



The Failure of *Gideon* and the Promise of Public Defense

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The Failure of *Gideon* and the Promise of Public Defense

Are public defenders the answer
hiding in plain sight?

Imagine that you are arrested and charged with a crime. You likely have a picture in your mind of how your first interactions with the police, your attorney, and the judge *should go*—interactions that are fair and just and protect your rights. The picture we paint next is that story. It is simple yet, to many, unfamiliar. We could have told the version that is true for so many people charged with a crime—a story of injustice and unfairness, a story so familiar it feels unchangeable. Instead, what follows is a thought experiment, a sadly unrepresentative one.

Max was arrested for grand larceny (stealing) in a mid-sized city and brought to the local jail for booking. Tacked to the wall was a poster explaining his Miranda rights.^[1] Detective Frost approached Max and asked if he had any questions. Max asked for a lawyer, explaining that he could not afford one himself. The detective called the Public Defender's Office. Jamie, a local public defender, arrived at the jail a short time later and explained to Max what was about to happen to him. She asked about witnesses and possible video footage. She asked if he had family or friends she could call. She told Max one of her colleagues would represent him at his first court appearance and gave him the number to her office, which is staffed 24/7.

Detective Frost then brought Max to a different area of the jail to wait for his turn to see a judge. A few hours later, Desmond, a public defender, arrived and explained to Max he would be representing him. A case manager from Desmond's office spoke with Max's brother and asked that he be present for Max's court appearance to demonstrate that Max has family support.

Max appeared before the judge uncuffed, standing next to Desmond. The prosecutor requested Max be released under pretrial supervision. Desmond explained to Max what that meant and then made the case to the judge that Max be released on his own recognizance. The judge listened carefully and, as Desmond had already prepared Max to expect, released Max to pretrial supervision.

There is nothing heroic about Max's story. It should be a low bar for the system to meet. Nevertheless, it remains out of reach for most people who come in contact with the criminal legal system. People regularly wait days, sometimes weeks, to see an attorney for the first time, and if they can't afford bail, they may be doing that waiting in jail. Often people have no idea what is about to happen when they finally stand before a judge; they're scared, confused, and might be looking for any avenue to get themselves out of jail. Some people go through this process without an attorney present at all, and some may even plead guilty without speaking to one.

But what if Max's story became the commonplace one? What if all people who could not afford a lawyer received representation that looked like Max's? What would be the effects on a system currently rife with income and racial disparities and swollen jail populations? What is the potential for criminal legal system reform if we put equity and justice at its center in the form of access to quality public defense?

The Crisis (and Hope?) of Gideon

As we celebrate the sixtieth anniversary of the Supreme Court ruling in *Gideon v. Wainwright*,^[2] in which the court held that people experiencing poverty are entitled to lawyers in criminal cases if facing incarceration, there is still much to lament. Roughly four out of five people charged with crimes in the U.S. qualify for a public defender.^[3] Yet public defense provision is a patchwork across the country.^[4] Emerging research indicates that public defender systems nationwide are underfunded by at *minimum* \$3.4 billion.^[5] Public defenders are hobbled by staggering caseloads, a critical shortage of resources, limited training, and negative perceptions of their role by the people they represent. That perception is hardly surprising given the stark power imbalance with more well-funded prosecutors' offices; defenders often lack access to such basic resources as trained investigators and expert witnesses.^[6]

Yet the tides are changing. Could it be, notwithstanding the abysmal lack of investment in public defense, that public defenders are, ever so incrementally, pushing the importance of their work to the center of reform efforts and disrupting the system anyway? Can reforming public defense representation be a catalyst to broader system reform?

These questions emerged during a day-long roundtable of public defense leaders and experts from around the country in March 2023, hosted by the Center for Justice Innovation with support from Arnold Ventures. Given the paucity of research on effective public defense

models and practices, the objectives of the session were to promote innovative approaches and strategies to improving public defense. The leaders identified the four practice areas with the most potential for disrupting the status quo:

1. early access to counsel,
2. rural defense,
3. assigned counsel systems, and
4. holistic defense.

All of these areas require deeper investments in both resources and research.

