

ESTTA Tracking number: **ESTTA576898**

Filing date: **12/16/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Monster Energy Company
Granted to Date of previous extension	12/14/2013
Address	1 Monster Way Corona, CA 92879 UNITED STATES

Attorney information	Brigette B. Chaput Knobbe, Martens, Olson & Bear LLP 2040 Main Street, 14th Floor Irvine, CA 92614 UNITED STATES efiling@knobbe.com, francie.leonguerrero@knobbe.com Phone:949-760-0404
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Applicant Information

Application No	85490012	Publication date	10/15/2013
Opposition Filing Date	12/16/2013	Opposition Period Ends	12/14/2013
Applicant	Bacardi & Company Limited Aeulestrasse 5 Vaduz, LIX 9490 LIX		

Goods/Services Affected by Opposition


Class 033. First Use: 2012/04/01 First Use In Commerce: 2012/04/01 All goods and services in the class are opposed, namely: Distilled spirits, namely, rum and rum-based beverages; prepared alcoholic cocktails, namely, cocktails flavored with rum
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Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Marks Cited by Opposer as Basis for Opposition


U.S. Registration No.	2903214	Application Date	05/07/2003
Registration Date	11/16/2004	Foreign Priority Date	NONE
Word Mark	M		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 032. First use: First Use: 2002/03/27 First Use In Commerce: 2002/04/18 Drinks, namely, carbonated soft drinks, carbonated drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated and non-carbonated energy or sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf stable, [and water;]*but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not.*

U.S. Registration No.	3434821	Application Date	09/07/2007
Registration Date	05/27/2008	Foreign Priority Date	NONE
Word Mark	M		
Design Mark			
Description of Mark	The mark consists of the letter "m" in the form of a claw.		
Goods/Services	Class 005. First use: First Use: 2002/03/27 First Use In Commerce: 2002/04/18 Nutritional supplements		

U.S. Registration No.	3434822	Application Date	09/07/2007
Registration Date	05/27/2008	Foreign Priority Date	NONE
Word Mark	M		

Design Mark	
Description of Mark	The mark consists of the letter "m" in the form of a claw.
Goods/Services	Class 032. First use: First Use: 2002/03/27 First Use In Commerce: 2002/04/18 Non-alcoholic beverages, namely, energydrinks, excluding perishable beverage products that contain fruit juice or soy

U.S. Registration No.	3134841	Application Date	05/07/2003
Registration Date	08/29/2006	Foreign Priority Date	NONE
Word Mark	M MONSTER ENERGY		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 032. First use: First Use: 2002/03/27 First Use In Commerce: 2002/04/18 Beverages, namely, carbonated soft drinks, carbonated soft drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated [and non-carbonated] energy and sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf stable, [and aerated water, soda water and seltzer water,] but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not		

Attachments	78246564#TMSN.gif(bytes) 77274643#TMSN.jpeg(bytes) 77274662#TMSN.jpeg(bytes) 78246567#TMSN.gif(bytes) 2013-12-16-EXHIBIT RE REG NO. 2903214-HANBEV.2198M.pdf(198280 bytes) 2013-12-16-EXHIBIT RE REG NO. 3434821-HANBEV.2198M.pdf(202906 bytes) 2013-12-16-EXHIBIT RE REG NO. 3434822-HANBEV.2198M.pdf(203446 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Brigette B. Chaput/
Name	Brigette B. Chaput
Date	12/16/2013



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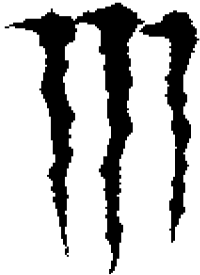
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Word Mark M

Goods and Services IC 032. US 045 046 048. G & S: Drinks, namely, carbonated soft drinks, carbonated drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated and non-carbonated energy or sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf stable, [and water;]*but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not.*. FIRST USE: 20020327. FIRST USE IN COMMERCE: 20020418

