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August 8, 2022

Office of the Risk Management Administrator  
Administrator of the Office of Public Affairs  
P.O. Box 53364  
Oklahoma City, Oklahoma 73152

Board of County Commissioners  
Attn: County Clerk  
320 Robert S. Kerr, Room 2013  
Oklahoma City, Oklahoma 73102

**NOTICE OF GOVERNMENTAL TORT CLAIM**

This constitutes a "Notice of Claim" filed against the County of Oklahoma County, the State of Oklahoma, and its representative(s) Judge **TIMOTHY HENDERSON**, Oklahoma County District Judge; Oklahoma County Assistant District Attorney **KELLY COLLINS**; her direct Supervising Assistant District Attorney **GAYLAND GIEGER**; **JIMMY HARMON**, First Assistant District Attorney and next-in-line supervisor, and **DAVID PRATER**, the final supervising authority Oklahoma County District Attorney; as well as the **BOARD OF COUNTY COMMISSIONERS OF THE COUNTY OF OKLAHOMA**, and in accordance with the *Oklahoma Governmental Tort Claims Act*, 51 Okla. Stat. Ann. § 156.<sup>1</sup>

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<sup>1</sup> Please note that this claim is also being submitted independently and separately to both the County Clerk for Oklahoma County and to the State of Oklahoma as it involves the county of Oklahoma County as well.

**Name of Claimant:** AARON THOMAS BROCK is currently detained pending trial in Oklahoma County District Court in the case of *State of Oklahoma vs. Aaron Thomas Brock*, CF-2015-8935 after his prior conviction was vacated and he was granted a new trial by Judge Paul Hesse (Canadian County District Court Judge sitting by assignment) and whose statutory and due process rights were and are being violated under the laws and Constitution of the United States of America by the State of Oklahoma and Oklahoma County. See Attachment 1.<sup>2</sup>

**Address of Claimant:** AARON THOMAS BROCK, c/o Robert D. Gifford, Attorney-at-Law, GIFFORD LAW, P.L.L.C., P.O. Box 2682, Oklahoma City, Oklahoma 73101; Robert.Gifford@GiffordLawyer.com.

**Telephone Number of Claimant:** c/o his attorney at (405) 810-5406.

**Date of Occurrence Giving Rise to Claim:** presided over the motions hearing (March 13, 2018), jury trial (April 23-24, 2018, second stage April 25, 2018), and judicial sentencing (June 1, 2018) of the Claimant AARON THOMAS BROCK.

**Circumstances of Claim:** This is a claim for a violation of Mr. BROCK's federal and state constitutional rights to due process where the State of Oklahoma, by and through the listed defendants, as previously been judicially determined he was "denied a fundamentally fair trial" by an "unconstitutional potential for bias" due to the sexual relationship that existed between Defendant Judge TIMOTHY HENDERSON and Defendant Assistant D.A. KELLY COLLINS, and the failure to supervise and the "pimping" by supervisor

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<sup>2</sup> On December 20, 2021, Judge Paul Hesse (Canadian County) issued a "Findings of Fact and Conclusions of Law" in the matter of *State v. Hashagen*, CF-2017-1448, in which he found a multi-year sexual relationship between HENDERSON and COLLINS that encompassed the entirety of BROCK's case.

GAYLAND GIEGER, as well as the failure to supervise and the culture created in that office by First Assistant HARMON and elected-D.A. DAVID PRATER.

The State of Oklahoma has previously conceded these claims in writing, and Judge Paul Hesse made a judicial finding of a violation of Mr. BROCK's constitutional due process rights in a June 22, 2022, order filed in the matter of *State v. Aaron Thomas Brock*, CF-2015-8935. See Attachment 1 (Hesse Order and Findings of Due Process violations).

