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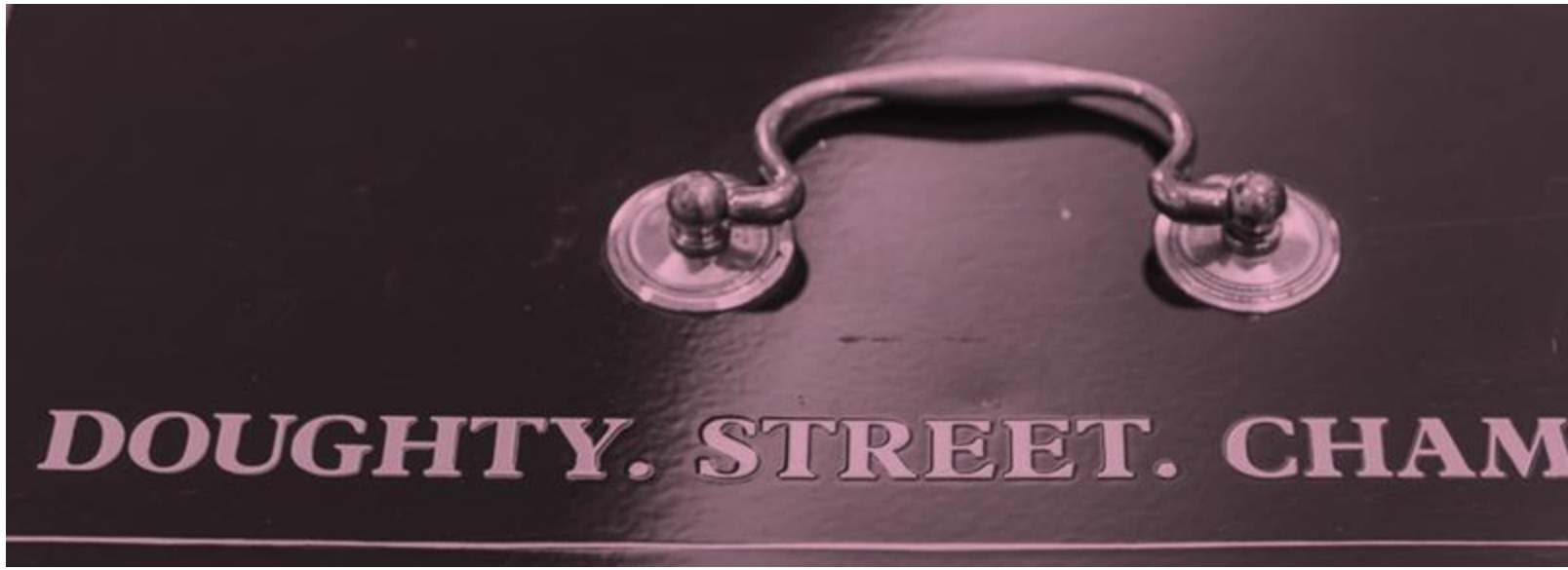
Key developments in homelessness

15th January 2025



doughty street chambers

Chair: Sarah Steinhardt

Speakers: Zia Nabi and Joshua Jackson

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Housing needs assessments – 2024 homelessness update

doughty street chambers

Josh Jackson

OUTLINE

1. The housing needs assessment duty
2. 2024 case law update
3. Implications and horizon gazing

The Basics (1)

Context: Homelessness Reduction Act 2017 + the relief duty (**s.189B HA96**)

S.189A(1): local authorities "*must make an assessment of the applicant's case*" where an applicant is homeless or threatened with homelessness and eligible for assistance.

S.189A(2): HNA must include an assessment of:

"(a) the circumstances that caused the applicant to become homeless or threatened with homelessness,

(b) the housing needs of the applicant including, in particular, what accommodation would be suitable for the applicant and any persons with whom the applicant resides or might reasonably be expected to reside ('other relevant persons'), and

(c) what support would be necessary for the applicant and any other relevant persons to be able to have and retain suitable accommodation."

s.189A(3): The authority must notify the applicant, in writing, of the assessment that the authority make.