Mark Drawing Code (5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM

Serial Number 78246564

Filing Date May 7, 2003

Current Basis 1A

Original Filing Basis 1A

Published for Opposition August 24, 2004

Change In Registration CHANGE IN REGISTRATION HAS OCCURRED

Registration Number 2903214

Registration Date November 16, 2004

Owner (REGISTRANT) Hansen Beverage Company CORPORATION DELAWARE 550 Monica Circle Suite 201
Corona CALIFORNIA 92880

(LAST LISTED OWNER) MONSTER ENERGY COMPANY CORPORATION DELAWARE 1 Monster Way
Corona CALIFORNIA 92879

Assignment Recorded ASSIGNMENT RECORDED

Attorney of Record Diane M. Reed
Description of Mark Color is not claimed as a feature of the mark.
Type of Mark TRADEMARK
Register PRINCIPAL
Affidavit Text SECT 15. SECT 8 (6-YR).
Live/Dead Indicator LIVE

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CORONA, CALIFORNIA 92880**Entity Type:** CORPORATION**Citizenship:** DELAWARE**Correspondent:** DIANE M. REED2040 MAIN STREET, 14TH FLOOR
IRVINE, CA 92614

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Int. Cl.: 32

Prior U.S. Cls.: 45, 46 and 48

United States Patent and Trademark Office

Reg. No. 2,903,214

Registered Nov. 16, 2004

TRADEMARK
PRINCIPAL REGISTER



HANSEN BEVERAGE COMPANY (DELAWARE
CORPORATION)
1010 RAILROAD STREET
CORONA, CA 92882

FOR: DRINKS, NAMELY, CARBONATED SOFT
DRINKS, CARBONATED DRINKS ENHANCED
WITH VITAMINS, MINERALS, NUTRIENTS, AMI-
NO ACIDS AND/OR HERBS, CARBONATED AND
NON-CARBONATED ENERGY OR SPORTS
DRINKS, FRUIT JUICE DRINKS HAVING A JUICE

CONTENT OF 50% OR LESS BY VOLUME THAT
ARE SHELF STABLE, AND WATER, IN CLASS 32
(U.S. CLS. 45, 46 AND 48).

FIRST USE 3-27-2002; IN COMMERCE 4-18-2002.

SER. NO. 78-246,564, FILED 5-7-2003.

GINNY ISAACSON, EXAMINING ATTORNEY



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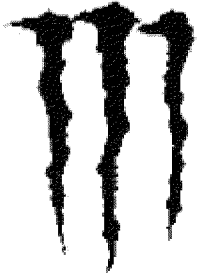
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Word Mark	M
Goods and Services	IC 005. US 006 018 044 046 051 052. G & S: Nutritional supplements. FIRST USE: 20020327. FIRST USE IN COMMERCE: 20020418
Mark Drawing Code	(3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS
Design Search Code	03.17.03 - Claws; Feet, bird; Parts of birds: claws, talons, feet, foot tracks; Talons; Tracks, bird
Trademark Search Facility Classification Code	LETS-1 M A single letter, multiples of a single letter or in combination with a design SHAPES-MISC Miscellaneous shaped designs
Serial Number	77274643
Filing Date	September 7, 2007
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	March 11, 2008
Registration Number	3434821
Registration Date	May 27, 2008
Owner	(REGISTRANT) Hansen Beverage Company CORPORATION DELAWARE 550 Monica Circle Suite 201 Corona CALIFORNIA 92880 (LAST LISTED OWNER) MONSTER ENERGY COMPANY CORPORATION DELAWARE 1 Monster Way Corona CALIFORNIA 92879

Assignment Recorded	ASSIGNMENT RECORDED
Attorney of Record	Diane M. Reed
Prior Registrations	2903214;3134841
Description of Mark	Color is not claimed as a feature of the mark. The mark consists of the letter "m" in the form of a claw.
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR).
Live/Dead Indicator	LIVE

