UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION

VOTER VERIFIED, INC., a Florida corporation,

Plaintiff,

v.

ELECTION SYSTEMS & SOFTWARE, LLC, a Delaware limited liability company, f/k/a Election Systems & Software, Inc., a Delaware corporation,

Defendant.
_____/

Case No.

INJUNCTIVE RELIEF AND JURY TRIAL REQUESTED

COMPLAINT

The Plaintiff, VOTER VERIFIED, INC., sues the Defendant, ELECTION SYSTEMS & SOFTWARE, LLC, and says:

PARTIES

1. The Plaintiff, VOTER VERIFIED, INC. ("VVI"), is a corporation organized and existing under the laws of the State of Florida.

2. The Defendant, ELECTION SYSTEMS & SOFTWARE, LLC ("ES&S-LLC") is a limited liability company existing under the laws of the State of Delaware as a conversion on October 1, 2011 under 8 Delaware Code § 266 of Election Systems &

Software, Inc. ("ES&S-Inc"), a corporation organized under the laws of the State of Delaware; is "deemed to be the same entity as the corporation", ES&S-Inc under subsection (h) thereof; and is licensed to do business in the State of Florida.

3. Prior to said conversion, ES&S-Inc acquired Premier Election Solutions, Inc. ("Premier"), formerly known as Diebold Election Systems, Inc., from Diebold, Incorporated on September 2, 2009 by purchase of all of the capital stock of Premier from Diebold. Premier continued as the wholly owned subsidiary of ES&S-Inc until the merger into ES&S-LLC on October 1, 2011 under 8 Delaware Code § 259 in which "all debts, liabilities and duties of the respective constituent corporations shall thenceforth attach to said surviving or resulting corporation, and may be enforced against it to the same extent as if said debts, liabilities and duties had been incurred or contracted by it".

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.,* of United States Patent No. RE40,449 ("the '449 patent"), the reissue of United States Patent No. 6,769,613 ("the '613patent"), copies of said United States Patents being attached hereto as **Exhibits B and A,** respectively.

5. This Court has exclusive subject matter jurisdiction over this action under 28 U.S.C. §§1331 and 1338(a).

6. ES&S-LLC is subject to the jurisdiction of this Court by reason of ES&S-LLC having received a license to do business in the State of Florida and having accordingly appointed a resident agent for service of process in the State of Florida.

7. The Northern District of Florida is a proper venue for this action under 28 U.S.C. §§ 1391(c) and 1400(b), in that ES&S is subject to personal jurisdiction in the Northern District of Florida, and thus is deemed to reside in the Northern District of Florida for purposes of venue.

8 . Venue is proper under 28 U.S.C. §§ 1391 (b) and/or 1400(b), in that some of the events giving rise to the claims of VVI occurred in the Northern District of Florida.

9. ES&S-LLC has infringed, and is continuing to infringe the '449 Patent by making, selling, offering to sell, importing, exporting, and/or using within and throughout the United States of America certain voting systems and equipment that practice certain voting methods claimed in the '449 Patent, to wit: the AccueView Printer Module used in combination and/or systematized with the AccuVote®-TSX or other direct recording electronic voting machines; the iVotronic Real-Time Audit Log used in combination and/or systematized with the iVotronic or other direct recording electronic voting machines; the ES&S AutoMARK; the ES&S Vote Express; and various "tabulators" used in combination and/or systematized therewith, including ES&S "tabulators", particularly the Model 100 Precinct Ballot Counter, the IntElect DS200, the Model 650 Central Ballot Tabulator, the DS850(I), and the DS850 central scanner and tabulator.

BACKGROUND

10. On December 7, 2000 Co-Inventors Michael R. McDermott and Anthony I. Provitola filed the Application for United States Patent with the United States Patent and Trademark Office (USPTO) entitled "Auto-Verifying Voting System and Voting Method",

which was assigned the Application Serial Number 09/732,324 by the USPTO, according to the Co-Inventor supplied post card mailed by the USPTO on December 19, 2000, a copy of which is attached hereto as **Exhibit C**.