The Basics (2)

ss.189A(4)-(8): The **"PHP duties"**:

- Authority "*must try to agree*" with the applicant any steps that the applicant must take to secure that he has and can retain suitable accommodation (s.189A(4) HA96)
- Must be recorded in writing and a copy given to the applicant (ss.189A(5) and (8))
- Where they cannot agree, the authority must record the reasons for the absence of agreement and the steps they consider would be reasonable to require the applicant to take (s.189A(6))

ss.189A(9)-(11): The **"review duties"**:

- Until "*such time as the authority consider that they owe the applicant no duty under [Part VII], the local authority must keep under review*" its HNA and the appropriateness of the steps in the PHP (s.189A(9))
- If the authority's assessment under s.189A(2) HA96 or of applicant's case or steps in PHP changes, the authority must notify the applicant in writing (s.189A(10)-(11))

The Basics (3) – Code of Guidance

*When assessing the **housing needs** of an applicant housing authorities will need to consider the individual members of the household, and all relevant needs**. This should include an assessment of the size and type of accommodation required, any requirements to meet the needs of a person who is disabled or has specific medical needs, and the location of housing that is required**. The applicant's wishes and preferences should also be considered and recorded within the assessment; whether or not the housing authority believes there is a reasonable prospect of accommodation being available that will meet those wishes and preferences .*

*An assessment of the applicant's and household member's **support needs** should be **holistic and comprehensive**, and not limited to those needs which are most apparent or have been notified to the housing authority by a referral agency. Housing authorities will wish to adopt assessment tools that enable staff to tease out particular aspects of need, without appearing to take a 'checklist' approach using a list of possible needs. Some applicants may be reluctant to disclose their needs and will need sensitive encouragement to do so, with an assurance that the purpose of the assessment is to identify how the housing authority can best assist them to prevent or relieve homelessness (original emphasis)*

The Cases - Overview (1)

1. ***XY v London Borough of Haringey*** **[2019] EWHC 2276 (Admin)**
2. ***R (ZK) v London Borough of Havering*** **[2022] HLR 27**
3. ***R (YR) v London Borough of Lambeth*** **[2023] HLR 16**
4. ***UO v London Borough of Redbridge*** **[2023] HLR 39 (‘*UO No.1*’)**
5. ***R (Ahamed) v Haringey LBC*** **[2023] HLR 43 (CA)**
6. ***R (SK) v Royal Borough of Windsor and Maidenhead*** **[2024] EWHC 158 (Admin)**
7. ***UO v London Borough of Redbridge*** **[2024] EWHC 1989 (Admin) (‘*UO No.2*’)**

The Cases – First Generation

***XY v London Borough of Haringey* [2019] EWHC 2276 (Admin); *R (ZK) v London Borough of Havering* [2022] HLR 27.** Takeaway points:

- Must identity *"the key needs: those that would provide the "nuts and bolts" for any offer of accommodation"* (*XY* at §51).
- "*[I]mportant distinction to be made between an applicant's "needs" and an applicant's "wishes"."* (*ZK* at §42)
- Court should ask "*how a reasonable and sensible housing officer would understand what had been written"* (*XY*, §62).
- No requirement for "*one clearly indexed document*" - "*To decide whether or not the duty on the local authority to provide a lawful HNA and/or a lawful PHP has been discharged requires, therefore an assessment of the totality of the written housing file as it might be viewed by a "reasonable and sensible housing officer.*" (*ZK*, §39)

The Cases – Second Generation

***R (YR) v London Borough of Lambeth* [2023] HLR 16; *UO v London Borough of Redbridge* [2023] HLR 39 ('*UO No.1*')**

4 component parts:

1. Reasonable steps of **inquiry** to be able to identify / assess potential housing needs (*YR,* §86; *UO No.1*, §59)
2. **Analyse and evaluate** the nature, extent and severity of one's needs, and "what accommodation would be suitable" (*YR,* §§28, 88(i)-(iii); *UO NO.1*, §61)
3. **Identify** "the key needs: the "nuts and bolts" for any offer of accommodation" (*YR,* §§28, 81)
4. Must be "sufficiently **reasoned** to demonstrate that the authority has addressed the statutory matters in s 189A(2)(a)-(c)" + **s.11 of the Children Act** (*YR*, §88(i)-(iii); *UO No.1*, §62)

The house of cards effect: suitability decisions based in fact on HNA vitiated

Ahamed – s.189A in the s.202/204 process

Attempt to rely on inadequate HNA to vitiate review decision:

- Context of CoA considering the review officer had made sufficient inquiries, sufficiently took into account the medical evidence on disability, and came to a substantively reasonable decision.
- Undecided point on whether HNA could be read in light of prior "*vulnerability assessment*" [54]
- "*An omission [in the HNA] could have mattered if it had somehow resulted in Mr Perdios being unaware of something significant. There is, however, no reason to suppose that any deficiency in the "Assessment and Personalised Housing Plan" affected Mr Perdios' decision-making*" [54]
- "*For my part, I would stress that, given the existence of sections 202 and 204 of the 1996 Act, challenges to decisions of local housing authorities relating to homelessness should generally be pursued under those provisions and not by way of judicial review.*" [68]

