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NEW APPLICATION

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

COMMISSIONERS

DOCKETED

DEC 15 2010

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

DOCKETED BY [Signature]

In the matter of:
KENNETH JOSEPH PLEIN, a married man,
MARY KATHRYN PLEIN (a.k.a. "MARY KAY PLEIN"), a married woman,
KENNETH JOSEPH PLEIN and MARY KATHRYN PLEIN (a.k.a. "MARY KAY PLEIN"), Co-Trustees of THE PLEIN FAMILY TRUST U/T/A dated DECEMBER 1, 1993,
PLEIN ENTERPRISES INCORPORATED (d.b.a. "TRI-STAR REALTY"), an Arizona corporation,
Respondents.

DOCKET NO. S-20774A-10-0494

NOTICE OF OPPORTUNITY FOR HEARING REGARDING PROPOSED ORDER TO CEASE AND DESIST, ORDER FOR RESTITUTION, ORDER FOR ADMINISTRATIVE PENALTIES AND ORDER FOR OTHER AFFIRMATIVE ACTION

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AZ CORP COMMISSION
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NOTICE: EACH RESPONDENT HAS 10 DAYS TO REQUEST A HEARING
EACH RESPONDENT HAS 30 DAYS TO FILE AN ANSWER

The Securities Division ("Division") of the Arizona Corporation Commission ("Commission") alleges that Respondents KENNETH JOSEPH PLEIN, MARY KATHRYN PLEIN (a.k.a. "MARY KAY PLEIN"), KENNETH JOSEPH PLEIN and MARY KATHRYN PLEIN (a.k.a. "MARY KAY PLEIN"), Co-Trustees of THE PLEIN FAMILY TRUST U/T/A dated DECEMBER 1, 1993, and PLEIN ENTERPRISES INCORPORATED (d.b.a. "TRI-STAR REALTY"), have engaged in acts, practices, and transactions that constitute violations of the Securities Act of Arizona, A.R.S. § 44-1801 et seq. ("Securities Act").

The Division further alleges that Respondents KENNETH JOSEPH PLEIN, and MARY KATHRYN PLEIN (a.k.a. "MARY KAY PLEIN"), directly or indirectly controlled Respondent

1 PLEIN ENTERPRISES INCORPORATED (d.b.a. "TRI-STAR REALTY") within the meaning of
2 A.R.S. § 44-1999, and that KENNETH JOSEPH PLEIN, and MARY KATHRYN PLEIN (a.k.a.
3 "MARY KAY PLEIN"), are each jointly and severally liable with, and to the same extent as PLEIN
4 ENTERPRISES INCORPORATED (d.b.a. "TRI-STAR REALTY"), for its violations of the anti-
5 fraud provisions of the Securities Act.

6 **I.**

7 **JURISDICTION**

8 1. The Commission has jurisdiction over this matter pursuant to Article XV of the
9 Arizona Constitution and the Securities Act.

10 **II.**

11 **RESPONDENTS**

12 2. At all times relevant, Respondent KENNETH JOSEPH PLEIN ("KP") has been a
13 married man and an Arizona resident. At all times relevant, KP issued, offered and sold the
14 investments discussed below within and from Arizona in his individual capacity, and on behalf of
15 Respondents: (a) THE PLEIN FAMILY TRUST U/T/A dated DECEMBER 1, 1993 (the
16 "TRUST") as its Co-Trustee and investment salesman; and (b) PLEIN ENTERPRISES
17 INCORPORATED (d.b.a. "TRI-STAR REALTY") ("PE") as its co-owner, president, director and
18 investment salesman. In these capacities, KP promoted, controlled and bore responsibility for PE's
19 business and financial affairs, and its investor solicitation activities. At all times relevant, KP was a
20 real estate broker licensed by the Arizona Department of Real Estate ("Arizona DRE"),
21 #BR006126000 (the "License"). On or about October 1, 2010, KP's License was cancelled by the
22 Arizona DRE. KP has not been registered by the Commission as a securities salesman or dealer.

