount in controversy above \$5,000,000. The plaintiff countered by pointing out that it had not sought punitive damages on behalf of itself or the putative class and without the possibility of a “speculative” punitive award, the amount in controversy could not be met.

The court recognized that while jurisdictional *facts* must be alleged and, if challenged, proven by a preponderance of the evidence, that does not require the defendant to show it was more likely than not the plaintiff class would recover in excess of the jurisdictional amount. *Id.* at 829. It then identified what it considered to be jurisdictional *facts*:

The legal standard was established by the Supreme Court in *St. Paul Mercury*: unless recovery of an amount exceeding the jurisdictional minimum is legally impossible, the case belongs in federal court. Only jurisdictional facts, such as which state issued a party's certificate of incorporation, or where a corporation's headquarters are located, need be established by a preponderance of the evidence.

Back Doctors Ltd., 637 F.3d at 830. Because the defendant in that case could show that the compensatory damages sought exceeded \$2,900,000 and because the plaintiff could not show that punitive damages were legally impossible to recover under state law, the court reversed the district court's remand order and directed it to consider the case on the merits. *Id.* at 831. We believe this approach would best balance the federalism concerns inherent in diversity removals while allowing the courts to devote their resources to issues other than fights over jurisdiction.

Now, if I may, Mr. Chairman, let me spend a few minutes on the DRI National Public Opinion Poll on the Civil Justice System. Often time in discussing these issues we forget about the American people, to whom the civil justice system really belongs. And that's why we created the DRI Poll.

As an advocacy group, we know that the integrity of our data has to be impeccable. That's why we selected Gary Langer of Langer Research Associates (NY) as our pollster. Langer is the former head of polling for ABC News and a former board member of the American Association of Public Opinion Researchers which sets the standards for the industry. All of our polls have been accepted by the Roper Center at the University of Connecticut, a premier repository that makes methodologically sound polls available to researchers. Summary results of all of our polls are available on our web site at www.dri.org.

We've asked class action questions on each of our polls. Let me highlight some of the data that we've obtained. We found that 38 percent of all adult Americans say they've been invited to join a class action suit. Six in 10 of them declined. That means a total of 15 percent of

all adults report having participated in a class action suit, the equivalent of nearly 37 million adults. And while 68 percent feel their participation was worthwhile, nearly three-quarters of those who won an award say it was “insignificant.”

Basic attitudes on class actions are mixed. Fifty percent of Americans think most of these lawsuits as justified; 38 percent see them as unjustified, with the rest unsure. Ideology is a key factor: Liberals are 27 percentage points more apt than strong conservatives to see class-action suits as justified, 61 vs. 34 percent, as are Democrats over Republicans, 57 vs. 44 percent.

Yet there’s substantial bipartisan and cross-ideological consensus on two questions – the preference that a class-action plaintiff should show actual harm and opposition to opt-out enrollment. Regardless of partisan and ideological preferences, two-thirds or more agree on these.

I mentioned earlier that 78% of Americans would support a law requiring a showing of actual harm in order for an individual to participate in a class action law suit. On another class action issue, 85% of Americans say class action lawyers should be required to obtain permission from individuals before enrolling them as plaintiffs.

Mr. Chairman, large majorities of the American public find it makes no sense to pay damages to people who have suffered no harm. They find it makes no sense to represent people in a lawsuit without asking their permission.

The public supports reform. It’s just common sense to them...and should be to us.

Feb. 27, 2015

Briefing Paper: Public Attitudes on Class-Action Litigation

Prepared for testimony of DRI-The Voice of the Defense Bar before the U.S. House
Subcommittee on the Constitution and Civil Justice

Independent public opinion polling sponsored by DRI-The Voice of the Defense Bar since 2012 has found broad public support for significant reforms in the handling of class-action lawsuits, including opposition to opt-out enrollment and support for changes in who can join such suits.

These surveys also have demonstrated the vast reach of this type of litigation – 38 percent of all adult Americans say they’ve been invited to join a class action suit – as well as mixed feelings about their utility. While 54 percent think class actions often enable people to hold companies responsible, 62 percent say they often force companies that have done no wrong to pay damages.

Further, just half think most class action lawsuits that are filed are justified.

The random-sample telephone surveys have been conducted for DRI by the nonpartisan survey research firm Langer Research Associates, with rigorous methodology; neutral, balanced questions; and independent data analysis. The company, which polls for ABC News, Bloomberg and others, is a charter member of the Transparency Initiative of the American Association for Public Opinion Research and subscribes to its Code of Professional Ethics and Practices.

This memo summarizes some key findings from the research to date. Full results are available at DRI’s website, <http://www.dri.org>, including analyses, full questionnaires, topline results and methodological details. Raw datasets from these surveys have been deposited with the nonprofit Roper Center for Public Opinion Research at the University of Connecticut for unfettered secondary analysis.

