ORAL ARGUMENT SCHEDULED FOR DECEMBER 4, 2015

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 15-1063 (and consolidated cases)

UNITED STATES TELECOM ASSOCIATION, *et al.*
Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,
Respondents,

On Petitions for Review of an Order
of the Federal Communications Commission

BRIEF OF FIRST AMENDMENT SCHOLARS AS AMICI CURIAE IN SUPPORT OF RESPONDENTS

GREGORY A. BECK
3504 Woodridge Ave.
Silver Spring, MD 20902
(202) 684.6339
gregory.beck@gmail.com

Counsel for Amici Curiae

September 21, 2015

CERTIFICATE AS TO PARTIES, RULINGS, AND RELATED CASES

A. Parties and Amici

Except for the following, all parties, intervenors, and amici appearing in this Court are listed in the brief for Petitioners United States Telecom Association, National Cable &Telecommunications Association, CTIA – The Wireless Association®, American Cable Association, Wireless Internet Service Providers Association, AT&T Inc., and CenturyLink.

The following parties have filed a notice or motion for leave to participate as amici as of the date of this filing:

- Harold Furchtgott-Roth
- Washington Legal Foundation
- Consumers Union
- Competitive Enterprise Institute
- American Library Association
- Richard Bennett
- Association of College and Research Libraries
- Business Roundtable
- Association of Research Libraries
- Center for Boundless Innovation in Technology
- Officers of State Library Agencies
- Chamber of Commerce of the United States of America
- Open Internet Civil Rights Coalition
- Georgetown Center for Business and Public Policy
- Electronic Frontier Foundation
- International Center for Law and Economics and Affiliated Scholars
- American Civil Liberties Union
- William J. Kirsch
- Computer & Communications Industry Association
- Mobile Future

- Mozilla
- Multicultural Media, Telecom and Internet Council
- Engine Advocacy
- National Association of Manufacturers
- Phoenix Center for Advanced Legal and Economic Public Policy Studies
- Dwolla, Inc.
- Telecommunications Industry Association
- Our Film Festival, Inc.
- Christopher Seung-gil Yoo
- Foursquare Labs, Inc.
- General Assembly Space, Inc.
- Github, Inc.
- Imgur, Inc.
- Keen Labs, Inc.
- Mapbox, Inc.
- Shapeways, Inc.
- Automattic, Inc.
- A Medium Corporation
- Reddit, Inc.
- Squarespace, Inc.
- Twitter, Inc.
- Yelp, Inc.
- Media Alliance
- Broadband Institute of California
- Broadband Regulatory Clinic
- Tim Wu
- Edward J. Markey
- Anna Eshoo
- Professors of Administrative Law
- Sascha Meinrath
- Zephyr Teachout
- Internet Users

B. Rulings Under Review

The ruling under review is the FCC's *Protecting and Promoting the Open Internet, Report and Order on Remand, Declaratory Ruling, and Order*, 30 FCC Rcd. 5601 (2015) ("*Order*").

C. Related Cases

The FCC's *Order* has not previously been the subject of a petition for review by this Court or any other court. All petitions for review of the *Order* have been consolidated in this Court, and amici are unaware of any other related cases pending before this Court or any other court.

CERTIFICATE REGARDING AUTHORITY TO FILE AND SEPARATE BRIEFING

Amici curiae filed a motion for leave to participate on September 21, 2015.

Pursuant to D.C. Circuit Rule 29(d), amici curiae certify that they are submitting a separate brief from other amici because of the specialized nature of each amicus's distinct interests and expertise. Amici are scholars and teachers of the First Amendment and its intersection with Internet and communications law. In submitting this brief, they draw upon their academic expertise to articulate and defend the position that the Federal Communications Commission's Open Internet Rules do not trigger heightened scrutiny under the First Amendment. Amici anticipate an amicus brief on behalf of former FCC Commissioners including Reed Hundt and Michael Copps that will in part address the First Amendment issues raised by the FCC's rules. That brief will also address the impact of heightened scrutiny on the broader scheme of common carriage regulation, a topic that amici do not address. As former government officials, moreover, the Commissioners have interests distinct from academic scholars of the First Amendment and their views have been shaped by different experiences. Given these divergent interests, amici certify that filing a joint brief would not be practicable.

