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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JW GAMING DEVELOPMENT, LLC,
Plaintiff,

v.

Angela James et. al.,
Defendants.

No. 3:18cv-02669-WHO

**DEFENDANTS ANDREW
STEVENSON, DONALD WILLIAMS
AND VERONICA TIMBERLAKE'S
NOTICE OF MOTION AND
MOTION FOR JUDGMENT ON THE
PLEADINGS; AND SUPPORTING
MEMORANDUM OF POINTS AND
AUTHORITIES**

Date: June 17, 2020

Time: 2:00

Department: Courtroom 2, 17th floor

Judge: William Orrick

Reservation No*:

Date Action Filed: March 12, 2018

Trial Date: Not Set

TABLE OF CONTENTS

| | Page |
|--|------|
| TABLE OF CONTENTS | i |
| TABLE OF AUTHORITIES | ii |
| NOTICE OF MOTION AND MOTION | 1 |
| MEMORANDUM OF POINTS AND AUTHORITIES | 3 |
| INTRODUCTION | 3 |
| ARGUMENT | 5 |
| I. PLAINTIFF’S SECOND CAUSE OF ACTION FOR FRAUD AND DECEIT DOES NOT ALLEGE FACTS SUFFICIENT TO STATE A COGNIZABLE CLAIM AGAINST DEFENDANTS STEVENSON, WILLIAMS, AND TIMBERLAKE..... | 5 |
| II. PLAINTIFF’S CIVIL RICO CAUSES OF ACTION DO NOT ALLEGE FACTS SUFFICIENT TO STATE COGNIZABLE CLAIMS AGAINST DEFENDANTS STEVENSON, WILLIAMS, AND TIMBERLAKE | 8 |
| CONCLUSION | 14 |

TABLE OF AUTHORITIES

| | | Page |
|----|---|----------|
| 1 | | |
| 2 | | |
| 3 | Cases: | |
| 4 | <i>Ashcroft v. Iqbal</i> | |
| 5 | 556 U.S. 662 (2009) | 5, 6, 12 |
| 6 | <i>Balisteri v. Pacifica Police Dept.</i> | |
| 7 | 901 F.2d 696 (9th Cir. 1990) | 14 |
| 8 | <i>Bell Atl. Corp. v. Twombly</i> | |
| 9 | 550 U.S. 544 (2007) | 6 |
| 10 | <i>Cafasso v. Gen. Dynamics C4 Sys., Inc.</i> | |
| 11 | 637 F.3d 1047 (9th Cir. 2011) | 5 |
| 12 | <i>Eclectic Props. E., LLC v. Marcus & Millchap Co.</i> | |
| 13 | 751 F.3d 990 (9th Cir. 2014) | 9 |
| 14 | <i>Grimmett v. Brown</i> | |
| 15 | 75 F.3d 506 (9th Cir. 1996) | 9 |
| 16 | <i>In re Toyota Motor Corp..Unintended Acceleration Mktg.</i> | |
| 17 | 785 F.Supp.2d 883 (C.D. Cal. 2011) | 7, 12 |
| 18 | <i>Lancaster Cmty. Hosp. v. Antelope Valley Hosp. Dist.</i> | |
| 19 | 940 F.2d 397 (9th Cir. 1991) | 10 |
| 20 | <i>Moore v. Kayport Package Exp., Inc.</i> | |
| 21 | 885 F.2d 531 (9th Cir. 1989) | 10 |
| 22 | <i>Morrisette v. United States</i> | |
| 23 | 342 U.S. 246 (1952) | 9 |
| | <i>Schreiber Distrib. v. Serv-Well Furniture</i> | |
| | 806 F.2d 1393 (9th Cir. 1986) | 6 |
| | <i>Swartz v. KPMG LLP</i> | |
| | 476 F.3d 756 (9th Cir. 2007) | 6, 7, 11 |
| | <i>United States v. Rogers</i> | |
| | 321 F.3d 1226 (9th Cir. 2003) | 10 |
| | <i>Walter v. Drayson</i> | |
| | 538 F.3d 1244 (9th Cir. 2008) | 12, 13 |

Statutes:

18 U.S.C. § 1961 8, 9

18 U.S.C. § 1962 8, 12

Court Rules:

