

IN THE CIRCUIT COURT IN AND FOR SANTA ROSA COUNTY, FLORIDA
FIRST JUDICIAL CIRCUIT

S.A.C., a minor, by and through
RENEE HAYES, as Guardian and
Natural Parent of S.A.C., a minor,

Plaintiff,

vs.

CASE NO.: 25000437CAXMX

SANTA ROSA COUNTY SCHOOL
BOARD,

Defendant.

AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff S.A.C., a minor by and through RENEE HAYES, as Guardian and Natural Parent of S.A.C., a minor, sues Defendant SANTA ROSA COUNTY SCHOOL BOARD, and alleges:

JURISDICTION AND VENUE

1. This is an action for damages that exceeds the minimum jurisdictional limits of this Court.

2. At all times material hereto, Plaintiff S.A.C., a minor and RENEE HAYES, Guardian and Natural Parent of S.A.C., a minor are and were residents of Gulf Breeze, Santa Rosa County, Florida.

3. Defendant SANTA ROSA COUNTY SCHOOL BOARD (also referred to as “SRCSB”) is a governmental organization responsible for the administration of public schools in Santa Rosa County, Florida including Gulf Breeze High School where the alleged incident occurred. SRCSB is licensed to and conducting business in the State of Florida.

COMMON ALLEGATIONS

4. Defendant SRCSB at all times relevant to this action was responsible for the operation and administration of Gulf Breeze High School located at 675 Gulf Breeze Parkway, Gulf Breeze, Florida 32561.
5. Plaintiff S.A.C., a minor, was enrolled and a member of the student enrollment at Gulf Breeze High School for the 2023-2024 school year.
6. K.T.R., a minor, was also enrolled and a member of the student enrollment at Gulf Breeze High School for the 2023-2024 school year.
7. During the 2023-2024 school year S.A.C. was a member of the Gulf Breeze High School girls' basketball team.
8. During this same time K.T.R. played multiple varsity sports for Gulf Breeze High School and had pending college offers.
9. During this time, S.A.C. was enrolled in a weightlifting class during 6th period with other girls on the high school basketball team.
10. At some point around October 2023, the girls' basketball coach, who is an employee of Gulf Breeze High School, told the players, including S.A.C. not to participate in the weightlifting class.
11. This resulted in S.A.C. and her teammates sitting in the gym unsupervised during 6th period.

12. When several parents of basketball players, including S.A.C.'s parents became aware that their children were sitting in the gym or locker room during all of 6th period unsupervised, they notified the school of their concerns. This notification took place beginning around December 2023 with numerous emails, calls and meetings with Gulf Breeze High School administrators, including but not limited to the Assistant Principal, and multiple parents of the girls' basketball players.

13. The parents were assured by the Assistant Principal that something would be done about the situation, and the girls would be supervised and have an organized PE class for 6th period.

14. Following these assurances by the Assistant Principal, the girl's 6th period class began having intermittent supervision. A syllabus was provided with a formal class plan for the remaining school year, but this plan was not regularly followed, and a dedicated Gulf Breeze High School employee did not supervise the class every day.

15. No one from Gulf Breeze High School administration followed up to assure someone was supervising the girls in the 6th period gym class.

16. Upon information and belief, prior to K.T.R.'s enrollment at Gulf Breeze High School he was accused of sexual assault while attending a local middle school in Santa Rosa County.

17. Prior to the incident on March 14, 2024, K.T.R. was regularly in the gym and locker room areas during 6th period despite not being enrolled in a class that meets in the gym during this time period.

18. Gulf Breeze High School staff was aware of K.T.R.'s propensity to wander the school during class period, and K.T.R. was told on multiple occasions by Gulf Breeze High School staff that he needed to return to his own class after being found in the gym area during class periods where he was not scheduled to be in the gym.

19. Prior to the incident on March 14, 2024, K.T.R. had attempted to enter the girls' basketball locker room on multiple occasions and had been asked by school staff to leave but never reprimanded.

20. Upon information and belief, K.T.R.'s Gulf Breeze High School disciplinary record shows that he was written up multiple times for not showing up to class and or not being on time for class despite being in attendance at school that day. It is believed he was wandering the school during these absences and tardies.