/s/Gregory A. Beck
Gregory A. Beck

TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page(s)

CASES

* Authorities upon which we chiefly rely are marked with asterisks.

STATUTES

ADMINISTRATIVE MATERIALS

MISCELLANEOUS

GLOSSARY

Order	Report and Order on Remand, Declaratory Ruling, and Order, *Protecting and Promoting the Open Internet*, 30 FCC Rcd 5601 (2015) (JA__-__)

STATUTES AND REGULATIONS

All applicable statutes and regulations are contained in the Joint Brief for Petitioners USTelecom, NCTA, CTIA, ACA, WISPA, AT&T, and CenturyLink and the Brief for Respondents.

IDENTITY AND INTEREST OF AMICI CURIAE[1]

Amici are scholars of law and communication who write and teach about the First Amendment and its intersection with Internet and communications law, and who have a shared interest in preserving a neutral and open Internet.[2] Several amici have testified on questions related to this proceeding before the FCC and Congress. Amici are deeply concerned about the role that the First Amendment plays in supporting and sustaining free speech and innovation in the modern technological environment. They submit this brief to articulate from a scholarly perspective their view of the proper reach of the First Amendment with respect to rules that encourage openness and nondiscrimination in the provision of Internet service.

---

[1] Pursuant to Fed. R. App. P. 29(c), amici curiae state that no counsel for a party authored this brief in whole or in part, and no person other than amici curiae or their counsel made a monetary contribution to the preparation and filing of this brief.

[2] A complete list of amici is provided in the Appendix.

ARGUMENT

The Open Internet Rules are not subject to scrutiny under the First Amendment because they do not regulate any person's speech. Broadband Internet access service, as the Commission found, is "service . . . that provides the capability to transmit data to and receive data from all . . . Internet endpoints." *Order* ¶ 187 (JA__). That service provides a conduit for speech, and broadband Internet access service providers transmit others' speech through that conduit. The Open Internet Rules regulate the *conduct* of those service providers. They cannot block or throttle lawful content, *id.* ¶¶ 112, 119 (JA__, __), cannot charge for prioritization of some content over other, *id.* ¶ 125 (JA__), and must not unreasonably interfere with content transmission, *id.* ¶ 136 (JA__). The providers' conduct is not speech that is restricted or compelled by the rules. Indeed, the Open Internet Rules are an instance of common carrier regulation, which is not and ought not to be subject to heightened First Amendment scrutiny.

I. THE OPEN INTERNET RULES DO NOT REGULATE BROADBAND INTERNET ACCESS SERVICE PROVIDERS AS SPEAKERS

Broadband Internet access providers do not act as speakers when they transmit the speech of others. The Supreme Court has held that conduct is protected by the First Amendment only when it is expressive: "In deciding whether particular conduct possesses sufficient communicative elements to bring

the First Amendment into play," the Court has "asked whether an intent to convey a particularized message was present, and whether the likelihood was great that the message would be understood by those who viewed it." *Texas v. Johnson*, 491 U.S. 397, 404 (1989) (quoting *Spence v. Washington*, 418 U.S. 405, 410-11 (1974)) (internal quotation marks and alterations omitted). Broadband Internet access service providers' conduct as conduits for others' speech fails this test.

First, providers do not intend to convey any message through the transmission of others' content. As a telecommunications service, broadband Internet access service is solely "the transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information." 47 U.S.C. § 153(50). The providers have nothing to do with the form or content of the information that others choose to send or receive. Indeed, they expressly disclaim any endorsement of such content. To take one example, Verizon's broadband Internet terms of service provide that "Verizon assumes no responsibility for the accuracy, integrity, quality, completeness, usefulness, or value of any Content, advice or opinions contained in any emails, message boards, chat rooms or community services, . . . or in any other public services or social networks, and that Verizon does not endorse any advice or opinion contained therein." Verizon Online Terms of Service ¶ 12(5) (Apr. 19, 2015), *available at* http://www.verizon.com/idc/groups/public/documents/adacct/

version_15-1_internet_tos.pdf (last visited Sept. 21, 2015); *see also* Alamo Broadband, Inc. Terms and Conditions ¶ 7, *at* http://www.alamobroadband.com/?page_id=277 ("[Alamo Broadband] specifically denies any responsibility for the accuracy or quality of any information obtained through the use of our services.") (last visited Sept. 21, 2015).