R (SK) v RB Windsor & Maidenhead [2024] 158 (Admin)

Importance of the HNA duty:

"The assessment of an applicant's needs is a highly significant step in the process of alleviating an applicant's homelessness, because it provides the basis on which accommodation will be offered to an applicant. If a family's needs are incorrectly assessed, it is unlikely that accommodation offered to that applicant under the housing authority's housing law obligations will meet the applicant's needs, unless it does so by happy accident." [36]

Reasons and evaluation:

"37. The assessment must be "sufficiently reasoned to demonstrate that the authority has addressed the statutory matters" (R (UO) v LB Redbridge [2023] HLR 39 at [62]). Proper assessment is essential to understanding what it is that the plan should achieve. Assessment is more than merely noting the factual background. As Munby J. stated, in the context of assessments of children leaving care, in R (G) v Nottingham City Council and Anor [2008] 1 FLR 1668 at [36]:

"... the local authority's duty during assessment is not merely to identify the child's needs – though that is presumably part of the process of assessing them – it is to "assess" the child's needs. "Assessment" goes beyond mere identification of needs; it involves analysis and evaluation of the nature, extent and severity of the child's need".

R (SK) v RB Windsor & Maidenhead [2024] 158 (Admin)

- Permissible to cross-refer back to previous HNAs and PHPs, but no indication housing officer took into account previous assessments in this case [40]-[41]
- Failure to assess circumstances of homelessness. "*Particularly important*" in cases where the circumstances of homelessness were particularly relevant to housing needs [41].
- HNA duty must include assessment of the needs of everyone who "*might reasonable be expected to reside*" with applicant and an assessment of who that is (e.g. children in foster care subject to ongoing family court proceedings) [42]-[45].
- PHP not underpinned by lawful HNA [46]
- No need to determine s.11(2) of the Children Act 2004? [47]

UO v LB Redbridge No.2 [2024] EWHC 1989 (Admin)

Ground 1 - First HNA:

- Material error of fact that there had been "no known interventions from well-being teams" or "changes in children's behaviour" [73].
- Explanation statement didn't concern past interventions but only lack of present interventions: (i) viewed "with a measure of caution" (applying *Nash* and *Inclusion Housing CIC* on retro reasons) [78]-[79] & [87]; and, in any event, (ii) couldn't excuse failure to take into account previous interventions on bearing on future risks of impact on welfare if children moved OOB ("artificially narrow focus") [83]-[86]
- "*If a vital matter if omitted from the assessment of needs and priorities, that has the capacity to undermine the rationality of the decision*" [89].
- In this case, UO's status as a single mother wasn't sufficiently considered: "*The defendant should have anxiously considered the realities of her situation if she would be confronted with extensive journeys to take the children to school and back and bring her daughter home, any resulting additional strain on her capacity to cope, and the consequent potential impact on her ability to care for her children*." [91]
- Failure to take into account adult education breach of Art 2(b) of 2012 Homelessness Order [94]
- Disruption to employment per Art 2 2012 HO needed to be considered ("not in the abstract") but in context of UO as a single mother [95]-[96]

UO v LB Redbridge No.2 [2024] EWHC 1989 (Admin)

Ground 2 - Review Decision (s.189A(9)):

- Review officer didn't merely acknowledge HNA but placed reliance upon it, and adopted its analysis. Skeptical "confirmatory in nature" (common failings and no new inquiries) [111]-[113]
- Continued lack of analysis on UO's status as a lone parent and failure to engage with children's history of trauma [111]-[114]
- Failure to make inquiries with eldest child's school regarding disruption of move or educational department in receiving borough regarding availability of pastoral care / school places [116], [124]:
    - Lack of inquiry can't be blamed on C: "*Tameside* duty falls on the defendant"; C reps had comprehensively alerted D to relevant matters; bolstered by s.11 CA ("important element in this country's child welfare and safeguarding mechanism" [116]-118
- Misdirection as to policy and elevation of critical schooling age into a rigid rule to exclusion of wider relevant circumstances [120]-[121]; subsequent explanation dismissed as "after-the fact rationalization" (applying *Nash* et al) [122]
- Failure to accept C evidence on travel journeys; unreasonable preference for Google Maps [126]

