

Kelly Donovan

January 8, 2018

Ministry of the Attorney General
McMurtry-Scott Building
720 Bay Street, 11th Floor
Toronto, Ontario
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To the Honourable Yasir Naqvi, Attorney General:

At this point, I trust that you have read my report of systemic misfeasance in Ontario policing that I widely distributed back in July, 2017. The report compiles actual cases from across Canada that show systemic abuses of power, investigative conflicts of interest and influences of power between police services and their oversight agencies; allowing misfeasance to flourish. I left the profession of policing to improve The Ethical Standard™ across Canada. Part of my journey has been ensuring the public is aware of the current state of policing, who the enablers are, and the ineffectiveness of our current oversight structure. I intend to hold police leaders and overseers to a higher standard of ethics and integrity. I trust that you would support me in this endeavour, and that is why you are receiving this document.

At this point in time, since I have not been engaged on these issues by anyone from your Ministry, I am involving you in these serious matters that should have been handled by various police services boards, the Ontario Civilian Police Commission (“the OCPC”) and Office of the Independent Police Review Director (“the OIPRD”), and were not. Legitimate, reasonable and terribly concerning complaints about police officers, police chiefs and police service board members have been made to these bodies and there has been a complete disregard for legislated oversight responsibility; usually citing that these investigations are not in the “public interest.” Perhaps it is time for the Ministry to survey the public to obtain their opinion of precisely what investigations are in the public interest.

There are enough studies to show that any police officer misconduct is a matter of interest to the public.

I have no doubt that misfeasance exists within all police services in Ontario. This document specifically addresses corruption at the Ottawa Police Service (“OPS”), Waterloo Regional Police Service (“WRPS”), and York Regional Police Service (“YRP”).

I have been advised by members of the OPS that complaints have been made to the OCPC and OIPRD in the past regarding the conduct of the OPSB Chair, Mr. Eli El-Chantiry, and OPS Chief of Police, Mr. Charles Bordeleau. To this day, both of those individuals maintain their positions of authority and to my knowledge have not faced any discipline or objective and impartial investigation. If, in fact, investigations have uncovered misconduct or illegal conduct then transparency needs to improve.

I have personal knowledge about the issues at WRPS and I complained to the proper authorities as well. Similar to the matters in Ottawa, the individuals creating the problems are still all in their positions of authority. None of my complaints to both the OCPC and OIPRD were even investigated. The power we give police chiefs in Ontario becomes evident when only two weeks after the filing of the class action lawsuit against WRPS, Chief Larkin was elected as President of the Ontario Association Chiefs of Police. No one in this province seems to be accountable to the police officers or taxpayers; everyone continues to defer responsibility.

As Attorney General, Hon. Mr. Naqvi, I hold you responsible for ensuring this misfeasance does not continue, and that those committing these unethical and illegal acts are held accountable. Only with consistency and transparency will police services in Ontario regain the trust of the public and policing communities.

When you continue to reward, promote and insulate those responsible for the abuses of power, you become part of the problem.

I have outlined to you below my concerns based on evidence provided to me by complainants, all of which has already been brought to the attention of the OCPC and OIPRD.

I have broken down the concerns as follows:

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Part I – Criminal Allegations Against Members of Ottawa Police Service

1. Revolving around numerous incidents reported by a civilian over a two-year period (Dec 2016-present), members of OPS have allegedly repeatedly refused or ignored evidence provided by the complainant, refused to take information on new incidents, failed to file charges, failed to consult with the embedded crown, released personal information that was not of public record and discussed the active investigation with unauthorized parties; the investigations were passed on to four different investigators in ten month period. A request for information on the investigations, by the complainant, revealed and substantiated the above allegations, as well as showing egregious and biased characterization of the complainant and incomplete information, inaccurate information and contradictions in reports, notebooks, emails and previous information provided to the complainant. This has resulted in the complainant filing complaints to the OIPRD, OCPC and Information Privacy Commissioner related to conduct (negligence, obstruction of justice, deceit, etc.) under the PSA, and negligence under related privacy legislation.
2. Further, during the above investigations, in spring 2016 a concerned OPS member informed the complainant, as the accused continued their actions towards her, alleged that her investigations were "politicized" by the Chair of OPSB, who is also Councillor for her area. This was substantiated by other emails from the Chair showing implicit, detailed knowledge of her investigations while they were active and sharing of information with members of the public and the accused.
3. On November 22, 2016, at 9:46 am, a City of Ottawa employee, who is assistant to the OPSB Chair/Councillor, sent an email request to an OPS Inspector asking for details of police investigations and the outcome of the investigations involving civilians living on Needhams Side Road.
4. A 4-page brief was prepared detailing police involvement with a female civilian residing on Needhams Side Road. This brief was sent electronically to the City employee on November 22, 2016.

