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SUPREME COURT

**IN THE SUPREME COURT OF WISCONSIN**

No. 2023AP001399

REBECCA CLARKE, RUBEN ANTHONY, TERRY DAWSON, DANA GLASSTEIN, ANN GROVES-LLOYD, CARL HUJET, JERRY IVERSON, TIA JOHNSON, ANGIE KIRST, SELIKA LAWTON, FABIAN MALDONADO, ANNEMARIE MCCLELLAN, JAMES MCNETT, BRITTANY MURIELLO, ELA JOOSTEN (PARI) SCHILS, NATHANIEL SLACK, MARY SMITH-JOHNSON, DENISE (DEE) SWEET, AND GABRIELLE YOUNG,

*Petitioners,*

v.

WISCONSIN ELECTIONS COMMISSION; DON MILLIS, ROBERT F. SPINDELL, JR., MARK L. THOMSEN, ANN S. JACOBS, MARGE BOSTELMANN, AND JOSEPH J. CZARNEZKI, IN THEIR OFFICIAL CAPACITIES AS MEMBERS OF THE WISCONSIN ELECTIONS COMMISSION, MEAGAN WOLFE, IN HER OFFICIAL CAPACITY AS THE ADMINISTRATOR OF THE WISCONSIN ELECTIONS COMMISSION; SENATOR ANDRÉ JACQUE, SENATOR TIM CARPENTER, SENATOR ROB HUTTON, SENATOR CHRIS LARSON, SENATOR DEVIN LEMAHIEU, SENATOR STEPHEN L. NASS, SENATOR JOHN JAGLER, SENATOR MARK SPREITZER, SENATOR HOWARD L. MARKLEIN, SENATOR RACHAEL CABRAL-GUEVARA, SENATOR VAN H. WANGGAARD, SENATOR JESSE L. JAMES, SENATOR ROMAINE ROBERT QUINN, SENATOR DIANNE H. HESSELBEIN, SENATOR CORY TOMCZYK, SENATOR JEFF SMITH, AND SENATOR CHRIS KAPENGA,

*Respondents.*

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# *AMICUS CURIAE* BRIEF OF PROFESSOR CHARLES FRIED IN SUPPORT OF PETITIONERS

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## INTRODUCTION AND STATEMENT OF INTEREST

In 2019, despite holding that partisan gerrymandering claims were non-justiciable under the federal Constitution, the United States Supreme Court issued a direct invitation for the protections of state constitutions to fill the void. *Rucho v. Common Cause*, 139 S. Ct. 2484, 2507 (2019). Petitioners have taken up this invitation, filing a Petition for an Original Action with this Court based on claims grounded in the text and history of the Wisconsin Constitution. The federalist system ensures that this Court can exercise its distinct responsibility under Wisconsin's Constitution to effectuate the separate protections that its constitution provides. Wisconsin's Constitution—a foundational source of rights and liberties for Wisconsinites—provides "substantive protections against antidemocratic conduct that the federal Constitution does not." Jessica Bulman-Pozen & Miriam Seifter, *The Democracy Principle in State Constitutions*, 119 Mich. L. Rev. 859, 913 (2021). In particular, the Wisconsin Constitution provides protections against partisan gerrymandering, which is fundamentally anti-democratic.

The Wisconsin Constitution contains provisions distinct from the federal Constitution, including specific requirements of compactness, contiguity, and respect for political subdivision boundaries, alongside broad protections of equality and the right to petition the government, an enunciated right to vote, and an express command that the state's government be "free" by adherence to "justice[,]" "virtue[,]" and "frequent recurrence to fundamental principles." Wis. Const. art. I §§ 1, 3, 4, 22; Wis. Const. art. III §§ 1, 4, 5; Wis. Const. art. IV §§ 3,

4, 5; Wis. Const. art. IX § 3. The original meaning of these constitutional protections and this Court's own precedent compel the conclusion that partisan gerrymandering claims are justiciable under Wisconsin's Constitution.

Professor Charles Fried, *amicus curiae*, understands this well. He is the Beneficial Professor of Law at Harvard Law School and has been teaching at the school since 1961. He was Solicitor General of the United States, 1985–89, and an Associate Justice of the Supreme Judicial Court of Massachusetts, 1995–99. His scholarly and teaching interests have been moved by the connection between normative theory and the concrete institutions of public and private law. As part of his work, Professor Fried also files amicus briefs in cases such as this one, which are about democracy at the state level and fighting for every American's rights to responsive government and a fair opportunity to participate in and affect the democratic process.