Fed. R. Civ. P., rule 9 6

Fed. R. Civ. P., rule 12 2, 4, 5

Notice of Motion and Motion

TO PLAINTIFF JW GAMING DEVELOPMENT, LLC, AND THEIR
COUNSEL OF RECORD, AND TO ALL OTHER PARTIES AND THEIR COUNSEL
OF RECORD:

PLEASE TAKE NOTICE that, on June __, 2020, at __ a.m., in Courtroom __ of the above-entitled court, located at 450 Golden Gate Avenue, San Francisco, defendants Andrew Stevenson, Donald Williams, and Veronica Timberlake will ask the Court for an order granting them judgment on the pleadings, on the ground that the complaint fails to state a cause of action upon which relief can be granted against them. These individual defendants' motion is made under [Federal Rules of Civil Procedure 12\(c\)](#) and [12\(h\)\(2\)\(B\)](#) and it seeks entry of judgment in their favor and against plaintiff on the second, third, fourth, fifth, and sixth causes of action in the complaint. Their motion is based on the ground that the complaint lacks sufficient factual allegations linking these three defendants to any cause of action asserted against them in their individual capacity. These defendants' motion is based on this notice of motion and motion, the supporting memorandum of points and authorities, the pleadings and papers on file in this case, and any other matter that may be presented at the hearing on the motion.

Prometheus Partners

Respectfully submitted,

Dated: May 11, 2020

By: /s/ Eduardo Roy

EDUARDO G. ROY

Attorney for Defendants Andrew Stevenson, Donald Williams and Veronica Timberlake

Memorandum of Points and Authorities

INTRODUCTION

Plaintiff JW Gaming’s lengthy 76-page, 563-paragraph complaint seeks to hold defendants Andrew Stevenson, Donald Williams, and Veronica Timberlake personally liable for millions of dollars in damages based almost exclusively on a few allegations that each of these individuals is a member-at-large of the Tribal Council of the Pinoleville Pomo Nation, a federally-recognized Indian tribe that is one of the complaint’s principal targets. (Complaint, p. 7, ¶¶ 65–66, 67–68, 69–70.) The complaint does not allege that defendants Stevenson, Williams, and Timberlake are members of any of the tribal groups identified with inflammatory labels, such as the “Principal Fraudsters” (Complaint, p. 38, ¶ 305) or the “Financial Fixers” (Complaint, p. 41, ¶330). The complaint does not allege that any of these three defendants holds a tribal governance position.

Instead, and tellingly, plaintiff alleges only that defendants Stevenson, Williams, and Timberlake are currently members of the Tribal Council, which has seven members. (Complaint, p. 3, ¶ 9; p. 49, ¶ 393.) The complaint merely alleges that each of these defendants “is” a member of the tribal council. (Complaint, p. 7, ¶¶ 66, 68, 70.)¹ There are no allegations that any of these defendants was a Tribal Council

¹ Compare plaintiff’s allegations that other tribal defendants held positions or a status during relevant time periods, allegations that show plaintiff’s attempts to connect certain defendants to actions taken nearly a decade ago. For example, plaintiff alleges that defendant Kathy Stallworth “is and was at all relevant times the secretary of the Business Board” (Complaint, p. 6, ¶ 52) and repeatedly uses the identical phrase “is and was at all relevant times” to describe other individual defendants (e.g., Complaint, pp. 6-7, ¶¶ 54, 57, 60, and 63).

1 member during the years 2008 through 2012, the time period covered by most of
2 plaintiff's claims, or that they participated in any predicate act critical to plaintiff's civil
3 RICO causes of action. And any conclusory claims that the Tribal Council "approved"
4 other group or individual defendants' actions cannot be sufficient to state a claim
5 against these three persons in the absence of allegations that they were members of the
6 Tribal Council at relevant times and voted affirmatively. Simply put, the complaint
7 lacks sufficient factual allegations to state cognizable fraud or federal civil RICO
8 causes of action against them based merely on their current Tribal Council
9 membership.