UO v LB Redbridge No.2 [2024] EWHC 1989 (Admin)

Ground 3 - Review Decision (suitability):

- Suitability decisions vitiated - "It is difficult to conceive how the Ground 3 suitability assessment can survive the manifest flaws identified by the Court in Ground 2, further reinforced by the material connection to the unlawful assessment in Ground 1" [137]-[138]
- Failures of consideration / inquiry for HNA also infect suitability decision + insufficient arrangements made with education department to confirm if school places available during the academic year [139]-[141]
- Breach of s.208 / *Zaman* & *Nzolameso* principles: not established not reasonably practicable to accommodate as close as possible to the Borough b/c only searched for available 3-bed properties when 2-bed could be suitable [145]

What's on the Horizon?

1. The Court of Appeal?
2. The limits of the vitiation?
3. How far can the "totality of the housing file" be stretched?
4. Complimentary duties: The HNA & the PSED?
5. Alternative remedies: Are the floodgates open?

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Current issues in homelessness cases

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- Interim accommodation
- Suitability
- Out of borough accommodation
- Relief

INTERIM ACCOMMODATION

R (YABARI) V WESTMINSTER CC [2023] EWHC 185

- Section 188 (1) duty is immediate and non-deferrable; accommodation must be offered; the threshold for the duty is low; the housing function can only be discharged by suitable accommodation
- The duty is "*over and above*" the homelessness relief duty **[93]**.
- Once a local housing authority had accepted a section 188(1) duty it was within its discretion to reach a decision that an applicant was suitably accommodated in his current accommodation pending investigation and decision.
- The Claimant could not be determined as safe in his flat by any reasonable housing authority due to the fire safety risk. The Council's decision that the accommodation was suitable for section 188 was irrational because did not take fire safety into account.
- But irrationality had no effect in law or in fact because the Claimant had suspended or ended the Defendants' duty in relation to his application by choosing to stay put.

HOMELESSNESS (SUITABILITY OF ACCOMMODATION) (ENGLAND) ORDER 2003

- Subject to the exceptions contained in article 4, B&B accommodation is not to be regarded as suitable for an applicant with family commitments where accommodation is made available for occupation under section 188(1), 190(2) or 200 (1) HA 1996.
- Article 4 provides an exception where there is no accommodation other than B&B accommodation and an applicant is in occupation of such for no longer than six weeks.
- Family commitments – pregnancy / dependent children
- B & B accommodation - accommodation (whether or not breakfast is included) which is not separate and self-contained premises; and in which cooking facilities are not provided or any one of the following amenities is shared by more than one household:- a toilet, personal washing facilities, cooking facilities but does not include accommodation which is owned or managed by a local housing authority, a non-profit registered provider of social housing, or a voluntary organisation as defined in section 180 (3) Housing Act 1996 or accommodation that is provided in a private dwelling

R (PICKFORD) V SANDWELL MBC [2024] EWHC 756 (ADMIN)

- Hotel was "B&B accommodation".
- 'An applicant with family commitments covered an applicant with whom dependent children resided or might reasonably be expected to reside, those were alternatives and if a dependent child actually resided with the applicant parent, it was not necessary also to show that the child might reasonably be expected to reside with that parent
- Article 4 provided an exception where there was no accommodation other than B&B accommodation and an applicant was in occupation of such for no longer than six weeks.
- Once Claimant and child had been residing in the hotel for six weeks, art.3 deemed the hotel to be unsuitable for them. This was a hard edged rule. Mandatory order would have been made if necessary.

R (PICKFORD) V SANDWELL MBC [2024]

- Accommodation secured under section 188 (1) duty can switch to section 193 accommodation if main housing duty accepted.
- But such accommodation cannot switch to becoming accommodation obtained under section 189B, as this is not one of the ways in which the section 188 (1) comes to an end under the amended section 188 (1ZA) (1ZB) or (1A). I.e. it does not end simply by the section 189B(2) duty being discharged
- Also, relief duty is not a duty to secure accommodation. If authority already securing accommodation, then by continuing to provide the same accommodation it is not suddenly under section 189B(2) taking reasonable steps to help applicant secure that accommodation becomes available for at least 6 months. Such a switch would be an unlawful side stepping of the duty under section 188.

