

1 William J. Stafford
Tax Counsel
2 Board of Equalization, Appeals Division
450 N Street, MIC: 85
3 PO Box 942879
Sacramento CA 95814
4 Tel: (916) 206-0166
Fax: (916) 324-2618
5

6 Attorney for the Appeals Division

7 **BOARD OF EQUALIZATION**
8 **STATE OF CALIFORNIA**
9

10 In the Matter of the Appeal of:) **HEARING SUMMARY**
11) **PERSONAL INCOME TAX APPEAL**
12 **SEAN S. NIKNAFS AND SIMA**)
13 **MIRHASHEMI¹**) Case No. 529770
14)

15 Year Proposed
16 2004 Assessment
\$18,711

17 Representing the Parties:

18 For Appellants: James G. LeBloch, Esq.

19 For Franchise Tax Board: Andrew Ghim, Legal Intern
20

21 **QUESTION:** Whether appellants converted their home in Tustin, California, into property held for the
22 production of income in May of 2004 such that their mortgage interest deduction on the
23 Tustin home from May of 2004 to December of 2004 is not subject to the qualified
24 residence interest limitation set forth by Internal Revenue Code (IRC) section 163,
25 subdivision (h)(3).²
26

27 ¹ Appellants reside in Orange County, California.

28 ² IRC section 163 is generally incorporated by Revenue and Taxation Code (R&TC) sections 17201, 17224, 17230, and 17235.

1 HEARING SUMMARY

2 Background

3 Appellants filed a joint 2004 California return, reporting, among other things, mortgage
4 interest payments totaling \$208,173, which appellants paid in relation to their homes located in Tustin,
5 California, and Newport Coast, California (hereinafter the “Tustin home” and the “Newport home”).
6 (FTB OB, Ex B.) Appellants purchased their Tustin home in February 1999 and over the years they
7 allegedly made various improvements to the Tustin home (the last improvement was allegedly made in
8 late 2003). (Appl. Ltr. p 1; App. Reply Br. p 7.) On May 11, 2004, appellants state that they (i)
9 purchased the Newport home, (ii) moved out of the Tustin home, and (iii) offered the Tustin home for
10 sale or rent but the home was never rented. Later, appellants sold the Tustin home on or about
11 November 30, 2004. (See FTB OB, p 1; Appl. Ltr. p 2; App. Reply Br. p 2.)

12 Upon audit of appellants’ 2004 return, the FTB determined, among other things, that
13 appellants deducted mortgage interest in excess of the qualified residence interest limitation imposed by
14 IRC section 163, subdivision (h)(3). (FTB OB, p 2.) Accordingly, on October 23, 2008, the FTB issued
15 a Notice of Proposed Assessment (NPA), which, among other things, increased appellants’ California
16 taxable income by \$134,436 to account for the (alleged) excess mortgage interest that appellants
17 deducted on their 2004 return.³ (Appl. Ltr, Ex. B)

18 Appellants timely protested the NPA. After reviewing the matter, however, the FTB
19 affirmed the NPA in a Notice of Action (NOA) dated March 11, 2010. (Appl. Ltr, Ex. B)
20 Subsequently, appellants filed this timely appeal.

21 Contentions

22 Appellants

23 On appeal, appellants make four arguments: First, appellants state that the qualified
24 residence interest limitation set forth by IRC section 163, subdivision (h)(3), only applies to a “principal
25 residence.” (App. Reply Br. pp 1-2.) Appellants assert that they vacated their Tustin home on May 11,
26 2004, and took up residence at their Newport home on the same day. (App. Reply Br. p 2.)

27 _____
28 ³ On appeal, the only issue in dispute is the mortgage interest that appellants deducted on their 2004 return.

1 Accordingly, appellants argue that as of May 2004, the Tustin home “was not their principal residence”
2 and “the limitation under IRC § 163(h) should not apply.” (*Id.* p 3.)