5. The City employee is not a member of the OPS and did not file a request for information pursuant to the Municipal Freedom of Information and Protection of Privacy Act (“MFIPPA”).¹ OPS has confirmed that there was no MFIPPA request filed by anyone on the above investigations.
6. The 4-page brief was not redacted and the civilian’s permission was not granted to release the information in the brief.
7. FOR CONTEXT: On April 16, 2012, a police constable was arrested and charged with Breach of Trust by a Public Official, contrary to section 122 of the Criminal Code of Canada for having shared details of an occurrence report with a civilian. The officer’s guilty plea to the criminal charge and subsequent conviction of misconduct resulted in his termination from employment as a police officer.²

Part II – Criminal Allegations Against OPSB Chair

8. In May, 2017, a citizen of Ottawa laid a private information accusing board chair Eli El-Chantiry of the following Criminal Code of Canada offences:
 - a. s. 122 Breach of Trust by public officer; and
 - b. s. 123 Disobeying a Statute – aggravating charge to s. 122 Breach of Trust.
9. The court did not permit the charges to proceed.

Part III – Allegations of Corruption, Misconduct and/or Unethical Conduct by OPS Chief and OPSB Chair

10. In February, 2016, an odd series of events led to the dismissal of a provincial offence against Lester Thompson, (father-in-law of OPS Chief Charles Bordeleau). Bordeleau had telephoned the prosecutor’s office to find out who had been assigned the case. The charge was eventually dismissed, reasons cited being there was no one in attendance to provide evidence, despite the officer being advised he could leave. It is unclear if the board conducted an investigation into

¹ R.S.O. 1990, c. M.56.

² Markham and the Waterloo Regional Police Service, 2015 ONCPC 04.

the conduct of Chief Bordeleau.³ The Chief of police is involved with the administration of justice in ways that create great potential for conflict and improper use of power.⁴

11. In April, 2016, OPSB Chair Eli El-Chantiry was criticized for allowing four standing committees to meet more often than the entire board behind closed doors. Stéphane Émard-Chabot, a lawyer who teaches and practices municipal law, was quoted by Joanne Chianello of the CBC as saying; "That is a citizen's right to observe the functioning of municipal government in all its pieces, and it reflects the provincial priority to promote transparency and accountability." The Ottawa Police Association was quoted as saying the board's procedures did not provide enough transparency. The PSA explicitly states that the PSB meetings are to be public, save in-camera requirements, and that all agendas, minutes, disclosures, and decisions are to be posted.⁵

12. In May, 2017, Michael Edelson, defense lawyer, sent a letter to Chief Charles Bordeleau and two provincial cabinet ministers detailing legal disclosure the lawyer received while defending then-acting Staff Sgt. Marty Rukavina. The charges were ultimately stayed, but disclosure provided to the officer's lawyer is alleged to have shown that evidence in the case was changed by the force's legal counsel and that some senior officers gave false statements during the SIU's investigation.⁶ In response to this letter, Chief Bordeleau presented the issue to El-Chantiry and requested an investigation be conducted by the Ontario Provincial Police ("OPP") into the conduct of three senior members of the OPS. It is unclear what information the board was given at this time regarding the need to have the OPP conduct an investigation, although the allegations were publicly cited as "fraud and evidence manipulation."⁷

³ "Conflict-of-interest allegation involving top police families prompts review," by Shaamini Yogaretnam, Ottawa Citizen, February 17, 2016.

⁴ Vogel v. Canadian Broadcasting Corporation, 1982 CanLII 801 (BC SC).