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CORONA, CALIFORNIA 92880**Entity Type:** CORPORATION**Citizenship:** DELAWARE**Correspondent:** DIANE M. REED2040 MAIN STREET, 14TH FLOOR
IRVINE, CA 92614

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Int. Cl.: 5

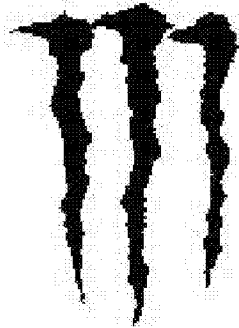
Prior U.S. Cls.: 6, 18, 44, 46, 51 and 52

United States Patent and Trademark Office

Reg. No. 3,434,821

Registered May 27, 2008

**TRADEMARK
PRINCIPAL REGISTER**



HANSEN BEVERAGE COMPANY (DELAWARE
CORPORATION)
550 MONICA CIRCLE
SUITE 201
CORONA, CA 92880

OWNER OF U.S. REG. NOS. 2,903,214 AND
3,134,841.

THE MARK CONSISTS OF THE LETTER "M" IN
THE FORM OF A CLAW.

FOR: NUTRITIONAL SUPPLEMENTS, IN CLASS
5 (U.S. CLS. 6, 18, 44, 46, 51 AND 52).

SER. NO. 77-274,643, FILED 9-7-2007.

FIRST USE 3-27-2002; IN COMMERCE 4-18-2002.

MICHAEL WIENER, EXAMINING ATTORNEY

**United States Patent and Trademark Office**

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Word Mark	M
Goods and Services	IC 032. US 045 046 048. G & S: Non-alcoholic beverages, namely, energy drinks, excluding perishable beverage products that contain fruit juice or soy. FIRST USE: 20020327. FIRST USE IN COMMERCE: 20020418
Mark Drawing Code	(3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS
Design Search Code	03.17.03 - Claws; Feet, bird; Parts of birds: claws, talons, feet, foot tracks; Talons; Tracks, bird
Trademark Search Facility Classification Code	ANI-MISC Part of the animals including animal bones,horns,claws,shells,eyes,coral,paws,eggs, feathers,hides or skins
Serial Number	77274662
Filing Date	September 7, 2007
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	March 11, 2008
Change In Registration	CHANGE IN REGISTRATION HAS OCCURRED
Registration Number	3434822
Registration Date	May 27, 2008

Owner (REGISTRANT) Hansen Beverage Company CORPORATION DELAWARE 550 Monica Circle Suite 201
Corona CALIFORNIA 92880

(LAST LISTED OWNER) MONSTER ENERGY COMPANY CORPORATION DELAWARE 1 Monster Way
Corona CALIFORNIA 92879

Assignment Recorded ASSIGNMENT RECORDED

Attorney of Record Diane M. Reed

Prior Registrations 2903214;3134841

Description of Mark Color is not claimed as a feature of the mark. The mark consists of the letter "m" in the form of a claw.

Type of Mark TRADEMARK

Register PRINCIPAL

Affidavit Text SECT 15. SECT 8 (6-YR).

Live/Dead Indicator LIVE

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CORONA, CALIFORNIA 92880**Entity Type:** CORPORATION**Citizenship:** DELAWARE**Correspondent:** DIANE M. REED2040 MAIN STREET, 14TH FLOOR
IRVINE, CA 92614

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Int. Cl.: 32

Prior U.S. Cls.: 45, 46 and 48

United States Patent and Trademark Office

Reg. No. 3,434,822

Registered May 27, 2008

**TRADEMARK
PRINCIPAL REGISTER**



HANSEN BEVERAGE COMPANY (DELAWARE
CORPORATION)
550 MONICA CIRCLE
SUITE 201
CORONA, CA 92880

FOR: NON-ALCOHOLIC BEVERAGES, NAMELY,
ENERGY DRINKS, EXCLUDING PERISHABLE
BEVERAGE PRODUCTS THAT CONTAIN FRUIT
JUICE OR SOY, IN CLASS 32 (U.S. CLS. 45, 46 AND
48).