These concerns, as a matter of background, are relevant to the underlying claim now brought by Mr. BROCK, include, but are not necessarily limited to the following facts and practices:

1. At all times relevant herein, Defendant TIMOTHY HENDERSON served as the district judge overseeing this matter of the Claimant. Judge HENDERSON ruled on motions (all against BROCK), objections (all against BROCK), oversaw the jury trial, imposed the ultimate sentence, and ruled that BROCK receive no credit for any time served prior to sentencing. HENDERSON has previously admitted under oath to having a consensual sexual relationship with the prosecutor, Assistant D.A. KELLY COLLINS, during the time-frame of this matter.
2. At all times relevant herein, Defendant KELLY COLLINS served as the prosecutor in the matter of the Claimant. She has been an attorney since 2014 and began with the Oklahoma County District Attorney's Office under David Prater in 2012 as an intern, and after graduating law school in 2014, she began working as a full time Assistant D.A. in the same office. She was supervised directly by "sex crimes prosecutor" Assistant D.A. GAYLAND GIEGER (and officed next to him during the time in question). KELLY COLLINS has previously admitted under oath to a sexual relationship with Judge TIM HENDERSON who oversaw the Claimant's case.

3. At all times relevant herein, Defendant **GAYLAND GIEGER** was the Team Leader for the Special Victims Unit, with authority over prosecution of sex crimes, including rape and sexual assault, and with supervisory authority over other Assistant District Attorneys, to include Co-Defendant **KELLY COLLINS** in the Special Victims Unit. **GIEGER** has also faced accusation of failing to supervise in the past when he was sued for alleged sexual abuse committed by a relative of **GIEGER**.
4. At all times relevant herein, Defendant **DAVID PRATER** was the District Attorney for District 7, with state prosecutorial authority over all matters occurring in Oklahoma County. As such, **PRATER** has sole authority to hire, fire, and discipline all staff of the District Attorney's office, and also has sole authority to assign Assistant District Attorneys to various legal matters
5. At all times relevant herein, Defendant **JIMMY HARMON** was **PRATER**'s First Assistant District Attorney, with supervisory authority over other Assistant District Attorneys to include **GIEGER** and **COLLINS**.
6. Defendant **BOARD OF COUNTY COMMISSIONERS OF THE COUNTY OF OKLAHOMA** (Oklahoma County) is a local governmental entity organized under the laws of the State of Oklahoma. It owns, operates, controls, and creates policy concerning the use of county property, including the Oklahoma County Courthouse, which is located in Oklahoma City, Oklahoma County, Oklahoma.
7. At all times relevant herein until June 22, 2022 (the date of Judge Hesse's order), Defendant **GAYLAND GIEGER** was an Assistant District Attorney in the Special Victims Unit and supervisor of Co-Defendant **KELLY COLLINS**, subject to the supervisory authority of Defendants **GIEGER**, **HARMON**, and **PRATER**, in that ascending order.
8. Defendant **KELLY COLLINS** was assigned to an office next to her direct supervisor and co-defendant **GAYLAND GIEGER**.

9. Defendant **KELLY COLLINS** was assigned by **GAYLAND GIEGER** to prosecute cases before Defendant Judge **TIMOTHY HENDERSON**, said assignment being subject to supervisory oversight by Defendants **HARMON** and **PRATER**, in that ascending order.
10. Defendants **PRATER** and **HENDERSON** were law partners prior to Defendant **PRATER** being elected as District Attorney in 2006.
11. **PRATER**, **HARMON**, and **GIEGER** all knew, prior to Defendant **KELLY COLLINS**'s employment as an Assistant District Attorney, that Defendant Judge **HENDERSON** had a habit of adulterous sexual promiscuity, with a preference of young attractive females as sexual partners.
12. Defendant **KELLY COLLINS** is a young blond female, the type of sexual partner Defendant **HENDERSON** preferred. Defendants **PRATER**, **HARMON**, and **GIEGER** were aware that Defendant **KELLY COLLINS** was the type of young woman who would be desired as a sexual partner by Defendant Judge **HENDERSON**.
13. Defendants **PRATER**, **HARMON**, and **GIEGER** believed that Defendant Judge **HENDERSON** would be inclined to provide court rulings more favorable to the District Attorney's office if the District Attorney's office assigned young, attractive, female lawyers to prosecute cases before Defendant Judge **HENDERSON**.
14. Defendants **PRATER**, **HARMON**, and **GIEGER** knew or reasonably should have known that Defendant Judge **HENDERSON** would likely seek to become a sexual partner with Defendant **KELLY COLLINS** if she were assigned to prosecute cases before Defendant Judge **HENDERSON**.
15. Defendant **GIEGER**, with approval of Defendants **HARMON** and **PRATER**, assigned Defendant **KELLY COLLINS** to prosecute cases before Defendant Judge **HENDERSON**, with the intention that such assignment would result in Defendant Judge **HENDERSON** providing more favorable rulings to the District Attorney's office. In short, Defendants **GIEGER**, **HARMON**, and

**PRATER** acted as pimps, assigning young, attractive female Assistant District Attorneys to prosecute cases before Defendant Judge **HENDERSON**.