10 Defendants Stevenson, Williams, and Timberlake are perforce aware that all
11 tribal entity and individual defendants made an earlier motion to dismiss under [Rule](#)
12 [12\(b\)\(1\)](#) and [12\(b\)\(6\)](#). They submit that those defendants' joint [Rule 12\(b\)\(6\)](#) dismissal
13 motion collectively sought more expansive relief – dismissal of the complaint in its
14 entirety – based on broader attacks on the complaint's factual support for its civil RICO
15 claims against all defendants. Defendants Stevenson, Williams, and Timberlake do not
16 now quarrel with the Court's ruling that the complaint adequately alleged fraud and
17 civil RICO claims generally. Instead, these three defendants contend that the complaint
18 does not sufficiently allege facts to make them individually liable for the alleged fraud
19 or civil RICO violations. Because the earlier [Rule 12\(b\)\(6\)](#) motion did not specifically
20 challenge the complaint's ability to state cognizable claims against defendants
21 Stevenson, Williams, and Timberlake individually, they now seek judgment on the
22 pleadings in their favor and against plaintiff JW Gaming.

1 on its face.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 556 (2007). A facially plausible
 2 claim pleads facts that “allow the court to draw the reasonable inference that the
 3 defendant is liable for the misconduct alleged.” *Ashcroft v. Iqbal*, at 678 (citation
 4 omitted). Plaintiff’s second cause of action simply does not admit of any inference that
 5 defendants Stevenson, Williams, and Timberlake should be liable for the alleged fraud.

6 Additionally, plaintiff’s second cause of action does not satisfy the requirement
 7 to plead fraud with particularity against defendants Stevenson, Williams, and
 8 Timberlake. *Fed. R. Civ. Proc. 9(b)*. The allegations do not include the required “time,
 9 place, and specific content of” these defendants’ allegedly false representations.
 10 *Schreiber Distrib. v. Serv-Well Furniture*, 806 F.2d 1393, 1401 (9th Cir. 1986). Instead,
 11 the complaint merely lumps multiple defendants together, failing to inform defendants
 12 Stevenson, Williams, and Timberlake “separately of the allegations surrounding [their]
 13 alleged participation in the fraud.” *Swartz v. KPMG LLP*, 476 F.3d 756, 764–765 (9th
 14 Cir. 2007) [citation omitted]. The complaint fails to identify each of these defendants’
 15 roles in the fraud scheme. *Id.* Accordingly, the complaint fails to state a cognizable
 16 fraud claim against defendants Stevenson, Williams, and Timberlake. *Id.* at 765.

17 Curiously, the second cause of action heading identifies defendants Stevenson,
 18 Williams, and Timberlake as defendants. (Complaint, p. 38.) But not one of the 79
 19 paragraphs in that section of the complaint (pp. 38–47) mentions or even alludes to
 20 defendants Stevenson, Williams, and Timberlake. Nor does the second cause of action
 21 specify any Tribal Council action purportedly relevant to plaintiff’s fraud and deceit
 22 claim, which is largely based on three allegedly fraudulent acts – the so-called Sham
 23 2009 Canales Note that occurred in 2008 and 2009 (Complaint, pp. 38–41,

¶¶ 305–327), the “Falsified 2011 Accounting” (Complaint, pp. 41–46, ¶¶ 328–367), and the “Sham 2012 Canales Note” (Complaint, pp. 46–47, ¶¶ 368–382.) Yet, plaintiff seeks to hold these individual defendants liable for fraud allegedly committed by other parties, without any allegation that they were members of the Tribal Council at relevant times or that they affirmatively approved the alleged misconduct as a Tribal Council member.

Plaintiff may counter that its complaint more generally alleges these defendants’ liability by asserting the need for Tribal Council approval of relevant tribal business transactions. For example, plaintiff alleges that the Tribe is “governed by its seven-member board.” (Complaint, p. 3, ¶ 9.) Plaintiff also alleges that the Tribal Council created the Business Board, which is a named defendant while the Tribal Council is not. (Complaint, pp. 4–5, ¶¶ 24–33.) As in *Swartz v. KPMG LLP*, plaintiff’s complaint “is shot through with general allegations that the ‘defendants’ engaged in fraudulent conduct, but attributes specific misconduct only to” other named defendants. *Swartz v. KPMG LLP*, 476 F.3d at 765. The complaint’s conclusory allegations about purported Tribal Council approval of other defendants’ actions, without any specific factual bases, are not sufficient to make these three Tribal Council members liable on the second cause of action for fraud. *Id.* Plaintiff cannot rest on boilerplate allegations about Tribal Council approvals, even if cast as factual allegations. *In re Toyota Motor Corp..Unintended Acceleration Mktg.*, 785 F.Supp.2d 883, 911 (C.D. Cal. 2011). Accordingly, the Court should grant these defendants’ motion for judgment on the pleadings on plaintiff’s second cause of action.