11. On January 19, 2001 Co-Inventor, Michael R. McDermott, assigned all of his right, title, and interest in and to United States Patent Application No. 09/732,324 to Co-Inventor, Anthony I. Provitola, the Assignment of Application evidencing said transfer, a copy of which is attached hereto as **Exhibit D**, being recorded with the USPTO on March 28, 2001, thereafter announced in the USPTO Official Gazette (OG), and electronically published by the USPTO on its Internet website www.uspto.gov at Patents>Search Patents>Patent Number Search>6,769,613.

12. On June 13, 2002 the USPTO issued the Notice of Publication of Application for United States Patent Application No. 09/732,324 stating that said Application had been published electronically in accordance with 37 CFR 1.211.

13. On August 3, 2004 the '613 patent was issued by the USPTO, following the mailing of the Notice of Allowance of United States Patent Application No. 09/732,324 on April 7, 2004, and was published by the USPTO on its Internet website www.uspto.gov at Patents>Search Patents>PatentNumberSearch>6,769,613[http://patft.uspto.gov/netacgi/nph-Parser?Sect1 PTO1&Sect2=HITOFF&d=PALL&p=1&u=%2Fnetahtml%2FPTO%2Fsrch num =.htm&r =1&f=G&l=50&s1=6,769,613.PN.&OS=PN/6,769,613&RS=PN/6,769,613]).

14. On August 27, 2004 Mr. Terry M. Sanks, Attorney at Law sent a letter to Mr. Thomas Swidarski, Senior Vice President of Premier, then known as Diebold Election

Systems, Inc., on behalf of Autoverify Voting Systems, LLC ("AVS"), the contractual licensing organization authorized by Co-Inventor Anthony I. Provitola for the '613 patent, a copy of which is attached hereto as **Exhibit E(1)**, covering a copy of the'613 patent and requesting the opening of negotiations for non-exclusive licensing of the '613 patent.

15. On August 27, 2004 Mr. Terry M. Sanks, Attorney at Law, sent a letter to Mr. Aldo Tesi, then President and Chief Executive Officer of ES&S-Inc on behalf of AVS, a copy of which is attached hereto as **Exhibit E(2)**, covering a copy of the'613 patent and requesting the opening of negotiations for non-exclusive licensing of the '613 patent.

16. Premier acknowledged receipt of said letter (Exhibit E(1)) by a letter dated September 16, 2004 from Ms. Nancy L. Reeves, Attorney at Law with the law firm of Walker & Locke, a copy of which is attached hereto as **Exhibit F(1)**.

17. ES&S-Inc acknowledged receipt of said letter (Exhibit E(2)) by a letter from Mr. Eric A. Anderson, then General Counsel of ES&S-Inc, dated September 14, 2004, a copy of which is attached hereto as **Exhibit F(2)**.

18. On December 2, 2004 Co-Inventor, Anthony I. Provitola filed a Request for Certificate of Correction, and on February 1, 2005 the Director of the USPTO issued the Certificate of Correction thereupon that became a part of the '613 patent, a copy of which is attached hereto as **Exhibit G**.

19. On February 14, 2005 Co-Inventor, Anthony I. Provitola filed with the USPTO a Reissue Application, assigned Serial Number 11/062,351, claiming the benefit of United States Patent Application No. 09/732,324 with child continuity therefrom.

20. On May 3, 2005 the USPTO announced the filing of said Reissue

Application in the USPTO OG issued for week 18 of 2005 pursuant to 37 CFR 1.11(b).

21. In conjunction with said announcement in the USPTO OG, said Reissue Application became open to inspection by the public by electronic publication in the USPTO Public Patent Application Information Retrieval (Public PAIR) system.

22. Upon Public PAIR publication of said Reissue Application the parent continuity from United States Patent Application No. 09/732,324 was included, and the child continuity of said Reissue Application was included in the Public PAIR publication of the '613 patent.

23. On August 5, 2008 the '613 patent was reissued by the USPTO to Co-Inventor, Anthony I. Provitola as the '449 Patent following the mailing of the Notice of Allowance of said Reissue Applicaton on May 9, 2008.

24. On June 1, 2009 Co-Inventor, Anthony I. Provitola filed a Request for Certificate of Correction to the '449 Patent, and on July 7, 2009 the Director of the USPTO issued the Certificate of Correction thereupon, a copy of which is attached hereto as **Exhibit H**, which became a part of the '449 Patent.

