



Security Council

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Letter dated 31 July 2002 from the Chairman of the Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism addressed to the President of the Security Council

I write with reference to my letter of 12 April 2002 (S/2002/461).

The Counter-Terrorism Committee has received the attached supplementary report from Paraguay, submitted pursuant to paragraph 6 of resolution 1373 (2001).

I would be grateful if you could arrange for the present letter and its annex to be circulated as a document of the Security Council.

(Signed) **Jeremy Greenstock**
Chairman

Security Council Committee established pursuant to
resolution 1373 (2001) concerning counter-terrorism

Annex

[Original: Spanish]

Letter dated 11 July 2002 from the Permanent Representative of Paraguay to the United Nations addressed to the Chairman of the Security Council Committee established pursuant to resolution 1373 (2001) concerning counter-terrorism

As requested in your letter dated 18 April 2002, I have the honour to transmit the supplementary report of the Government of Paraguay pursuant to paragraph 6 of Security Council resolution 1373 (2001) (see enclosure).

(Signed) Eladio **Loizaga**
Ambassador
Permanent Representative

Supplementary report of Paraguay on resolution 1373 (2001)

Subparagraph 1 (a)

The Counter-Terrorism Committee (CTC) notes, from paragraph 165 of the report, that, as of December 2001, a preliminary draft of an anti-terrorist Act was under consideration in various commissions in the Chamber of Deputies. On the basis of the summary of that proposed law contained in that paragraph, it is apparent that consideration is being given to matters of the kinds raised in the comments that follow. The CTC would be grateful, therefore, for a report on the progress made with the development and enactment of the proposed Act. The CTC also invites Paraguay to take the comments in this letter into account in the refinement of the draft. It would be appreciated if a detailed outline of the new law, either as enacted or as then proposed, could accompany Paraguay's further report.

At the time this supplementary report was being drafted, Parliament had indefinitely postponed (*sine die*) consideration of the draft anti-terrorism act; it will, however, be considered at the appropriate time. Various sectors of civil society opposed the bill and requested that it be subjected to detailed examination and analysis before being adopted, since it was feared that, once adopted, it might be applied in a manner that infringed civil liberties and safeguards. This concern was prompted largely by memories of laws that were in effect during the period of the dictatorship and that restricted the exercise of individual liberties. Moreover, it is the intention, when drafting the said bill, to take into account other relevant international instruments such as the Inter-American Convention against Terrorism, which Paraguay signed on 3 June 2002 at the thirty-second session of the General Assembly of the Organization of American States (OAS).

What is the purpose of the definition in the money-laundering law of the concept of a terrorist group? Please outline in more detail the scheme of the legislation.

The purpose of a law is to characterize individuals or groups of individuals and to outline their specific features so as to clarify how they will be dealt with under the law; that was the purpose of the definition of "terrorist group" in the said law.

As to the scheme of the legislation concerning money-laundering, it is limited to Act No. 1015/96 on preventing and punishing acts designed to launder money or property.

The Central Bank of Paraguay established the regulations issued under Act No. 1015 by resolution 2, record 84, dated 2 March 1997. This resolution establishes procedures for preventing and impeding the use of the financial system and other sectors of economic activity in the carrying out of acts intended to legitimize money or property derived from criminal activities by:

- Identifying the persons to whom certain obligations apply and who are under the oversight of the Superintendence of Banks (SIB);
- Determining the scope/operations for the application of the resolution in question;
- Providing also for clients to be clearly identified, by establishing a standard form for that purpose;

- Establishing that documents must be kept for a period of five years;
- Determining that entities have an obligation to report suspicious operations to the Secretariat for the Prevention of Money- or Property-Laundering (SEPRELAD) on specific forms established by resolution 245/97. It also requires external auditors to include in their annual statements, when so requested by SIB, a special report on compliance with Act. No. 1015/97;
- Regulating the procedures for internal oversight and designating one official to monitor compliance with the procedures;
- Prohibiting the existence of anonymous accounts or accounts held under fictitious names;
- Calling for compliance with Act. No. 1015/96 and considering failure to comply with it as a violation of the provisions established by the Central Bank of Paraguay (BCP);

Other rules supplement existing legislation on the matter; they include the following:

- Resolution 3, record 59, dated 25 March 1997, of the BCP Board of Directors on the regulation of foreign exchange operations of BCP;
- Resolution SIB 153/98, of 13 May 1998, establishing that entities which effect remittances of currency abroad must first inform SIB and the Department of Economic Crimes, for statistical purposes, of the type of currency, its amount and its geographic destination. Likewise, companies that transport cash must keep a record of all the transport operations effected;
- Resolution 9, record 105, dated 5 October 2001, of the BCP Board of Directors creating a unit to analyse the prevention of money- or property-laundering. The principal function of the unit is to centralize, at the institutional level, everything connected with the processing of, and requests for, reports on money-laundering;
- Resolution 1, record 123, of 15 November 2001, concerning a Code of Conduct for the Prevention and Identification of Money-Laundering and Other Financial Crimes and Offences and defining, among other things, the mechanism of control, responsibilities and unusual operations (and the requirement to report to the Unit any operation found to be unusual), which came into force on 3 February 2002. Even though it is now in operation and even though implementation of the Code is being effectively and efficiently monitored, it is necessary to have a team that is trained in, inter alia, foreign exchange operations and transfers, and a computer structure within SIB that can support and process the information provided by the entities of the financial system. It will be essential, also, to have the necessary budgetary and technical resources.

Subparagraph 1 (b)

Articles 8, 9 and 10 of the proposed law mentioned above are particularly relevant to compliance with this paragraph. The CTC would accordingly be especially interested in the progress made with enacting and giving effect to those articles.

Since Congress has postponed consideration of the said bill *sine die*, no progress has been made in the implementation of the said articles.

Subparagraph 1 (c)

The CTC notes from paragraph 4 of the report that action has been taken, employing mechanisms available under the money-laundering legislation, to freeze assets of named individuals and entities. However, the funds and other resources used to support terrorism do not always come from illicit sources. How does Paraguay propose to fulfil the requirements of this subparagraph in relation to lawful funds and resources which are used for terrorist purposes?

Provision is made, in the current legislation pertaining to money-laundering, for reporting to the Secretariat for the Prevention of Money- or Property-Laundering (SEPRELAD) any action or operation — irrespective of the amount involved — if there is any indication or suspicion that it might involve the offence of money-laundering. Investigations and analyses are initiated on the basis of reports from the national financial system regarding suspicious activities involving licit and illicit funds and resources.

SIB is responsible for monitoring compliance with Act No. 1015 within the financial system. It does so by:

Verifying *in situ* that all entities in the system are correctly applying the client identification form. Not only is this part of the SIB inspection programme, but BCP resolution 245/97 also requires external auditors to include in their annual statements, when so requested by SIB, a special report on the auditing of compliance with the said Act No. 1015;

Looking into the reports of suspicious operations made by financial entities, checking them out and dealing with them, as appropriate. There is also a requirement, under resolution 1, record 123, of 15 November 2001, to report to the unit to analyse the prevention of money- or property-laundering;

Lastly, one of the main purposes of creating the said unit is to monitor the financial system's operations (not just those having a value greater than US\$ 10,000) in order to verify suspicious operations and accelerate the freezing of and possible punishment for such operations.

Subparagraph 1 (d)

Do the obligations to report suspicious transactions that are applicable to the financial sector also extend to intermediaries outside the main financial sector, such as lawyers?

Article 13 of Act No. 1015/97 states to whom the obligation to report suspicious transactions applies and also contemplates persons other than those

included in the financial system. However, the scope of SIB action is limited to the financial system.

What preventive controls and surveillance measures exist to ensure that funds intended for the financing of terrorism are not transferred through charitable, religious or cultural organizations?

The preventive controls and surveillance measures are carried out by means of reports of suspicious operations within the national financial system.

In any operation having a value greater than US\$ 10,000, it is compulsory to fully identify the client and the principal, regardless of the type of entity involved.

Is the US\$ 10,000 test the only one for identifying reportable transactions?

The US\$ 10,000 test is not the only one for identifying reportable transactions; Act No. 1015/97 stipulates that the following must also be looked into:

- Operations that may have been broken up in order to avoid having to comply with the identification, recording or reporting obligations;
- Complex, unusual or large operations or operations that do not conform to the customary pattern of transactions or that by their nature and size do not correspond to clients' active or passive operations, based on their prior record of operations;
- Any cash income for which there is no apparent justification effected by a large number of persons.