16. In fact, Defendant **KELLY COLLINS** and Defendant Judge **HENDERSON** did become sexual partners.

17. Among the cases which Defendant **GIEGER** assigned Defendant **KELLY COLLINS** to prosecute before Defendant Judge **HENDERSON** was *State v. Aaron Thomas Brock*, CF-2015-8935 (Oklahoma County).

18. Defendant Judge **HENDERSON** provided rulings oddly favorable to the District Attorney's office in case number CF-2015-8935.

19. The Claimant **AARON THOMAS BROCK** was also greatly prejudiced by Judge Henderson's bias in favor of his Assistant D.A. **KELLY COLLINS**. See Attachment 2 (affidavit of Mr. Brock's State Public Defender).

- a. Because the Claimant, who was incarcerated in the U.S. Bureau of Prisons at the time he was pending the underlying state charges in Oklahoma County, and was not brought back to resolve them, he was not allowed to participate in the residential drug abuse programs<sup>3</sup> in the U.S. Bureau of Prisons; *Id.*
- b. Because **BROCK** was not allowed to return to resolve the underlying state charges, the Claimant was not allowed to serve as a GED tutor while in the U.S. Bureau of Prisons; *Id.*
- c. Because of the unlawful delayed detention, Claimant **BROCK** also missed a family court hearing regarding his own child in Oklahoma County on December 12, 2018; *Id.*

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<sup>3</sup> See *Inmate Admission & Orientation Handbook*, U.S. Dep't of Justice Bureau of Prisons, p. 31-32 ("If you have any outstanding warrants that would prohibit completion of the community treatment component of the RDAP. You must take care of that warrant prior to the interview."). See [https://www.bop.gov/locations/institutions/trm/trm\\_ao\\_handbook040518.pdf](https://www.bop.gov/locations/institutions/trm/trm_ao_handbook040518.pdf)

- d. The Claimant **BROCK** also lost opportunity to negotiate a favorable plea agreement (i.e. "the race to the courthouse doors"). Comparing co-Defendant (and mastermind of the robbery) Tonya Lee Thompson's May 12, 2016, sentence and allowance of suspended sentence to run concurrent, despite her own lengthy criminal history (Ms. Thompson discharged from custody on July 20, 2020).
  - e. The Claimant **BROCK** lost any opportunity for concurrent state sentence with federal sentence from the revocation of Supervised Release (*See* U.S.S.G. § 5G1.3);
  - f. The Claimant was compelled to go to trial for the sole purpose to preserve the legal issues of the Interstate Agreement on Detainers Act (IADA) when the Oklahoma County District Attorney's Office grossly failed to follow both state and federal law, as well as his Constitutional Due Process rights.
20. Finally, the Claimant **BROCK** did not receive credit for time served in his case at the request of the Judge's Lover/Assistant D.A. **COLLINS** who used her long history of sexual favors, in and out of the judge's chambers, to win questionable rulings with this Oklahoma County Judge.
21. The reason for Defendant Judge **HENDERSON**'s rulings favorable to the District Attorney's office in case number CF-2015-8935 is the sexual relationship between Defendant **KELLY COLLINS** and Defendant Judge **HENDERSON**, a result intended by Defendants **GIEGER**, **HARMON**, and **PRATER** when they assigned Defendant **KELLY COLLINS** to prosecute case number CF-2015-8935.
22. The actions of Defendants **PRATER**, **HARMON**, **GIEGER**, **COLLINS**, and Judge **HENDERSON** constitute a conspiracy to deny Mr. **BROCK** (and other criminal defendants) their due process rights under the U.S. and Oklahoma Constitutions and under Oklahoma law.