Early Access to Counsel

There are clear benefits to lawyers meeting with clients as early as possible. It provides an opportunity for the accused person to understand their rights more fully, to be apprised of the investigative and criminal adjudicative processes, and to discuss the possible outcomes of their case. In practice, early access to counsel is far from the norm for those unable to afford a lawyer.^[7] This delay may further exacerbate racial and ethnic disparities in the criminal legal system given the correlation between race and poverty.^[8]

Overall, research has shown that counsel at first appearance (CAFA) leads to better outcomes for people charged with a crime. Researchers have used randomized controlled trials and quasi-experimental designs to try to capture the impact of policy shifts around CAFA repre-

sentation, demonstrating that having an attorney may lead to fairer pretrial outcomes, decreased jail populations, and increased trust in the system.^[9] For example, a recent study in Allegheny County, PA, found that having an attorney present at bail hearings increased the use of nonfinancial conditions of release by 21%, increased judges' concurrence with recommendations of a pretrial assessment tool by 9%, and resulted in overall shortened periods of pretrial detention.^[10]

While most of these studies have focused on urban jurisdictions, in one study of three rural counties in upstate New York that incorporated CAFA, more people were released without financial conditions in two of the three counties, and lower bond amounts were levied when bail was set in all three counties.^[11] More research is needed to better understand how implementing CAFA programs in communities with different needs and resources may influence short and long-term outcomes and individuals' experiences.

Promisingly, even *earlier* access-to-counsel pilot projects have taken root in a few places across the country. Jurisdictions use different approaches, ranging from ensuring an attorney or member of the defense team meets with clients a day or more before their first appearance, to pre-arrest units when it is thought by the client that an arrest is imminent. The San Francisco (CA) Public Defender's Office has a Pretrial Release Unit (PRU) to enhance access to pre-arraignment legal representation. Incarcerated clients are interviewed, case investigation begins, and family and friends are contacted, all before the client appears in court.^[12] Neighborhood Defender

Service Detroit (MI) offers pre-arrest services to individuals facing felony charges, providing access to an attorney as soon as the client believes law enforcement contact is likely.^[13] In Santa Clara County, CA, staff from the Public Defender's Pre-Arrest Representation and Review (PARR) program meet with clients held in jail to collect information that they use to advocate to the prosecutor's office and court, as well as to and connect individuals to community resources. Researchers found that PARR increased the rate of release from custody by 28 percentage points and increased the likelihood of case dismissal by 36 percentage points.^[14] **Max** had even earlier access to counsel.

The right to an attorney is possibly the constitutional right most celebrated in popular media, yet 80 percent of people waive this right during police interviews and make statements that are used against them at bail hearings, plea negotiations, and trial.^[15] One challenge is the financial impossibility of securing an attorney when you are in early police custody and cannot afford to hire a lawyer. People with money bring their lawyers to police interviews that happen before or immediately after an arrest. Why shouldn't public defense clients have the same option?

Rural Defense

Should the picture in your mind of your arrest and hearing before the judge change based on where you live? Returning to **Max**, let's place him in rural America this time. From the start of his case, he's determined to go to

trial rather than plead guilty. His public defender Desmond starts preparing for this early on. Desmond has an investigator to interview witnesses and review video evidence. He has a fellow attorney join his team to support him during the trial. There are always risks, but Max and Desmond feel that going to trial is the right choice.

This too is a bar the system should have no trouble meeting, but again, Max's experience is hardly typical of most poor Americans living in rural communities. Where one is arrested should have no bearing on the promise of *Gideon*. Yet, rural areas face unique obstacles, which are less documented, studied, and funded. The lack of study may be attributed to limitations in data capacity, low case volume, and challenges in identifying comparable jurisdictions. The scant literature mostly compares rural to urban counties.^[16] One study found that access to counsel in misdemeanor cases in rural jurisdictions was more likely when there was an institutional defender.^[17] Some studies try to understand the mechanisms and factors that impact the quality of defense in rural counties, which may be more compelling than understanding how they are different from urban counties. However, these types of studies are sparse, have limitations, and are currently limited to understanding the impact of counsel at first appearance.^[18] Future studies should observe and test interventions that change practices within rural counties.