⁵ Police Services Act, R.S.O. 1990, c. P.15, Section 35(3).

⁶ "Ottawa police chief stands by temporary promotion of officer facing OPP probe," Ottawa Citizen, July 24, 2017.

⁷ "Updated: Ottawa police chief asks OPP to investigate senior officers for alleged evidence manipulation," Shaamini Yogaretnam, Ottawa Citizen, May 1, 2017.

13. On June 21, 2017, the lead investigator of the OPP probe emailed a member of the OPS and confirmed that the OPP were conducting a “criminal investigation” into the “conduct of a number of senior officers” of the OPS.
14. Matt Skof, president of the Ottawa Police Association (“OPA”), submitted an invoice to the OPS for legal indemnification for one of its members to the Chief. The Chief advised Skof that he wished to have the word “criminal” removed from future invoices.
15. June 29, 2017, Skof advised Chief Bordeleau that his conduct in relation to have the invoices from the lawyer disguise the ongoing criminal investigation by the OPP constituted a breach of the Police Services Act and OPS’ ‘Respectful Workplace Policy.’
16. For the period of July 22 to August 13, the Chief signed an order for the temporary promotion of Superintendent Chris Rheaume to the rank of Acting Deputy Chief.
17. In July, 2017, when confronted on the subject, Chief Bordeleau told the Ottawa Sun he stands by his decision to temporarily promote a senior officer who is under provincial police criminal investigation.⁸
18. On July 13, 2017, Skof sent a letter to the OPSB regarding conduct of the Chief in relation to the reimbursement of legal expenses. The letter addressed the following acts of misconduct by the Chief:
 - a. asking that the nature of the OPP investigation into the conduct of senior members of the OPS be disguised;
 - b. sending internal communication to the media, un-vetted (June 16, 2017, formal notice to the OPS Executive, in regards to the OPA-OPS relationship);
 - c. not abiding by OPS policy or Ministry of Labour regulations on July 1, 2017, while directing traffic in uniform and on duty;
19. The letter from Skof also addressed the conduct of a Superintendent:
 - a. misleading the Board regarding said OPP investigation;
 - b. his conduct towards a civilian member of the OPS;

⁸ “Ottawa police chief stands by temporary promotion of officer facing OPP probe,” Ottawa Sun, July 24, 2017.

20. On July 20, 2017, El-Chantiry forwarded Skof's letter to the board and included a response to the allegations. The following issues exist in this response:

- c. El-Chantiry states that the only issue surrounding legal indemnification was whether or not the invoice would be paid, and he stated the issue is being handled through the grievance procedure;
- d. El-Chantiry does not address the allegation that the Chief wanted the "criminal" aspect of the ongoing investigation to continue to be disguised for the board, (which was the major point of Skof's complaint, and shows that he and the chief are colluding to conceal the nature of the OPP investigation);
- e. El-Chantiry also tells board members that "it is not uncommon for off-duty officers to assist in the community without their uniform/use of force if they witness an incident." El-Chantiry misleads board members since whether on duty or off-duty, when a police officer is in uniform they have several legal responsibilities under the Police Services Act, Occupational Health and Safety Act and internal OPS policy.

21. In September, 2017, an article in the Ottawa Sun revealed that members of the OPSB accepted the temporary promotion of Rheume without realizing he was under criminal investigation.⁹ The information only came to light when the Ottawa Sun obtained emails between board members. The emails show that some board members believe they were led to believe it was not a criminal investigation by Chief Charles Bordeleau.¹⁰ In the article, board chair Eli El-Chantiry hides behind current Police Services Act legislation that prohibits the board from directing the chief in day-to-day operational decisions, and does not address the board's duty to monitor the chief's performance.

22. It is clear in the email from Allan Hubleby, Ottawa City Councillor and member of the police services board, on August 1, 2017, that he was led to believe there was no potential for criminal charges for Superintendent Chris Rheume when the

⁹ "Police board members didn't know promoted cop faced criminal probe, emails reveal," Ottawa Sun, Shaamini Yogaretnam, September 14, 2017.

¹⁰ *Supra* note 9.

board approved his promotion to Deputy Chief. Hubley's concerns were echoed by other members of the board (Sandy Smallwood, Tim Tierney, and Suzanne Valiquet).