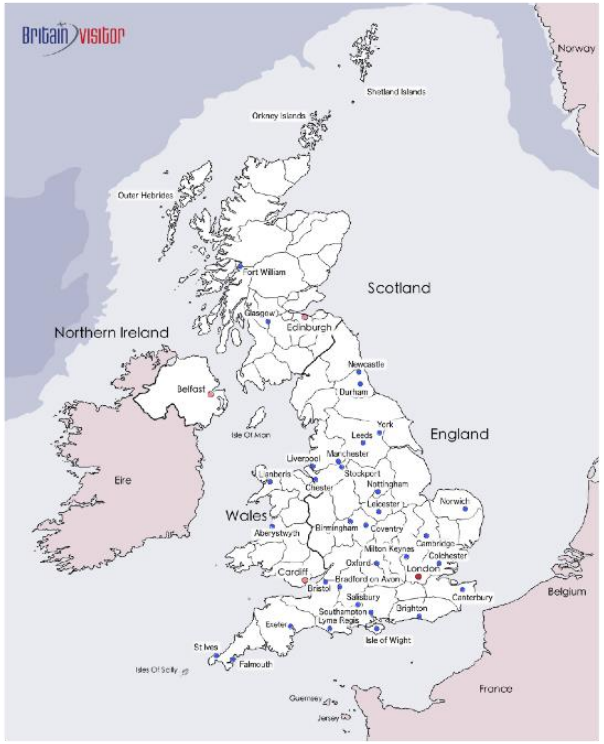
R. (ZRR) V BEXLEY LBC [2024] EWHC 2073 (ADMIN)

- Bed and breakfast accommodation provided in performance of section 190 (2) duty. Challenge brought on the basis that not suitable.
- Article 3 was subject only to the limited exceptions in art.4, namely that art.3 did not apply where no other accommodation was available, and the applicant occupied the B&B for no more than six weeks.
- There was no evidence that the former applied in the instant case.
- No reasonable local housing authority could have found that the room offered at the B&B was suitable accommodation for the claimant and her family, even for 14 nights.
- The offer of temporary accommodation in Manchester was flawed for a failure to take lawful account of the younger child's education needs

KYLE V COVENTRY CITY COUNCIL [2023] EWCA CIV 1360

- Reasonableness and suitability were distinct concepts. Accommodation can be suitable even if it would not be reasonable to continue to occupy.
- A person does not have to be entitled to remain in accommodation indefinitely or for any particular period of time for it to be reasonable to continue to occupy – a person will not be homeless if there is accommodation which it would be reasonable for him to continue to occupy over the period which would elapse before the local housing authority rehoused him.
- The halfway house intended to provide support for recovering drug addicts was distinguishable from the refuge occupied by Ms Moran in *Aweys*.
- Refuges had a particular character as temporary safe havens and were not places to live. Ms Moran had no right to any specific room, was forbidden visitors or from bringing men into the surrounding area, from giving her address to anyone, from having contact with neighbours and from disclosing the nature of the building.

SUITABILITY / OUT OF BOROUGH ACCOMMODATION



GHAOUI V WALTHAM FOREST LBC [2024] EWCA CIV 405

- Argued that suitability decision was unlawful because it did not recognise that preference for single faith education was protected by article 9 (freedom of thought, conscious and religion) and any interference had to be justified

HELD

- Homelessness decisions could engage convention rights, but instances of violation would be very rare.

- Decision makers did not have to identify rights and potential violations, and rights were protected through outcomes, not processes.

- Recorder had been entitled to conclude that no interference with article 9 on the facts of the case. Question of justification did not arise and even if it had the applicant would like to have faced an insuperable task in arguing that his faith based preference should give him priority over other homeless persons.

ZAMAN V WALTHAM FOREST LBC [2023] EWCA CIV 322

- Local housing authorities must seek to provide accommodation as near as possible to their districts [47]
- There was nothing wrong with Waltham's Forest's "Accommodation Acquisitions Policy", but there was a dearth of evidence to show that it was followed, and common sense rather suggested that it was not [52].
- Authority's evidence did not confirm that Waltham Forest had been seeking to ensure that Zone C properties were "as close to the borough as is reasonably practicable", in accordance with the "Accommodation Acquisitions Policy", or offer any explanation for the fact so many Zone C properties were in Stoke-on-Trent when common sense indicated that it should normally have been possible to obtain accommodation closer to the borough [52]

MOGE V EALING LBC [2023] EWCA COV 464

- Case concerned relief duty and out of borough accommodation – Ms. Moge refused an offer of suitable accommodation of a 24 month assured shorthold tenancy of a two-bedroom flat with a private sector landlord in the neighbouring London Borough of Hounslow.
- Nothing in the decision letter, or in the review decision to indicate what inquiries the Council actually made to locate properties for Ms. Moge other than the Flat.
- The absence of any statement in the minded to letter or the review decision of what inquiries the Council's officers had carried out to find suitable properties for Ms. Moge was entirely understandable, because although Ms. Moge had complained from the outset that the Flat was unsuitable because of its distance from her place of work in Ealing, at no point during the review had Ms. Moge or her solicitors contended that the Council had failed to make adequate inquiries or had failed to offer her other available properties closer to Ealing.
- On the second appeal, Council sought to provide evidence by means of a witness statement - allowed (just).

