[The R.M.C. 803 session was called to order at 1208, 18 October 2017.]

MJ [COL POHL]: The commission is called to order. All parties are again present that were present when the commission recessed.

Mr. Connell.

LDC [MR. CONNELL]: Thank you, sir. I would request the feed from Table 4 and permission to publish the slides in AE 514, which are AE 514E, to the gallery.

MJ [COL POHL]: Go ahead. I'm sorry. Go ahead.

LDC [MR. CONNELL]: As the government observed, 509, 510, 512, 513, and 514 are all related to each other. They essentially relate to five of the phases of the history between the United States and al Qaeda, which are defined by that historical model that I put up on the screen earlier.

There are a number of factors that are common to them all, and I won't repeat them. But I do want to discuss the significance of political/military plan Delenda, which is in many ways a complement to the Operation Infinite Resolve that the government just spoke about.

At the end of the Clinton administration and the beginning of the Bush administration, there were two major advocates of kinetic action against al Qaeda. One of those
was George Clarke, excuse me, George Tenet, and the other one was Richard Clarke. Tenet's views are the subject of AE 509, which will be heard another day, but Clarke's views were compiled in a document known as -- or perhaps even documents, I don't know -- known as political/military plan Delenda. It was important for two reasons. First, like Operation Infinite Resolve, it represents the path not taken and the reasons why that path was not taken; and second, it represents an important historical commentary on the transition between the Bush -- the Clinton and Bush presidencies. The delivery or lack of delivery of Delenda to the incoming Bush administration was a major subject of inquiry by the 9/11 Commission and has been extensively debated between people of different political views.

To really set up the controversy, I think that it is appropriate to hear from President Clinton himself. And Tech Sergeant, if you wouldn't mind pressing play.

[AE 514 video played.]

LDC [MR. CONNELL]: Can we turn up the volume?

All right. Let's try that again.

[AE 514 video played.]

LDC [MR. CONNELL]: The comprehensive strategy that President Clinton refers to there is political/military plan
Delenda and Dick Clarke is Richard Clarke, National Military Advisor.

The controversy is explained a little bit more in detail by President Clinton also appearing in Fox News Sunday on September 26, 2006. If you will push play, please.

[Video played.]

LDC [MR. CONNELL]: Thank you, we will stop there.

What we just saw encapsulates a wide number of debates, factual debates, regarding U.S. policy toward al Qaeda prior to 9/11 which will manifest in this trial as the question of hostilities.

The plan -- the government took the position earlier today that the failure to pursue a military response to al Qaeda was a question of Predator development and actionable intelligence. Certainly other members of the Clinton administration have echoed the actionable intelligence claim, although they don't support the Predator claim.

Another witness who is expected to testify in 502, Mr. Scheuer, has talked about the plan that President Clinton just described. And he says that Clarke's Delenda Est, or Delenda, was a plan like the one Mr. Clinton described to Chris Wallace that we just watched; it was meant to be a comprehensive and ongoing campaign against al Qaeda until it
was destroyed. In 1998, Delenda Est started and ended with the August 20, 1998 cruise missile strikes on Afghanistan and Sudan. Mr. Clinton did leave a plan for the Bush team, which I never heard of or saw. It was mostly a version of Delenda Est. The President Clinton statements and the rebuttal by the head of the CIA bin Laden unit encompass many of the questions around U.S. policy. Was there a plan? Was it part of the government described Infinite Reach as morphing into Infinite Resolve?

Mr. Scheuer describes Delenda as -- excuse me, Infinite Reach being part of Delenda. Were these the same? Were they different? Did it exist or did it not exist? So let's look at a couple of other approaches to the same problem.

President Clinton claimed in the clip that we just watched with Fox News Sunday that he had authorized the killing of bin Laden. It raises a question about the use of assassination versus law of war targets. Mr. Scheuer says that "President Clinton always refused to pull the trigger. In addition, we were never authorized while I was chief of operations to kill Usama bin Laden. In fact, Mr. Richard Clarke definitely told us we had no authorization to kill bin Laden."
If that is true, Your Honor, then it's a persuasive and important fact against hostilities because, of course, if you are engaged in an armed conflict with the person, you don't need any authorization to kill them. It's an act of war, not an assassination.