A signal challenge to rural defense is the lack of attorneys. Termed “legal deserts,” 40 percent of all counties in the U.S. have less than one lawyer per 1,000 residents.^[19] Public defenders in rural areas are often poorly paid, struggle with especially high caseloads, and fre-

quently travel long distances to visit clients and make court appearances. Some rural attorneys are retiring with no successor, leaving the area they served without a replacement.^[20] The problems are compounded by less access to broadband internet services than urban/suburban locations.^[21] For a client like **Max**, this may result in sitting in jail for extended periods without speaking to a lawyer or being arraigned in court without representation—a far cry from our thought experiment where his attorney, Desmond, has the time, resources, and skill to prepare a case for trial.

Attracting and retaining attorneys in rural areas is a major challenge requiring creativity and innovation. The struggles and potential solutions to rural defense practice have been documented. State and local governments are being encouraged to rethink how they allocate resources and, because the research base is limited, to experiment with promising practices.^[22] In Utah, for example, the Indigent Defense Commission developed a Managing Defender program as a means of regionalizing defense services in a very rural state. Managing Defenders oversee the contract attorneys that provide direct representation to clients and may manage in a single county or multiple regions.^[23] South Dakota has incentivized rural practice for qualified attorneys by offering nearly full student loan repayment if an attorney practices in a rural area for at least five years.^[24] The Rural Law Practice Clinic at the University of Maine pairs law students with rural practitioners. The students live, study, and work in Fort Kent, a Canadian border town, to meet the needs of the community.^[25]

Assigned Counsel Systems

Public defense cannot be transformed without looking at how it's provided through assigned counsel and contract systems and ad hoc appointments of defense lawyers by judges. It's estimated that a third to a half of all people that qualify for public defense are represented by lawyers appointed via these means,^[26] and fewer counties have a public defender or institutional office with full-time staff attorneys than counties with assigned counsel or flat-fee contracts.^[27] In rural areas, it is even more likely that representation is provided through assigned counsel or flat-fee contracts.^[28]

There are a handful of rigorous studies that compare assigned counsel plans to defender offices. Generally, the research shows that public defender and institutional offices achieve better outcomes than assigned counsel and flat-fee attorneys.^[29] Contributing to the variations are several underlying mechanisms that are misaligned with the interests of clients, including an incentive gap that motivates attorneys to maximize caseloads and minimize efforts.^[30] There are also pressures to donate to judicial campaigns to increase appointments,^[31] generally fewer resources to hire experts and investigators, and less access to colleagues or teams to consult on cases.^[32] Public defenders may also be able to attract higher-quality attorneys compared to assigned counsel systems.^[33] In an attorney survey, many flat-fee attorneys, who are paid (poorly) per case rather than by the hour, indicated that their fee structure encouraged early plea practice and disincentivized quality representation. In essence, fast pleas, typically at the expense of what is best for their

client, act as the counter to offset low pay.^[34] A study of assigned counsel in six counties in North Carolina found that switching from hourly to flat fees resulted in increased conviction rates and sentences to incarceration.^[35] Perhaps not surprisingly, researchers attributed the shift to a reduction in effort by the lawyers following the payment scheme shift.^[36] In a separate study, in Bexar County, Texas, when examining lawyers who accept both appointed and retained cases, the attorneys spent less time on their appointed cases.^[37]

The reimagining of assigned counsel and contract systems is underway and urgently requires more study. Less found in the literature are studies that isolate specific components of assigned counsel systems that achieve stronger outcomes. A promising model, the New York State Office of Indigent Legal Services (ILS) developed statewide standards for establishing and administering assigned counsel programs,^[38] as well as mentor and resource attorney programs. A mentor attorney provides training and guidance to less experienced colleagues. A resource attorney may have specialized expertise, like sex offense cases or sentencing. ILS explains that the underlying goal is to improve the quality of representation and foster high professional standards by building a culture of collaboration that honors the dignity and humanity of the clients served.^[39]

Holistic Defense

Holistic approaches to public defense practice have emerged in cities across the country in recent decades.