23. The sexual relationship between Defendant **KELLY COLLINS** and Defendant Judge **HENDERSON** was entirely consensual, and NOT sexual assault or otherwise not consensual.
24. On May 4, 2021, and May 18, 2021, OSBI executed search warrants of Judge **HENDERSON**'s computer and property. See SW-2021-839 and SW-2021-964 (Oklahoma County).
25. As one local attorney stated publicly, Judge **HENDERSON**'S intimate relationship with Assistant D.A. **KELLY COLLINS** was "the worst kept secret in the Oklahoma County Courthouse." *Id.*<sup>4</sup>
26. It is simply not believable that a prosecutor, especially a sex crimes prosecutor like Defendant **KELLY COLLINS**, would fail to report being the victim of an attempted sexual assault.
27. At no time did **HENDERSON**, **COLLINS**, **GIEGER**, **HARMON**, or **PRATER** disclose to Mr. **BROCK** or his attorneys the secret sexual relationship ongoing between the Judge and the Assistant D.A.
28. On or about \_\_\_\_\_, when the sexual relationship between Defendant **COLLINS** and Defendant Judge **HENDERSON** was in imminent danger of being exposed publicly, Defendants **PRATER**, **HARMON**, and **GIEGER** used their influence as supervisors over Defendant **KELLY COLLINS** to coerce her to claim falsely that her sexual relationship with Defendant Judge **HENDERSON** was not consensual, but rather sexual assault.
29. Defendants **PRATER**, **HARMON**, and **GIEGER** encouraged Defendant **COLLINS** to make a false claim of sexual assault in order to cover up the fact that Defendants **PRATER**, **HARMON**, and **GIEGER** had intentionally and successfully obtained rulings favorable to the District Attorney's office as a

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<sup>4</sup> *Oklahoma County Judge Reportedly Resigns In 'Worst Kept Secret', Metro Attorney Says*  
<https://www.news9.com/story/605e4a754906030beb87250d/oklahoma-county-judge-reportedly-resigns-in-worst-kept-secret-metro-attorney-says>

result of assigning Defendant **KELLY COLLINS** to prosecute cases before Defendant Judge **HENDERSON**, including case number CF-2015-8935.

30. The false claim made by Defendant **KELLY COLLINS** of sexual assault by Defendant Judge **HENDERSON**, as coerced by Defendants **PRATER**, **HARMON**, and **GIEGER**, constitutes a furtherance of the conspiracy by Defendants **PRATER**, **HARMON**, and **GIEGER** to deny **BROCK** and other criminal defendants their rights under the U.S. and Oklahoma Constitutions and under Oklahoma law.

**Nature of Injury:** Mr. **BROCK** seeks compensation and damages from the denial of basic Constitutional Due Process pursuant to the Fifth, Sixth Amendments, and Fourteenth Amendments to the United States Constitution, and Article 2, § 20 of the Oklahoma Constitution; 22 OK Stat § 22-812, due process due to promiscuous work environment (“pimping”) and the failure to supervise by **GAYLAND GIEGER**, **JIMMY HARMON**, and the Oklahoma County District Attorney **DAVID PRATER**, as well as a gross denial of due process, speedy trial, a fair trial, wrongful imprisonment, and illegal sentence by Defendants Assistant D.A. **KELLY COLLINS** and former-Judge **TIMOTHY HENDERSON**.

**Compensation Demanded:** The claimant has suffered extreme pain, suffering, as well as emotional anguish and **seeks the statutory limit pursuant to the Government Tort Claims Act \$175,000.00**. Due to the intentional and malicious acts, punitive damages are also authorized pursuant to 23 O.S. § 9.1. *See also Lierly v. Tidewater Petroleum Corp.*, 2006 OK 47, 139 P.3d 897. Please note that an insurer (for either the county or state) may not indemnify the insured for punitive damages awarded against the insured unless awarded for the acts of one for whom the insured is legally responsible under the

doctrine of *respondeat superior*. *Dayton-Hudson Corp. v. American Mutual Liab. Ins. Co.*, 1980 OK 193, 621 P.2d 1155.

**Attorney Authorized to Settle Claim:** Robert D. Gifford, GIFFORD LAW, P.L.L.C., P.O. Box 2682, Oklahoma City, Oklahoma 73101; Robert.Gifford@GiffordLawyer.com; (405) 810-5406.

Please confirm receipt of this letter in writing. This offer of settlement will remain open until ninety (90) days from the date of receipt of this letter. You can accept this offer of compromise by responding in writing to the undersigned attorney. This is an offer of settlement that is within the available limits of the *Oklahoma Governmental Tort Claims Act*.