21. He was given detention for his multiple violations of the school attendance policy and also failed to show up for detention.

22. The employees of Gulf Breeze High School turned a blind eye to K.T.R.'s failure to show up for detention, and he continued to wander the school, hang out in the gym and linger in the boys' locker room as evidenced by security footage on the date in question.

23. On or about March 14, 2024, at the time of the subject assault K.T.R. was supposed to be in a classroom that is nowhere near the basketball gym or locker rooms. Instead, he was roaming free around the school and eventually ended up in the gym and then the boy's locker room as documented on school security cameras.

24. During this time, the extra basketballs were stored in the boys' locker room despite there being storage closets that were accessible from the open gym.

25. A coach or school official is supposed to get basketballs out of the boys' locker room prior to 6th period, so the students have access to the balls while practicing.

26. On a regular basis no one would get the basketballs out, and the students, regardless of gender, were told to go in the boys' locker room and get the basketballs.

27. On this particular day no one had gotten extra basketballs out, so S.A.C. agreed to go and get them for her team to use in practice.

28. The female students, including S.A.C., were previously told if they had to enter the boys' locker room for any reason, they should open the door and loudly announce that a female was coming in the room. Unless instructed otherwise, they should then enter the locker room, get the equipment they needed, and return to the gym.

29. S.A.C. announced herself before entering the boys' locker room.

30. She got an extra basketball or two and began exiting the locker room when K.T.R. came from another area of the locker room and made his presence known to S.A.C.

31. As S.A.C was attempting to leave the locker room and return to the gym K.T.R., subjected Plaintiff S.A.C., to physical sexual assault, sexual harassment, unwanted touching, and was held her against her will.

32. The sexual assault included indecent exposure, lewd and lascivious behavior, unwanted physical touch, exposure of sexual organs, and sexual name calling. During the unwanted encounter, K.T.R, attempted to kiss her, grabbed her buttocks, pulled her towards his body, exposed his penis to her, pressed his exposed penis against her, and held her against her will.

33. After getting away from K.T.R., S.A.C. quickly returned to the gym where she was visibly upset and shaking.
34. S.A.C. and another teammate immediately asked permission to leave the gym and go to the Dean's office where S.A.C. reported the physical and verbal assault to Gulf Breeze High School Dean Arnold.
35. After reporting the incident, the school officials took a written statement from S.A.C. prior to notifying S.A.C.'s parents of the incident.
36. No school official notified S.A.C.'s mother about the allegations of sexual assaults.
37. S.A.C.'s mother was only notified when her daughter was able to text her from the school office after the interview and statement.
38. K.T.R. was never called out of class on the date of the incident to question him and the police were never notified by anyone at the school.
39. S.A.C.'s mother had to notify the police, who promptly came to the school to start a criminal investigation.
40. Instead of coming to S.A.C.'s aid, Gulf Breeze High School employees failed to adequately and equitably respond and investigate the allegations.
41. Gulf Breeze High School employees refused to make any assurances that K.T.R. would be kept away from S.A.C. during the pendency of the investigation.
42. They could not even assure S.A.C. and her parents that he would be kept out of the gym and locker room during 6th period when he is scheduled to be in another class on the other side of the school.

43. Gulf Breeze High School employees failed to take any steps to ensure S.A.C.'s safety while at school and left her feeling isolated and afraid to return to school.

44. S.A.C. was told by the Defendant that she had to return to school or completely start the semester over via the Florida virtual school (FLVS) option.

45. S.A.C.'s mother requested S.A.C be allowed in the Santa Rosa homeschool program so S.A.C. didn't have to start the semester over in mid-March, but the Santa Rosa School Board employees would not make an exception.

46. No school official took any action to protect S.A.C. and other students on March 14, 2024, or thereafter (should she have returned to Gulf Breeze High School) from the offender, in violation of the Santa Rosa County Public Schools Code of Student Conduct.

47. S.A.C. did not feel safe returning to Gulf Breeze High School for the 2024-2025 school year, so her parents had to enroll her in a private school and pay tuition instead of her attending the free public high school.