Professor Fried's legal expertise thus bears directly on the question of whether, relying on individual and collective state constitutional provisions, this court should grant the Petition. It will also bear on whether Wisconsin's highest court may go beyond the federal limits on the justiciability of partisan gerrymandering. Wisconsin most certainly may do so, and as such, this Court should grant the Petition for an Original Action.

## ARGUMENT

### I. Exercising Original Jurisdiction is Warranted in this Case.

Now is the time to consider whether partisan gerrymandering claims are justiciable and whether the current legislative maps are unlawful as such. This Court has virtually never denied original jurisdiction in a redistricting case. It should not start here.

Granting the Petitioners' request here is crucial because, in shutting the federal courts to partisan gerrymandering claims, the U.S. Supreme Court "[did] not condone excessive partisan gerrymandering." *Rucho*, 139 S. Ct. at 2507. Instead of "condemn[ing] complaints about districting to echo into a void," the Court recognized that state constitutions might indeed point in another direction. *Id.* That should come as no surprise, for "the very premise of . . . cases that foreclose federal remedies constitutes a clear call to state courts to step into the breach." William J. Brennan, Jr., *State Constitutions and the Protection of Individual Rights*, 90 Harv. L. Rev. 489, 503 (1977). "[L]iberties," like the rights violated by partisan gerrymandering, "cannot survive if the states betray the trust the [Supreme] Court has put in them." *Id.* Indeed, state courts' "manifest purpose is to expand constitutional protections." *Id.*

This Court can achieve this by recognizing that the Wisconsin Constitution precludes partisan gerrymandering and authorizes this Court to stop it. It authorizes this not only by operation of several individual provisions, but by the interplay between them. Considered together, Wis. Const. art. I §§ 1, 3, 4, 22, Wis.

Const. art. III §§ 1, 4, 5, Wis. Const. art. IV §§ 3, 4, 5, and Wis. Const. art. IX § 3 are best read to recognize that partisan gerrymandering undermines the state's sweeping guarantee of free government, popular sovereignty, and equality. Their history and this Court's precedents confirm as much.

An exercise of this Court's broad original jurisdiction is appropriate where "the questions presented are of such importance as under the circumstances to call for [a] speedy and authoritative determination by this court in the first instance." *State ex rel. Ozanne v. Fitzgerald*, 2011 WI 43, ¶ 99 n.9, 334 Wis. 2d 80, 798 N.W.2d 436 (Abrahamson, C.J., concurring in part and dissenting in part) (quoting in part *Petition of Heil*, 230 Wis. 428, 446, 284 N.W. 42 (1939)). Given this, this Court has routinely exercised original jurisdiction "in cases involving legislative redistricting." *Jensen v. Wis. Elections Bd.,* 2002 WI 13, ¶ 18, 249 Wis. 2d 706, 639 N.W.2d 537 (collecting cases); *Johnson v. Wis. Elections Comm'n*, 2021 WI 87, ¶ 20, 399 Wis. 2d 623, 967 N.W.2d 469 ("[A]ny reapportionment or redistricting case is, by definition *publici juris*, implicating the sovereign rights of the people of this state.").

The current state of affairs in Wisconsin fully warrants granting the Petition for an Original Action. One round of elections have now been held under maps that Petitioners claim to be an illegal partisan gerrymander, and of course, 2024 is an election year for Wisconsin's legislature. Any delay in adjudicating this issue thus carries substantial risks to popular sovereignty, forcing the state's 3.6 million-plus voters to the polls next year under a cloud of legal uncertainty. These millions

of voters deserve to know if their maps are lawful, and if they are not, to have lawful maps put in place.

As it has done virtually every time it has been asked in a redistricting case, the Court should grant Petitioners' request.

## II. State Constitutions—Including Wisconsin's—Contain More Extensive Protections of Individual Rights Than the U.S. Constitution.