Why they didn't shoot, of course, at least from Mr. Tenet's viewpoint, is because one time they were afraid to have shrapnel hit a mosque when they killed bin Laden which, in a law-of-war framework, of course, would simply be collateral damage rather than being controlled by political considerations.

I would show you the video for this, Your Honor, but as far as I can tell, it doesn't exist anymore; only transcript exists.

Next slide, please. Thank you.

A person who -- Mr. Benjamin, a member of the Clinton administration defending him, said -- gave the position that the government gives today, which is the actionable intelligence argument. Mr. Benjamin says we never got the confirming intelligence, we never had enough information to do this with confidence knowing that we would get the target.

Now, these controversies are important because either the military commissions acting as finder of fact or the
members of the panel acting as finders of fact are going to want a persuasive explanation of what happened and why it happened, especially since we are trying to explain the existence of a negative, the existence of -- the nonexistence of hostilities with al Qaeda.

In fact, both of these explanations are exculpatory to us. There was lack of political will. If we didn't have political will to enter into hostilities with al Qaeda or if we didn't have the actionable intelligence to enter into hostilities with al Qaeda, both of them are of assistance to the defense and are exculpatory.

Next slide, please.

MJ [COL POHL]: Who is the decision-maker?

LDC [MR. CONNELL]: The President. The President is always the decision-maker, sir.

MJ [COL POHL]: So I'm just saying is we have a lot of opinions here. So the issue as to whether or not there is hostilities is a -- at the end of the day, does it just come down to the President's opinion?

LDC [MR. CONNELL]: No, sir. If we were in state-to-state conflict, it would come down to Congress's opinion. In state-to-state conflict, a declaration of war is a constitutional act which itself establishes the applicability
of the law of armed conflict that the government argued this morning. Which itself establishes the application of the law of armed conflict as the government argued this morning. With respect to nonstate actors, it's a different situation here. And I, in fact, disagree with the argument from the Nashiri camp that President Clinton's address to the nation in November of 2000 that the United States was at peace after the USS COLE is dispositive. It is not dispositive because the subjective views of any -- bracketing the constitutional operation of the declaration of war, the subjective views of leaders as to whether hostilities did or did not exist are significant. They can inform an answer, but it's actually an objective inquiry. The place ----

MJ [COL POHL]: But objective inquiry into the facts on the ground? Objective inquiry of the facts on the ground as they are interpreted by others?

LDC [MR. CONNELL]: No, sir. In fact, that's what I was about to come to. That I disagree with your idea or your suggestion -- and I know not to read too much into questions -- I disagree with the suggestion that the people in this debate are expressing opinions about hostilities. They are not. No one before us has ever really addressed the question of whether the law of armed -- setting aside the
ICRC, the United States Government has never really addressed the question of whether the law of armed conflict applies in this situation pre-9/11 because it hasn't had to.

What these people are debating is what were the facts. Is it a fact that the political people -- bodies decided that actionable intelligence did not exist? Is it a fact that a planned Delenda existed? Is it a fact that it did not exist? Is it a fact that it was part of Operation Infinite Reach? These are people who are not giving opinions on the ultimate question of hostilities; frankly, they probably couldn't care less. These are people who are debating what the facts were. And that is why discovery is important, because the government will have its view of what the facts were and must produce discovery when relevant and helpful, even if classified, to the defense so that we may present our view of what the facts were.

MJ [COL POHL]: Okay.

LDC [MR. CONNELL]: The other significant issue that I mentioned with respect to political/military plan Delenda, is the extensive debate over whether the Bush administration took -- had any proactive stance, hostilities or otherwise, with respect to al Qaeda prior to September 11, 2001. The main elements of that debate come down to did Richard Clarke
present his plan Delenda at a meeting in January of 2001 and was he ignored? When President Clinton says he was demoted, yes, he was literally demoted; but the other question is, is it true, as Secretary Rice said, that the United States was engaged in active opposition to al Qaeda or was it something that was not really on the issue -- on the radar of the Bush administration, and that the -- one of the claims around plan Delenda was that it was not a subject of the meeting of the principles of the National Security Council what to do about al Qaeda until September 4, 2001.

Now, that's the position that the 9/11 Commission took, although it laid out other lower-level questions about al Qaeda prior to September 4. But if Mr. Clarke is correct, the Bush administration did not even take up the question of Delenda until a week before the attacks on 9/11.

