

1 THOMAS C. HORNE
2 The Attorney General
3 Firm No. 14000

4 Rose Daly-Rooney, No. 015690
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6 Assistant Attorneys General
7 Civil Rights Division
8 400 W. Congress, Suite S-215
9 Tucson, Arizona 85701
10 Telephone: (520) 628-6756; Fax: (520) 628-6765
11 Rose.Daly-Rooney@azag.gov
12 Cathleen.Dooley@azag.gov
13 Attorneys for Plaintiff

14 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
15 IN AND FOR THE COUNTY OF PIMA

16 THE STATE OF ARIZONA *ex rel.* TERRY
17 GODDARD, the Attorney General, and THE
18 CIVIL RIGHTS DIVISION OF THE ARIZONA
19 DEPARTMENT OF LAW,

20 Plaintiff,

21 CHERYL TOWNSEND,

22 Plaintiff-Intervenor,

23 vs.

24 TUCSON UNIFIED SCHOOL DISTRICT No. 1
25 of Pima County, and ALYSON NIELSON,

26 Defendants.

No. C20087298

**NOTICE OF SETTLEMENT
AND LODGING OF
CONSENT DECREE**

(Assigned to Judge Tang)

1 The State of Arizona *ex rel.* Thomas C. Horne, the Attorney General and the Civil
2 Rights Division of the Arizona Department of Law (“State” or “Plaintiff”), Cheryl Townsend
3 (“Townsend” or “Plaintiff-Intervenor”) (collectively “Plaintiffs”), Defendants Tucson Unified
4 School District No. 1 (“TUSD”) and Alyson Nielson (“Nielson”) (collectively “Defendants”)
5 desire to resolve the issues raised by the State’s Complaint, Plaintiff-Intervenor’s Complaint-
6 in-Intervention, Plaintiff-Intervenor’s Motion to Amend Complaint, and Defendants’
7 Opposition to Amend Plaintiff-Intervenor’s Complaint in the above-captioned matter without
8 the time, expense and uncertainty of further contested litigation. To that end, the Plaintiffs
9 and Defendants agreed to enter into the terms of a Consent Decree to settle the lawsuit
10 attached as Exhibit A. The length of the Consent Decree is one year.

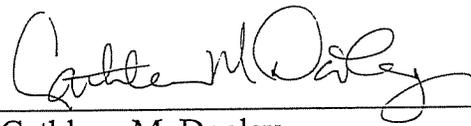
11 The Consent Decree should be approved because it is fair, reasonable, in the public
12 interest, and is consistent with the policies of the State of Arizona and its civil rights laws.
13 Defendants and Plaintiff-Intervenor consented to the entry of the Consent Decree, which is
14 reflected in the executed forms consenting to enter into a Consent Decree, attached to the
15 Consent Decree.

16 By the terms of the proposed Consent Decree, the State’s lawsuit would not be
17 dismissed and the Court would retain jurisdiction over both the subject matter of this Consent
18 Decree and the State and Defendant TUSD for one year from the date of entry of the Decree
19 to effectuate and enforce this Decree. The State may, for good cause shown, petition this
20 Court for compliance with this Decree at any time during the period that this Court maintains
21 jurisdiction over this action. Should the Court determine that Defendant TUSD has not
22 complied with this Decree, appropriate relief, including extension of this Decree for such
23 period as may be necessary to remedy its non-compliance, may be ordered. In the event
24 either the State does not submit any petitions for compliance with the Decree or the Court
25 determines Defendant TUSD has complied with the Decree, the Decree shall automatically
26

1 expire and the Court shall lose jurisdiction over this action on the date one year after the entry
2 of this Consent Decree.

3 The parties agree to the entry of this Decree upon final approval by the Court. The
4 effective date of this Decree shall be the date that it is entered by this Court.

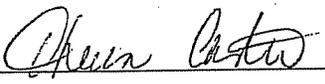
5 **DATED** this 5th day of May, 2011.