FIRST USE 3-27-2002; IN COMMERCE 4-18-2002.

OWNER OF U.S. REG. NOS. 2,903,214 AND
3,134,841.

THE MARK CONSISTS OF THE LETTER "M" IN
THE FORM OF A CLAW.

SER. NO. 77-274,662, FILED 9-7-2007.

MICHAEL WIENER, EXAMINING ATTORNEY



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**MONSTER
ENERGY**

Word Mark M MONSTER ENERGY

Goods and Services IC 032. US 045 046 048. G & S: Beverages, namely, carbonated soft drinks, carbonated soft drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated [and non-carbonated] energy and sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf stable, [and aerated water, soda water and seltzer water,] but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not. FIRST USE: 20020327. FIRST USE IN COMMERCE: 20020418

Mark Drawing Code (5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM

Serial Number 78246567

Filing Date May 7, 2003

Current Basis 1A

Original Filing Basis 1A

Published for Opposition June 6, 2006

Registration Number 3134841

Registration Date August 29, 2006

Owner (REGISTRANT) Hansen Beverage Company CORPORATION DELAWARE 550 Monica Circle Suite 201 Corona CALIFORNIA 92880
(LAST LISTED OWNER) MONSTER ENERGY COMPANY CORPORATION DELAWARE 1 Monster Way Corona CALIFORNIA 92879

Assignment Recorded ASSIGNMENT RECORDED

Attorney of Record Steven J. Nataupsky

Disclaimer NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "ENERGY" APART FROM THE MARK AS SHOWN

Description of Mark Color is not claimed as a feature of the mark.

Type of Mark TRADEMARK

Register PRINCIPAL

Affidavit Text SECT 15. SECT 8 (6-YR).

Live/Dead Indicator LIVE

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CORONA, CALIFORNIA 92880**Entity Type:** CORPORATION**Citizenship:** DELAWARE**Correspondent:** DIANE M. REED2040 MAIN STREET, 14TH FLOOR
IRVINE, CA 92614

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Int. Cl.: 32

Prior U.S. Cls.: 45, 46 and 48

Reg. No. 3,134,841

United States Patent and Trademark Office

Registered Aug. 29, 2006

TRADEMARK
PRINCIPAL REGISTER



HANSEN BEVERAGE COMPANY (DELAWARE
CORPORATION)
1010 RAILROAD STREET
CORONA, CA 92882

FOR: BEVERAGES, NAMELY, CARBONATED
SOFT DRINKS, CARBONATED SOFT DRINKS EN-
HANCED WITH VITAMINS, MINERALS, NUTRI-
ENTS, AMINO ACIDS AND/OR HERBS,
CARBONATED AND NON-CARBONATED ENER-
GY AND SPORTS DRINKS, FRUIT JUICE DRINKS
HAVING A JUICE CONTENT OF 50% OR LESS BY
VOLUME THAT ARE SHELF STABLE, AND AERA-
TED WATER, SODA WATER AND SELTZER WA-
TER, BUT EXCLUDING PERISHABLE BEVERAGE

PRODUCTS THAT CONTAIN FRUIT JUICE OR
SOY, WHETHER SUCH PRODUCTS ARE PASTEUR-
IZED OR NOT, IN CLASS 32 (U.S. CLS. 45, 46 AND
48).

FIRST USE 3-27-2002; IN COMMERCE 4-18-2002.

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "ENERGY", APART FROM THE
MARK AS SHOWN.

SER. NO. 78-246,567, FILED 5-7-2003.

AMY HELLA, EXAMINING ATTORNEY

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MONSTER ENERGY COMPANY, a Delaware corporation

Opposer,

v.

Bacardi & Company Limited, a Liechtenstein corporation

Applicant.