For a client, the myriad problems of public defense delivery can be exacerbated by the traditional defense model. That model focuses exclusively on the legal outcome of a case without fully addressing the collateral consequences of a potential conviction or the client's nonlegal needs,^[40] including underemployment, lack of secure housing, and untreated trauma and/or substance use disorders.^[41] The traditional approach may also fail to address concurrent legal matters in immigration, family, civil, and housing courts.^[42] This risks only accelerating the “revolving door” justice that plagues this country, contributing in particular to the disparate treatment of communities of color.^[43]

Holistic defense attempts to fill the gaps in traditional practice by providing client-centered and comprehensive advocacy prioritizing clients' needs—legal or otherwise. In addition to providing quality legal representation, holistic defenders work with an interdisciplinary team to help clients avoid future justice involvement by accessing services and social supports and minimizing the hidden or collateral consequences that can ensnare clients in other legal or government systems.^[44]

There has been limited research documenting the impact of holistic defense.^[45] The available research comparing holistic defense to traditional public defender or institutional offices suggests that holistic practices can positively impact criminal case proceedings and reduce the severity of punishments.^[46] In a multi-state process evaluation of holistic defender offices, interviews with former clients in Minnesota highlighted that holistic practice increased client experiences of satisfaction and procedural justice

and improved case outcomes relative to traditional public defense representation.^[47] In the only study to date to use a quasi-experimental design to estimate causal effect, the Bronx Defenders' holistic defense model showed promising results, such as reducing pretrial detention rates by 8.6%, sentences to incarceration by 15.5%, and incarceration length by 9.5 days. The model, however, yielded mixed results when measuring impact on other outcomes such as failure to appear, pretrial and post-disposition recidivism, conviction, and guilty pleas.^[48]

Overall, while promising, more rigorous research is needed to understand how the model functions in different indigent defense systems and how it influences other key outcomes beyond those associated with the criminal legal system.

Adapting the Culture of Defense Practice

Justice for people experiencing poverty is justice for all of us. As explored during the meeting in March 2023, the foundations needed to support innovative practices to public defense are (1) recruiting and retaining good lawyers and (2) elevating the voices of directly impacted people.

*Returning to our story, let's focus on our defender, **Desmond**. Desmond was a law student the first time he heard about being a public defender as a career choice. He was excited by the idea of using his legal skills to advocate for some of the most vulnerable. As a newly admitted attorney, he took advantage of his defender office's robust training program. All the attorneys in his office regularly received training from senior staff and from national public defender organizations. Desmond's excitement about serving as a public defender was nurtured and directed thanks to his internship and access to training.*

While Desmond's experience *does* correspond to an emerging model of defender recruitment and training, it contrasts with the experience of most people who opt to become public defenders. Even if the excitement and desire to serve are present, many attorneys who choose public defense work are thrown into the deep end, forced to learn as they go. Public defense service providers are understaffed and losing the mid-level attorneys who often serve as trainers and mentors. By contrast, **Desmond** is set up for success from the outset, which

trickles down to his clients. His experience is what the field needs and is striving for.

Recruitment, Retention... Revolution?

Public defender offices, managed assigned counsel programs, statewide commissions and task forces, and national organizations such as Gideon's Promise, the National Legal Aid and Defender Association, the National Association for Public Defense, and the National Association of Criminal Defense Lawyers, to name a few, all who attended the roundtable, are doing the work every day to build a culture of public defense that supports lawyers and values their clients. The approaches may vary, but the commitment is consistent: invest in who you bring to the profession and value them while they are there. Max did not dismiss Desmond as a "public pretender," a cog in the system that would process him into jail. Rather, Max had an attorney who understood the criminal court process, reviewed the facts of his case and asked for an investigation, knew the possible consequences of a conviction and the risks and rewards of going to trial, and understood the importance of explaining everything to Max and of building a relationship with him.

Desmond had the support and resources he needed to be an *effective* advocate, which should be the promise of *Gideon*. When Max and Desmond went to trial, Desmond held the state to its burden to prove Max was guilty, ensuring the system was accountable to the rights the Constitution requires under the Sixth Amendment. This

should be the floor, not the rarely glimpsed ceiling, for public defense provision in this country. Imagine if all defenders were as well-equipped as Desmond is in our thought experiment.