"State constitutions . . . are a font of individual liberties, their protections often extending beyond those required by the Supreme Court's interpretation of federal law." Brennan, *supra*, at 491. Accordingly, "state courts, no less than federal [courts] are and ought to be the guardians of our liberties." *Id*. As the final arbiters of the meaning of their constitutions, state courts "may experiment all they want with their own constitutions, and often do in the wake of [the Supreme] Court's decisions." *Kansas v. Carr*, 577 U.S. 108, 118 (2016) (Scalia, J.). "And of course, state courts that rest their decisions wholly . . . on state law need not apply federal principles of . . . justiciability that deny litigants access to the courts." Brennan, *supra*, at 501.

This two-tiered federalist system is a defining feature of American constitutional governance. "Our system of dual sovereigns comes with dual protections." Jeffrey S. Sutton, 51 Imperfect Solutions 2 (2018). That basic idea traces back to the nation's founding: "[T]he state and federal founders saw federalism and divided government as the first bulwark in the rights protection and assumed the States and state courts would play a significant role, even if not an

exclusive role, in that effort." Jeffrey S. Sutton, *The Enduring Salience of State Constitutional Law*, 70 Rutgers U. L. Rev. 791, 795 (2018). While some limited protections of the federal Constitution began to be applied against the states earlier, before the U.S. Supreme Court incorporated the Bill of Rights' protections against the states in the mid-twentieth century, state constitutions and state courts were the key constitutional guardians of individual rights against actors other than the federal government. *See* Jonathan Thompson, *The Washington Constitution's Prohibition of Special Privileges and Immunities: Real Bite for "Equal Protection" Review of Regulatory Legislation?*, 69 Temp. L. Rev. 1247, 1249 (1996).

Nevertheless, state courts' critical rights-protecting role did not wane following the incorporation of the federal Constitution against the states; such incorporation only further underscored state constitutions' and courts' importance in our federalist system. In the latter part of the twentieth century, state courts continued to recognize that state constitutional guarantees provided "greater protection than was available under the federal Constitution" in hundreds of cases. G. Alan Tarr, UNDERSTANDING STATE CONSTITUTIONS 165– 66 (1998). Indeed, much of state constitutions would be superfluous if state courts protected only those rights the federal Constitution already preserved. But that is not the purpose of our federal structure.

State courts can and must go further; they should consider the text and history of their own constitutions to determine whether their founding documents

provide stronger bulwarks against government encroachment than the federal Constitution. And when, as here, the U.S. Supreme Court declined to protect the rights violated by partisan gerrymandering, "the state courts [became] the only forum . . . for enforcing the right under their own constitutions, making it imperative to see whether, and if so, how the States fill the gaps left by the U.S. Supreme Court." Sutton, 51 Imperfect Solutions at 2.

Wisconsin should heed this call, just as it has in the past. "[A]t the debates of the national convention … the respective states were regarded as the essential, if not the sole guardians of the personal rights and liberties of the individual citizens." *In re Booth*, 3 Wis. 13, 87 (1854) (Smith, J., concurring); *State ex rel. Kellogg v. Currens*, 111 Wis. 431, 435, 87 N.W. 561 (1901) ("[L]ong before the enactment of the fourteenth amendment … our legislature was bound to accord to all persons … the equal protection of the laws, and to refrain from legislation which deprived any of them of life, liberty, or the pursuit of happiness."). As such, this Court has repeatedly—and even recently, unanimously—recognized that it "need not always follow federal constitutional interpretation in lockstep" in assessing the boundaries of the state constitution. *State v. Halverson*, 2021 WI 7, ¶ 4, 395 Wis. 2d 385, 953 N.W.2d 847; *see also State v. Knapp*, 2005 WI 127, ¶ 59, 285 Wis. 2d 86, 700 N.W.2d 899 (State not "bound by the minimums which are imposed by the Supreme Court of the United States if … the Constitution of Wisconsin … require[s] that greater protection of citizens' liberties ought to be afforded") (quoting *State v. Doe*, 78 Wis. 2d 161, 171, 254 N.W.2d 210 (1977));

*Coulee Catholic Sch. v. Labor & Indus. Review Comm'n*, 2009 WI 88, ¶ 59, 320 Wis. 2d 275, 768 N.W.2d 868.

Again, the immediate question before the Court is whether Petitioners' alleged potential unlawful deprivation of the right to meaningfully vote is an exemplary matter of significant public concern and importance, such that it effects the entire state. *See Ozanne*, 2011 WI 43, ¶ 99 n.9 (Abrahamson, C.J., concurring in part and dissenting in part). The above discussion of state constitutional rights shows that it is. As it stands, Wisconsinites are subject to a districting regime that deprives them of access to the vehicle of true popular sovereignty. Nothing less than the structure and fair functioning of state government—to say nothing of state residents' faith in that government—is at stake. The existence of state rights more expansive than their federal counterparts fully warrants granting the Petition.