23 3. At all times relevant, Respondent MARY KATHRYN PLEIN (a.k.a. "MARY
24 KAY PLEIN") ("MP") has been a married woman and an Arizona resident. At all times
25 relevant, MP issued, offered and sold the investments discussed below within and from Arizona
26 in her individual capacity, and on behalf of: (a) the TRUST as its Co-Trustee and/or investment

1 salesman; and (b) PE as its co-owner, secretary, treasurer, director and/or investment salesman.
2 In these capacities, MP promoted, controlled and bore responsibility for PE's business and financial
3 affairs, and its investor solicitation activities. MP has not been registered by the Commission as a
4 securities salesman or dealer.

5 4. The TRUST was formed by KP and MP under Arizona law on or about December 1,
6 1993. At all times relevant, the Trust issued the investments discussed below within and from
7 Arizona. The TRUST has not been registered by the Commission as a securities dealer.

8 5. PE was formed as an Arizona corporation by KP and MP on May 7, 1985.¹ At all
9 times relevant, PE maintained its principal place of business in Sun City, Arizona, and it issued the
10 investments discussed below within or from Arizona. PE has not been registered by the Commission
11 as a securities dealer.

12 6. KP, MP, the TRUST and PE may be referred to as "Respondent(s)."

13 7. At all times relevant, KP and MP were married to each other, and were acting for
14 their own benefit and the benefit or in furtherance of their marital community.

15 **III.**

16 **FACTS**

17 **A. Respondents' Real Estate Business**

18 8. At all times relevant, Respondents represented to offerees and investors, both
19 verbally and in writing, that Respondents are in the business of buying, leasing, remodeling, and
20 reselling residential and commercial real estate and vacant land located in the greater Sun City,
21 Arizona area (the "Real Estate").

22 9. From approximately May 1985 to June 2010, Respondents issued, offered and sold
23 investments to the general public to raise capital to fund and operate Respondents' Real Estate
24

25
26 ¹ At all times relevant, PE was licensed by the Arizona DRE as a "Real Estate Corporation,"
#CO001185000, with KP serving as its "Designated Broker." PE's license has been cancelled by the
Arizona DRE.

1 business (the "Investment(s)"). The Investments have not been registered as securities with the
2 Commission to be offered or sold within or from Arizona.

3 10. Respondents solicited offerees and investors, in part, by publishing and distributing
4 detailed one- or two-page letters drafted on PE letterhead that described the benefits of purchasing
5 the Investments, current Investment opportunities, and the positive opportunities available to
6 Respondents in the Real Estate market (the "Prospectus(es)").

7 11. For instance, a Prospectus dated September 22, 2008, drafted by KP and addressed
8 to existing or potential "Private Investors," states, in part, as follows:

9 Our private investor family has grown to 110 couples or individuals with
10 investments on [sic] over 200 properties, including rental homes, condos, duplexes,
11 land, office buildings, shopping center [sic], and rehab/fix-up properties.

12 There are 55 Sun City foreclosures now on the market. This is the time for us to be
13 acquiring properties to fix up and re-sell or hold and rent until the market returns to
14 normal. Buying prices have never been lower and there are excellent buys
15 available...

16 We are looking for additional investment capital to expand our real estate programs.
17 We are willing to pay [investors] 9% interest on all new loans [*i.e.*, Investments].

18 12. KP encouraged offerees and investors to cash in their bank certificates of deposit,
19 stock, mutual funds, and other pre-existing investment or retirement accounts, and to reinvest those
20 funds by purchasing the Investments. For instance, as explained in a Prospectus dated February 17,
21 2009, provided by KP to existing or potential "Private Investors:"

22 We are in the greatest buying time of the greater Sun City area due to the bank
23 lender foreclosures.

24 We acquired seven properties (four in Sun City and three in Youngtown) the past
25 two months. We have already remodeled those homes and re-sold four of them. If
26 they do not sell quickly we're holding those homes as re-modeled rentals.

27 We are using nice Travertine flooring, granite countertops, stainless steel appliances
28 and new modern amenities so the renovated homes sell very quickly.

29 We need your help. We are looking for additional investment capital.

30 We are willing to pay [investors] 9% interest on all new loans [*i.e.*, Investments].

1 If you are only getting 1% or 2% in the bank, or seeing your stocks, mutual funds,
2 bonds and annuities dropping in value, please call us to invest your funds.