)
) Opposition No.: _____
)

) Serial No.: 85/490012
)

**BACARDI
WOLF
BERRY**

**BACARDI
WOLF
BERRY**



) Mark:
)
)

NOTICE OF OPPOSITION

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Dear Sir:

Monster Energy Company, a Delaware corporation, located and doing business at 1 Monster Way, Corona, California 92879, (“Opposer”) believes that it will be damaged by the registration of U.S. Trademark Application Serial No. 85/490012 (“Application”) for the mark



owned by Bacardi & Company Limited, a Liechtenstein corporation

(“Applicant”) and therefore oppose the same.


As grounds for opposition, it is alleged:

1. By the Application filed on December 7, 2011, Applicant seeks to obtain registration




on the Principal Register of the trademark for “Distilled spirits, namely, rum and rum-based beverages; prepared alcoholic cocktails, namely, cocktails flavored with rum” in International Class 33.

2. Opposer manufactures and sells a line of non-alcoholic drinks under the marks


MONSTER ENERGY,  (“Claw Icon”), and related marks.


3. Opposer’s famous Claw Icon mark is a global brand and has appeared on billions of Opposer’s beverage cans and is prominently featured in extensive nationwide promotions involving, among other things, sponsorship of music festivals, athletes, and sports events, that are televised live nationwide and internationally. Opposer has made an enormous investment to develop the considerable renown and goodwill associated with its Claw Icon mark. Opposer also uses its famous Claw Icon mark on goods including clothing and accessories, headgear, and video recordings featuring sports.



4. Opposer owns and relies on incontestable U.S. Trademark Registration 2,903,214

for the mark  for “Drinks, namely, carbonated soft drinks, carbonated drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated and non-carbonated energy or sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf stable, but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not” in International Class 32, which registration issued November 11, 2004 and is based on an application filed in the United States Patent and Trademark Office (“PTO”) on May 7, 2003. The filing date of Opposer’s ‘214 Registration is prior to the filing date of

Applicant's Application. True and correct copies of the specifics of the '214 Registration obtained from the PTO's TSDR, TESS and Assignment databases are attached hereto and made of record.

5. Opposer owns and relies on incontestable U.S. Trademark Registration 3,434,821 for the mark  for "Nutritional supplements" in International Class 5, which registration issued May 27, 2008 and is based on an application filed in the PTO on September 7, 2007. The filing date of Opposer's '821 Registration is prior to the filing date of Applicant's Application. True and correct copies of the specifics of the '821 Registration obtained from the PTO's TSDR, TESS and Assignment databases are attached hereto and made of record.

6. Opposer owns and relies on incontestable U.S. Trademark Registration 3,434,822 for the mark  for "Non-alcoholic beverages, namely, energy drinks, excluding perishable beverage products that contain fruit juice or soy" in International Class 32, which registration issued May 27, 2008 and is based on an application filed in the PTO on September 7, 2007. The filing date of Opposer's '822 Registration is prior to the filing date of Applicant's Application. True and correct copies of the specifics of the '822 Registration obtained from the PTO's TSDR, TESS and Assignment databases are attached hereto and made of record.

7. Opposer owns and relies on incontestable U.S. Trademark Registration 3,134,841 for the mark   for "Beverages, namely, carbonated soft drinks, carbonated soft drinks enhanced with vitamins, minerals, nutrients, amino acids and/or herbs, carbonated energy and sports drinks, fruit juice drinks having a juice content of 50% or less by volume that are shelf

stable, but excluding perishable beverage products that contain fruit juice or soy, whether such products are pasteurized or not” in International Class 32 which registration issued August 29, 2006 and is based on an application filed in the PTO on May 7, 2003. The filing date of Opposer’s ‘841 Registration is prior to the filing date of the Applicant’s Application. True and correct copies of the specifics of the ‘841 Registration obtained from the PTO’s TSDR, TESS and Assignment databases are attached hereto and made of record.

8. Opposer’s Registration Nos. 2,903,214, 3,434,821, 3,434,822 and 3,134,841 are valid, subsisting, unrevoked and uncanceled; as such they constitute *prima facie* evidence of the validity of the registered marks and of the registrations thereof, and of Opposer’s ownership of the marks shown therein. Opposer’s registrations also constitute notice to Applicant of Opposer’s claim of ownership of the marks shown therein as provided in Sections 7(b), 22 and 33(a) of the Trademark Act.