And that's my argument, Your Honor.

MJ [COL POHL]: Were there hostilities in August of '98 when they shot the cruise missiles into Afghanistan?

LDC [MR. CONNELL]: That is a question of debate. This is a -- different people look at it differently. Some people say use of kinetic activity means that, you know, military assets under -- the question in Hamdan or the question in the analysis in Tadic, different people have different views.
Some people say it lacks sufficient duration and intensity. But I want to give the members of the panel an answer to that question. I see you smile when I don't answer you, but I want to give an answer to that question ----

MJ [COL POHL]: Good, go ahead.

LDC [MR. CONNELL]: ---- I just don't have the information I need to do it yet.

MJ [COL POHL]: I am just wondering if hostilities come and go under your argument.

LDC [MR. CONNELL]: They could.

MJ [COL POHL]: And so if it requires duration, then a one-time cruise missile assault wouldn't count, is that your position?

LDC [MR. CONNELL]: It requires intensity under Tadic. It does require duration under the government's Hamdan instruction. But it doesn't say -- there is no bright-line rule as to duration. Certainly if the members were called upon to decide whether hostilities existed on 20 August 1998, duration would be a factor, which is one of the reasons why, when I was arguing 510, I said we need to know what was the actual ordnance on target, what was the duration.

We call it a one-day -- we call it one day of hostilities, it could have been six minutes of hostilities
under the government's theory. So we don't actually know.
And that's why information like we seek in 510 is important,
because we have to answer the question of duration.

There has been a report that a night watchman was
killed at the factory in Sudan. Is that the only casualty?
If so, the fact that a noncombatant was killed probably argues
against the existence of hostilities. The fact that if, in
fact, 80 Tomahawk missiles landed at their targets, that much
ordnance on target argues in favor of hostilities. These are
questions which we will have to argue to you and the members
of the panel. All we are asking for is the information we
need to do that with.

MJ [COL POHL]: And we're kind of sliding into the 502
motion itself, but okay. Thank you.

LDC [MR. CONNELL]: They are all related, sir.

MJ [COL POHL]: I got it. I got it.

Any other defense counsel want to be heard in support of
this motion? Apparently not.

Trial Counsel?

MTC [MR. TRIVETT]: I wish I had played that video of
President Clinton for you. The Commander in Chief at the time
that the embassies were attacked; the Commander in Chief at
the time the '96 declaration of war was set forth; the
1 Commander in Chief when the '98 fatwa took place; the
2 Commander in Chief when the USS COLE was struck. I believe
3 the quote was, "I tried to kill him after the USS COLE battle
4 plans were drawn, I just didn't have the basing rights I
5 needed in order to attack."
6 And at least for the last two and a half months he
7 was President, while of course the investigation into the USS
8 COLE attack was still very much in its infancy, the FBI and
9 CIA couldn't tell him specifically that al Qaeda was
10 responsible. Obviously we have evidence that will establish
11 that it was, that al Qaeda was, in fact, responsible.
12 But I just -- I don't accept from a legal perspective
13 any of Mr. Connell's argument. It almost boils down to,
14 because we didn't fight the war well we must not have been at
15 war. That was the most that I could get out of the argument.
16 There was clearly a military plan, but ultimately you heard it
17 from the Commander in Chief at the time. You heard what he
18 was doing, what he was trying to do, that there were battle
19 plans. All of this supports the United States position that
20 we were in armed conflict.
21 LDC [MR. RUIZ]: Judge, I am going to object. If we are
22 going to continue to argue the merits of 502, then at some
23 point we are going to ask to be heard on the merits of 502.
This is a discovery issue.

MJ [COL POHL]: The objection is overruled. He is simply putting it in context. I am only being -- I am only considering the discovery aspect of this, but it is intertwined with 502, so I don't see how he can totally separate the two.

Go ahead, Mr. Trivett.

MTC [MR. TRIVETT]: So it may be that there were lots of plans on the shelf. It may be that people looked at Mr. Clarke's plan and said it wasn't good enough, it wasn't aggressive enough.

In the end, it doesn't matter. The plans on the shelf do not matter to the standard and, therefore, they are not entitled to them on discovery. These are classified, highly sensitive documents that sometimes involve executive privilege. They certainly almost always involve deliberative process privilege when they are trying to consider what it is they are going to do against a group that had just killed 3200 people over the course of three years, the vast majority of which were Americans.