3 Second, appellants argue that they “converted” their Tustin home from a personal
4 residence to a property held “for the production or collection of income” in May 2004. (App. Reply Br.
5 pp 1-3.) Accordingly, appellants assert that they are entitled to deduct all mortgage interest related to
6 their Tustin home from May 2004 through December 2004, as the qualified residence interest limitation
7 set forth in IRC section 163, subdivision (h)(4), does not apply to their Tustin home after it was
8 converted. (*Id.*)

9 Third, appellants acknowledge that in *Newcombe v. Commissioner* (1970) 54 T.C. 1298,
10 1300-1303, the Tax Court set forth a five factor test for determining whether the personal residence in
11 that particular case had been converted to property held for the production of income. (App. Reply Br.
12 pp 4-5.) Appellants argue, however, that the FTB’s application of the *Newcombe* five factor test to the
13 current appeal is improper because (i) in *Newcombe*, the home at issue was sold for a loss, whereas in
14 the current appeal, the Tustin home was sold for a profit, and (ii) in *Newcombe*, the taxpayers never
15 attempted to rent the home, whereas in the current appeal, the Tustin home was held for sale and,
16 alternatively, for rent. (*Id.*)

17 Fourth, if the Board were to adopt the *Newcombe* five factor test, then appellants make
18 the following respective arguments in relation to the five factors:

- 19 • *Occupancy of Home for a Substantial Period of Time:* Although the Tustin home was held by
20 appellants since 1999, the Tustin home was substantially upgraded throughout the years until it
21 was (allegedly) abandoned in May of 2004. Accordingly, the period of time from which to
22 determine whether the Tustin home was held for a “substantial period of time” should start to run
23 from when the Tustin home was last upgraded, which (allegedly) happened in late 2003. (App.
24 Reply Br. pp 6-7.)
- 25 • *Abandonment of All Further Use :* There is no evidence in the appeal record to suggest that
26 appellants ever reoccupied the Tustin property after May 2004. (*Id.* p 7.)
- 27 • *Recreational Character of Home:* The Tustin home cannot be considered recreational property,
28 given that it is a single family home located in Tustin, California (and is only about 17 miles
away from their Newport home). (*Id.*)
- *Offering the Home for Rent:* There is sufficient evidence showing that the Tustin home was held
for rent. (*Id.* pp 7-8.) The appeal file contains, among other things, the following documents:

- 1 ○ An undated advertising flyer, stating the Tustin home was held for rent. (App.
2 Rep. Br., Ex. A.)
- 3 ○ Homeowners Association (HOA) rules and regulations, showing that the rules and
4 regulations do not prevent appellants from renting the Tustin home. (App. Rep.
5 Br., Ex. B.)
- 6 ○ A draft unsigned lease form for the Tustin home. (App. Rep. Br., Ex. C.)
- 7 ○ A promissory note for the amount of \$23,625, payable to David Niknafs
8 (appellant-husband's brother), as a "real estate commission for selling" the Tustin
9 home. The promissory note states that it was fully paid on May 5, 2006. (FTB
10 OB, Ex. L.)
- 11 ○ The Protest Hearing Officer's report stating, among other things, that appellants
12 provided "copies of three checks issued to David Niknafs, totaling \$13,625."
13 (FTB OB, Ex. A, p. 5.) In the FTB's Opening Brief, the FTB states that with
14 respect to the \$13,625, "[a]ppellants produced copies of three checks to David N.
15 and undated Note Payable with no due dates or any reason for its issuance." (FTB
16 OB, p 12.)
- 17 ○ A statement from David Niknafs, stating that in March of 2004 he was hired by
18 appellants to rent the Tustin home for a one year tenancy, unless the Tustin home
19 was sold prior to finding a tenant. The statement is not signed under penalty of
20 perjury. (FTB OB, Ex M.)
- 21 ○ A list of improvements made to the Tustin home. (FTB OB, Ex N.)

22 *Offering the Home for Sale:* "There should be no doubt that the [Tustin home] was put up for
23 sale and ultimately sold at a profit." (*Id.* p 8.)

24 The FTB

25 The FTB asserts that appellants' focus on whether the Tustin home was their "principal
26 residence" during the period at issue is "irrelevant" and "confuses the main inquiry." (FTB Reply Br. p
27 2.) The FTB states the only question that needs to be answered on appeal is whether appellants
28 converted their Tustin home in May of 2004 into a property held for the production of income. (*Id.* pp
29 2-3.) In this respect, the FTB asserts that (i) appellants did not convert their Tustin home into a property
30 held for the production of income in May of 2004 (or at any other time in 2004), and (ii) the proper
31 focus for the Board's inquiry is the test set forth in *Newcombe v. Commissioner, supra*, which sets forth
32 the following five factors: (1) the length of time the home was occupied by the individual as his or her
33 residence before placing it on the market for sale; (2) whether the individual permanently abandoned all
34 further use of the home; (3) the character of the home (recreational or otherwise); (4) offers to rent; and
35 (5) offers to sell. (FTB OB pp 2-14.) In relation to each of the five factors, the FTB makes the