9. Opposer’s registrations as specified in Paragraphs 4, 5, 6, and 7 above are incontestable. As such, they constitute conclusive evidence of the validity of the registered marks and of the registration of the marks, of Opposer’s ownership of its marks, and of Opposer’s exclusive right to use the registered marks in commerce as provided in Section 33 of the Lanham Act, 15 U.S.C. § 1115.



10. Since at least before the filing date of the application, Opposer has continuously used and promoted the Claw Icon Marks shown in Registration Nos. 2,903,214, 3,434,821, 3,434,822 and 3,134,841 (the “Claw Icon Marks”) in interstate commerce in connection with its goods. By virtue of Opposer’s continuous and substantial use, the Claw Icon

Marks have become famous identifiers of Opposer and its goods, and distinguish Opposer's goods from the goods of others. As a result, Opposer has built up, at great expense and effort, valuable goodwill in the Claw Icon Marks. Opposer has developed a significant amount of goodwill through the use and promotion of its Claw Icon Marks, such that consumers have come to recognize a family of Claw Icon marks with which Opposer markets and sells its goods.

11. In addition to the protection afforded Opposer by its federal trademark registrations, Opposer has extensive common law rights in its Claw Icon marks throughout the United States, having sold billions of dollars worth of goods under Opposer's Claw Icon Marks. Opposer's common law rights in its Claw Icon marks predate the dates of first use claimed by



Applicant in its application and through extensive use and promotion, Opposer's Claw Icon Marks have become famous for Opposer's goods since well before the filing date of the Application.



12. The application was filed on December 7, 2011 and claims first



use of the mark as of April 1, 2012, and a first use in commerce as of April 1, 2012. Opposer's use of its Claw Icon marks predates Applicant's use of its mark.



13. By its application to register Applicant seeks an unrestricted



federal registration for

covering the goods listed in the Application. As such, if a



registration issues for the

Application, such registration will constitute prima

facie evidence of the Applicant's exclusive right to use the registered mark in commerce on or in

connection with these goods throughout the United States with no limitation thereon. Opposer



will be damaged by registration of the

Application in that the claw mark



included in Applicant's

mark so resembles Opposer's Claw Icon marks

registered in the United States Patent and Trademark Office, and in which Opposer owns common

law trademark rights, as to be likely, when used on or in connection with the goods as they are



identified in the

application, as to cause confusion, or to cause mistake or to

deceive within the meaning of Section 2(d) of the Trademark Act, 15 U.S.C. § 1052(d).

14. In view of Opposer's prior rights in its Claw Icon marks, Applicant is not entitled to



federal registration of the

mark pursuant to Section 2(d) of the Trademark Act,


15 U.S.C. § 1052(d).

WHEREFORE, Opposer prays that U.S. Trademark Application Serial No. 85/490012 be rejected and stricken, that no registration be issued thereon to Applicant, and that this opposition be sustained in favor of Opposer.

Please charge Deposit Account No. 11-1410 to cover the opposition fee and any additional fees which may be required, or credit any overpayment to this account.

Respectfully submitted,
KNOBBE, MARTENS, OLSON & BEAR, LLP

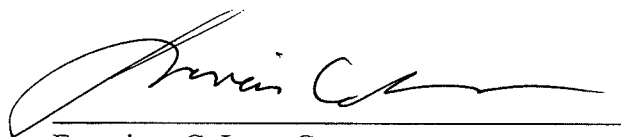
Dated: 12/10/2013

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing NOTICE OF OPPOSITION upon Applicant's correspondent by depositing one copy thereof in the United States Mail, first-class postage prepaid, on December 16, 2013, addressed as follows:

Maria A. Scungio
Edwards Wildman Palmer LLP
PO BOX 130 FDR Station
New York, NY 10150



Francisca C. Leon Guerrero

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