There is a couple of things I want to make sure we make clear as far as what our position is in regard to armed conflict as it relates back to this discovery, but we can rely
solely on the actions of al Qaeda to establish hostilities,
and none of the evidence that they are seeking undermine any
of our arguments. If there was some kind of evidence that
establishes that they weren't responsible for the East Africa
embassy bombings, yes, we have a discovery obligation for
that. We don't have a discovery obligation for what plans
were put on the shelf after 1998 that, for whatever reason the
Commander in Chief -- and he pretty much explained why he
couldn't execute those plans, how all of that information is
discernible.

And quite frankly, I don't know that it ever ends.

It can't be that our discovery obligations are constrained to
the creativity of Mr. Connell, who we have all seen is
tremendously creative in his legal arguments and very
persuasive. But in the end, the legal standard is the legal
standard and evidence is either relevant to it or not. And
when it is classified, we have an obligation to turn it over
if it is relevant and helpful to a legally cognizable defense,
rebuttal of the prosecution's case in chief, or to sentencing.

That's our standard. And this information and all other
information like it, quite frankly, simply does not meet the
standard for discovery.

MJ [COL POHL]: Mr. Trivett, let me follow on something
you just said and make sure I follow what you are saying. You said it doesn't make any difference, and I'm paraphrasing, what the U.S. response was.

MTC [MR. TRIVETT]: What I said was we can rely solely on al Qaeda's acts and still establish hostilities. That was what I meant to say.

MJ [COL POHL]: Yes, well, maybe I said it the other way around, but let me just ask you this then: Then for hostilities, it doesn't take two sides to agree to be engaged in hostilities, one side is enough?

MTC [MR. TRIVETT]: Absolutely. There is no two to tango requirement for hostilities.

MJ [COL POHL]: Okay.

MTC [MR. TRIVETT]: If we get completely obliterated by a nuclear weapon and don't ever respond, that doesn't mean that the law of war didn't apply and it didn't mean that we weren't engaged in hostilities. One of the questions you asked Mr. Connell is whether or not hostilities can come and go. Our position is that they came in 1996 and they haven't left today. I mean, that's our position.

But one attack alone, the 9/11 attack alone, which is in our other papers, our moving papers, our pleadings, is -- we believe we could rest on the 9/11 attacks alone from
al Qaeda.

MJ [COL POHL]: I don't want to drift too far from 502, but I wanted to get a clarification of that particular remark.

MTC [MR. TRIVETT]: Yes, sir. Subject to your questions, sir.

MJ [COL POHL]: I have none.

Mr. Connell.

LDC [MR. CONNELL]: I have gathered from the government's responses that they don't agree with our defense. That has been made clear. What their responses do not establish is that either it is not a defense or that we are not entitled to it, and the -- there are opposing views on the existence of hostilities, especially sort of in the revisionist history that the government uses. We will watch a clip tomorrow from Secretary Albright about how important it is to remember the -- how things looked different after 9/11 and before 9/11.

And the examples that the government just used, which certainly it can use to you or to a panel, are susceptible to different interpretations and argument. For example, the government just relied on "I tried to kill him" from President Clinton. That sounds an awful lot like an attempt to kill bin Laden rather than a noninternational armed conflict with a nonstate actor, defined however al Qaeda is going to be
defined retroactively.

The fact that President Clinton couldn't obtain basing rights in Uzbekistan, the government says, shows why there were hostilities in some way. In fact, it shows the reason why there were no hostilities, or one of them, or, if believed, one of them. And the government describes this as a defense position that we didn't fight the war well. In fact, the defense position is we didn't fight the war because there was no war. And when the panel reflects on -- you know, some of them might have been in the military on September 10, 2001, and I doubt many of them thought they were at war.

The government's argument is that the existence of political/military plan Delenda and the existence, by extension, of Operation Infinite Resolve war planning establishes hostilities. That position is extraordinary. The United States spent trillions of dollars establishing war plans with the Soviet Union. The United States never entered into a state of hostilities with the Soviet Union because there was no armed conflict subject to the law of war.