25. The '449 Patent included an amended Claim 49 of the '613 patent (as corrected by the Certificate of Correction issued on July 7, 2009 (Exhibit H)), which is substantially identical to the original Claim 49 in the '613 patent.

26. On November 12, 2009 Co-Inventor, Anthony I. Provitola assigned all of his right, title and interest in and to the '613 patent and the '449 Patent to VVI, including all rights to recover by legal action any claims for infringement that had accrued prior to said transfer, by execution of the Assignment of Patent, a copy of which is attached hereto as

Exhibit I.

27. On November 19, 2009 VVI commenced actions for infringement of said United States Patents in the U. S. District Court, Middle District of Florida ("MDFL Court") against ES&S-Inc, Case No. 6:09-cv-1969-Orl, ("1969 Case"), and Premier**,** Case No. 6:09-cv-1968-Orl ("1968 Case") in which ES&S-Inc and Premier both counterclaimed for declaratory judgment to invalidate all of the claims of said United States Patents. Both cases ("MDFL Cases") were adjudicated on motions for summary judgment to Final Judgments, which were rendered in accordance with the MDFL Court's Orders on the parties motions for summary judgment, copies of which are attached hereto as **Exhibit J** and **Exhibit K** respectively, as follows:

(a) in the '1968 Case

(1) For VVI and against Premier: "[O]n the counterclaim of Premier Election Solutions, Inc. to the extent such counterclaim asserted that claims 1-48, 50-84, and 86-92 of United States Patent No. RE40,449 are invalid" (Paragraph 5);

(2) For Premier and against VVI:

A. "[O]n Plaintiff's claims of infringement of claims 1-93 of United States Patent No. RE40,449" (Paragraph 1);

B. "[O]n Plaintiff's claim of infringement of claim 94 of United States Patent No. RE40,449 as such claim 94 is invalid pursuant to 35 U.S.C.§ 112" (Paragraph 3);

C. "[O]n Plaintiff's claim of infringement of claim 49 of United States Patent No. RE40,449 as claim 49 is invalid pursuant to 35 U.S.C. 103" (Paragraph 4);

(b) In the '1969 Case:

(1) For VVI and against ES&S-Inc: "[O]n the counterclaim of Election Systems & Software, Inc. to the extent such counterclaim asserted that claims 1-48, 50-84, and 86-92 of United States Patent No.RE40,449 are invalid" (Paragraph 5);

(2) For ES&S-Inc and against VVI:

A. "[O]n Plaintiff's claims of infringement of claims 1-93 of United States Patent No. RE40,449" (Paragraph 1);

B. "[O]n Plaintiff's claim of infringement of claim 94 of United States Patent No. RE40,449 as such claim 94 is invalid pursuant to 35 U.S.C. 112" (Paragraph 3);

C. "[O]n Plaintiff's claim of infringement of claim 49 of United States Patent No. RE40,449 as claim 49 is invalid pursuant to 35 U.S.C. 103" (Paragraph 4).

28. The collective effects of those Final Judgments pertinent to this action are as follows:

(a) The holding in favor of VVI and against Premier and ES&S-Inc on the validity of Claims 1-48, 50-84, and 86-92 of United States Patent No.RE40,449;

(b) The holding in favor of Premier and ES&S-Inc on the invalidity of Claims 49 and 94

(b) The holding in favor of Premier and ES&S on their claims of non-infringement of claims 1-93.

(1) Claims 49 and 94 were held not to be infringed because they were held invalid.

(2) Claims 49 and 85 were held to be non-infringing on the authority of *Muniauction, Inc. v. Thomson Corporation,* 532 F.3d 1531 (Fed Cir. 2008) and *BMC Resources, Inc. v. Paymentech, L.P.*, 498 F.3d 1373 (Fed. Cir., 2007) with the MDFL Court's finding that there was no agency or contractual relationship among the users of the accused voting methods and the sellers thereof, Premier and ES&S.

(3) Dependent Claims 50-55 were also held to be non-infringing under the doctrine of *Muniauction* because of the commonality of elements with independent Claim 49, which are included in each dependent claim by operation of law.

(4) Dependent Claims 86-93 were also held to be non-infringing under the doctrine of *Muniauction* because of the commonality of elements with independent Claim 85, which are included in each dependent claim by operation of law.