Attorney mentoring programs are rare but emerging. They are a tool for shifting the culture of public defense and systematizing delivering client-centered representation. Assigned counsel pilot programs in Westchester County, NY and Lubbock County, TX were studied and yielded promising results with attorney mentees in both counties agreeing or strongly agreeing that the program improved their confidence as criminal defense lawyers and helped them to develop their lawyering skills.^[49] A law school partnership program developed by Gideon's Promise provides paid, one-year fellowships to law students interested in careers in public defense and places them in partnering public defender offices. The fellows receive training on client-centered values and legal skills critical to public defense and build community with a cohort of public defenders nationwide.^[50]

From Proximate to Primary, the Role of People Directly Impacted

When talk turns to reform, public defenders are often asked to act as proxies for people directly impacted by the criminal legal system. During the day-long roundtable with public defense leaders, one participant, who is a directly impacted person,^[51] reminded the group that everyone (including public defenders) must do more to uplift the voices of those who experience the

system's harms most intimately and ground all reform conversations in those unique experiences. It gave rise to thoughtful, passionate exchanges about language and intention, about avoiding tokenism, and about the *how* and *why* of research. That conversation is happening more and more often around the country. It is part of a larger call to action to reformers—to start by looking at who is at the table and then go a step further and ensure that what is on the menu for reform is selected by those closest to the problem.

Conclusion

When it comes to adjudicating the success of *Gideon*, the jury is *not* out: the promise of the sixty-year-old decision is far from fulfilled. The tireless work of public defenders in the courtroom, and of advocates, researchers, academics, people directly impacted, and communities, is shifting the needle. It is a scrappy movement, acting without an invitation or adequate funding, bent on testing new innovations and calling out injustice, and it is making a difference in reducing jail time and achieving better outcomes.

Excitingly, public defense is having a moment and capturing national attention. Recently released revised American Bar Association Ten Principles of a Public Defense Delivery System and a *first-ever* National Public Defense Workload Study recognize the importance of quality public defense and the significant changes in the field since the first set of principles were developed and past caseload (not workload) standards were offered.^[52] The revised principles are a roadmap for policymakers, public defense administrators, and others. They consolidate some of the original principles and add or revise others, emphasizing:

1. the importance of data collection and transparency;
2. the need for systematic evaluation of lawyers, specialized training, and cultural competency,
3. the importance of non-lawyer professionals as part of the defense function,

4. the National Public Defense Workload Study, and
5. the place for defenders in law and policy changes.^[53]

The workload study notes that existing national standards are outdated and harmful because they create the risk of excessive workloads. The new standards reflect modern practice and obligations of defense lawyering. The study highlights that attorneys with too many cases will not have sufficient time to present a competent defense.^[54]

Are public defenders the answer hiding in plain sight to the myriad woes of the criminal legal system? It is the Constitution that enshrines the role of the defender as the check on the power of the state. Imagine how the use of that power would be transformed if the overwhelming majority of people that enter the criminal legal system were effectively represented? *What is the true potential for criminal legal system reform if we were to center public defense representation?*

Endnotes

- [1] *Miranda v. Arizona*, 384 U.S. 436 (1966) established that, under the Fifth Amendment to the U.S. Constitution, “[p]rior to any questioning, the person [in custody] must be warned that he has a right to remain silent, that any statement he does make may be used as evidence against him, and that he has a right to the presence of any attorney, either retained or appointed.”
- [2] *Gideon v. Wainwright*, 372 U.S. 335 (1963).
- [3] Oppel, Jr., R. & Patel, J. 2019. “One Lawyer, 194 Felony Cases, and No Time.” *The New York Times*. Accessed at: <https://www.nytimes.com/interactive/2019/01/31/us/public-defender-case-loads.html>.
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- [5] Preliminary findings presented on April 28, 2023 at the Indigent Defense Research Association's 2023 Virtual Spring Conference. The researcher wishes to note that the current estimate is highly preliminary and relies on several highly conservative assumptions, including using the 1973 National Advisory Committee workload standards, which will be replaced in the final analysis by the newly released National Public Defense Workload Study. Manuscript in preparation: Polk, B. 2023. *Estimating the Cost of Providing Constitutionally-Sufficient Indigent Defense throughout the United States*.
- [6] Primus, E. 2017. *Defense Counsel and Public Defence*. Ann Arbor, MI: University of Michigan Law School. In E. Luna (Ed.) *Reforming Criminal Justice: Pretrial and Trial Processes*, 3: 121-145. Phoenix, AZ: Academy for Justice. Accessed at: https://repository.law.umich.edu/book_chapters/113/.
- [7] Metzger, P., Hoeffel, J., Meeks, K., & Sidi, S. 2021. *Ending Injustice: Solving the Initial Appearance Crisis*. Dallas, TX: Southern Methodist University, Deason Criminal Justice Reform Center. Accessed