## III. Wisconsin's Constitution Precludes Partisan Gerrymandering—This Court Should Address the Issue Without Delay.

The rights protected by the Wisconsin Constitution extend beyond those afforded by the U.S. Constitution and bars redistricting in a manner that severely inhibits a critical mass of voters from meaningfully electing representatives of their choosing. The only way to ensure these rights are recognized and protected in a meaningful fashion—that is, before the next round of elections—is for the Court to grant Petitioners' request. Once it does so, it should hold that partisan gerrymandering claims are justiciable under specific state constitutional provisions *and* based on the structure of Wisconsin's constitution.

The structure of Wisconsin's constitutional system and language of its constitution, taken as a whole, demonstrate that partisan gerrymandering is unlawful. Wisconsin's Constitution sets forth a litany of rights and requirements that undergird the state's system of democracy and are not found in the federal Constitution. *Wis. Just. Initiative, Inc. v. Wis. Elections Comm'n*, 2023 WI 38, ¶ 15, 407 Wis. 2d 87, 990 N.W.2d 122 (State constitution preamble "reflects the foundational assumption of the state's system of government: all authority resides with the people, and it is the people alone who have the authority to establish the terms and methods by which they will be governed.") These rights come up in a variety of contexts, but when it comes to voting, they are all in service of enabling the people to govern through their elected representatives. Indeed, the right to vote—and for that vote to be meaningful—is the lynchpin of the entire system. Without it, voters would no longer be in the driver's seat, violating the Constitution's express command that state governmental power be "deriv[ed] from the consent of the governed." Wis. Const. art. I § 1; *Wis. Just. Initiative*, 2023 WI 38, ¶ 15; *State ex rel. Bell v. Conness*, 106 Wis. 425, 428, 82 N.W. 288 (1900) ("The purity and integrity of elections is … of such prime importance … that the courts ought never to hesitate … to test them by the strictest legal standards.") *see also State ex. rel. McGrael v. Phelps*, 144 Wis. 1, 51, 128 N.W. 1041 (1910) (Timlin, J., dissenting) ("The right to vote means the right to vote effectively; not merely to cast a ballot under circumstances where it is certain that it can have no practical effect[.]")

These rights and requirements are related to two "fundamental principles" core to Wisconsin's legal-political identity, Wis. Const. art. I § 22: popular sovereignty and majoritarianism. The Constitution explicitly endorses popular sovereignty, specifying that state officials "deriv[e] their just powers from the consent of the governed." Wis. Const. art. I § 1. "At the Wisconsin Constitutional Convention of 1846, the Judiciary Committee reported that judges as well as legislatures and executives should be selected in accordance with 'an axiom of government in this country, that the people are the source of all political power, and to them should their officers and rulers be responsible for the faithful discharge of their respective duties.'"[1] These views were the consensus of the 1846 constitution's framers, but were clearly shared by the 1848 framers given that they not only retained relevant rights included in the first draft, but actually included provisions allowing for more direct election of government officials. R. Lawrence Hachey, *Jacksonian Democracy and the Wisconsin Constitution*, 62 Marq. L. Rev. 485, 516-17 (1979). Majoritarianism is also a readily identifiable principle in nearly all aspects of state government, from the requirement of legislative majorities to pass laws and impeach officials, to the innumerable examples of this Court's majoritarian character.[2] This undeniable majoritarian

[1] Miriam Seifter, et al., *The Democracy Principle in State Constitutions*, 119 Mich. L. Rev. 859, 885-86 (2021) (citing and quoting Journal of the Convention to Form a Constitution for the State of Wisconsin: Begun and Held at Madison, on the Fifth Day of October, One Thousand Eight Hundred and Forty-Six 106-08 (Madison, Beriah Brown 1847)).