1 following arguments:

- 2 • *Occupancy of Home for a Substantial Period of Time*: Appellants' occupancy of the Tustin home
3 from 1999-2004 constitutes a "substantial period of time," which supports a finding that the
4 mortgage interest deductions on the Tustin home from May 2004 to December 2004 were not
5 related to a property held for the production of income. (FTB OB, p 8.)
- 6 • *Abandonment of All Further Use* : The Tustin home (i) is located only a few miles away from
7 the Newport home, had a pool and spa, and (iii) was never rented before being sold in 2004. In
8 view of these facts, appellants could have easily used the Tustin home for personal purposes
9 while it was on the market. Accordingly, these facts work against a finding that the Tustin home
10 was converted to property held for the production of income. (*Id.* pp 8-10.)
- 11 • *Recreational Character of the Property*: This factor "carries minimal significance" because the
12 property is a residence. Even though the Tustin home has a pool and spa, the classification of the
13 Tustin home as a "recreational property" might be a difficult argument to make. (See *id.*, p 10, fn
14 61.)
- 15 • *Offering the Home for Rent*: Appellants provided insufficient evidence showing they offered the
16 Tustin home for rent. (*Id.* pp. 11-13; FTB Reply Br. pp 3-4.) Specifically,:
- 17 ○ The alleged rental agent—David Niknafs—is the brother of appellant-husband.
 - 18 ○ Appellants provided conflicting evidence that they paid commissions to David
19 Niknafs—for example, in relation to commissions of \$23,625 allegedly paid to
20 David Niknafs, the FTB states that appellants could not account for \$10,000 of
21 the commissions. Moreover, "with respect to the remaining \$13,625, Appellants
22 produced copies of three checks to David N. and an undated Note Payable with no
23 due dates or any reason for its issuance." (FTB OB, p 12.)
 - 24 ○ The lease for the Tustin home is simply a draft form that does not identify a
25 tenant.
 - 26 ○ The HOA rules and regulations do not prove that appellants attempted to rent the
27 Tustin home.
 - 28 ○ "... even if Appellants offered the [Tustin home] for rent, there is authority that
taxpayers cannot convert personal use property to property held for the production
of income merely by renting it for a short period" (citing *Saunders v.*
Commissioner, T.C. Memo 2002-143). (FTB OB, p 12.)
- *Offering the Home for Sale*: An important factor for the Board's consideration is whether
appellants held the Tustin home for "post-conversion" appreciation. After appellants moved out
of the Tustin home they immediately put the Tustin home up for sale, which supports a finding
that appellants did not hold the Tustin home for post-conversion appreciation. The Tax Court in
Newcombe stated that "the placing of the property on the market for immediate sale, at or shortly
after the time of its abandonment as a residence, will ordinarily be strong evidence that a
taxpayer is not holding the property for post-conversion appreciation in value." (*Newcombe v.*
Commissioner, supra, at 1302.) And "[u]nder such circumstances, only a most exceptional
situation will permit a finding that the statutory requirement has been satisfied." (FTB OB pp
13-17.)

///

1 Applicable Law

2 Mortgage Interest Deductions – For a Personal Residence

3 Income tax deductions are a matter of legislative grace, and a taxpayer who claims a
4 deduction has the burden of proving by competent evidence that the he or she is entitled to that
5 deduction. (See *New Colonial Ice Co. v. Helvering* (1934) 292 U.S. 435; *Appeal of Michael E. Myers*,
6 2001-SBE-001, May 31, 2001.)⁴

7 Qualified residence interest is interest paid or accrued during the taxable year on
8 indebtedness (subject to limitations) secured by any property that is a qualified residence of the
9 taxpayer. (Int.Rev. Code, § 163(h)(3); see also Hoffman, Smith & Willis, *Individual Income Taxes*,
10 2008 Ed. (hereinafter “Hoffman”), Ch. 10, p. 16.) Qualified residence interest falls into two categories:
11 (1) interest on acquisition indebtedness, and (2) interest on home equity loans. Before discussing each
12 of these categories, however, the term qualified residence must be defined.