Among the findings:

- Just 26 percent of Americans say that showing the potential for harm should be adequate to join a class-action lawsuit. Sixty-eight percent instead say plaintiffs should be permitted to join a class only if they can show they’ve actually been harmed.

The question: Do you think people should be allowed to join class-action lawsuits as plaintiffs only if they can show that they’ve been harmed by a company’s products or actions, or is it enough for them to show the potential for harm, regardless of whether they’ve actually been harmed?

- A vast 85 percent say class-action lawyers should be required to obtain permission from individuals before enrolling them as plaintiffs. Just 10 percent support the current practice allowing lawyers to include individuals whom they believe are eligible without getting their permission first, then providing them the opportunity to opt-out later.

The question: Lawyers who file class-action suits often include people who they think are eligible to be plaintiffs without first getting their permission. People who don't want to participate can drop out later. Do you think lawyers should or should not be required to get permission from people before including them as plaintiffs in class-action lawsuits?

It's probable that few Americans are closely following these issues; as such their expressed attitudes most likely reflect underlying world views, for example favoring personal precepts of fairness, individualism and self-determination. While additional information and argumentation could influence public views, the DRI survey's baseline measurements provide valuable insight into public preferences on these relatively little-studied issues.

Most broadly, basic attitudes on class actions are mixed. Fifty percent of Americans see most of these lawsuits as justified; 38 percent see them as unjustified, with the rest unsure. Ideology is a key factor: Liberals are 27 percentage points more apt than strong conservatives to see class-action suits as justified, 61 vs. 34 percent, as are Democrats over Republicans, 57 vs. 44 percent.

Yet there's substantial bipartisan and cross-ideological consensus on the preference that a class-action plaintiff should show actual harm and on opposition to opt-out enrollment. Across partisan and ideological groups, two-thirds or more agree on the former, eight in 10 or more on the latter.

As noted, 38 percent say they've been invited to join a class action; six in 10 of them declined. That leaves a total of 15 percent of all adults who report having participated in a class action suit, the equivalent of nearly 37 million adults. As many say they joined "to send a message" as to win an award. And indeed while 68 percent feel their participation was worthwhile, nearly three-quarters of those who won an award say it was "insignificant."

Selected results follow. Full results are available at <http://www.dri.org>.

Respectfully submitted,

Gary Langer, president
Langer Research Associates
New York, N.Y.

2012:

12. Have you yourself ever been invited to participate in a class action lawsuit, or not?

	Yes	No	No opinion
8/19/12	38	62	*

13. (IF INVITED TO PARTICIPATE) Have you ever participated in a class action lawsuit, or not?

	Yes	No	No opinion
8/19/12	39	61	1

12/13 NET:

	----- Invited -----	Never been invited	No opinion
8/19/12	NET 38	Participated 15	Never participated 23
			62
			*

15. (IF EVER PARTICIPATED) Did you participate mainly to (win damages), to (send a message to the company involved) or some other reason?

	Win damages	Send a message	Other reason	No opinion
8/19/12	43	45	10	1

16. (IF EVER PARTICIPATED) Did you receive an award, or not?

	Yes	No	No opinion
8/19/12	70	28	2

17. (IF EVER PARTICIPATED AND RECEIVED AN AWARD) Would you describe that award as substantial, modest or insignificant?

	Substantial	Modest	Insignificant	No opinion
8/19/12	8	19	73	*

18. (IF EVER PARTICIPATED) Do you think your participating in this suit was worthwhile, or not worth the trouble?

	Worthwhile	Not worth trouble	No opinion
8/19/12	68	27	5

2013:

8. In class-action lawsuits, a group of people known as plaintiffs sue a company for what they see as a faulty product, bad service or an unfair policy. Do you think most class-action lawsuits filed in this country are justified or unjustified?

	Justified	Unjustified	No opinion
10/6/13	50	38	13

9. Do you think people should be allowed to join class-action lawsuits as plaintiffs only if they can show that they've been harmed by a company's products or actions, or is it enough for them to show the potential for harm, regardless of whether they've actually been harmed?

	Show harm	Show potential for harm	No opinion
10/6/13	68	26	6

Compare to (2014): 4. Would you support or oppose a law saying that in order to join a class action lawsuit a person has to show that he or she has been actually harmed by a company's products, services or policies, rather than just showing the potential for harm?

	Support	Oppose	No opinion
9/21/14	78	19	4

10. Lawyers who file class-action suits often include people who they think are eligible to be plaintiffs without first getting their permission. People who don't want to participate can drop out later. Do you think lawyers should or should not be required to get permission from people before including them as plaintiffs in class-action lawsuits?

	Should be required	Should not be required	No opinion
10/6/13	85	10	5

Selected Charts