6
7 
8 _____
9 Cathleen M. Dooley
Assistant Attorney General

10 Copy of the foregoing mailed
11 this 5th day of May, 2011, to:

12 Jerald R. Wilson, Esq.
13 Miniatt & Wilson, P.C.
14 550 West Ina Rd., Suite 101
15 Tucson, AZ 85704-4496
Attorneys for Defendants

16 Mary Judge Ryan
17 Ryan Turchik, P.C.
18 300 North Main, Suite 106
19 Tucson, AZ 85701
Attorney for Plaintiff-Intervenor

20 By  _____

21 #1851439
22 *conformed copies mailed*
23 *on May 10, 2011*

24
25
26 -----

EXHIBIT A

1 THOMAS C. HORNE
2 The Attorney General
3 Firm No. 14000

4 Rose Daly-Rooney, No. 015690
5 Cathleen M. Dooley, No. 022420
6 Assistant Attorneys General
7 Civil Rights Division
8 400 W. Congress, Suite S-215
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11 Rose.Daly-Rooney@azag.gov
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14 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
15 IN AND FOR THE COUNTY OF PIMA

16 THE STATE OF ARIZONA *ex rel.* TERRY
17 GODDARD, the Attorney General, and THE
18 CIVIL RIGHTS DIVISION OF THE ARIZONA
19 DEPARTMENT OF LAW,

20 Plaintiff,

21 CHERYL TOWNSEND,

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23 vs.

24 TUCSON UNIFIED SCHOOL DISTRICT No. 1
25 of Pima County, and ALYSON NIELSON,

26 Defendants.

No. C20087298

CONSENT DECREE

(Assigned to Judge Tang)

1 The State of Arizona *ex rel.* Thomas C. Horne, the Attorney General and the Civil
2 Rights Division of the Arizona Department of Law (“State” or “Plaintiff”), Cheryl Townsend
3 (“Townsend” or “Plaintiff-Intervenor”), Defendants Tucson Unified School District No. 1
4 (“TUSD”) and Alyson Nielson (“Nielson”) (collectively “Defendants”) desire to resolve the
5 issues raised by the State’s Complaint, Plaintiff-Intervenor’s Complaint-in-Intervention,
6 Plaintiff-Intervenor’s Motion to Amend Complaint, and Defendants’ Opposition to Amend
7 Plaintiff-Intervenor’s Complaint in the above-captioned matter without the time, expense and
8 uncertainty of further contested litigation. To that end, the Plaintiffs and Defendants agreed
9 to enter into the terms of this Consent Decree to settle the lawsuit. The length of the Consent
10 Decree is one year.

11 On October 20, 2008, Plaintiff State of Arizona filed a civil lawsuit in Pima County
12 Superior Court alleging violations of the Arizona Civil Rights Act (“ACRA”). On December
13 30, 2008, Defendant TUSD answered the State’s Complaint and admitted that Cheryl
14 Townsend was its employee. On July 20, 2009, Plaintiff-Intervenor filed a Complaint in
15 Intervention against TUSD and Alyson Nielson alleging violations of ACRA and seeking to
16 intervene in the State’s lawsuit. The Court granted Plaintiff-Intervenor’s motion to intervene
17 on July 31, 2009. On August 19, 2009, TUSD answered the Complaint in Intervention. After
18 the U.S. Equal Employment Opportunity Commission (EEOC) performed a substantial
19 weight review and adopted the State’s reasonable cause determination and the U.S.
20 Department of Justice issued a right to sue letter in this same matter, Plaintiff-Intervenor
21 moved to amend her complaint to include the federal claims of retaliation and coercion under
22 the Americans with Disabilities Act (ADA), 42 U.S.C. § 12203, and retaliation under the Age
23 Discrimination in Employment Act (ADEA), 29 U.S.C. § 623d. Ms. Nielson is no longer an
24 employee, officer or agent of TUSD.
25
26

1 Specifically, the State and Plaintiff-Intervenor's complaints against Defendant TUSD
2 allege that the Defendants discriminated against Cheryl Townsend by retaliating against her
3 after Ms. Townsend filed a charge of discrimination based on age and disability with the Civil
4 Rights Division and the EEOC. Plaintiffs allege that the retaliation included failure to hire
5 Ms. Townsend for a position for which she applied and was qualified and the issuance of a
6 Letter of Direction that was placed in her personnel file.

7 The Defendants, the State, and Plaintiff-Intervenor expressly acknowledge that this
8 Decree is the compromise of disputed claims and that there was no adjudication of any claim.
9 Defendants agree to be bound by this Decree and not to contest that it was validly entered into
10 in any subsequent proceeding to implement or enforce its terms. The parties, therefore, have
11 consented to the entry of this Decree, waiving trial, findings of fact, and conclusions of law.