1 **II. PLAINTIFF’S CIVIL RICO CAUSES OF ACTION DO NOT ALLEGE**
2 **FACTS SUFFICIENT TO STATE COGNIZABLE CLAIMS AGAINST**
3 **DEFENDANTS STEVENSON, WILLIAMS, AND TIMBERLAKE**

4 Defendants Stevenson, Williams, and Timberlake contend that plaintiff’s civil
5 RICO claims, the third, fourth, fifth, and sixth causes of action, contain the same defect
6 as the second cause of action – the failure to allege facts sufficient to state claims
7 against these individual defendants. Noticeably lacking in the complaint’s 563
8 paragraphs are specific factual allegations connecting these defendants individually to
9 the multiple RICO claims. Instead, as plaintiff’s recent motion for summary judgment
10 tacitly admits, these three defendants’ RICO liability is purportedly predicated on their
11 status as members-at-large on the Tribal Council. (Plaintiff’s Motion for Summary
12 Judgment filed March 23, 2020, p. 18:2–8.) But that status, alone, is not a sufficient
13 factual basis for making these defendants liable to plaintiff on its civil RICO claims.

14 Before turning to the specific factual deficiencies in plaintiff’s complaint against
15 defendants Stevenson, Williams, and Timberlake, they submit that certain controlling
16 principles should guide the Court’s assessment of the adequacy of plaintiff’s
17 allegations. The RICO statutes are criminal laws. Those statutes are contained in Title
18 18 of the United States Code, entitled “Crimes and Criminal Procedure.” More
19 specifically, the RICO statutes are in Part I of Title 18, the part that defines federal
20 crimes. The asserted basis for plaintiff’s civil RICO claims, [section 1962](#), is a criminal
21 statute, as made plain by the applicable definition of “racketeering activity” in [section](#)
22
23

1 1961(1)(B). That statutory definition says that “‘racketeering activity’ means . . . (B)
 2 any act which is *indictable* under any of the following provisions of title 18, United
 3 States Code:” 18 U.S.C. § 1961(1)(B)(emphasis added).

4 Because RICO is a criminal law, civil RICO liability requires wrongful acts and
 5 criminal intent. *Morrisette v. United States*, 342 U.S. 246, 274 (1952). So, a cognizable
 6 civil RICO claim must contain allegations of both a defendant’s allegedly unlawful
 7 conduct and the required state of mind. Plaintiff’s complaint lacks factual allegations
 8 sufficient to satisfy either requirement for a valid civil RICO cause of action.

9 The elements of a civil RICO claim are: “(1) conduct (2) of an enterprise (3)
 10 through a pattern (4) of racketeering activity (known as ‘predicate acts’) (5) causing
 11 injury to the plaintiff’s ‘business or property.’” *Grimmett v. Brown*, 75 F.3d 506, 510
 12 (9th Cir. 1996).) This Court has already determined that the complaint pleads wire
 13 fraud and money laundering as predicate acts for plaintiff’s RICO claims. (Order
 14 Denying Defendants’ Motion to Dismiss, Etc. filed October 5, 2018, p. 10.) That
 15 determination allowed plaintiff’s complaint to survive a global challenge by all tribal
 16 defendants, but it should not permit plaintiff’s RICO claims to continue against
 17 defendants Stevenson, Williams, and Timberlake in the absence of specific factual
 18 allegations connecting them to those acts.