MOGE V EALING LBC [2023] EWCA COV 464

- "*It is plainly not the law that in every case, a local authority should have to give chapter and verse on each and every internet search and property inquiry that its officers made to find accommodation as close as possible to an applicant's previous home or place of work. That would place an intolerable burden on hard-pressed local authorities dealing with homelessness cases. The question of how detailed and specific the information provided or evidence adduced will depend upon the facts of the particular case*" **[122]**

- There may be cases where more detail was required. The recent decision in *Zaman v London Borough of Waltham Forest [2023] EWCA Civ 322* provided such an example.

MOGE V EALING LBC [2023] EWCA COV 464

In either case it is important that the principle should be applied with reasonable flexibility. If a person to whom housing duties are owed by a London borough is offered accommodation in another part of the country, the court is likely to expect convincing evidence that nothing suitable was available any nearer. But it will recognise that, once it is shown that nothing is available in Greater London, suitable and affordable accommodation is likely to be available only in metropolitan areas, such as the West Midlands. Hence it has been said that a local authority is "not required to scour every estate agent's window between Brent and Birmingham", or to investigate every theoretical possibility where something closer may be found." **[144]**

YR V LAMBETH LBC [2022] EWHC 2020 (1)

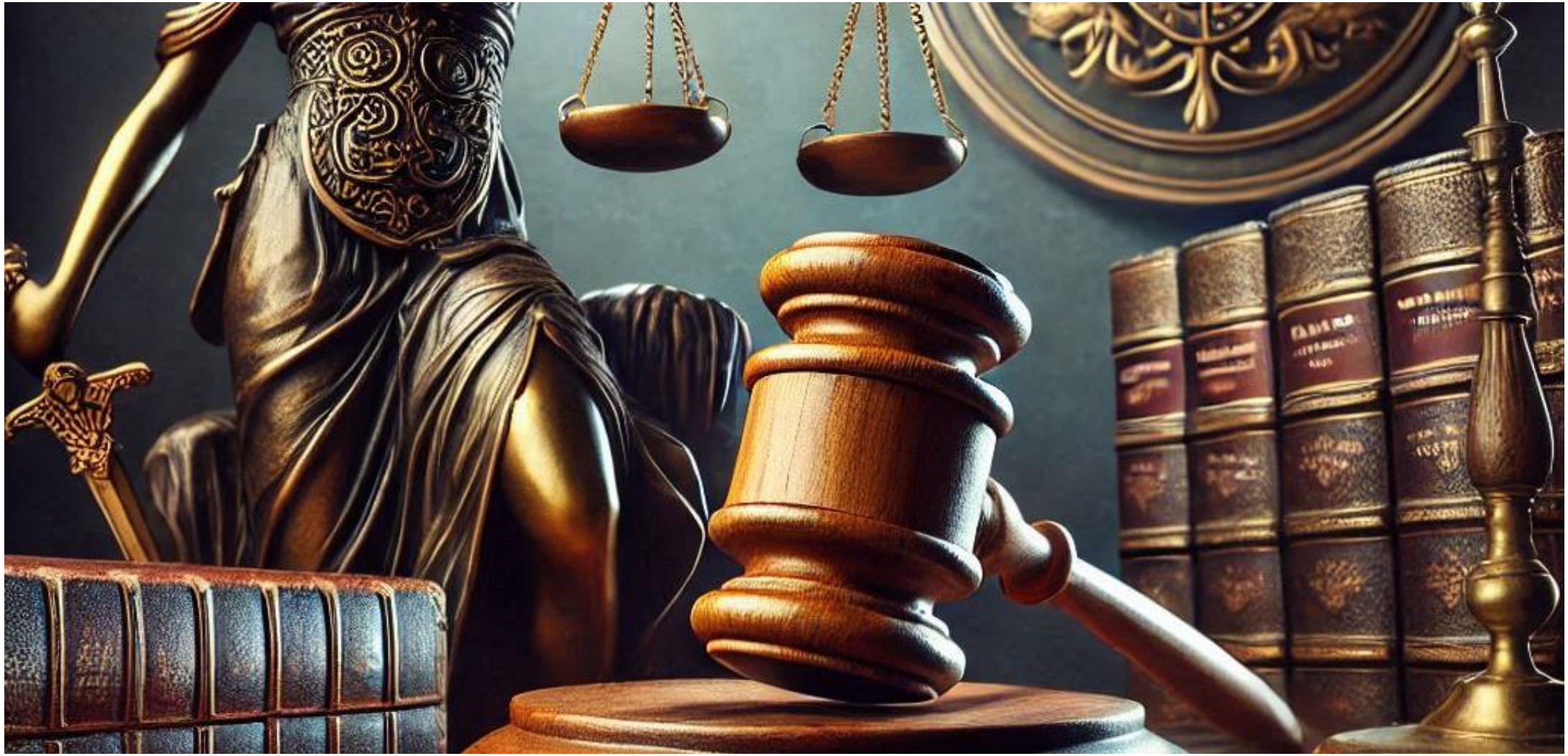
- The initial housing needs assessment and the personal housing plan conducted under s 189A of 17-18 August 2022 were unlawful.
- No reference to the needs of the children and the disruption that the provision of interim accommodation outside the borough, and a consequent move of school, would cause to their education.
- The educational needs of the children and the disruption of their education caused by relocating the family to another area were also matters to which the authority must have regard in the discharge of their welfare duty under s. 11(2) Children Act 2004
- The fact that five of the six school-age children had only been attending school for a term and a half did not obviate the need for the Defendant to assess their welfare and how a move to another school would affect them
- Defendant's duty was to have regard to the need not only to safeguard but to *actively promote* their welfare, including their educational welfare