Similarly, Verizon has argued in past litigation that it does not endorse or take responsibility for the content it transmits between Internet users:

> [T]he Internet service provider performs a pure transmission or "conduit" function. . . . This function is analogous to the role played by common carriers in transmitting information selected and controlled by others. Traditionally, this passive role of conduit for the expression of others has not created any duties or liabilities under the copyright laws.

Brief for Appellant at 23, *Recording Indus. Ass'n of Am. v. Verizon Internet Serv.*, 351 F.3d 1229 (D.C. Cir. 2003) (Nos. 03-7015 & 03-7053). Indeed, to the extent that broadband Internet access service providers now claim to be First Amendment speakers in their transmission of others' speech, *see* Alamo Pet. Br. 4-5, they cannot have it both ways. *See* Rob Frieden, *Invoking and Avoiding the First Amendment: How Internet Service Providers Leverage Their Status as Both Content Creators and Neutral Conduits*, 12 U. Pa. J. Const. L. 1279, 1284-95 (2010) (cataloguing alternative First Amendment positions of broadband providers). Based on their representations to their customers and the public,

broadband providers are conduits that make no claim to any particular message sent or received by their users.

Second, there is little likelihood that users would understand providers to be expressing a message through their provision of broadband Internet access service. A broadband provider transmits an all-but-infinite variety of messages and content across the entire Internet. These messages are of course often contradictory, and no reasonable user could impute all of these various conflicting views to the provider.

In this way, broadband providers are similar to the shopping center owner in *PruneYard Shopping Center v. Robins*, 447 U.S. 74 (1980). In that case, the Supreme Court held that a state constitution (which the Court treated no differently from a state statute) could require the private owner of a shopping mall that was open to the public to allow members of the public to distribute leaflets and solicit petition signatures inside the mall. While the First Amendment does not require that shopping malls be held open for public speech, the Court concluded that imposing such a requirement by legislation was not a regulation of the owners' speech. Instead, it was a regulation of the owners' *conduct*—holding the mall open as a forum. *See id.* at 87-88. That conduct, the Court reasoned in part, was not expressive because "[t]he views expressed by members of the public in passing out

pamphlets or seeking signatures for a petition . . . will not likely be identified with those of the owner." *Id.* at 87.

Internet users, moreover, would not draw a connection between the performance of their broadband networks—the conduct that the Open Internet Rules regulate—and expression by the network operators. That is because an Internet user who "encounters a slow or inaccessible website or application has no way of knowing whether that content is being slowed down or blocked by her Internet access provider." Nicholas Bramble, *Ill Telecommunications: How Internet Infrastructure Providers Lose First Amendment Protection*, 17 Mich. Telecomm. & Tech. L. Rev. 67, 89 (2010). Slowdowns or interruptions in service might be caused by another entity's network congestion or decision to block the website, or the website provider's own failure to maintain the site or its decision not to transmit content at that time and location. *See id.* In short, the connection between conduct and message is too attenuated to support in the average user an inference that her broadband provider disapproves of particular content. Without additional explanation from the provider to express an opinion about the content it does or does not transmit, a user's inability to access that content communicates nothing. As the Supreme Court has explained, "[t]he fact that . . . explanatory speech is necessary is strong evidence that the conduct at issue here is not so

inherently expressive that it warrants protection." *Rumsfeld v. Forum for Academic and Institutional Rights, Inc.*, 547 U.S. 47, 66 (2006) (*FAIR*).

Broadband providers do not convey a particularized message and Internet users would not see their providers' conduct as conveying a particularized message. Because the Open Internet Rules therefore regulate only non-expressive conduct, they are not subject to heightened First Amendment scrutiny under the rule in *Johnson*, 491 U.S. at 404, and *Spence*, 418 U.S. at 410-11.

II. THE OPEN INTERNET RULES DO NOT COMPEL SPEECH

As described above, broadband Internet access service providers are not speakers when they engage in the regulated conduct but instead are merely conduits. It follows that when the Open Internet Rules require providers to carry others' speech, they do not require the providers themselves to speak.