48. S.A.C. has been in counseling for her mental health since the incident.

49. The sexual harassment along with the School Board employees' deliberate indifference toward the sexual harassment, has harmed S.A.C. educationally, traumatized her emotionally and psychologically, and caused damage to her reputation and standing in her community, as well as exposing her to the risk of additional bullying in the form of sexual harassment.

50. The sexual abuses suffered by S.A.C., at the hands of the abusive peer resulted in severe mental health trauma to S.A.C., adverse developmental impact, and development of severe mental health distress and disorders, including post-traumatic stress disorder, and/or aggravation of pre-existing mental health conditions.

51. The combination of actions by Gulf Breeze High School administrators led to an environment at the school and specifically in the gym where students like K.T.R. knew there was not regular or adequate supervision, where students like K.T.R. knew the same rules did not apply to him as a star athlete, and where vulnerable female students would be put in compromising situations when they had to enter the boys locker room to get the equipment they needed to participate in class.

52. This combination of inactions led to the perfect environment for students like K.T.R. to sexually assault a student like S.A.C. which is exactly what happened on March 14, 2024.

53. On November 7, 2024, in conformity with the requirements of Florida law and specifically Section 768.28 Florida Statutes (2002), Plaintiff S.A.C., a minor by and through RENEE HAYES, as Guardian and Natural Parent of S.A.C., a minor placed Defendant SANTA ROSA COUNTY SCHOOL BOARD on notice of a claim for damages and personal injuries. A copy of the Administrative Claim is attached hereto as Exhibit "A". Six months have expired since this claim was made and the claim is deemed denied.

54. All conditions precedent to this action have been met.

NEGLIGENCE

55. Plaintiff S.A.C., a minor by and through RENEE HAYES, as Guardian and Natural Parent of S.A.C. readopts and realleges allegations contained in paragraphs 1-48 as though fully set forth herein.

56. Defendant SANTA ROSA COUNTY SCHOOL BOARD had a duty to reasonably supervise its students during all activities that are subject to the control of the school.

57. Defendant SANTA ROSA COUNTY SCHOOL BOARD's duty to supervise its students required Defendant's administrators, teachers, and other employees to act with reasonable care under the circumstances.

58. Defendant SANTA ROSA COUNTY SCHOOL BOARD owed S.A.C., a duty to ensure its employees acted with reasonable care under the circumstances. This included following the appropriate safety plans to protect students from harm.

59. Defendant SANTA ROSA COUNTY SCHOOL BOARD owed S.A.C., a duty to supervise its employees and agents.

60. Defendant SANTA ROSA COUNTY SCHOOL BOARD also owed S.A.C., a duty to terminate any employees and agents that it knew or should have known could not act with reasonable care under the circumstances.

61. At all times material, Defendant SANTA ROSA COUNTY SCHOOL BOARD owed S.A.C., a duty to act with reasonable care under the circumstances.

62. Defendant SANTA ROSA COUNTY SCHOOL BOARD's duty to S.A.C., included the duty to use reasonable care to keep her safe from other students during school.

63. Defendant SANTA ROSA COUNTY SCHOOL BOARD breached its duties to S.A.C. by:

- a. Failing to consistently and reliably provide the level of supervision a reasonable school would provide under like circumstances;
- b. allowing the K.T.R. to sexually assault and harm S.A.C., during school;
- c. failing to provide a safe environment for S.A.C. where she would not be harmed by other students, including K.T.R.
- d. failing to procure or develop policies and procedures to prohibit harm to S.A.C. and other students;
- e. failing to investigate facts regarding K.T.R. that demonstrated a likely potential for K.T.R. to harm S.A.C.;
- f. failing to provide reasonable surveillance, investigation, and reporting of students to prevent or detect inappropriate student conduct, such as the conduct of K.T.R. in harming S.A.C.;
- g. failing to ensure its employees or agents properly supervise and protect students like S.A.C.
- h. failing to supervise its employees or agents in a proper manner to protect S.A.C.;
and
- i. failing to procure, develop, or follow policies and procedures intended to keep students like K.T.R. from having unsupervised access to students like S.A.C.;
- j. failing to provide adequate personnel support to employees or agents who were unable to properly supervise and protect S.A.C.