29. VVI timely appealed the Final Judgments of the MDFL Court to the United States Court of Appeals for the Federal Circuit ("CAFC") on August 20, 2011, citing multiple errors by the MDFL Court, including the grounds upon which the MDFL Court held that the '449 Patent was not directly infringed under Section 271(a) of the U.S. Patent Laws, by operation of the doctrine of *Muniauction* and *BMC Resources*.

30. ES&S-Inc and Premier also timely cross-appealed, citing as error the failure of the District Court to grant a motion for reconsideration with respect to rulings adverse to them holding all but claims 49, 85, 93 and 94 to be valid.

31. On November 5, 2012 the CAFC affirmed the Final Judgments of the District Court. On December 5, 2012 VVI timely filed its Combined Petition for Panel Rehearing

and Rehearing En Banc, preserving all issues for reconsideration, to which ES&S-Inc did not respond, and which was denied on January 10, 2013.

32. On April 4, 2013 VVI filed its Petition for Certiorari in the United States Supreme Court, again preserving all issues for reconsideration. ES&S-Inc and Premier did not cross-petition, and were not invited to respond. The Supreme Court considered VVI's Petition for Certiorari in conference on June 6, 2013.

33. Also considered at the Supreme Court conference on June 6, 2013 were the Petition and Cross-Petition for Certiorari by Limelight Networks, Inc. ("Limelight") and Akamai Technologies, Inc. ("Akamai") respectively directed to the decision of the CAFC in *Akamai Technologies, Inc. v. Limelight Networks, Inc.,* CAFC Case No. 2009-1372, reported at 692 F.3d 1301 (Fed. Cir. 2012), a case decided *en banc* by the CAFC on August 31, 2012. The Petition for Certiorari by Limelight, Supreme Court Case No. 12-786, presented the following question: "Whether the Federal Circuit erred in holding that a defendant may be held liable for inducing patent infringement under 35 USC § 271(b) even though no one has committed direct infringement under § 271(a)". That question arose from an effort by the CAFC in *Akamai* to ameliorate the effect of the doctrine of *Muniauction* by allowing liability for induced infringement under 351 USC § 271(b) in the gap in liability for direct infringement created by that doctrine. The Cross-Petition for Certiorari by Akamai, Supreme Court Case No. 12-960, presented the following question: "Whether a party may be liable for infringement under either 35 USC § 271(a) or § 271(b) where two or more entities join together to perform all the steps of a process claim". The question presented to the Supreme

Court by Akamai was essentially the same as the principal issue presented by VVI in its Petition for Certiorari.

34. Following the conference held by the Supreme Court on June 6, 2013, the Petition of VVI was denied, but the Petitions of Limelight and Akamai were held over for several succeeding conferences.

35. With the affirmance by the CAFC of the MDFL Judgments the law of the case of the MDFL cases was established as a result of the operation of the doctrine of preclusion of issues with respect to: 1) the validity of the claims of the '449 Patent; and 2) the infringing actions by and attributable to Premier and ES&S-Inc with respect to the methods claimed in the '449 Patent in Claims 49, 85, and 93.

36. On January 10, 2014 the Supreme Court granted certiorari on the Petition of Limelight, but denied the Cross-Petition of Akamai. Following oral argument, and on June 2, 2014, the Supreme Court unanimously reversed the Judgment of the CAFC in *Limelight*, holding in the affirmative on the question presented therein and remanded to the CAFC for further consideration. In that decision the Supreme Court commented on the conditions placed upon direct infringement of method patents under Section 271(a) by the CAFC, such as in *Muniauction*. *Limelight Networks, Inc. v. Akamai Technologies, Inc.*, Supreme Court Case No. 12-786, 134 S.Ct. 2111 (U.S. 2014): "Our decision on the §271(b) question necessitates a remand to the Federal Circuit, and on remand, the Federal Circuit will have the opportunity to revisit the §271(a) question if it so chooses."