23. On October 27, 2017, it was announced that the OPP will lay no criminal or disciplinary charges against senior Ottawa police employees after nearly a five-month investigation into allegations of fraud and evidence manipulation.¹¹ Despite the earlier letter by Edelson, Chief Bordeleau said the OPP "found no evidence of any misconduct or wrongdoing that would support charges under the Criminal Code or substantiate charges under the Police Services Act on any of the nine members."¹² Chief Bordeleau did not release any other details of the OPP report.

24. Michael Edelson is a lawyer bound to the Law Society of Upper Canada's Rules of Professional Conduct. Any lay person can deduce that when a lawyer discloses to a chief of police and two provincial cabinet ministers that he discovered evidence of criminal offences, he is in fact telling the truth. I find it completely unacceptable that the response from the OPS and OPP does not address what prompted the letter from Edelson in the first instance. If Edelson had no evidence of wrongdoing and reported that he did, the public expect that his conduct will be reported to the Law Society of Upper Canada and appropriately investigated. If this step was not taken by the OPS or OPP then one has to ask why? If Edelson made a false statement to the OPS he should be held accountable.

25. In October, 2017, OPS Sergeant Marty Rukavina filed a \$3.35M lawsuit against OPS. Among his allegations are:

- a. Malicious prosecution, misfeasance in public office, deceit, civil conspiracy and infliction of mental suffering by the OPS board and several police employees.
- b. A Staff Sergeant had operated a private business that provided unsanctioned training to members of the OPS.

¹¹ "No charges after five-month OPP probe of Ottawa police," Ottawa Citizen, by Shaamini Yogaretnam, October 27, 2017.

¹² *Supra* note 11.

- c. A systemic campaign was launched by OPS members to publicly discredit and humiliate Rukavina and implicate him in the explosion incident.¹³
26. On November 22, 2017, the female civilian mentioned in paragraph 2 above, sent information to the OCPC and specified her concerns regarding El-Chantiry's alleged personal relationship with a young female civilian. It is my understanding as well that this same female, who is El-Chantiry's protégé, had been arrested in the past, yet charges had all but disappeared; a check of police records would show. The belief at OPS is that El-Chantiry is using his influence and position as OPSB Chair to provide opportunities to this female; beyond any opportunities being offered to other residents of Ottawa; and other specific allegations of interference and obstruction of judicial proceedings and abuse of power. When I attended the OPSB in September, 2017, to present a delegation on the need for independent and impartial training of board members, I observed this female sitting at the "press" table within the council chambers.

Part IV - Allegations of Corruption, Misconduct and/or Unethical Conduct by WRPS Chief, Waterloo Regional Police Services Board and York Regional Police Service

27. In May, 2016, I wanted to complain about the conduct of several members of the Waterloo Regional Police Service ("WRPS") when conducting internal investigations. The WRPS' Public Complaints and Chief's Complaints procedure did not allow a member of the WRPS to be a Complainant of misconduct. I knew I was not permitted to make a complaint to the OIPRD since officers are not permitted to complain about officers at their service.
28. On May 4, 2016, I presented a lawful delegation to the WRPS Board revealing corruption and unlawful discretion during four internal criminal investigations.
29. On May 9, 2016, Chief Larkin directed me to not present myself in front of the board again, and placed me on administrative duties while professional standards investigated me for six Police Services Act ("PSA") charges.

¹³ "\$3.35M lawsuit alleges deceit, civil conspiracy and "campaign" of mistreatment against Ottawa cop," Shaamini Yogaretnam, Ottawa Citizen, October 3, 2017.