64. As a direct and proximate result of Defendant's conduct, S.A.C., suffered bodily injury, pain and suffering, disability, mental anguish, psychological injuries, and other permanent or continuing losses.

65. As a further direct and proximate result of Defendant's conduct, S.A.C. incurred medical and psychological expenses for the treatment of her injuries and will incur additional expenses in the future.

66. As a direct and proximate result of Defendant's conduct, S.A.C., was forced to move her educational needs to a private school and incur tuition payments that she did not have while attending Gulf Breeze High School.

67. As a direct and proximate result of Defendant SANTA ROSA COUNTY SCHOOL BOARD'S actions, Plaintiff S.A.C., was caused to suffer humiliation, embarrassment, mental distress, mental anguish, psychological injuries, and other directly and indirectly related damages and Plaintiff S.A.C., a minor, will suffer such losses in the future.

WHEREFORE, Plaintiff S.A.C., a minor, by and through RENEE HAYES, Guardian and Natural Parent of S.A.C., a minor sues Defendant SANTA ROSA COUNTY SCHOOL BOARD for damages and a trial by jury of all issues so triable.

/s/ Rachael Gilmer
RACHAEL GILMER, Esquire
Florida Bar Number: 0887331
Levin, Papantonio, Proctor, Buchanan, O'Brien,
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316 South Baylen Street, Suite 600
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(850) 436-6159 (Fax)
Attorneys for Plaintiff



LEVIN PAPANTONIO

PROCTOR | BUCHANAN | O'BRIEN
BARR | MOUGEY | P.A.

November 7, 2024

NOTICE OF ADMINISTRATIVE CLAIM

Santa Rosa County Board of
County Commissioner
6495 Caroline Street #M
Milton, FL

Certified Mail
7021 2720 0002 7761 3821

Santa Rosa County School District
6032 US-90
Milton, FL 32570

Certified Mail
7021 2720 0002 7761 3869

Tom Dannheisser, Esquire
Santa Rosa County Attorney
6495 Caroline Street, Suite C
Milton, FL 32570

Certified Mail
7021 2720 0002 7761 3852

Florida Department of Financial Services
Division of Risk Management
200 E. Gaines Street
Tallahassee, Florida 32399-0338

Certified Mail
7021 2720 0002 7761 3845

RE: S A C , a minor by and through
Renee Hayes, as Guardian and Natural Parent of S A C
Date of Accident: March 14, 2024

Dear Sir/Madam:

This firm represents S A C , a minor in a claim as a result of an incident on March 14, 2024, in Gulf Breeze, Santa Rosa County, Florida. Attached is a copy of the Administrative Claim which is submitted pursuant to Section 768.28, Florida Statute.

Please notify the adjuster in charge of this claim to contact me as soon as possible.

Thank you for your attention to this matter.

Sincerely,

RACHAEL R. GILMER

RRG/dkj
Enclosure



SWORN STATEMENT AND ADMINISTRATIVE CLAIM
PURSUANT TO SECTION 768.28 (Florida Statutes)

CLAIMANT: S A C , a minor by and through
RENEE HAYES, as Guardian and Natural Parent of
S C

CLAIMANT'S D.O.B.: JULY 8, 2008

CLAIMANT'S P.O.B.: Joliet, Illinois

CLAIMANT'S SSN: 329-08-9043

JUDGMENTS IN FAVOR OF STATE: There are no prior adjudicated unpaid claims of any nature of this claimant to the State, its agencies, officers or subdivisions.

RESPONDENTS: SANTA ROSA COUNTY SCHOOL DISTRICT, SANTA ROSA COUNTY, FLORIDA

DATE OF INCIDENT: MARCH 14, 2024

FACTS THAT GIVE RISE TO THE CLAIM: On or about March 14, 2024, July 8, 2023, S A C , suffered sexual assault, attempted rape, and exposure of sexual organs from a male student that occurred in the gym at Gulf Breeze High School, 675 Gulf Breeze Parkway, Gulf Breeze, Florida. The incident occurred as a result of inadequate supervision of the male student and improper storage of sports equipment used by both male and female students in the gym under the control of GULF BREEZE HIGH SCHOOL, a part of the SANTA ROSA COUNTY SCHOOL DISTRICT.