13 A qualified residence includes the taxpayer’s principal residence and one other residence
14 of the taxpayer or spouse. (Int.Rev. Code, § 163(h)(4).) The principal residence is one that meets the
15 requirement for nonrecognition of gain upon sale under IRC section 121. (*Id.*) The *one other residence*,
16 or second residence, refers to one that is used as a residence if not rented or, if rented, meets the
17 requirements for a personal residence under the rental of vacation home rules. (*Id.*) A taxpayer who has
18 more than one second residence can make the selection each year of which one is the qualified second
19 residence. (*Id.*; see also, Hoffman, *supra.*)

20 Although in most cases interest paid on a home mortgage is fully deductible, there are
21 limitations. (Int.Rev. Code, § 163, subd. (h)(3).) Interest paid or accrued during the tax year on
22 aggregate *acquisition indebtedness* of \$1 million or less (\$500,000 for married persons filing separate
23 returns) is deductible as qualified residence interest. (*Id.*) Acquisition indebtedness refers to amounts
24 incurred in acquiring, constructing, or substantially improving a qualified residence of the taxpayer.
25 (*Id.*; see also Hoffman, *supra.*)

26 Qualified residence interest also includes interest on *home equity loans*. (Int.Rev. Code,
27

28 _____
⁴ Board of Equalization cases are generally available for viewing on the Board’s website (www.boe.ca.gov).

1 § 163, subd. (h)(3).) These loans utilize the personal residence of the taxpayer as security. Because the
2 funds from home equity loans can be used for personal purposes (e.g., auto purchases, medical
3 expenses), what would otherwise have been nondeductible consumer interest becomes deductible
4 qualified residence interest. However, interest is deductible only on the portion of a home equity loan
5 that does not exceed the lesser of: (i) the fair market value of the residence, reduced by the acquisition
6 indebtedness, or (ii) \$100,000 (\$50,000 for married persons filing separate returns). (*Id.*; see also
7 Hoffman, *supra.*)

8 Conversion of Residence to Property Held for Production of Income

9 IRC section 212 allows individual taxpayers to deduct, among other things, all ordinary
10 and necessary expenses (i) for the production or collection of income, or (ii) for the management,
11 conservation or maintenance of property held for the production of income. Thus, once a taxpayer has
12 established that he or she held property for the production of income, that taxpayer may, subject to
13 certain limitations,⁵ deduct (i) the expenses associated with the production of income, and (ii) the
14 expenses associated with the management and maintenance of the property. Treasury Regulation
15 section 1.165-9 makes clear, however, if the property has been acquired or used as the taxpayer's
16 personal residence, it must first be converted to a use related to the production of income in order for the
17 taxpayer to become entitled to deduct expenses.

18 Five factors have been identified by the Tax Court and other federal courts in deciding
19 whether a personal residence has been converted to property held for the production of income: (1) the
20 length of time the home was occupied by the individual as his or her residence before placing it on the
21 market for sale; (2) whether the individual permanently abandoned all further use of the home; (3) the
22 character of the home (recreational or otherwise); (4) offers to rent; and (5) offers to sell. (See *Saunders*
23 *v. Commissioner, supra*; *Newcombe v. Commissioner, supra*; *Bolaris v. Commissioner* (9th Cir. 1985)
24 776 F.2d 1428; *Grant v. Commissioner*, (1985) 84 T.C. 809, 825, *affd.* without published opinion (4th
25 Cir. 1986) 800 F.2d 260.) No one factor is determinative; and all facts and circumstances must be
26

27 _____
28 ⁵ IRC section 469 precludes most individuals from deducting losses incurred in connection with a passive activity. A passive activity generally includes "any rental activity." (Int.Rev. Code, § 469, subd. (c)(2).) The limitation on the deduction of losses imposed by IRC section 469 disappears when the taxpayer disposes of the entire interest in a passive activity in a fully taxable transaction. In the current matter on appeal, appellants sold the Tustin home in 2004.

1 considered. (*Saunders v. Commissioner, supra.*)

2 1. *Occupancy of Home for a Substantial Period of Time:* Whether the taxpayer has
3 occupied the home as a personal residence for a substantial period of time often indicates whether the
4 taxpayer was holding the home for sale. (*Neave v. Commissioner* (1952) 17 T.C. 1237; *Leslie v.*
5 *Commissioner* (1946) 6 T.C. 488; Weller & Paulukonis, California Real Estate Law & Practice § 130.17
6 (hereinafter “Weller”).)