YR V LAMBETH LBC [2022] EWHC 2020 (2)

- In the absence of a lawful assessment and inquiries it was not open to the Defendant to conclude that: the Claimant only had a 'wish', not a 'need', to be located in Lambeth; the Property was 'suitable' for her and her family's needs; it was not reasonably practicable to accommodate the Claimant in or near to Lambeth; or for the Defendant to demonstrate it had regard to the need to safeguard and promote the welfare of the children.

- The Defendant acted irrationally in concluding that the Property was 'suitable accommodation' for the purposes of s. 188(1).

RELIEF



R (IMAM) V CROYDON LBC [2023] UKSC 45 (1)

- The local authority was subject to a public law duty imposed by Parliament which was not qualified in any relevant way by reference to available resources.
- Where Parliament imposed a statutory duty on a public authority to provide a specific benefit or service, it did so on the footing that the authority must be taken to have the resources available to comply with that duty.
- It was not for a court to modify or moderate the substance of the duty by routinely declining to grant relief to compel performance on the grounds of absence of sufficient resources.
- Remedies in public law are discretionary, it is incumbent on a court to exercise its discretion in accordance with principle and to avoid arbitrariness .

R (IMAM) V CROYDON LBC [2023] UKSC 45 (2)

- Where a breach of the law is established, the ordinary position is that a remedy should be granted. A court should proceed cautiously in exercising its discretion to refuse to make an order and should take care to ensure that it does so only where that course is clearly justified.
- Where Parliament imposes a statutory duty on a public authority to provide a specific benefit or service, it does so on the footing that the authority must be taken to have the resources available to comply with that duty.
- A court should not make a mandatory order to require compliance with a statutory duty where that is impossible.
- The onus was on the authority to explain to the court why a mandatory order should not be made to ensure compliance with its duty. The question of whether the authority had taken all reasonable steps to comply was an objective one for the court to determine.
- The longer an authority with notice of a problem concerning non-performance of its duty had sat on its hands, the more important it may be for the court to enforce the law by making a mandatory order.

R (IMAM) V CROYDON LBC [2023] UKSC 45 (3) **5 COMMENTS**

- Could Ms Imam's need to be provided with suitable accommodation could be met out of any contingency fund?
- Was authority was on notice in the past of a problem in relation to the non-performance of its duty, but failed to take the opportunity to react to that in good time?
- Extent of the impact on the individual to whom the duty is owed. The less the impact on the individual, the less compelling will be the grounds for making an immediate mandatory order with potentially disruptive effect.
- If there is no sign as things stand at the time the matter is before the court that the authority is moving to rectify the situation and satisfy the individual's rights, that is a factor pointing in favour of the making of a mandatory order.
- In deciding whether to make a mandatory order, a court should take care not to create a situation which is unfair to others, by giving a claimant undue priority over others who are also dependent on a local housing authority for provision of suitable accommodation and who may have an equal or better claim as compared to the claimant.