30. On May 9, 2016, I notified the board members by email of the reprisal action taken against me. This email was shared by an unknown board member with Chief Larkin, (the email was not addressed to Chief Larkin). Board members have all sworn (or affirmed) an Oath of Office to discharge their duties impartially. I was then directed by Chief Larkin to not communicate in any way with members of the board and two additional charges were added to the internal investigation.
31. An Investigative Review was conducted by YRP into one of the criminal cases referenced in my delegation. I provided the investigating officer with thirteen clear points of issue with the investigation. The investigating officer ignored almost all of those points and in the final report made several false statements. Issues outstanding with said criminal investigation and negligent review are as follows:
- a. WRPS investigators and the Crown Attorney suppressed exculpatory evidence;
 - b. Chief Larkin did not consult with the Crown Attorney prior to arresting the officer, yet stated publicly that he had;
 - c. Several conflicts of interest existed in the investigative process and none were declared;
 - d. Evidence obtained after the officer's arrest proved that key aspects of the unsworn witness statements obtained by investigators prior to the officer's arrest contained false statements.
 - e. A WRPS Inspector made false statements to YRP Investigator.
 - f. Crown Attorney made false statements to YRP Investigator.
 - g. YRP Investigator did not conduct investigation of any issues I raised in my interview, yet concluded the WRPS investigation was full, fair and impartial.
 - h. YRP Investigator made false statements in the report provided to Larkin.
32. During the 14-month period that the WRPS conducted their protracted disciplinary investigation (despite the 6-month limitation), I began to suffer from symptoms of post-traumatic stress disorder. Rather than be concerned for my wellbeing I was threatened by the professional standard branch with an additional charge of insubordination if I was not well enough to attend a compelled interview.

Neglect of Duty:

What I find most concerning is that the OCPC and OIPRD were made aware of these, and other serious issues of misfeasance in Ontario policing, and have done little to curtail the level of corruption that exists within senior leadership and oversight agencies. Specific complaints, of which I am aware, are detailed below, in chronological order:

- December 1, 2010 – The OCPC, OIPRD and the Solicitor General at the time, Ian Davidson, were made aware of several acts of misconduct and criminal behaviour by members of the Orangeville Police Service. Some of those allegations included:
 - A member offered to not show up for criminal trial if he could be served alcohol after last-call;
 - A member refused to provide services while on duty, but offered the services through a private business the member owned;
 - A member made an order to destroy evidence and remove criminal charges against a friend;
 - Members saving pornography to work computers;
 - A member arriving for duty and operating a police vehicle while in a “drunken state;”
 - Members engaging in repeated “bullying” with no intervention by management;
 - General inconsistent discipline;
 - Outdated policies;
 - Inadequate training.
- June 28, 2016 – The Commission refused to investigate the Chief of the WRPS for refusing to initiate a Chief’s complaint into a negligent criminal investigation that saw Constable Jeremy Snyder charged and suspended for 2-years only to later be acquitted by an Honourable Justice and the investigation to be criticized. The Commission determined that an investigation was not warranted, and Snyder in turn filed a civil lawsuit.

- August 8, 2016 – The OCPC cleared Chief Bordeleau of misconduct when he phoned the Provincial Offences Court office on January 25, 2016, to find out the name of the prosecutor assigned to his father-in-law’s careless driving charge. The OCPC determined that Bordeleau “did not attempt to use his position to influence the outcome of the Highway Traffic Act matter nor to communicate with the prosecutors.”
- August 25, 2016 – The Commission refused to investigate the Ottawa Police Services Board holding meetings which were not open to the public, contrary to Police Services Act s. 35(3).¹⁴
- March 6, 2017 – The Commission decided to not commence an investigation into my complaint of members of the WRPS board for suppressing my complaint of corruption during internal investigations and failing to properly monitor the performance of the Chief, and the Chief of WRPS for taking reprisal action against me for merely uncovering internal corruption and reporting it to the board.
- March 29, 2017 – The OIPRD determined it was not in the public interest to investigate my complaint of negligence, collusion and deceit by members of the YRP in conducting an Investigative Review for WRPS. Despite the fact that the officers in the complaint were YRP officers, the OIPRD stated I was not permitted to make the complaint.
- August 17, 2017 – The Commission refused to investigate the OPSB chair Eli El-Chantiry for misconduct in relation to false and misleading information provided to other board members and not adequately monitoring the performance of the Chief.
- On October 27, 2017, the civilian mentioned in paragraph 1 above, received a response to her letter to Hon. Minister Lalonde written by Matthew Torigian, former Chief of WRPS, advising her to address her concerns to the OPSB directly and the OIPRD.
- November 29, 2017 – The OIPRD refused to investigate Chief Charles Bordeleau when he failed to advise the Board of the nature of an ongoing OPP investigation into members of the OPS and his request of the OPA to disguise the nature of the OPP investigation.