7 2. *Abandonment of All Further Use:* Whether the home is occupied during the period
8 between its abandonment as the taxpayer’s residence and its ultimate disposition may indicate whether
9 the home was available for the taxpayer’s personal use. (*Rumsey v. Commissioner* (2nd Cir. 1936) 82
10 F.2d 158; *Morgan v. Commissioner* (5th Cir. 1935) 76 F.2d 390; Weller, *supra*, at section 130.17.)

11 3. *Recreational Character of Home:* The recreational character of the home may
12 indicate that the home has not been converted to income-producing use. (See *May v. Commissioner* (4th
13 Cir. 1962) 299 F.2d 725; Weller, *supra*, at § 130.17.)

14 4. *Offering the Home for Rent to a Tenant:* Offering a home for rent may be an
15 important element in finding that the home was converted and is being “held for the production of
16 income” to allow deductions under IRC section 212 (maintenance expense deduction) and IRC section
17 167 (depreciation deduction). (See *Newcombe v. Commissioner, supra*, at 1300.)⁶ However, a
18 taxpayer’s inability to successfully rent a home might be explained by the adverse state of the rental
19 market. (*Newcombe v. Commissioner, supra*, at 1301.) Also, a taxpayer’s decision to not rent the home
20 might be explained by the adverse impact the rental could have on the taxpayer’s ability to sell the
21 home. (*Id.*) The overriding concept is that an offer to rent the home to a tenant (and even an actual
22 rental of the home to a tenant) will not convert the home from personal use property to property held for
23 the production of income, if the attempted rental (or actual rental as the case may be) was *ancillary* to a
24 primary nonqualifying purpose. (*Murphy v. Commissioner*, T.C. Memo 1993-292; *Saunders v.*
25 *Commissioner, supra.*) For example, in *Murphy*, the Tax Court found that the taxpayer’s rental of a
26

27
28 ⁶ In comparison, for a taxpayer to obtain a deduction under IRC section 165(c) (for the loss on the sale of property), the taxpayer may have to show that he or she actually rented the property to prove the property was converted. (See *McAuley v. Commissioner*, T.C. Memo 1976-276; *Horrman v. Commissioner*, 17 T.C. 903 (1951); *Appeal of Claude D. and Jessie v. Plum*, 58-SBE-052, Nov. 19, 1958; *Appeal of J. Perry and Sybil N. Yates*, 73-SBE-010, Feb. 6, 1973.)

1 home was ancillary to the taxpayer’s primary purpose of trying to get rid of the home as-soon-as-
2 possible.

3 5. *Offering the Home for Sale*: Courts have held that when a home was sold for post-
4 conversion appreciation, i.e., the appreciation that accumulated after the taxpayer moved out of the
5 home, such a situation may support a finding that the home was converted to income-producing
6 property. (*Newcombe v. Commissioner, supra*, at 1302.) Emphasis should be placed, however, on the
7 term “post-conversion” appreciation—for example, in *Newcombe*, the court stated that “where the profit
8 represents only the appreciation which took place during the period of occupancy as a personal
9 residence, it cannot be said that the property was ‘held for the production of income.’” (*Id.*) Likewise,
10 the court stated that “placing of the property on the market for immediate sale, at or shortly after the
11 time of its abandonment as a residence, will ordinarily be strong evidence that a taxpayer is not holding
12 the property for post-conversion appreciation in value.” (*Id.*) And “[u]nder such circumstances, only a
13 most exceptional situation will permit a finding that the statutory requirement has been satisfied.” (*Id.*)

14 STAFF COMMENTS

15 Principal Residence

16 Staff questions appellants’ statement that the qualified residence interest limitation set
17 forth by IRC section 163, subdivision (h)(3), only applies to a “principal residence.” (See App. Reply
18 Br. p 2-3.) As noted above, for purposes of this section, a qualified residence includes the taxpayer’s
19 principal residence and one other residence of the taxpayer or spouse. (Int.Rev. Code, § 163(h)(4).) A
20 taxpayer who has more than one second residence can make the selection each year of which one is the
21 qualified second residence. (*Id.*; see also, *Hoffman, supra.*) At the oral hearing, appellants may want to
22 further clarify this issue.