3 **B. Investment Terms and Documentation**

4 13. KP represented to offerees and investors both verbally and in writing that the
5 Investments would provide them with passive profits equaling seven to ten percent of their
6 principal Investments per year, with interest paid out on a monthly basis and the eventual return of
7 their principal at the conclusion of the Investments.

8 14. The Investments included stated terms ranging from approximately one to seven
9 years. Respondents most often issued and sold Investments with five-year terms. At the
10 conclusion of expired Investments, KP sometimes persuaded investors to accept new Investments
11 that incorporated investors' original principal Investments and/or accrued or paper profits (the
12 "Roll-Over" investments).

13 15. The Investments were purchased for varying amounts ranging from, without
14 limitation, \$10,000 up to \$180,000.

15 16. The Investments were primarily documented by promissory notes (the "Note(s)")
16 made and executed by: (a) KP in his individual capacity; (b) both KP and MP in their individual
17 capacities; (c) both KP and MP on behalf of the Trust as its Co-Trustees; and (d) by KP and/or MP
18 on behalf of PE as its owners, officers and directors.

19 17. At all times relevant, KP represented to offerees and investors that the Notes would
20 be adequately "secured" by a lien on the Real Estate purchased by Respondents with the investors'
21 money. To perfect these lien interests in favor of investors, KP further represented to offerees and
22 investors that Respondents would draft, execute, and timely record deeds of trust and assignments
23 of rent ("DOT(s)") in the county where the related Real Estate was located.

24 18. Like the Notes, the DOTs were signed by KP and MP in their individual capacities
25 and on behalf of the Trust as its Co-Trustees, and on behalf of PE as its owners, officers and
26 directors.

1 **C. Respondents' Misrepresentations and Omissions**

2 19. KP represented to offerees and investors that the DOTs would create first position
3 liens, and the only lien interests in favor of investors on the Real Estate purchased with their
4 Investment money.

5 20. KP further represented to offerees and investors that the Investments were safe
6 because the fair market value of the secured Real Estate would exceed investors' principal
7 Investments by twenty five to twenty percent, resulting in a loan Investment to value ratio of
8 seventy-five to eighty percent.

9 21. Thus, in the event of Respondents' default on their Investment obligations, investors
10 were led to believe that they would be able to recoup all or a vast portion of their principal
11 Investment funds by foreclosing on their Real Estate collateral.

12 22. Unbeknownst to offerees and investors, however, Respondents often failed to record
13 any DOTs on behalf of investors. Respondents' failure to timely perfect investors' lien interests in
14 the Real Estate purchased with investors' money often resulted in the investors' Investments being
15 unsecured.

16 23. Also unbeknownst to offerees and investors, Respondents sometimes prepared and
17 recorded multiple DOTs relating to a single piece of Real Estate in favor of multiple investors,
18 thereby effectively creating first, second, third and even fourth position lien interests. This
19 practice, coupled with the recent decline in the Real Estate market, resulted in investors'
20 Investments being under-secured and/or effectively unsecured.

21 24. Also unbeknownst to offerees and investors, Respondents sometimes encumbered
22 Real Estate collateral that had purportedly been assigned as security for an investor's Investment
23 by: (a) borrowing money from a bank or hard money lender; and (b) authorizing the bank or lender
24 to record a first position DOT against the Real Estate (the "Commercial Loan Liens"). These
25 Commercial Loan Liens similarly resulted in the investors' Investments being under-secured and/or
26 effectively unsecured.

1 25. Also unbeknownst to offerees and investors, Respondents sometimes used the
2 Investment funds of one investor to repay another, more recent investor. As discussed further
3 below, Respondents' Real Estate business has failed and the value of the Real Estate collateral has
4 plummeted. Thus, investors who unknowingly received repayment of their Investments from the
5 principal Investment funds of more recent investors were benefited, while those more recent
6 investors' Investments are under-secured and/or effectively unsecured for the reasons discussed
7 above.