Please indicate the measures and instruments available to regulate alternative funds transfer arrangements such as the system known as Hawala.

SIB exercises control only over entities that are part of the financial system; it does not have measures and instruments to regulate alternative funds transfer arrangements.

Subparagraph 2 (a)

Please outline the measures, both legislative and practical, preventing entities and individuals from recruiting, collecting funds or soliciting other forms of support for terrorist activities to be carried out inside or outside Paraguay, including, in particular:

- The carrying out, within or from Paraguay, of recruiting, collecting of funds and soliciting of other forms of support from other countries; and
- Deceptive activities such as recruitment based on a representation to the recruit that the purpose of the recruitment is one (e.g. teaching) different from the true purpose and collection of funds through front organizations.

How does Paraguay control the establishment and operation in its territory of paramilitary groups that have the potential to engage in terrorist activities?

The armed forces work jointly with other governmental institutions through exchanges of information. They work especially with the National Police, the National Anti-Drug Secretariat (SENAD) and the government departments to prevent the establishment and operation of paramilitary groups. No such groups are known to exist thus far.

What measures does Paraguay have in place to prevent terrorists obtaining weapons within or outside its territory, in particular small arms or light weapons? Please outline the legislation concerning the acquisition and possession, and import and export, of such weapons.

Paraguay has signed bilateral agreements on the subject, including Act No. 1057, which approves the Agreement on facilitating the control of illicit trafficking in weapons between the Republic of Paraguay and the Federative Republic of Brazil.

Executive Decree 119/2001, of 19 January 2001, establishes control mechanisms in respect of Brazilian nationals, foreign residents in Brazil or Brazilian legal persons who obtain weapons and ammunition in the Republic of Paraguay.

In June 2002, the National Congress approved the Weapons Act, which incorporates the international instruments of both the United Nations system and the inter-American system.

The Secretariat for the Prevention and Investigation of Terrorism and the Department of Economic and Financial Crimes of the National Police carry out prevention and intelligence work in strategic areas of the country, with a view to detecting terrorist and other related activities.

Detentions and arrests are also effected. The following are examples:

Secretariat for the Prevention and Investigation of Terrorism:

<i>Arrests</i>	<i>Deportations</i>	<i>Tried</i>
1 person in 1998	1 person in 1998	3 persons
2 persons in 2000	1 person in 2001	
23 persons in 2001	2 persons in 2002	
2 persons in 2002		

Law enforcement has intelligence agents dispersed throughout the national territory. One of its functions is to detect the possible formation of paramilitary groups capable of conspiring against the constitutional order and to alert the State accordingly.

There are currently two bodies that exercise control over the possession, bearing and importation of firearms: the Department of Military Supplies (DIMABEL) belonging to the armed forces and the Department of Weapons and Ammunition of the National Police.

Subparagraph 2 (b)

Does Paraguay have a body that specializes in counter-terrorism, or is that the responsibility of a number of departments or agencies? In the latter case, how is coordination between the various entities effected? In this connection, the CTC notes the establishment of the Secretariat for the Prevention and Investigation of Terrorism but notes also that it is stated to be subordinate to the National Police.

The Government of the Republic of Paraguay has a body that specializes exclusively in the prevention and investigation of terrorism. It is the Secretariat for the Prevention and Investigation of Terrorism, which is subordinate to the Police Command, and its function is to plan, coordinate and execute tasks related to the prevention and suppression of terrorist acts.

Does each agency define its strategy independently, or does it carry out measures that have been established at a higher level? Who determines that policy and, if applicable, the distribution of tasks among agencies?

The Secretariat for the Prevention and Investigation of Terrorism and the Ministry of the Interior coordinate their activities with the National Defence Council and the Council for the Internal Security of the Nation, pursuant to Act No. 1,337/99 on National Defence and Internal Security.

What is the scope of the activities of the Specialized Working Group on Terrorism mentioned in paragraph 76 of the report? What are the results of its activities?

The Permanent Working Group (GTP) is made up of the Ministers and Deputy Ministers of the Interior of the Southern Common Market (MERCOSUR), Bolivia and Chile. The Specialized Working Group (GTE) is made up of the heads of the anti-terrorism units and advisers of the aforementioned countries. They are all members of the Meeting of Ministers of the Interior of MERCOSUR, Bolivia and Chile, which is subordinate to the Council of the Southern Common Market.