R (PICKFORD) V SANDWELL MBC [2024] EWHC 756

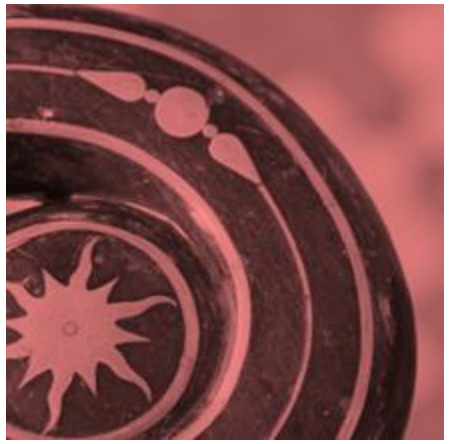
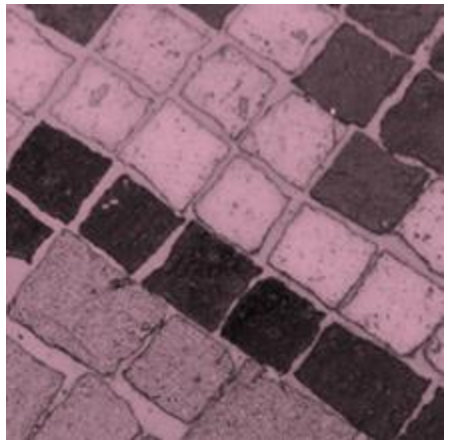
- The interim duty to accommodate under section 188(1) HA is not qualified by reference to resources.
- With a section 188 HA "interim accommodation suitability challenge" there may well not yet have been an authority's section 184 HA decision on the claimant's application. So, the court may be cautious of prejudging factual issues which are properly a matter for the authority, especially in an application for interim relief
- Court will need to tread with great care, not least as a mandatory order to provide scarce housing may prejudice other applicants' rights to the same "pool" of housing
- There should ideally be evidence from the claimant themselves which does so and detailing the impact of the accommodation on them and their family
- "However, in my own view, such evidence is more likely to have weight if it calmly details the impact on the applicant and explains why a mandatory order is justified, notwithstanding the undoubted pressures on authorities, rather than just making a series of bald assertions and shrill complaints "

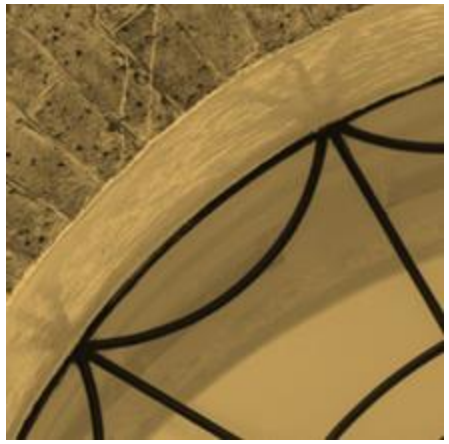
R (PICKFORD) V SANDWELL MBC [2024] EWHC 756

- it may be helpful for an authority's evidence to detail its budgetary position and relevant aspects of its current budget, eg whether there is a "contingency fund".
- it may be helpful for an authority's evidence to detail the "availability" of its own and other local housing resources (including properties earmarked for Part VII allocation) and the pressures between "supply" and "demand" for them.
- it may be helpful for the authority's evidence to explain any relevant policies it has adopted so as to comply with the 2003 Order.
- it may help for the authority to provide current homelessness statistics tailored to the case—e g how many families are in the same position as the claimant's family (and where the claimant is in any relevant "waiting list" .
- it may be helpful for the authority to address in evidence the specific impact of breach on the individual claimant and their family (and for the claimant to prepare a *short* statement in response.
- it may be helpful for a court to be presented with different "realistic options" (including the status quo) and evidence of their advantages and disadvantages and for the claimant to comment on that.

R (AO) V HARINGEY LBC 2024

- Family in bed and breakfast accommodation.
- Defendant admitted breach of section 188 (1). Resisted relief.
- D submitted that accommodation had only been deemed unsuitable for three days, there were no health conditions or disabilities within the family and there was nothing available.
- Claimant filed reply evidence, which identified several units of self-contained accommodation in a suitable area which were available on a nightly or short let basis
- Found that authority had not taken all reasonable steps to perform duty.



THANK YOU

QUESTIONS