DAMAGES: Claimant seeks recovery for all damages allowed under Florida law. RENEE HAYES, as Guardian and Natural Parent of S A C seeks recovery for bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, expense of medical and nursing care and treatment and mental health services. The claimant also seeks recovery for the costs associated with private school tuition on behalf of S A C . Her injuries include depression, emotional distress, mental anguish, and feelings of shame, fear, and vulnerability. Medical expenses are ongoing.

AMOUNT OF CLAIM:

Claimant demands all maximum damages recoverable and allowable under Florida Law and believes the value of the claim for S A C exceeds \$200,000.00.

DATE OF CLAIM:

November 8th 2024.

Renee Hayes

RENEE HAYES, as Guardian and Natural Parent of S A C, a minor

STATE OF Florida
COUNTY OF Escambia

The foregoing instrument was acknowledged before me this 8th day of November, 2024 by Renee Hayes, who is personally known to me or who has produced Drivers License as identification and who did/did not take an oath.



CAROLINE HANNA
Commission # HH 221642
Expires February 20, 2026

Caroline Hanna

NOTARY PUBLIC
Type Name: CAROLINE HANNA
My Commission Expires: 2/20/26
Commission No.: 221642

Rachael R. Gilmer

RACHAEL R. GILMER, Esquire
Florida Bar Number: 0887331
Levin, Papantonio, Proctor, Buchanan, O'Brien,
Barr & Mougey, P.A.
316 South Baylen Street, Suite 600
Post Office Box 12308 (32591)
Pensacola, Florida 32502
(850) 435-7159 (Gilmer)
(850) 436-6159 (Fax)
Attorneys for Claimant
RGilmer@Levinlaw.com
LJones@Levinlaw.com

7021 2720 0002 7761 3845

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Levin, Papantonio
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Pensacola, FL 32591

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City, State, ZIP+4 **Tallahassee, Florida 32399-0338**

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<p>1. Article Addressed to:</p> <p>Florida Dept. of Financial Services Division of Risk Management 200 E. Gaines Street Tallahassee, Florida 32399-0338</p>	<p>3. Service Type</p> <table border="0" style="width: 100%;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
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City, State **Milton, FL 32570**

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Bridget Burnett</i> C. Date of Delivery <i>11/15/21</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p style="text-align: center;"><i>Collier</i></p>
<p>1. Article Addressed to:</p> <p>Santa Rosa County School District 6032 US-90 Milton, FL 32570</p> <p style="text-align: center;">  9590 9402 6996 1225 0259 68 </p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p> <p>7021 2720 0002 7761 3869</p>	

7021 2720 0002 7761 3852

U.S. Post Service
CERTIFIED MAIL
 Domestic Mail

For delivery

Rachael R. Gilmer, Esq.
Levin, Papantonio
P. O. Box 12308
Pensacola, FL 32591

Collier

Certified Mail Fee \$

Extra Services & Fees (check box, add fee as appropriate)

Return Receipt (hardcopy)

Return Receipt (electronic)

Certified Mail Restricted Delivery

Adult Signature Required

Adult Signature Restricted Delivery

Postage \$

Total Postage and Fees \$

Sent To


Street and Apt. No.

City, State, ZIP+4

Santa Rosa County Attorney
6495 Caroline Street, Suite C
Milton, FL 32570

Postmark Here

PS Form 3800, July 2015

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>Ashley Kern</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Ashley Kern</i></p> <p>C. Date of Delivery <i>11/15/24</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p style="text-align: right;"><i>Collier</i></p>
<p>1. Article Addressed to:</p> <p>Santa Rosa County Attorney 6495 Caroline Street, Suite C Milton, FL 32570</p> <p style="text-align: center;">  9590 9402 5663 9308 3434 33 </p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7021 2720 0002 7761 3852</p>	