Both expert groups work predominantly on the prevention of terrorism, by exchanging information and conducting joint preventive operations against terrorism.

It is worth mentioning the important advance made in regional communication, in the form of an encrypted communication system that was introduced recently. In addition, anti-terrorism training courses are being held this year.

Subparagraph 2 (c)

It would be helpful to the CTC if Paraguay would clarify whether there are any provisions in existing laws which exclude from access to Paraguay persons of the kind mentioned in subparagraph 2 (c) of the resolution who are not asylum-seekers.

Under the provisions of Migration Act No. 978/96, an alien perceived as persona non grata in Paraguay may be refused admission or expelled. This is an administrative decision taken by the Migration Office.

Subparagraph 2 (e)

What is the competence of the courts of Paraguay to deal with criminal acts of each of the following kinds:

- **An act committed outside Paraguay by a person who is a citizen of, or habitually resident in, Paraguay (whether that person is currently present in Paraguay or not);**
- **An act committed outside Paraguay by a foreign national who is currently in Paraguay?**

In chapter II, “Law enforcement”, of the Penal Code of the Republic of Paraguay, article 4 refers to the application of the Code to all punishable acts provided for in special laws, in relation to and consistent with article 321 of the Code, which refers to the general adaptation of penalties to the special penal laws.

Article 6 of the Penal Code, by referring to acts in national territory, reflects the principle of territoriality and therefore equates with national territory ships and boats flying the flag of each State, thereby adopting the so-called flag principle. The following principles have been added to this principle: the person, protection of interests, substitution and universality.

According to the principle of the person, the penal laws of a State apply to its nationals even though the offences have been committed outside its national territory. In the formulation of concern here, the principle is described as “active” in contrast to its “passive” counterpart, which denotes the extension of the penal law of a State to offences committed outside its territory when the victims are nationals of that State. The latter form of the principle of the person is not reflected in the Penal Code.

According to the principle of protection of interests, the courts of a State have jurisdiction to apply its penal law is recognized when offences that affect its interests as a State are committed outside its territory by its nationals or by aliens. This principle is expressly embodied in article 7 of the Penal Code, which enumerates a series of punishable acts whose common denominator is prejudice to the State interests of Paraguay (the existence of the State itself, the constitutional order, the constitutional organs, the administration of State justice, acts committed by a holder of public office in Paraguay in connection with his or her functions, punishable acts involving the security of persons when there is collective risk).

The principle of universal justice established in article 8 of the Penal Code refers to acts committed abroad against legal property enjoying universal protection. Under this principle, the State reserves for itself the right to adjudicate acts committed outside its territory by nationals or aliens when such acts are directed against legal property of concern to the entire international community. Accordingly, a judge of the State in which the offence is committed acts as representative of the international community, in accordance with the principle of “dual function”, to prosecute acts of concern to that community.

The principle of universality ensures that prosecution occurs more promptly than in the case of extradition. The State can proceed, unhampered, in penal matters and applies the relevant penal law abroad in cases where the object of the suppression is of predominantly human interest, not merely national.

The requirements for the aforementioned prosecution are: universal nature of the legal property, and the presence of the perpetrator in the national territory (art. 8, para. 2).

Article 9 establishes a principle of real importance, the principle of substitution. This principle continues to remedy lacunae in the law with respect to punishability that occur as a result of the deficiencies of the other principles mentioned above. In accordance with this principle, the Paraguayan State reserves the right of its courts to hear cases in which: (a) the acts were committed abroad, (b) the acts are punishable in the place of commission, (c) the perpetrator is an alien or without nationality and is present in Paraguay, (d) *ne bis in idem* does not apply, and (e) the foreign State refuses to extradite even though extradition is admissible for the category of punishable offence involved.

It also establishes that the principle of substitution shall operate when there is no provision for punishment in the place where the act is committed.

With the application of article 11 of the Penal Code, the principle of ubiquitousness is introduced in that the act is understood to be committed in all the places in which the protagonist or the participant has carried out the action or, in the case of omission, should have carried it out; or in those in which the result envisaged by the law has been produced, or it should have been produced according to the protagonist.