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- at: <https://www.smu.edu/-/media/Site/Law/Deason-Center/Publications/Public-Defense/Initial-Appearance-Campaign/Ending-Injustice-Solving-The-Initial-Appearance-Crisis-FINAL.pdf>.
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- [10] Between 2019 and 2020, researchers conducted a field experiment involving over 4,000 cases to compare how the presence or absence of a public defender at bail hearings impacted conditions of release, appearance rates, and 6-month re-arrest rates. The presence of a public defender increased the use of nonfinancial conditions of release by 21% and increased judges' concurrence with the

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recommendations of a pretrial assessment tool by 9% relative to those without counsel. This ultimately culminated in those individuals represented by a public defender experiencing shorter periods of pretrial detention, with the effects being most prominent for individuals charged with nonviolent offenses. It is worth noting that, although there were no noticeable differences in appearance rates for the next hearing set two weeks out, those represented by a public defender were approximately 3 percentage points (or 16.6%) more likely to be re-arrested (most commonly for retail theft) than unrepresented individuals. Anwar, Bushway, & Engberg, 2023.

- [11] In 2013 and 2014, researchers constructed a sample of over 4,000 misdemeanor cases across three rural counties in upstate New York. One county saw 9 percent more people released without conditions, one saw 10 percent more people released without conditions, and one saw a slight increase in the use of financial conditions. All three counties saw lower bail amounts set, which resulted in people spending fewer days in jail pretrial. The researchers note that data limitations and lack of individual-analyses makes it difficult to confidently attribute the changes in outcome to CAFA. Worden, Morgan, Shteynberg, & Davies, 2018.
- [12] To study impact, researchers were able to establish a comparison group by applying statistical techniques to administrative records to identify individuals comparable to PRU clients. Accordingly, this allowed for investigation into the impact of the program, which revealed that people with representation from the PRU were *twice* as likely to be released at arraignment relative to similar individuals. Yarmosky, 2018.
- [13] Neighborhood Defender Service. n.d. *Pre Arrest Services*. Detroit, MI: Neighborhood Defender Service. Accessed at: <https://neighborhooddefender.org/services/pre-arrest-services/>.
- [14] Lacoë, Fischer, & Raphael, 2023.
- [15] There are few examples of police precinct representation in the United States. The Cook County, IL Public Defender's Office has a small unit of attorneys (reaching only 2% of people arrested in Chicago) that go to the local precincts and represent people during interrogations prior to booking. Fair Trials. 2020. *Station House Counsel: Shifting the Balance of Power Between Citizen and State*. Washington, D.C.: Fair

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- [17] Results suggest that appointment rates in misdemeanor cases are far more a product of the simple unavailability of attorneys in rural areas than they are of policy, political, or economic factors. Appointment rates were eleven percentage points higher in counties where the defense function was institutionalized, suggesting that the presence of an identifiable agency whose job it is to provide defense services will tend to be associated with improved access to counsel. Rates were a full thirteen percentage points higher in counties with a small town. Davies, & Clark, 2019
- [18] The researchers note that data limitations and lack of individual-analyses makes it difficult to confidently attribute the changes in outcome to CAFA. Worden, Morgan, Shteynberg, & Davies, 2018.
- [19] American Bar Association. 2020. *ABA Profile of the Legal Profession*. Chicago, IL: American Bar Association. Accessed at: <https://www.americanbar.org/content/dam/aba/administrative/news/2020/07/potlp2020.pdf>.
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- [48] Looking at a 10-year period, holistic defense reduced incarceration by over 1 million days. Measured increases in pretrial arrests and failures to appear are "likely attributable to clients' higher release rate coupled with their longer exposure time before cases are resolved." Anderson, 2019, p. 864. While the findings do not show a reduction in recidivism, it appears holistic defense reduces incarceration. Anderson, Buenaventura & Heaton, 2019.
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- [51] A thank you to Amir Chapel for his bravery in sharing his story at the roundtable. Amir spent nearly 10 years incarcerated and under

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community supervision. Since discharged from parole in 2008, he has embarked on a path of redemption, giving everything he has to improving criminal legal outcomes for those that go through the system. Amir has done this by contributing to the body of knowledge and research in the criminal legal field, community engagement to reduce gun violence in the most impacted communities, policy advocacy, and police reform. He currently works at Partners for Justice as a Senior Program Manager.

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