[2] They include, at minimum, this Court's continuous composition of an odd number of justices; the requirement of a majority vote to decide any given case; the uniform treatment of tied votes as requiring affirmance of a lower court decision; and the manner in which the Justices confer to

bent supports both the instant request to grant the Petition, as well as Petitioners' substantive case, given their claim that the Legislature has used map-drawing software to undermine the rights of a majority of the state's voters, Democrats and Republicans alike. (*See* Pet. for Original Action at 5; *id.* at ¶ 57; Francesca L. Procaccini, *Reconstructing State Republics*, 89 Fordham L. Rev. 2157, 2187 (2021) (partisan gerrymandering threatens the "foundational principle of majority rule").

Consider one commentator on the original 1846 constitution that was rejected, writing against ratification in the *Prairie Du Chien Patriot* in 1847 due to the infirmities in "representative and senatorial districts": "where is the necessity of attaching Columbia and Marquette [counties] to Crawford and St. Croix [counties] while the district would have a fair ratio of population without them? Was it gerrymandering? If so who did it and for what purpose?" Milo M. Quaife, *The Struggle Over Ratification: 1846-47*, at 647 (Wis. Historical Society 1920). The first-proposed constitution's lack of sufficient protections in districting appears to have been a reason for its rejection. The second version won voter approval. The first constitution's rejection heightens the importance of provisions in the adopted version that limit drawing legislative maps, as well as how those provisions sit within the document as a whole. The relationship between these

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discuss draft opinions or make changes to the Court's Internal Operating Procedures. *See Portraits of Justice: The Wisconsin Supreme Court's First 150 Years*, vii (2d ed. 2003), https://www.wicourts.gov/courts/supreme/docs/portraitsofjustice.pdf; *State v. Lynch*, 2016 WI 66 n.1, 371 Wis. 2d 1, 885 N.W.2d 89; Wis. SCR IOP Introduction; Wis. SCR IOP § III.

provisions, considered in the context of majoritarianism and popular sovereignty, shows why partisan gerrymandering is unlawful and redressable.

It is worth identifying these state constitutional provisions, and the others, all of which relate to and effectuate a meaningful right to vote. The constitution explicitly connects governmental power to the freedom to vote, Wis. Const. art. I § 1, *but also*, textually connects the popular "right of sovereignty" to the lands within the state itself, Wis. Const. art. IX § 3. It commands that the representatives of the popular will be elected in territory that is "contiguous," be in "as compact form as practicable," and in the case of senators, be based on single districts made up of assembly districts, Wis. Const. art. III §§ 4-5. This is a limitation of power to the legislature to draw its own districts, and as such, voters' rights when new maps are drawn must be broadly construed. *See Conness*, 106 Wis. at 428; *SEIU, Local 1 v. Vos,* 2020 WI 67, ¶ 120, 393 Wis. 2d 38, 946 N.W.2d 35 (Kelly, J., partial lead op.) (if constitutional mandates can be ignored by the Legislature, then constitutions represent "absurd attempts on the part of the people to limit a power in its own nature illimitable") (quoting *Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 177 (1803)); *State ex rel. Graef v. Forest Co.*, 74 Wis. 610, 43 N.W. 551 (1889) (state constitution is a limitation on government branches' power). Finally, and critically, the Wisconsin Constitution's opening provisions state that people are "equal[,]"have the right to free speech, and have the right to "petition the government" without "abridge[ment]." Wis. Const. art. I §§ 1, 3, 4. In the

districting context, the same broad interpretation of these rights must apply given its central role in effectuating popular sovereignty and majoritarianism.

These provisions form a tapestry that precludes partisan gerrymandering, given how it undermines voters rights, and because all provisions of the state constitution must be read in harmony with one another. *See Attorney General v. Chicago & Northwestern Ry. Co.*, 35 Wis. 425 (1874) (constitutional provision reserving legislature power to alter or repeal corporate charters must be construed "to make it consistent with the other provisions of the same instrument"); *State ex rel. Wausau S. R. Co. v. Bancroft*, 148 Wis. 124, 136, 134 N.W. 330 (1912) (same). The list of connections is virtually limitless. There is the right to petition government as an exercise of popular sovereignty, but is abridged in practice by limiting any citizen's direct influence as a voter to their representatives, in such a way that requires fairness in a district's partisan makeup. In the inverse, representatives derive their power in state government from popular sovereignty *and* the specific way in which land-based popular sovereignty is divided among districts. Equality of treatment of voters, along with compactness and contiguousness of districts, ensures that each representative's district will be divided in a way that does not disadvantage any one voter's ability to exercise their rights over another district's voters' by virtue of sliced-and-diced geography rooted in detailed partisan data. *Cf. Teigen v. Wis. Elections Comm'n*, 2022 WI 64 ¶ 23, 403 Wis. 2d 607, 976 N.W.2d 519 (partial lead op.) (condemning officials who win elections by "force" and "not the people's consent" because "[i]f