The fact that the United States spent so much money on it might demonstrate, probably in President Reagan's view, is that the reason -- the existence of a military plan was the reason why the United States never entered into armed conflict.
with the Soviet Union because, the one, in the thinking of the time, the thinkability of nuclear war, the extent of planning meant that created mutual destruction in one view, or deterrence in another view, and to stop hostilities from coming into existence.

No person who was analyzing the existence of hostilities or lack thereof between the United States and the Soviet Union in the 1980s would ever find it irrelevant that the United States had vast military planning, nor would they conclude that that military planning meant hostilities as opposed to preventing hostilities.

Now, the government is exactly wrong on its two-to-tango argument. In state-to-state conflict, there is a one-shot rule. If North Korea fires one missile at the United States, a state-to-state conflict comes into being. And whether the United States ever responds or not is irrelevant to the existence of armed conflict. If the United States ----

MJ [COL POHL]: If that first shot violates the law of war, for example, just for the sake of a discussion, that the first shot deliberately targets a hospital, is a nonmilitary objective, so the first shot violates the law of war ----

LDC [MR. CONNELL]: Yes.

MJ [COL POHL]: ---- would that be cognizable as a

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chargeable offense in the law of war even though hostilities began with that first shot? And again, we are talking about under the rubric of the MCA, so I understand.

LDC [MR. CONNELL]: Okay. Under the state-to-state violence, right -- which is what I was just talking about, and I think you want the answer in nonstate actor, too, and I will answer it, too -- but in state-to-state violence, it would not be chargeable under the MCA because the North Korean who fired the missile would be a combatant. They might be subject to other law of war jurisdiction for attacking a hospital, for example.

MJ [COL POHL]: That's where this analogy gets confusing.

LDC [MR. CONNELL]: But under the MCA, combatants are excluded from the MCA. So state-to-state violence involves combatants on both sides. The one-shot rule that applies in state-to-state violence ----

MJ [COL POHL]: Would the one-shot rule apply to the NIAC?

LDC [MR. CONNELL]: No, the one-shot rule does not apply to a NIAC. Let me give you an example. The perfect example is the violence between the Irish Republican Army and the UK. The Irish Republican Army named itself an Army to try to bring itself, among other reasons, under the rubric of the law of war. And from the IRA perspective -- and this goes to the
statements of leaders question we are going to discuss
tomorrow -- but from the IRA perspective, they were engaged in
hostilities with the UK. But when the United Kingdom ratified
Additional Protocol 1, one of their reservations,
understandings, and declarations was we do not understand
Additional Protocol 1 to the Geneva Conventions, which
establishes additional nonstate actors as combatants, to apply
to the IRA. And that was not ten attacks. That was thousands
of attacks. Those were not attacks that -- battlefield. They
didn't comply with the law of war. Those were thousands of
civilian casualties in many cases.

So the -- in the question of whether a
noninternational armed conflict rises to the level of an armed
conflict or not, there is an objective analysis, but the most
important vote is the state. It is not like state-to-state
violence. Japan -- the United States was in an armed conflict
with Japan when it attacked Pearl Harbor, whether or not the
United States retaliated or not.

And here is the absolute, perfect example for you,
Your Honor. The Civil War. The first -- the opening shots in
the Civil War were fired not in April of 1861, they were fired
in December of 1860, not in the Lincoln administration but in
the Buchanan administration.
In January of 1861, Buchanan sent a ship, The Star of the West, to Charleston Harbor which the -- which South Carolina fired upon. But at the time South Carolina was a nonstate actor and, in modern terms, there was no conflict. In the first inaugural address, President Lincoln described South Carolina, and by then the Confederacy, not as a wartime opponent but as a conspiracy of criminals.

The firing on Fort Sumter took place on April 12, 1861, where Confederate forces -- by that time because South Carolina had formed the Confederacy -- and Confederate forces fired on Fort Sumter. But the Civil War did not begin on April 12, 1861, despite the first shot in December, additional shots in January, additional shots on April 12. The Civil War doesn't begin until April 19, which is when President Lincoln imposes a blockade, which is under the law of armed conflict, on the South. President Lincoln decided when the Civil War changed from a conspiracy of criminals engaged in violence to a conflict under the law of war.

MJ [COL POHL]: So bringing that ahead a hundred years, 150 years, this is back to what we discussed earlier, who decides whether we are on a -- we are talking about a NIAC here.