19 The wire fraud claim requires three elements: (1) the formation of a scheme to
 20 defraud; (2) the use of the mails or wires in furtherance of that scheme; (3) the specific
 21 intent to defraud. *Eclectic Props. E., LLC v. Marcus & Millchap Co.*, 751 F.3d 990, 997
 22 (9th Cir. 2014). Although this Court earlier found “[t]he complaint provides dates,
 23 excerpts from email correspondence, and amounts of transactions” to support the claim

1 that “defendants” were part of a scheme to defraud, plaintiff (Order filed October 5,
 2 2018, p. 10: 11–16), the complaint does not connect these defendants to any of the wire
 3 fraud elements. There are no allegations about these defendants’ participation in a
 4 scheme to defraud, especially in the absence of specific allegations about their times as
 5 members of the Tribal Council. There are no allegations linking any of these
 6 defendants to the relevant email correspondence. In short, the complaint does not meet
 7 plaintiff’s burden of alleging the role of these defendants in the alleged fraud.

8 *Lancaster Cmty. Hosp. v. Antelope Valley Hosp. Dist.*, 940 F.2d 397, 405 (9th Cir.
 9 1991), cert. denied 502 U.S. 1094 (1992). And even detailed allegations about other
 10 defendants’ roles in the fraud scheme do not fix the failure to specify these defendants’
 11 involvement in that scheme. See *Moore v. Kayport Package Exp., Inc.*, 885 F.2d 531,
 12 541 (9th Cir. 1989).

13 Plaintiff’s money laundering claim against defendants Stevenson, Williams, and
 14 Timberlake is even more factually deficient. The four elements of that claim include:
 15 (1) defendant’s knowing engagement in a monetary transaction; (2) knowledge that the
 16 transaction involved criminal property; (3) property valued at more than \$10,000; (4)
 17 the property’s derivation from a specified criminal activity. *United States v. Rogers*,
 18 321 F.3d 1226, 1229 (9th Cir. 2003). Although this Court earlier ruled that the
 19 complaint states a claim for money laundering, the Tribal defendants’ original joint
 20 motion challenged that claim on the sole ground that plaintiff had not pleaded a specific
 21 unlawful activity. The Court found that plaintiff had adequately alleged defendants’
 22 misappropriation of funds for individual purposes. (Order Denying Defendants’ Motion
 23 to Dismiss, Etc., filed October 5, 2018, p. 10: 22–27.) Though the complaint may

1 generally allege a money laundering claim against some defendants, it lacks specific
2 factual allegations to establish the four elements of that claim against defendants
3 Stevenson, Williams, and Timberlake.

4 The complaint does not allege these defendants' participation in a monetary
5 transaction. They are not parties to any disputed contract. They did not sign any
6 contracts. There are no factual allegations establishing their knowledge that any tribal
7 transaction involved criminal property. Instead, the complaint, without any factual
8 basis, asserts the conclusion that the Tribal Council members "vote on and approve
9 resolutions they know, or reasonably should know, will be used . . . to perpetrate frauds
10 against third parties" (Complaint, p. 60, ¶481.) Tellingly, the complaint does not
11 specify the Tribal Council's composition at the times it allegedly acted improperly, and
12 it does not identify the periods of time that these three defendants have been Tribal
13 Council members. It utterly fails to identify each of these defendant's role in the
14 alleged scheme. *Swartz v. KPMG LLP*, 476 F.3d at 765.

15 And allegations about the Tribal Council's votes creating the Business Board and
16 empowering it to open bank accounts do not cure the complaint's defects against
17 defendants Stevenson, Williams, and Timberlake. (Complaint, p. 60, ¶ 482.) These
18 defendants are not members of the Business Board. (Complaint, p. 6, ¶¶ 26–31.) They
19 were not authorized signers on the Business Board's short-lived checking account,
20 which was only open for four months. (Complaint, p. 36, ¶¶ 274–276.) Although
21 plaintiff asserts that the Tribal Council Defendants delegated certain authority to the
22 Business Board (Complaint, p. 60, ¶ 483), the complaint does not allege the
23 composition of the Tribal Council at the relevant time. Because the complaint only

1 alleges that these three defendants are currently Tribal Council members, not that they
 2 were members “at all relevant times” (Complaint, p. 49, ¶ 393), it does not adequately
 3 allege facts sufficient to state civil RICO claims against defendants Stevenson,
 4 Williams, and Timberlake, despite the complaint’s conclusory assertion that Tribal
 5 Council members “actively participated in the management and direction of the
 6 association-in-fact enterprise.”³ (Complaint, p. 52, ¶ 414,). That conclusory statement,
 7 even though offered as a factual allegation, is not sufficient to satisfy plaintiff’s
 8 obligation to allege the factual bases for its civil RICO claims. *In re Toyota Motor*
 9 *Corp..Unintended Acceleration Mktg.*, 785 F.Supp.2d at 911.