This conclusion draws support from a line of cases in which the Supreme Court has held that there can be no compulsion of speech without an underlying expressive interest. In *FAIR*, for example, the Court held that law schools could be required to host military recruiters who wanted to interview student job applicants on their campuses. *See* 547 U.S. at 60-61, 64-65. The Court held that on-campus employment services were not expressive. *See id.* at 65-67. It therefore followed easily that the requirement of access for military recruiters on equal terms with other employers "affect[ed] what law schools must *do* . . . not what they may or

may not *say*." *Id.* at 60 (emphasis in original). The regulation therefore did not compel any speech from the law schools. *See id.* at 63-65. Broadband providers are similarly situated to the law schools in *FAIR*. By contrast, they are unlike the parade organizers in *Hurley v. Irish-American Gay, Lesbian & Bisexual Group of Boston*, 515 U.S. 557 (1995). In that case, the Court did not treat Boston's annual St. Patrick's Day parade as a neutral conduit for others' speech because "[p]arades are . . . a form of expression," *id.* at 568, in which the organizers "mak[e] some sort of collective point." *Id.* The Court therefore found it a violation of the First Amendment to compel the parade organizers to include speakers with which they disagreed. To be sure, "a narrow, succinctly articulable message is not a condition of constitutional protection," *id.* at 569, and the message in *Hurley* was diffuse and varied, an expression of Irish pride, *see id.* at 570. But broadband providers' conduct does not evince even a diffuse message of "provider pride." Broadband providers do not organize parades intended to communicate a point with which the Open Internet Rules interfere; and Internet users are not participating in such a parade. Instead, users are trying to speak with one another using broadband providers' conduit services. Requiring providers to transmit users' speech evenhandedly therefore does not compel those providers to speak.

Similarly, broadband providers cannot claim that the Open Internet Rules "interfere[]" with any of their own expressive choices. *FAIR*, 547 U.S. at 64.

Broadband providers are unlike the newspaper publisher in *Miami Herald Publishing Co. v. Tornillo*, 418 U.S. 241 (1974), which exercised editorial judgment over the content of its newspaper and therefore could not be compelled to give political candidates equal space to address criticism that the newspaper published. *See id.* at 254-58. As press organs, newspapers have long been thought to exercise their own expressive functions. *See id.* at 254-55; *see also Turner Broadcasting Sys., Inc. v. FCC*, 512 U.S. 622, 653 (1994) ("*Tornillo* affirmed an essential proposition: The First Amendment protects the editorial independence of the press."). The "editor" of a newspaper is responsible for doling out assignments and selecting stories, whereas broadband service providers offer Internet transmission and interconnection services, not content curation. Because newspapers cannot "proceed to infinite expansion of . . . column space," *Tornillo*, 418 U.S. at 257, "[t]he choice of material to go into a newspaper . . . constitute[s] the exercise of editorial control and judgment." *Id.* at 258.

Broadband providers also are unlike the cable operators in *Turner Broadcasting*. In that case, the Supreme Court held that a statute requiring cable operators to transmit local broadcast television signals over their systems was subject to heightened First Amendment scrutiny. *See* 512 U.S. at 643-45. The Court understood cable operators to "exercis[e] editorial discretion over which stations or programs to include in [their] repertoire," *id.* at 636 (quoting *Los*

Angeles v. Preferred Commnc'ns, Inc., 476 U.S. 488, 494 (1986)) because technological constraints on the number of available cable channels meant that the selection of stations to carry was an act of judgment. The must-carry rules "reduce[d] the number of channels over which cable operators exercise[d] unfettered control," *id.* at 637, and therefore interfered with that judgment. Indeed, the Court in *Denver Area Educational Telecommunications Consortium, Inc. v. FCC*, 518 U.S. 727 (1996) drew a distinction for First Amendment purposes between those channels and public access channels, "over which cable operators have not historically exercised editorial control," subjecting the latter to lower scrutiny. *Id.* at 761 (plurality op.).