LDC [MR. CONNELL]: Right.
MJ [COL POHL]: Who decides we are in a state of
hostilities?

LDC [MR. CONNELL]: In NIACs, and including the Civil War, 
essentially all judgments about whether we are at -- involved 
in a NIAC or not, they are almost retrospective. The only 
reason why we are having this discussion today and why 
President Clinton and others discussing this in 2006 didn't 
really care, the only reason is because the Military 
Commissions Act of 2009, which imposes hostilities as a basis 
for personal jurisdiction, it's always a backward-looking 
analysis.

At the time President Lincoln -- many of his cabinet 
opposed his blockade for the exact reason that they did not 
want to impose the law of armed conflict on the conflict with 
the South. They thought that they should, you know, 
especially hang all the leaders of the South.

MJ [COL POHL]: Again, come back to the 20th century 
here -- the 21st century ----

LDC [MR. CONNELL]: The 21st century, whatever you want.

MJ [COL POHL]: It's almost the 21st century. But your 
discovery request, it is to know what the lay of the land, for 
want of a better view, of the American leaders vis-a-vis the 
hostilities.
LDC [MR. CONNELL]: Yes, sir. The only thing I disagree with is so much the word leaders, because it is not the leaders that are so important, it is the United States as a whole. You know, President Clinton -- or Vice President Gore is a better example, I suppose. Vice President Gore doesn't enter into a state of armed conflict, the United States enters into a state of armed conflict. The same way that the actual war fighters' actions may determine whether we are in a state of armed conflict, especially in state-to-state conflict, right, if the -- if Mexico -- if a battalion of soldiers in Mexico invades the United States, even without the approval of the President, there could be a state-to-state armed conflict. So it's not -- like the whole leader's idea, while relevant, is not -- hardly controls the situation.

MJ [COL POHL]: Okay. Got it.

LDC [MR. CONNELL]: The last thing I want to say, Your Honor, is we actually drew this exact distinction using evidence, sworn evidence, that is attached to AE 494D Attachment I, in which Ambassador Pickering, who was engaged at the time, explains that, in his view, the isolated use of military force against bin Laden was a strategic move trying to lead to a particular objective, neutralizing bin Laden and al Qaeda. War, however, is a consistent series of military
operations and attacks. The fact that military force against bin Laden was authorized does not in itself support the government's argument that we were engaged in an armed conflict with al Qaeda. The significant part of that, Your Honor, is not that an ambassador, a leader of the United States holds that opinion, the significant part of that is that is a legitimate view held by a number of people who know that we should have the evidence to support and the ability to argue to the military commission or the panel as the trier of fact.

MJ [COL POHL]: Thank you.

LDC [MR. CONNELL]: Thank you.

MJ [COL POHL]: Mr. Trivett, anything further?

MTC [MR. TRIVETT]: I think I will save it for 502, sir.

MJ [COL POHL]: Okay. As discussed earlier, there are some things we wanted to do this afternoon to explore the -- start out with Mr. Connell, the issues of the 502 and the 525 slides. And rather than coming back to do the 523, we will do 523 tomorrow also. And that will give counsel time to resolve the legal -- the issue about the seizure of the legal materials.

So the way forward will be tomorrow morning we will do 502J, 523 and 525 in an open session; 114, 502J, 510, 514,
523 and 525 in a closed session.

Mr. Harrington, did you need further argument -- you wanted some argument on 152 in a closed session?

LDC [MR. HARRINGTON]: Yes, sir. Very brief.

MJ [COL POHL]: And then just to -- one other kind of hanging thing out there. Mr. Connell, in 522K you indicated 517 would also be subject to a closed session. And again, I could be wrong here, but my tracking shows we had that argument on the 23rd of August, '17.

LDC [MR. CONNELL]: Sir, we never had that. You already issued an order closing part of the session, and that argument never came to pass.

MJ [COL POHL]: Okay. Then I must be -- so we will do 517 tomorrow?

LDC [MR. CONNELL]: Yes, sir.

MJ [COL POHL]: Excuse me -- yes, tomorrow we will do the open session. The closed session will be 114, 502, 510, 514, 517, 523 and 525. Okay.

And that being said, we will recess until tomorrow at 0900. The commission is in recess.

[The R.M.C. 803 session recessed at 1247, 18 October 2017.]

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