10 To state cognizable civil RICO claims against defendants Stevenson, Williams,
 11 and Timberlake, plaintiff must specifically allege that they conducted or participated,
 12 directly or indirectly, in the conduct of the unlawful enterprise’s offenses. 18 U.S.C. §
 13 1962(c). Although these defendants do not challenge plaintiff’s allegation of an
 14 association-in-fact enterprise generally, they contend that the complaint lacks plausible
 15 factual allegations showing their conduct or participation in the conduct of the
 16 enterprise. Their motion raises the question whether the particular allegations about
 17 them are sufficient to subject them to liability for conducting the affairs of the
 18 enterprise. *Walter v. Drayson*, 538 F.3d 1244, 1247 (9th Cir. 2008). That question must
 19 be answered in the negative.

20 For these three defendants to be properly subject to civil RICO liability, they
 21 must have had some part of directing its affairs. *Walter v. Drayson*, 538 F.3d at 1249.
 22 Their mere involvement in the enterprise is not enough. *Id.* Even if defendants

23 ³ This conclusory statement should be disregarded, as it is not entitled to any
 presumption of truth. *Ashcroft v. Iqbal*, 556 U.S. at 679.

1 Stevenson, Williams, and Timberlake are alleged to be part of an association-in-fact
2 enterprise, their alleged performance of services for the enterprise would not be enough
3 to make them liable. They can be part of an enterprise without having any role in its
4 management or operation. *Id.* And some element of direction is necessary to subject
5 them to liability. *Id.*

6 The complaint does not allege facts about these three defendants' purported
7 conduct or participation in the conduct of any association-in-fact enterprise. The few
8 factual allegations about them do not even raise any inference that they tried to conduct
9 the enterprise's affairs. The complaint does not allege that they directed any of the
10 enterprise's activities. At best, the complaint alleges their mere service on the Tribal
11 Council. Thus, the complaint fails the test for plausible allegations that defendants
12 Stevenson, Williams, and Timberlake conducted or participated in the conduct of an
13 enterprise, and, for that reason, it necessarily fails to state cognizable civil RICO claims
14 against them.

15 Shorn of its conclusory statements about the Tribal Council and the numerous
16 so-called Non-Governmental Defendants, and examined only for its specific factual
17 allegations against defendants Stevenson, Williams, and Timberlake, plaintiff's
18 complaint appears as a factual desert in its attempt to state cognizable claims against
19 defendants Stevenson, Williams, and Timberlake. Any appearance of a claim against
20 them is mere mirage, created by superficial suppositions about the Tribal Council,
21 unsupported conclusions that stand in stark contrast to plaintiff's factual allegations
22 detailing at exhaustive length the alleged misdeeds of other defendants. For this reason,
23 the Court's earlier ruling that the complaint may sufficiently state civil RICO claims

1 against some of those defendants should not be any bar to entry of judgment on the
 2 pleadings for defendants Stevenson, Williams, and Timberlake. These defendants are
 3 entitled to dismissal based on the absence of sufficient facts alleged against them, even
 4 though the complaint may state cognizable legal theories. *Balisteri v. Pacifica Police*
 5 *Dept.*, 901 F.2d 696, 699 (9th Cir. 1990).

6 **CONCLUSION**

7
 8 For the stated reasons, defendants Andrew Stevenson, Donald Williams, and
 9 Veronica Timberlake respectfully submit that the Court should grant their motion for
 10 judgment on the pleadings and enter judgment in their favor and against plaintiff JW
 11 Gaming.

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 13 Prometheus Partners

14 Respectfully submitted,

15 Dated: May 11, 2020

By: /s/ Eduardo Roy

16 EDUARDO G. ROY

17 Attorney for Defendants Andrew
 18 Stevenson, Donald Williams and
 19 Veronica Timberlake
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