23 Whether appellants “converted” their Tustin home

24 As indicated above, the overriding concept is whether appellants intended to earn income
25 from the Tustin home (either via rental income or post-conversion appreciation) or whether appellants
26 were merely holding the Tustin home because they could not get rid of it immediately (i.e., was
27 appellants’ desire to earn income from the Tustin home merely *ancillary* to their desire to get rid of the
28 Tustin home as-soon-as-possible). (See *Murphy v. Commissioner, supra*; *Saunders v. Commissioner,*

1 *supra.*) In making such a determination, the courts usually focus on the five factors as discussed below.
2 No single factor is controlling; and the Board should consider all facts and circumstances. At the
3 hearing, the parties should be prepared to discuss the following:

4 **1. *Occupancy of Home for a Substantial Period of Time:*** Appellants occupied the
5 Tustin home from 1999 to sometime in 2004, which some courts have found to be a “substantial period
6 of time.” (See *Neave v. Commissioner, supra*; *Leslie v. Commissioner, supra*; *Weller, supra.*)
7 Accordingly, this factor seems to work against appellants’ argument that they converted the Tustin home
8 to property held for the production of income. Furthermore, appellants have cited no legal authority to
9 support their argument that the period of time for determining whether the Tustin home was held for a
10 “substantial period of time” should run from when the upgrades and/or improvements were completed
11 (i.e., allegedly in 2003)—and staff is not aware of any authority to support such an argument.

12 **2. *Abandonment of All Further Use:*** As noted above, (i) the Tustin home and the
13 Newport home are located only a few miles apart, (ii) the Tustin home contains a pool and a spa, and
14 (iii) the Tustin home was never rented. At the oral hearing, the parties should be prepared to discuss
15 whether appellants used the Tustin home after it was allegedly abandoned. Appellants have the burden
16 of proof. (See *New Colonial Ice Co. v. Helvering, supra*; *Appeal of Michael E. Myers, supra.*)

17 **3. *Recreational Character of Home:*** Although the Tustin home contains a pool and a
18 spa, it appears that both parties may be willing to concede that the Tustin home is not a recreational
19 property. The parties may want to discuss this issue at the oral hearing.

20 **4. *Offering the Home for Rent to a Tenant:*** As noted above, the offering of the Tustin
21 home for rent may be an important factor in the determination of whether the Tustin home was
22 converted to property held for the production of income. Thus, the Board may want to consider whether
23 the evidence on appeal supports a finding that appellants attempted to rent the Tustin home. The
24 overriding concept is that an offer to rent the home to a tenant (and even an actual rental of the home to
25 a tenant) will not convert the home from personal use property to property held for the production of
26 income, if the attempted rental (or actual rental as the case may be) was *ancillary* to a primary
27 nonqualifying purpose. (*Murphy v. Commissioner, supra*; *Saunders v. Commissioner, supra.*) For
28 example, in *Murphy*, the Tax Court found the taxpayer’s rental of a home was ancillary to the taxpayer’s

1 primary purpose of trying to get rid of the home as-soon-as-possible.

2 **5. Offering the Home for Sale:** As noted above, courts have held that when a home was
3 sold for post-conversion appreciation, such a situation may support a finding that the home was
4 converted to income-producing property. (*Newcombe v. Commissioner, supra*, at 1302.) Emphasis
5 should be placed, however, on the term “post-conversion” appreciation—for example, in *Newcombe*, the
6 Tax Court stated that “where the profit represents only the appreciation which took place during the
7 period of occupancy as a personal residence, it cannot be said that the property was ‘held for the
8 production of income.’” (*Id.*) Likewise, the Tax Court stated that “placing of the property on the market
9 for immediate sale, at or shortly after the time of its abandonment as a residence, will ordinarily be
10 strong evidence that a taxpayer is not holding the property for post-conversion appreciation in value.”
11 (*Id.*) Here, appellants immediately put the Tustin home up for sale and, alternatively, for rent. This may
12 support a finding that the Tustin home was not converted to income-producing property. The parties
13 should be prepared to discuss this issue at the oral hearing.

14 ///

15 ///

16 ///

17 Niknafs_wjs

18

19

20

21

22

23

24

25

26

27

28