37. Upon remand the CAFC assigned the case to the same panel that originally affirmed against Akamai in 2011 (with one replacement member), which affirmed 2 to 1

against Akamai on May 13, 2015 on the authority of *Muniauction*, and Akamai petitioned for rehearing *en banc*. On August 13, 2015 the CAFC granted Akamai's petition for rehearing *en banc*, and (*on the same day*) unanimously reversed the panel decision against Akamai thereupon. *Akamai Technologies, Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (Fed. Cir. 2015). A copy of the August 13, 2015 *en banc* decision by the CAFC is attached hereto as **Exhibit L**. As stated by the CAFC in that *en banc* decision: "This case was returned to us by the United States Supreme Court, noting 'the possibility that [we] erred by too narrowly circumscribing the scope of § 271(a)' and suggesting that we 'will have the opportunity to revisit the § 271(a) question . . . .' *Limelight Networks, Inc. v. Akamai Techs., Inc.*, 134 S. Ct. 2111, 2119, 2120 (2014). We hereby avail ourselves of that opportunity." Thus the CAFC vacated the recent Panel decision in favor of Limelight, overruling *Muniauction* and *BMC Resources* and all of the other cases that held to the same conditions on liability for infringement under Section 271(a), stating that "Section 271(a) is not limited solely to principal-agent relationships, contractual arrangements, and joint enterprise, as the vacated panel decision held.[3] " Footnote 3 states: "To the extent our prior cases formed the predicate for the vacated panel decision, those decisions are also overruled." Those "prior cases" are *Muniauction,* and *BMC Resources.*

38. On the basis of the August 13, 2015 *en banc* holding by the CAFC in *Akamai* VVI filed its motions under Rule 60(b), Fed.R.Civ.P. in the MDFL Cases for relief from the affirmed Final Judgments rendered therein, particularly under subsections (5) and (6) thereof, requesting vacatur of those Final Judgments to the extent that they rely upon the overruled doctrines of *Muniauction* and *BMC Resources* and thus directly affected the outcome of the

MDFL Cases, copies of said motions being attached hereto as **Exhibit M** and **Exhibit N.**

39. The MDFL Court denied VVI's Rule 60(b) motions in the MDFL Cases in two orders which are presently the subject of two consolidated appeals before the CAFC, Case Nos. 2016-2272 and 2016-2273.

40. The law of the case in the MDFL Cases is expressed in the MDFL Court's Orders ('1968 Case Doc. 155 at Page 22 and '1969 Case Doc. 114 at Page 27, under **Analysis**, Section **IV. Infringement**, Subsection **A. Claims 49, 85, and 93**) regarding the Second Motion for Summary Judgment by Voter Verified, Inc.: Premier and ES&S-Inc developed and marketed the Accused Systems and its printer, and all of the elements of the independent method Claims 49, 85, and 93 were to be performed in the Accused Systems by multiple actors according to the instructions provided in the Accused Systems.

41. The *en banc* decision of the CAFC in *Akamai* on August 13, 2015 imposes the responsibility on the United States District Courts to afford equal protection of the law and due process under 35 USC §271(a) to all cases previously decided under *Muniauction* and *BMC Resources*, and re-adjudicate within the confines of the doctrine of the law of the case without the distortion caused by the erroneous doctrine of *Muniauction* and *BMC Resources*.

CLAIMS FOR RELIEF FOR INFRINGEMENT OF UNITED STATES PATENT

42. VVI incorporates herein by reference the allegations set forth in paragraphs 1-41 of this Complaint as though fully set forth herein.

43. VVI is the owner by assignment (Exhibit I) of the entire right, title, and interest in and to the '449 Patent entitled "AUTO-VERIFYING VOTING SYSTEM AND

VOTING METHOD", including all rights to recover by legal action any claims for infringement that had accrued to the owner of the '449 Patent.

44. ES&S-LLC has infringed the '449 Patent, and is continuing to infringe the '449 Patent, by making, using, selling, advertising, and/or offering for sale in the United States, and/or importing and/or exporting, voting machines and systems that embody and/or practice the invention claimed in the '449 Patent, with full knowledge of the '449 Patent, including the amended and new claims thereof.

45. ES&S-LLC has been infringing the '449 Patent and has continued to infringe the '449 Patent under 35 U.S.C. § 271(b) by actively inducing direct infringement by end-users who use voting systems and methods that embody and/or practice the invention claimed in the '449 Patent.