¹⁴ R.S.O. 1990, c. P.15.

- The OIPRD has very recently advised Matt Skof, in a general statement, that it will not conduct any investigations into the conduct of Chief Bordeleau.

As a result of the systemic neglect by the oversight agencies, officers are resorting to the only remaining avenue for justice; civil litigation. Here is a list of *some* of the ongoing litigation which will cost the taxpayers of Ontario millions of dollars and could have been prevented with adequate oversight:

- ✓ Constable Mike Sladek, London Police Service
- ✓ Constable Jeremy Snyder, Waterloo Regional Police Service
- ✓ Constable Paul Manning, Hamilton Police Service
- ✓ Sergeant Marty Rukavina, Ottawa Police Service
- ✓ Sergeant Gurdip Panaich, York Regional Police Service
- ✓ The Women of Waterloo Regional Police Service (Class Action)

All citizens of Ontario are facing a dawn of increased accountability in policing as a result of transparency achieved through access to information legislation and people like myself who are taking great risks to expose internal police corruption. When serious allegations are made about a person in a position of authority, the public need to trust that those allegations will be handled with due diligence, in a manner identical to that of a citizen-involved investigation. When it comes to internal matters within police services and oversight bodies, this simply has not been happening. What is being exposed in Thunder Bay and more recently in Montreal is happening everywhere. Trust in police is at an all-time low. Remaining in denial, and refusing to acknowledge the scope of the issue is not an improvement strategy.

If it is not completely evident, by the time you read this document, that a full review and inspection is warranted then please see Appendix A, at the end of this document, for a list of recommended interim solutions by way of directives for policy improvements. These recommendations can easily be implemented and will ensure that abuses are detected through better reporting and those committing these acts of misconduct or misfeasance will no longer be protected by other officers' oaths of secrecy.

I will make myself available should an advisory committee be formed to address any of the issues contained herein. I have taken on this initiative to not only expose the problems I am also very interested in being part of the solution.

Most sincerely,

Kelly Donovan

Copied To:

Hon. Marie-France Lalonde, Minister of Community Safety and Correctional Services

Mr. Benson Cowan, Ontario Civilian Police Commission

Mr. Graham Boswell, Ontario Civilian Police Commission

Mr. Gerry McNeilly, Ontario Independent Police Review Director

Appendix “A”

Directives to improve accountability and transparency:

These are suggestions only, and further dialogue will ensure understanding of the objectives of each recommendation.

Mandatory Reporting

The following must be reported to the public on an annual basis and can be produced without the names of members of the service or public.

1. Police Services must report all expenses related to the prosecution (misconduct or criminal) of its members, (this includes all FTE involved in the investigation and prosecution).
2. Police Services must report all legal expenses paid to defend Human Rights of Ontario (“HRTO”) complaints made by members of the public.
3. Police Services must report all legal expenses paid to defend HRTO complaints made by its members.
4. Police Services must report all legal expenses paid to defend lawsuits filed by members of the public.
5. Police Services must report all legal expenses paid to defend lawsuits filed by its members.
6. Police Services must report all settlements paid to members of the public divided by HRTO complaints and lawsuits.
7. Police Services must report all settlements paid to its members divided by HRTO complaints and lawsuits.

**The Ministry of the Attorney General reports each year on how much of their budget was dedicated to the Human Rights Legal Support Centre, Prosecuting Crime, (as examples). It is reasonable for police services to report the above figures in order for the public to better understand where budgets are being spent, and assist in reducing the cost of policing.*

Policy

1. Members of police services shall be provided means of reporting misconduct of other members, including the Chief of police.
2. Members of police services shall be provided a means of appeal for all allegations of misconduct or criminal conduct that are not investigated.
3. A member of a police service alleging reprisal for having filed an HRTO complaint or complaint of misconduct or criminal conduct of another member, shall have the ability to complain to the OIPRD.
4. When an allegation of criminal conduct was made about a senior member of a police service and no charges are laid, the case is always referred to the office of the Attorney General to be reviewed.