8 **D. Investment Offering Summary**

9 26. Respondents often issued and sold two or more Investments to a single investor.
10 Based on the foregoing, Respondents issued and sold at least three hundred and forty six (346)
11 separate Investments (*i.e.*, original, additional and Roll-Over investments) totaling approximately
12 \$19,851,868 to ninety eight (98) investors residing throughout Arizona and seventeen (17) other
13 states including: (a) Arkansas; (b) California; (c) Colorado; (d) Florida; (e) Illinois; (f) Indiana; (g)
14 Kentucky; (h) Minnesota; (i) Nebraska; (j) Nevada; (k) New Mexico; (l) North Dakota; (m)
15 Oregon; (n) Texas; (o) Utah; (p) Washington; and (q) Wisconsin.

16 27. Respondents have defaulted on the majority of their Investment obligations.
17 Respondents ceased making any Investment payments to investors in or about July 2010.

18 28. Many of Respondents' investors are retired or senior citizens who cashed out all or a
19 substantial portion of their pre-existing retirement-based investments and/or life savings to
20 purchase their Investments.

21 29. KP and MP voluntarily filed a Chapter 7 bankruptcy petition in the U.S. Bankruptcy
22 Court, District of Arizona on August 6, 2010 (*See*, Case No. 2:10-bk-24921-CGC).

23 30. KP and MP also caused PE to voluntarily file a Chapter 7 bankruptcy petition in the
24 U.S. Bankruptcy Court, District of Arizona on August 6, 2010 (*See*, Case No. 2:10-bk-24919-RJH).

25 31. The pending bankruptcies were consolidated on August 30, 2010, and are now being
26 jointly administered under the main Case No. 2:10-bk-24921-RJH (the "Bankruptcy(cies)").

1 Respondents' Bankruptcy schedules indicate that their liabilities exceed their assets by millions of
2 dollars.

3 32. Many of Respondents' investors are identified in and/or participating in the
4 Bankruptcies at great and/or additional expense to said investors. As a result of the Bankruptcies,
5 the majority of Respondents' investors only recently received information indicating that their
6 Investments are under-secured and/or effectively unsecured for the reasons set forth above.

7 **E. General Investment Allegations**

8 33. Investors provided their Investment money directly to Respondents, who then
9 deposited and commingled Investment funds in common Arizona bank accounts owned and
10 controlled by Respondents (the "Arizona Bank Account(s)") including, without limitation, one
11 repeatedly referred to by Respondents as the "Green Builder Account."

12 34. Respondents caused to be deposited into, or disbursed from the Arizona Bank
13 Accounts, all monies related to Respondents' Real Estate business operations including, without
14 limitation: (a) tenant rent payments; (b) Investment returns (principal and interest); (c) Real Estate
15 construction and development payments; and (d) even the personal funds of KP and MP.

16 35. Respondents prepared and maintained material records of the Investments, although
17 not all of this information was provided to investors. Rather, after an investor purchased an
18 Investment, Respondents would send to the investor a letter regarding their "Real Estate
19 Investment" that included their Note, a copy of their often unrecorded DOT, a copy of their
20 investment check, and a receipt acknowledging their Investment purchase.

21 36. Respondents and/or their authorized agents managed the essential elements of the
22 Investments and, without limitation: (a) selected, inspected and evaluated potential Real Estate
23 acquisitions; (b) negotiated the terms and conditions of Real Estate purchases; (c) arranged for and
24 participated in Real Estate escrow closings including, for example, the procurement of title reports
25 and insurance policies; (d) raised capital from Investors, banks and/or hard money lenders to
26 purchase and/or renovate Real Estate; (e) planned and managed the renovation of the Real Estate;

1 (f) calculated the appropriate sales prices or rental rates for Real Estate, in part, by analyzing
2 comparable properties; (g) advertised and marketed the Real Estate to potential buyers and renters;
3 (h) negotiated and executed tenant lease agreements and residential and commercial purchase
4 contracts; and (i) collected Real Estate rent and purchase money, and distributed such funds to
5 investors and/or hard money lenders.

6 37. Respondents' investors generally had no direct contact with Real Estate purchasers
7 or renters. Instead, investors specifically agreed, and/or intended that Respondents would
8 communicate with Real Estate purchasers or renters on their behalf.

9 38. Respondents profited from the Investments, without limitation, by retaining the
10 difference between: (a) the ultimate resale price of a particular piece of Real Estate, minus
11 expenses and the amounts owed to related investors and lenders; and/or (b) monthly rent payment
12 made by the tenants of a particular piece of Real Estate, minus expenses and amounts owed to
13 related investors and lenders.