46. ES&S-LLC has the specific intent to encourage direct infringement of the '449 Patent by end-users who use voting systems and methods that embody and/or practice the invention claimed in the '449 Patent.

47. ES&S-LLC's actions, including their sales, advertising, and instructions induced direct infringement by the end-users who use voting systems and methods that embody and/or practice the invention claimed in the '449 Patent.

48. ES&S-LLC knew or should have known that its actions would induce direct infringement by end-users who operate and/or use voting systems and methods that embody and/or practice the invention claimed in the '449 Patent.

49. ES&S-LLC has been infringing the '449 Patent and is continuing to infringe the '449 Patent under 35 U.S.C. § 271(c) by contributing to the direct infringement by end-

users who operate and/or use voting systems and methods that embody and/or practice the invention claimed in the '449 Patent.

50. The voting systems and methods and components thereof sold, made and/or operated by ES&S-LLC constitute a material part of the invention claimed in the '449 Patent and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

51. At all times pertinent hereto ES&S-LLC knew that the voting systems and methods and components thereof are being used by the end-user as a material part of the invention claimed in the '449 Patent.

52. ES&S-LLC failed to obtain a license for the invention claimed in the '449 Patent, and willfully and deliberately proceeded to conduct business without such a license and infringing the '449 Patent, all with full and complete knowledge of the legal effect of the '449 Patent.

55. As a direct and proximate result of infringement of the '449 Patent, VVI has been and continues to be damaged in an amount yet to be determined.

56. Continued willful and deliberate infringement of the '449 Patent as herein alleged is likely unless enjoined by this Court in view of the failure of ES&S-LLC to obtain a license for the invention claimed in the '449 Patent, and proceeding to conduct its business without such a license and with infringement of the '449 Patent, all with full and complete knowledge of the legal effect of the '449 Patent.

57. Unless enjoined and restrained by this Court, the willful infringement of the '449 Patent by ES&S-LLC, is likely to cause irreparable injury to VVI with respect to

prospective business in the voting system market and the licensing of the '449 Patent to competitors of ES&S-LLC in the voting systems market as by: influencing the decisions of potential licensees as to whether or not to obtain a license from VVI under the '449 Patent in order to compete with ES&S-LLC in the voting systems market; and by impeding any licensing negotiations of VVI with such potential licensees; all of which cannot be adequately compensated, measured, or calculated.

58. VVI has no adequate remedy at law for such future infringement, and is therefore entitled to injunctive relief enjoining and restraining ES&S-LLC and its members, subsidiaries, officers, agents, servants, and employees, and all persons acting in concert with them, and each of them from further infringement of the '449 Patent.

59. All conditions precedent to bringing this action have occurred or been performed.

PRAYER FOR RELIEF

WHEREFORE, VVI prays for judgment against ES&S-LLC as follows:

A. for a judicial determination and declaration that ES&S-LLC has infringed United States Patent No. RE40,449;

B. for a judicial determination and decree that infringement of United States Patent No. RE40,449 by ES&S-LLC was done willfully;

C. for damages resulting from the past and present infringement of United States Patent No. RE40,449, including requiring an accounting by ES&S-LLC for the determination of fair market value and/or reasonable royalty, and the trebling of

such damages because of the willful and deliberate nature of the infringement by ES&S-LLC;

D. for permanent injunctive relief enjoining against further infringement of United States Patent No. RE40,449 by ES&S-LLC, and its members, subsidiaries, their officers, directors, shareholders, agents, servants, employees, and all other entities and individuals acting in concert with them or on their behalf;

E. for an assessment of prejudgment interest on damages;

F. for a declaration that this is an exceptional case under 35 U.S.C. § 285 and for an award of attorneys fees and costs in this action; and

G. for such other and further relief as the Court deems just and equitable.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure VVI hereby demands a trial by jury of all issues triable of right by a jury.

DATED: July 28, 2016

Respectfully submitted,

s/Anthony I. Provitola
Anthony I. Provitola
Florida Bar No. 95290
Attorney for Plaintiff, VVI
ANTHONY I. PROVITOLA, P.A.
Trial Counsel
Post Office Box 2855
DeLand, Florida 32721
(386) 734-5502 - Telephone
(386) 736-3177 - Facsimile
aprovitola@cfl.rr.com