Paragraph 3 of that article is even clearer, since it provides that Paraguayan law will apply to a person who participates in an act committed abroad when he or she has acted in national territory, even where there is no provision for a penalty under the law in the place in which it was committed. Accordingly, there is no room for impunity.

The CTC would appreciate a report on progress with the passage and implementation of the Aviation Code bill that was before the National Parliament at the time of delivery of the report.

The Aviation Code was approved by Act No. 1860 of 20 December 2001 and, in accordance with its article 345, will enter into force 180 days after its promulgation, which took place on 7 January 2002 and was officially published on 30 January 2002.

Subparagraph 2 (g)

Please describe the inter-agency mechanism for implementing this subparagraph, in particular as regards the interaction between the authorities responsible for narcotics control, financial tracking and security.

In this connection, mention must first be made of the provision in article 71 of the National Constitution to the effect that: "The State shall repress the production of and illegal trafficking in narcotics and shall also combat the unlawful consumption of such drugs". This is the responsibility of the National Anti-Drug Secretariat (SENAD) by virtue of Act No. 108/91.

Resolution No. 840/2000 of the Attorney-General's Office created Specialized Penal Units to work with SENAD in combating drug trafficking and related crimes

and, through the staff of the Office, with the country's criminal court judges dealing with civil rights guarantees.

In addition, as provided in Act No. 1015/97 (articles 26 and 27), SENAD works closely with other similar agencies referred to in the above-mentioned provisions in the "Prevention of Unlawful Money- or Property-Laundering Activities", in coordination with the Public Prosecutor's Office.

Moreover, Decree 15.975/97, entrusting additional responsibilities to SENAD, created the Financial Offences Investigation Unit (article 23). As part of its duties, if the Unit uncovers the existence of financial assets of suspicious persons or entities, it must inform the authorities.

Another approach adopted by SENAD, within the framework of the interaction between authorities responsible for drug traffic control and financial investigations, is joint and coordinated work with similar institutions in the MERCOSUR countries. This approach was successful in a joint operation known as Alianza VII, conducted in May 2002 in Paraguay, in which representatives of Brazil and Argentina participated.

How does Paraguay secure its extensive borders against unauthorized crossings?

The Ministry of the Interior, through the National Police and the Department of Migration, has permanent controls at authorized border crossings. Because of its length, the border is porous and vulnerable to illegal crossings.

Article 7 of Act No. 216 on the general organization of the armed forces of the nation specifies: "In order to achieve their goals, the armed forces of the nation shall: (a) Maintain the inviolability of land and river borders and of airspace". In pursuance of this Act, the armed forces have deployed their military units in order to prevent unauthorized crossings.

Subparagraph 3 (c)

While, under certain extradition agreements that Paraguay has made or proposes making with other States, terrorism is not considered a political offence, it appears that it is currently possible under the law of Paraguay for requests for extradition of alleged terrorists to be refused on political grounds in cases to which those agreements do not apply. Is that correct? If so, what action does Paraguay propose to ensure that refusal of extradition of alleged terrorists is not possible in those cases?

Concerning extradition agreements, chapter VI, section I, of the Code of Penal Procedure refers to communication between authorities and the duty to collaborate (article 144) and section II refers to all matters relating to extradition, both active and passive, and to precautionary measures. Article 5 of the National Constitution establishes that no period of limitation should apply to genocide or torture, or to disappearance of persons, kidnapping or murder for political reasons. The Ministry of Foreign Affairs, representing the executive branch, is responsible for proposing or concluding agreements with other States.

The promulgation of the Penal Code precludes any kind of impunity. If a request for extradition is refused, the principle of supplementary justice or the principle of penal law through representation may be applied.

Most of the extradition agreements concluded recently by Paraguay, as well as those which are to be signed and those which are currently under negotiation, contain specific clauses ensuring that acts of terrorism will in no circumstances be considered as a political offence and clarifying that grounds alleging a political goal or motive shall not suffice to confer a political character on this unlawful act.

In addition, the Supreme Court of Justice, as the highest jurisdiction of the Republic, has the power to review extradition requests refused by the competent judges, while that Court's criminal division may rule on the arguments adduced by the lower court to justify the refusal. The relevant provision is contained in article 149 of Act No. 1286/98 establishing the Code of Penal Procedure.