14 39. At all times relevant, KP emphasized to offerees and investors that Respondents'
15 ability to repay investors their promised profits would depend on his superior Real Estate
16 knowledge and skill in purchasing, renovating, leasing and reselling the Real Estate purchased with
17 investor money, and his approximately thirty years of Real Estate experience. Investors contacted
18 by the Division have further stated that they purchased their Investments based on their belief that
19 Respondents were successful Real Estate professionals who have sold a large number of Real
20 Estate properties for many years.

21 40. As discussed above, Respondents' ability to repay Investment investors, and the
22 investors' risk of loss of their Investments, was interwoven with and dependent on: (a)
23 Respondents' ability, effort and success in profitably reselling and/or renting the Real Estate
24 serving as collateral for the Investments; (b) Respondents' management of the Investments
25 including, without limitation, their timely recordation of the DOTs as promised; and (c)
26 Respondents' continued viability as successful and profitable Real Estate professionals.

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IV.

VIOLATION OF A.R.S. § 44-1841

(Offer or Sale of Unregistered Securities)

41. From on or about May 1985 to June 2010, Respondents offered or sold securities in the form of notes and investment contracts, within or from Arizona.

42. The securities referred to above were not registered pursuant to Articles 6 or 7 of the Securities Act.

43. This conduct violates A.R.S. § 44-1841.

V.

VIOLATION OF A.R.S. § 44-1842

(Transactions by Unregistered Dealers or Salesmen)

44. Respondents offered or sold securities within or from Arizona while not registered as dealers or salesmen pursuant to Article 9 of the Securities Act.

45. This conduct violates A.R.S. § 44-1842.

VI.

VIOLATION OF A.R.S. § 44-1991

(Fraud in Connection with the Offer or Sale of Securities)

46. In connection with the offer or sale of securities within or from Arizona, Respondents directly or indirectly: (i) employed a device, scheme, or artifice to defraud; (ii) made untrue statements of material fact or omitted to state material facts that were necessary in order to make the statements made not misleading in light of the circumstances under which they were made; or (iii) engaged in transactions, practices, or courses of business that operated or would operate as a fraud or deceit upon offerees and investors. Respondents' conduct includes, but is not limited to, the following:

A. Representing to offerees and investors that the Investments would be adequately secured by the Real Estate purchased with their Investment money, while further

1 failing to disclose to them that their Investments would be unsecured because
2 Respondents would fail to record DOTs in their favor as promised;

3 B. Representing to offerees and investors that the Investments would be adequately
4 secured by the Real Estate purchased with their Investment money, while further
5 failing to disclose to them that: (1) Respondents would often file multiple DOTs in
6 favor of multiple investors to create multiple lien interests in a single piece of Real
7 Estate, resulting in the investors receiving second, third and fourth position lien
8 interests in their purported Real Estate collateral; and (2) that, as a result, their
9 Investments would be under-secured and/or effectively unsecured;

10 C. Representing to offerees and investors that the Investments were safe, in part, because
11 the fair market value of the Real Estate purchased with their Investment money
12 exceeded the related principal Investments by twenty-five to twenty percent, while
13 further failing to disclose to them that Respondents would often cause multiple DOTs
14 to be filed with respect to a single piece of Real Estate and, as a result, the value of
15 their purported Real Estate collateral would be greatly exceeded by the value of the
16 attached, often multiple lien interests;

17 D. Representing to offerees and investors that the Investments would be adequately
18 secured by a first position DOT that would represent the only lien interest in the Real
19 Estate purchased with investor money, while further failing to disclose to them that
20 Respondents would often cause multiple DOTs to be filed with respect to a single piece
21 of Real Estate including, without limitation, first position Commercial Loan Liens and,
22 as a result, the Investments would be under-secured and/or effectively unsecured; and

23 E. Representing to offerees and investors that Respondents would purchase Real Estate
24 with their Investment money, while further failing to disclose to them that Respondents
25 would sometimes use their principal Investment funds to repay other investors their
26 principal Investments and/or promised profits.

1 47. This conduct violates A.R.S. § 44-1991.