If this offer, or other compromised settlement agreement, is not accepted, the injured individual will bring suit in federal court seeking all available damages, including additional damages for violation of civil rights and federal statutes (of which there is already a judicial finding of), **for an amount to exceed \$1,000.000.00** which will exceed the protections of the Oklahoma Governmental Tort Claims Act. We trust that you will see the benefit of promptly resolving this matter and avoiding exposure to additional damages that will exceed the limits of your protection provided under the Oklahoma Governmental Tort Claims Act.

At this time, the victim listed herein is willing to fully and unconditionally release all of his claims. This offer will expire if not accepted within the ninety (90) days from the date of receipt of this letter. Upon payment of this sum, the victim will provide a full and complete release of all claims, arising out of the underlying claims, including the satisfaction of any liens or otherwise, and protection from cross claims for contribution and indemnity. In addition, upon payment of this sum, the victim will provide a full and complete release of all

claims to be brought against former or present employees when acting within their official capacity and within the scope of their employment.

This demand is an unconditional offer of compromise to settle and release this victim's claims, which an "ordinarily prudent insurer" would accept. *Barnes v. Okla. Farm Bureau Mut. Ins. Co.*, 11 P.3d 162, 175-76 (Okla. 2000). This offer of settlement contains important deadlines.

Please be aware that the ninety days is only the obligatory time period under the Oklahoma Governmental Tort Claims act before a lawsuit is brought in federal court. The ninety days is not offered as a stand-down. If my office does not receive serious negation activity within thirty (30) days, we will be utilizing out time wisely to bring pressure to assure the quick resolution of this case presented by a qualified attorney.

### **CONCLUSION**

It is requested that this matter be resolved in a fair and equitable matter on behalf of **AARON THOMAS BROCK**, in the interests of justice, and in the interests of the Oklahoma and Oklahoma County taxpayer. This disgusting matter is on the verge of becoming a national outcry. That good fortune will run out if this matter is not resolved in 30 days.

**GIFFORD LAW, P.L.L.C.**

**ROBERT D. GIFFORD, II**  
Attorney and Founder



FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

JUN 22 2022

RICK WARREN  
COURT CLERK

THE STATE OF OKLAHOMA,  
Plaintiff,

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v.

Case No. CF-2015-8935

AARON THOMAS BROCK,  
Defendant.

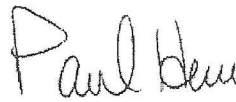
ORDER GRANTING APPLICATION FOR POST-CONVICTION RELIEF

Pending before the Court is the Defendant's Application for Post-Conviction Relief filed herein on January 10, 2022. The Defendant's sole proposition of error is that he was denied due process because the sexual relationship between the trial judge and the lead prosecutor was not disclosed to him prior to trial. The State filed a response on May 5, 2022, and conceded that the Defendant was "likely denied a fundamentally fair trial" and that there was an "unconstitutional potential for bias" due to the sexual relationship that existed between the judge and prosecutor. The State now recommends that the Judgment and Sentence be vacated and the Defendant be granted a new trial. The Defendant filed a reply on June 3, 2022, and argued that a dismissal with prejudice, instead of a new trial, is the appropriate remedy for the constitutional violation.

The Defendant has proven to the satisfaction of this Court that his convictions and sentences were in violation of the Constitution of the United States and the Constitution of this state. The Defendant's right to due process was violated because the sexual relationship between former district judge Timothy Henderson and assistant district

attorney Kelly Collins was not disclosed to the Defendant prior to his jury trial in April 2018. This constitutional violation warrants a new trial as recommended by the State. **IT IS THEREFORE ORDERED** that the Defendant's Application for Post-Conviction Relief is granted. **IT IS FURTHER ORDERED** that the Judgment and Sentence is vacated and set aside and a new trial is granted. The parties are directed to contact the chambers of District Judge Cindy Truong for purposes of arranging the return of the Defendant from the custody of the Department of Corrections and the scheduling of this case for trial.

**IT IS SO ORDERED** this 22<sup>nd</sup> day of June, 2022.

A handwritten signature in cursive script that reads "Paul Hesse".