This is not how broadband providers operate. Unlike newspapers and cable companies, broadband providers do not and need not exercise editorial control in order to determine how to fill a limited number of newspaper column inches or television channels. There is no limit to the applications, content, and services available over the Internet, and no technological constraint that prevents broadband providers from offering their users access to the entire Internet. Broadband Internet access service, as described above, is not the provision of a curated body of the Internet's "greatest hits," nor is there any technological reason why it has to be. Instead, that service gives users a connection over which they select for themselves the content they want to send and receive. It is much more like

traditional phone networks; there is no need to "edit" or "select" who can make or receive phone calls.

To the extent that broadband providers *do* speak through services other than broadband Internet access service—when, for example, they set up their own websites advertising or selling their own or affiliated products—they benefit just as much from the Open Internet Rules as any other speaker transmitting content over the Internet. They enjoy nondiscriminatory access to any user with a broadband connection. The Open Internet Rules therefore enhance, rather than chill, broadband providers' other speech. Because, as described above, this is not a case in which the government is compelling speech, it is *a fortiori* not a case in which the government is burdening a commercial speaker with additional speech. Carrying other speakers' content is entirely distinct from and does not interfere with any commercial content that the broadband provider itself might express. Even if they were related, compelled commercial disclosure is only subject to heightened scrutiny if it has a "chilling" effect on protected commercial speech. *See Zauderer v. Office of Disciplinary Counsel of Supreme Court of Ohio*, 471 U.S. 626, 651 (1985).[3] The Open Internet Rules have the opposite effect here.

[3] The reach of *Zauderer* remains unsettled in this Court and more broadly. *See Nat'l Assn. of Mfrs. v. SEC*, No. 13-5252, 2015 WL 5089667, at *4 & n.16 (D.C. Cir. Aug. 18, 2015). To the extent that broadband providers speech comprises commercial advertising, which is likely to be the bulk of broadband providers' speech as a practical matter, it falls squarely within *Zauderer*'s scope as this Court

III. COMMON CARRIAGE REGULATIONS LIKE THE OPEN INTERNET RULES ARE NOT AND SHOULD NOT BE SUBJECT TO FIRST AMENDMENT SCRUTINY

The Open Internet Rules are a form of common carriage regulation. This Court so held in *Verizon v. FCC*, 740 F.3d 623 (D.C. Cir. 2014), with respect to the Commission's previously enacted anti-discrimination, *see id.* at 655-56, and anti-blocking rules, *see id.* at 657-59. And in this case, the Commission has expressly reclassified broadband Internet access service as a "telecommunications service" subject to Title II of the Communications Act. *See* Order ¶¶ 355-408. That classification subjects broadband Internet access service to common carriage regulation. *See* 47 U.S.C. § 153(51) ("A telecommunications carrier shall be treated as a common carrier under this chapter only to the extent that it is engaged in providing telecommunications services.").

The "basic characteristic" of common carriage is "the common law requirement of holding oneself out to serve the public indiscriminately." *Verizon*, 740 F.3d at 651 (internal quotation marks omitted). Telephone companies are classic common carriers—they transmit voice traffic indiscriminately over their networks. Such carriers are treated as neutral platforms. "The assumption for common carriers like telephone companies generally has been that they are not

---

interpreted it in *American Meat Institute v. United States Department of Agriculture*, 760 F.3d 18, 22-23 (D.C. Cir. 2014) (en banc).

speakers, and have no First Amendment right to discriminate against speech or speakers." Rebecca Tushnet, *Power Without Responsibility: Intermediaries and the First Amendment*, 76 Geo. Wash. L. Rev. 986, 125 n.100 (2008); *see also* Stuart Minor Benjamin, *Transmitting, Editing, and Communicating: Determining What "The Freedom of Speech" Encompasses*, 60 Duke L.J. 1673, 1686-87 (2011) ("Courts have placed common carriers and other mere conduits at the opposite end of the spectrum from speakers, and have held that conduits do not have free speech rights of their own.").