2 48. KP and MP directly or indirectly controlled respondent PE within the meaning of
3 A.R.S. § 44-1999. As a result, KP and MP are each jointly and severally liable with, and to the same
4 extent as PE for its violations of the anti-fraud provisions of the Securities Act set forth above.

5 **VII.**

6 **REQUESTED RELIEF**

7 The Division requests that the Commission grant the following relief:

8 1. Order Respondents to permanently cease and desist from violating the Securities Act
9 pursuant to A.R.S. § 44-2032;

10 2. Order Respondents to take affirmative action to correct the conditions resulting from
11 Respondents' acts, practices, or transactions, including a requirement to make restitution pursuant to
12 A.R.S. § 44-2032;

13 3. Order Respondents to pay the state of Arizona administrative penalties of up to five
14 thousand dollars (\$5,000) for each violation of the Securities Act, pursuant to A.R.S. § 44-2036;

15 4. Order that the marital community of KP and MP be subject to any order of restitution,
16 rescission, administrative penalties, or other appropriate affirmative action pursuant to A.R.S. § 25-
17 215; and

18 5. Order any other relief that the Commission deems appropriate.

19 **VIII.**

20 **HEARING OPPORTUNITY**

21 Each Respondent may request a hearing pursuant to A.R.S. § 44-1972 and A.A.C. R14-4-306.

22 **If a RESPONDENT requests a hearing, the requesting respondent must also answer this Notice.**

23 A request for hearing must be in writing and received by the Commission within 10 business days
24 after service of this Notice of Opportunity for Hearing. The requesting respondent must deliver or
25 mail the request to Docket Control, Arizona Corporation Commission, 1200 W. Washington, Phoenix,
26

1 Arizona 85007. Filing instructions may be obtained from Docket Control by calling (602) 542-3477
2 or on the Commission's Internet web site at <http://www.azcc.gov/divisions/hearings/docket.asp>.

3 If a request for a hearing is timely made, the Commission shall schedule the hearing to begin
4 20 to 60 days from the receipt of the request unless otherwise provided by law, stipulated by the
5 parties, or ordered by the Commission. If a request for a hearing is not timely made the Commission
6 may, without a hearing, enter an order granting the relief requested by the Division in this Notice of
7 Opportunity for Hearing.

8 Persons with a disability may request a reasonable accommodation such as a sign language
9 interpreter, as well as request this document in an alternative format, by contacting Shaylin A.
10 Bernal, ADA Coordinator, voice phone number 602/542-3931, e-mail sabernal@azcc.gov.
11 Requests should be made as early as possible to allow time to arrange the accommodation.

12 **IX.**

13 **ANSWER REQUIREMENT**

14 Pursuant to A.A.C. R14-4-305, if a Respondent requests a hearing, the requesting
15 respondent must deliver or mail an Answer to this Notice of Opportunity for Hearing to Docket
16 Control, Arizona Corporation Commission, 1200 W. Washington, Phoenix, Arizona 85007, within
17 30 calendar days after the date of service of this Notice. Filing instructions may be obtained from
18 Docket Control by calling (602) 542-3477 or on the Commission's Internet web site at
19 <http://www.azcc.gov/divisions/hearings/docket.asp>.

20 Additionally, the answering respondent must serve the Answer upon the Division. Pursuant
21 to A.A.C. R14-4-303, service upon the Division may be made by mailing or by hand-delivering a
22 copy of the Answer to the Division at 1300 West Washington, 3rd Floor, Phoenix, Arizona, 85007,
23 addressed to Mike Dailey.

24 The Answer shall contain an admission or denial of each allegation in this Notice and the
25 original signature of the answering respondent or respondent's attorney. A statement of a lack of
26

1 sufficient knowledge or information shall be considered a denial of an allegation. An allegation not
2 denied shall be considered admitted.

3 When the answering respondent intends in good faith to deny only a part or a qualification
4 of an allegation, the respondent shall specify that part or qualification of the allegation and shall
5 admit the remainder. Respondent waives any affirmative defense not raised in the Answer.

6 The officer presiding over the hearing may grant relief from the requirement to file an
7 Answer for good cause shown.

8 Dated this 15 day of December, 2010.

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11 _____
12 Matthew J. Neubert
13 Director of Securities
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