Accordingly, Paraguayan positive law relating to penal matters cannot be said to contain any provision whereby it could correctly be claimed that persons presumed to have committed terrorist acts could possibly benefit from refusal of a request made for their extradition on the grounds that the acts constituted political offences.

Subparagraph 3 (c)

The CTC would welcome a report, in relation to the relevant international conventions and protocols relating to terrorism, on the progress made by Paraguay in:

- **Becoming a party to the instruments to which it is not yet a party; and**
- **Enacting legislation, and making other necessary arrangements, to implement the instruments to which it has become a party.**

The Government of Paraguay has since September 2001 embarked on the process of ratification of the international instruments that have been signed, as mentioned in the report submitted earlier. These instruments are the following:

- International Convention for the Suppression of Terrorist Bombings
- Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation
- International Convention against the Taking of Hostages
- International Convention for the Suppression of the Financing of Terrorism
- Convention to Prevent and Punish Acts of Terrorism Taking the Form of Crimes against Persons and Related Extortion that are of International Significance
- Convention on the Marking of Plastic Explosives for the Purpose of Detection (within the purview of the International Civil Aviation Organization — ICAO).

The most recent instrument on the subject signed by Paraguay is the **Inter-American Convention against Terrorism** of 3 June 2002.

Subparagraph 3 (e)

Have the crimes set forth in the relevant international conventions been included as extraditable offences in the bilateral treaties to which Paraguay is a party?

It is indeed planned to include the terrorism-related offences and crimes set forth in the multilateral conventions as extraditable offences in the bilateral treaties to be signed by Paraguay. A specific example is the Extradition Treaty with Mexico, the text of which has already been agreed and which will be signed shortly.

In addition, an Agreement on measures to combat organized crime is about to be signed with the Italian Republic and a similar agreement will be signed with the Russian Federation; these agreements specifically envisage punishment of crimes and offences related to terrorism.

Subparagraph 3 (g)

The CTC would welcome a progress report on the proposed legislation relating to the status of refugees.

The proposed legislation relating to the status of refugees has been embodied in Act No. 1938/02, approved by the National Congress in June 2002 and promulgated by the executive branch on 2 July 2002. It has thus recently entered into force.

Paragraph 4

Has Paraguay addressed any of the concerns expressed in paragraph 4 of the resolution?

Paraguay does share the concern expressed in paragraph 4 of resolution 1373 (2001) concerning the close connection between international terrorism and other criminal phenomena and therefore in June 2002 adopted the Act governing all matters concerning "Arms, Ammunition and Explosives".

With regard to nuclear and radioactive substances, Paraguay has recently announced its intention to sign the Additional Protocol to the Safeguards Agreement between Paraguay and the International Atomic Energy Agency (IAEA). This will probably be done on the occasion of the Agency's forthcoming General Conference, to be held in September 2002, and will result in even tighter control of possible production of and trafficking in radioactive substances.

At the subregional and regional levels, various political arrangements for coordination to combat terrorism and related activities have been evolved both within the framework of MERCOSUR and in the Rio Group, the Summit of the Americas and the Ibero-American Summit.

Other matters

Could Paraguay please provide an organizational chart of its administrative machinery, such as police, immigration control, customs, taxation and financial supervision authorities, established to give practical effect to the laws, regulations and other documents that are seen as contributing to compliance with the resolution?

The Inter-Agency Commission established by Decree 15125 of the executive branch of the Republic of Paraguay dated 24 October 2001 is designed precisely to ensure joint coordination of efforts among the various State agencies and authorities as regards terrorism and related activities.

To this end, for example, the police and immigration control are the responsibility of the Ministry of the Interior and the Deputy Minister is a member of the above-mentioned Inter-Agency Commission; as regards customs, taxation and financial supervision authorities, the Ministry of Finance, through its Deputy Minister for Taxation, is the responsible body.

Lastly, as the representative of society, the Office of the Public Prosecutor and Attorney-General is responsible for investigating activities suspected of being related to terrorism, in close coordination with the judiciary's criminal court judges dealing with civil rights guarantees.

There is thus an inter-agency structure that functions dynamically, through regular meetings and exchange of information, so as to constantly enhance the progress made in efforts to combat terrorism and related activities.