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**PAUL HESSE**  
**DISTRICT COURT JUDGE**

CERTIFICATE OF MAILING

I, Rick Warren, Court Clerk for Oklahoma County, hereby certify that on the 22<sup>nd</sup> day of June, 2022, a true and correct copy of the foregoing was mailed to the following:

The Honorable Cindy Truong, 321 Park Avenue, Rm. 821, Oklahoma City, OK 73102  
Brant Elmore, Office of District Attorney, 320 S. Robert S. Kerr, Suite 505, Oklahoma City,  
OK 73102  
Robert Gifford, P.O. Box 2682, Oklahoma City, OK 73101-2682

Rick Warren, Court Clerk



By Deputy Court Clerk

STATE OF OKLAHOMA                     )  
COUNTY OF CLEVELAND                )

**AFFIDAVIT OF KATIE J. BOURASSA**

Katie J. Bourassa, a credible person and of lawful age, who being first duly sworn, on her oath, deposes and says:

**Affiant's Statement of Facts**

I, Katie J. Bourassa, served as one of the Oklahoma County Assistant Public Defenders assigned to represent Aaron Thomas Brock in Oklahoma County case, State v. Aaron Thomas Brock, case number CF-2015-8935, that was heard before the Honorable Timothy Henderson, District Court Judge for Oklahoma County.

The failure of the District Attorney's Office to comply with the Interstate Agreement on Detainers Act ("IADA") was grossly prejudicial to Mr. Brock for several reasons.

First, he did not have the proverbial chance to beat his co-defendant to the courthouse door. By the time Mr. Brock appeared in court, two years after an arrest warrant was issued, his co-defendant's case was resolved with a very generous plea-bargain. The co-defendant received a dismissal of the most severe charge (count one) and pled guilty to counts two and three with a sentence of fifteen (15) years to run concurrently with one another in the Oklahoma Department of Corrections. In addition, the sentence was allowed to run concurrently to a revocation of suspended sentence in a second felony case. Mr. Brock was forced to go to trial in order to preserve his IADA claim so that he could challenge it on appeal. Mr. Brock received a thirty (30) year sentence on count one and five (5) year sentence on count two. Judge Henderson ran the sentences consecutive to one another and did not give any credit for any time served.

Second, Judge Henderson would not allow the trial to start on April 24, 2018 instead of April 23, 2018, so that I could attend my husband's grandmother's funeral out of state. Instead, the judge stated if I wanted a "continuance" until April 24, 2018, he would grant that, but otherwise the trial would begin April 23, 2018. Two other assistant public defenders had to take the case to trial so Mr. Brock would not have to waive his IADA issue by getting a one-day continuance. One attorney had been working on the case with me for two months, but another was brought onto the case less than one week before trial.

Third, Mr. Brock did not have an opportunity to seek concurrent time between his federal sentence and his state sentence. The state court could have easily sentenced Mr. Brock to concurrent sentences and he could have returned to federal custody immediately.

Fourth, while he was in federal custody, the detainer forced Mr. Brock into a higher security level than he otherwise would have been eligible for. As a result, Mr. Brock was not allowed to participate in federal drug abuse programs and was not allowed to serve as a GED tutor while in the U.S. Bureau of Prisons. Mr. Brock was denied opportunities to better himself and to help others.

Fifth, Mr. Brock was unable to attend a family court hearing in Caddo County on December 12, 2018, regarding his children. Mr. Brock was under the impression that when he arrived in Oklahoma County, his case would be dismissed under a violation of the IADA, and the judge in Caddo County was working with him to ensure his attendance at the hearing. As far as I am aware, Mr. Brock was never able to attend any family court proceedings in Caddo County and lost custody of his children.

#### DECLARATION UNDER PENALTIES OF PERJURY

I, Katie Bourassa, declare under penalties of perjury and pursuant to under 12 OS 426 and 28 U.S.C. 1746 that the following information and allegations of this Declaration are true and correct to the best of my knowledge:

1. I have personal knowledge of the facts stated in this declaration.
2. I have not been compelled or threatened to sign this declaration in any manner.
3. I am signing this declaration knowingly, voluntarily, and freely.
4. I fully understand the contents of this declaration, and I read, write, and speak English.

  
AFFIANT  
Katie Bourassa, OBA #33120

4-21-2020