elections are conducted outside of the law, the people have not conferred their consent on the government"); *State ex rel. Binner v. Buer*, 174 Wis. 120, 182 N.W. 855, 858 (1921) (no state equal protection violation where voter enjoyed the right to vote for judicial and school officers of Milwaukee county in the same manner, at the same time, and "with the same effectiveness" of any other elector of the county). Avoiding the use of perceived partisan affiliation of voters ensures that popular sovereignty is not undermined by consideration of factors that are "incompatible with democratic principles," and unrelated to the state constitution's explicit rules for drawing district lines or valid considerations such as, but not limited to, preserving communities of interest. *See Ariz. State Legislature v. Independent Redistricting Comm'n*, 576 U.S. 787, 791 (2015).

There are countless examples of these types of interrelationships that could be listed. *See also* Seifter, et al., *The Democracy Principle in State Constitutions*, 119 Mich. L. Rev. at 907-08 (noting that "abundant textual, purposive, and structural clues" in state constitutions point to means of protecting democracy from, among other things, partisan gerrymandering). However, the fundamental point of this: If the right to vote is the font from which all other rights flow, then overly and overtly partisan gerrymandering must be unlawful, because it disparages every right identified in the preceding section, and thus, the whole of Wisconsin's constitutional structure. Wisconsin should follow the lead of Pennsylvania in applying this more holistic view of its constitution. *See, e.g., League of Women Voters v. Commonwealth,* 178 A.3d 737, 801-02 (Pa. 2018).

Beyond this broader argument, specific constitutional provisions are also sufficient to encompass a claim of partisan gerrymandering and merit granting the Petition. While the Wisconsin Constitution's equal protection clause has sometimes been interpreted equally with its federal counterpart in the Fourteenth Amendment, they are not fully coterminous. *County of Kenosha v. C & S Mgmt.,* 223 Wis. 2d 373, 393, 588 N.W.2d 236 (1999) (equal protection provisions are "essentially" the same, but due process protections provided are "identical"); *Buse v. Smith*, 74 Wis. 2d 550, 580, 247 N.W.2d 141 (1976) (federal and state equal protection clauses are only "substantially" equivalent). This Court has repeatedly hedged against a lockstep interpretation of Wis. Const. art. I § 1 with the federal Equal Protection Clause. This is demonstrable evidence that Wisconsin has chosen to reserve a broader set of equal protection rights than at the federal level. This Court should use this opportunity to define those rights as they relate to drawing legislative districts.

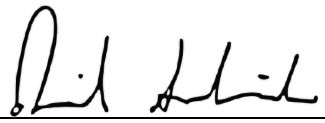
Similarly, Wisconsin's protections of speech, and rights to petition the government and assembly, are not completely coterminous with federal limits on First Amendment rights. This Court has never held in a case that offered a shred of supporting historical analysis that free speech rights protected by Article I, section 3 of the state constitution are equivalent to those protected by the First Amendment—and has even suggested that such rights are broader. *See, e.g., McCauley v. Tropic of Cancer*, 20 Wis. 2d 134, 139, 121 N.W.2d 545 (1963). Likewise, it has never held that the rights in Article I, section 4 are equivalent to

their federal counterparts. Specifically, this Court has never addressed the question of whether the right to assemble and petition the government are protected to the same extent as by federal law—and if not, whether extreme partisan gerrymandering may give rise to a claim under Article I, section 4. This case would squarely address this issue.

## CONCLUSION

This Court should exercise its independent authority under the Wisconsin Constitution to address Petitioners' claims and redress their injuries.

Respectfully submitted, this 22nd day of August, 2023.

/s/ 

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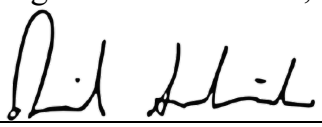
## CERTIFICATION REGARDING FORM AND LENGTH

I hereby certify that this brief conforms to the rules contained in s. 809.19(8) (b), (bm), and (c) for a brief. The length of this brief is 4,040 words.

/s/ 

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