The Supreme Court has often drawn a distinction between protected speech and unprotected common carriage. *See, e.g.*, *FCC v. League of Women Voters of Cal.*, 468 U.S. 364, 378 (1984) ("Unlike common carriers, broadcasters are entitled under the First Amendment to exercise the widest journalistic freedom consistent with their public duties.") (internal quotation marks omitted); *Denver Area*, 518 U.S. at 739 (plurality op.) (describing "speech interests" in "leased channels" as "relatively week because they act less like editors, such as newspapers or television broadcasters, than like common carriers, such as telephone companies"); *Turner Broad.*, 512 U.S. at 684 (O'Connor, J., concurring in part and dissenting in part) (suggesting that common carriage regulation of cable companies, like telephone companies, would be constitutionally permissible). Indeed, *Sable Communications v. FCC*, 492 U.S. 115 (1989), suggests not only that nondiscrimination in

telephone service is never suspect under the First Amendment, but that the opposite is true: government interference with neutral transmission of content over common carriage communications systems is a violation of the *users*' free speech rights. *See id.* at 126-31.

This treatment of common carriage supports rather than undermines critical First Amendment values. As the Court explained in *Reno v. ACLU*, 521 U.S. 844 (1997), the Internet is "the most participatory form of mass speech yet developed," *id.* at 863 (internal quotation marks omitted), enabling "any person with," at that time, "a phone line [to] become a town crier with a voice that resonates farther than it could from any soapbox." *Id.* at 870. The Court did *not* say that only those who own the phone company or have permission from the phone company that holds relevant First Amendment rights can be the town crier. Today, of course, phone lines have been replaced with broadband Internet access, which makes the Internet an even more effective and crucial tool of speech and communication. And *Reno*'s observations are more important than ever. As the Commission found, "the Internet's openness is critical to its ability to serve as a platform for speech and civic engagement." *Order* ¶ 77. Because common carriage rules foster that openness they provide crucial support for the speech activity that happens every second of every day over the Internet.

CONCLUSION

The petition for review should be denied.

September 21, 2015

Respectfully submitted,

/s/Gregory A. Beck
Gregory A. Beck
3504 Woodridge Ave.
Silver Spring, MD 20902
(202) 684.6339
gregory.beck@gmail.com

Counsel for Amici Curiae

APPENDIX

LIST OF SIGNATORIES
(Institutions are listed for identification purposes only)

Jack M. Balkin
Knight Professor of Constitutional Law and the First Amendment
Yale Law School

Yochai Benkler
Jack N. and Lillian R. Berkman Professor for Entrepreneurial Legal Studies
Harvard Law School

John F. Blevins
Associate Professor of Law
Loyola University New Orleans College of Law

Michael J. Burstein
Associate Professor of Law
Cardozo School of Law
Yeshiva University

Robert Frieden
Pioneers Chair and Professor of Telecommunications and Law
Penn State University

Brett Frischmann
Professor of Law
Cardozo School of Law
Yeshiva University

Theodore L. Glasser
Professor, Department of Communication
Stanford University

Ellen Goodman
Professor of Law
Rutgers University School of Law

Lawrence Lessig
Roy L. Furman Professor of Law
Harvard Law School

Dawn C. Nunziato
Professor of Law
The George Washington University Law School

Pamela Samuelson
Richard M. Sherman Distinguished Professor of Law
University of California, Berkeley

Fred Turner
Professor and Chair, Department of Communication
Stanford University

Rebecca Tushnet
Professor of Law
Georgetown University Law Center

Barbara van Schewick
Professor of Law and (by Courtesy) Electrical Engineering
Helen L. Crocker Faculty Scholar
Stanford Law School

Jonathan T. Weinberg
Professor of Law
Wayne State University

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(a)(7)(C) and D.C. Circuit Rule 29(d), the undersigned certifies that this brief complies with the applicable type-volume limitations. This brief was prepared using a proportionally spaced type (Times New Roman, 14 point). Exclusive of the portions exempted by Federal Rule of Appellate Procedure 32(a)(7)(B)(iii) and D.C. Circuit Rule 32(e)(1), this brief contains 3,273 words. This certificate was prepared in reliance upon the word-count function of the word-processing system (Microsoft Word for Mac 2011) used to prepare the brief.

/s/Gregory A. Beck
Gregory A. Beck

September 21, 2015

CERTIFICATE OF SERVICE

I hereby certify that, on September 21, 2015, I electronically filed the foregoing brief with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

/s/Gregory A. Beck
Gregory A. Beck

September 21, 2015