12 It appearing to the Court that entry of this Decree will further the objectives of the
13 ACRA, the ADA and the ADEA, and that the Decree fully protects the parties and the public
14 with respect to the matters within the scope of this Decree,

15 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** as follows:

16 **JURISDICTION**

17 1. This Court has jurisdiction over the subject matter of this action and over the
18 parties and venue in Pima County is proper. The allegations in the State's and Plaintiff-
19 Intervenor's Complaints (and Amended Complaint in Intervention), if proved, are sufficient
20 to state claims upon which relief could be granted against Defendants under the ACRA, the
21 ADA, and the ADEA.

22 **RESOLUTION OF THE COMPLAINTS**

23 2. This Decree resolves all issues and claims set forth in the State's and Ms.
24 Townsend's Complaints. This Decree also resolves all issues relating to acts and practices of
25 discrimination to which this Decree is directed.

RELEASE

1
2 3. Except for the obligations of Defendant TUSD that are expressly set forth in
3 this Decree, Defendant TUSD, its agents, employees, successors, assigns and all persons in
4 active concert or participation with Defendant TUSD, and Defendant Nielson are released
5 from any and all civil liability to the State and Ms. Townsend for the counts alleged in the
6 Complaints.

7 **INJUNCTION AND COMPLIANCE WITH THE ACRA AND TITLE VII**

8 4. Defendant TUSD, its Governing Board, employees, and successors are
9 permanently enjoined for the duration of this Consent Decree from:

10 (a) discriminating against any employee based on sex, race, color, national origin,
11 age, religion, or disability, and

12 (b) retaliating against Cheryl Townsend or any employee or individual who
13 opposes any practice made unlawful by the Arizona Civil Rights Act ("ACRA") and/or by
14 Title VII of the Civil Rights Act ("Title VII), makes a charge of discrimination, testifies,
15 assists, participates in any manner an investigation, proceeding, or hearing under ACRA
16 and/or Title VII, or makes an internal complaint of discrimination.

17 **DEFENDANT TUSD'S CORRECTIVE POLICIES**

18 5. Within 90 days of the effective date of this Consent Decree, Defendant TUSD
19 will adopt a revised AC policy expanding the section on retaliation. The policy shall prohibit
20 retaliation and shall include, at a minimum, the following:

21 a. A statement that retaliation is prohibited by state and federal law and
22 lays out a definition of retaliation that comports with the law but is written in terms
23 understandable to the average employee, and makes clear that former employees can still be
24 subject to prohibited retaliation;

25 b. A statement that Defendant TUSD is committed to a workplace free of
26 unlawful retaliation, coercion, or intimidation;

1 c. A statement encouraging employees who believe they have experienced
2 retaliation, coercion, or intimidation to use the steps in the employer's policy to complain
3 about retaliation, coercion or intimidation;

4 d. A description of the consequences, up to and including termination,
5 which will be imposed upon violators of the policy; and

6 e. A statement of the Defendant TUSD's intent to handle complaints of
7 retaliation, intimidation or coercion as confidentially as appropriate under the circumstances,
8 including a convenient, confidential, and reliable procedure to report incidents of workplace
9 retaliation that does not require the individual to report it to the alleged retaliator.

10 6. Defendant TUSD will adopt the Revised AC Policy, incorporated by reference
11 at Exhibit 1 of the Consent Decree; and the parties agree that the policy in Exhibit 1 satisfies
12 the minimum requirements of the Paragraph 5.

13 7. Within 90 days of the effective date of this Agreement, Defendant TUSD shall
14 implement a regulation whereby individuals who have opposed a practice made unlawful by
15 the ACRA, ADA, ADEA or Title VII or participated in a proceeding under these state and
16 federal anti-discrimination laws and who apply for posted positions will be protected from
17 retaliation in the selection process. The regulation will include, at minimum, the following:
18 A statement assuring applicants and employees that they will not be subject to retaliation,
19 intimidation or coercion for their protected activities and that the person(s) named in their
20 internal or external discrimination complaints will generally not participate in decision-
21 making for personnel actions, such as hiring, promotion, and demotion. Exception will be
22 made when the individual named in the employee or applicant's internal or external
23 complaint is the direct supervisor of the position at issue in the personnel action. In that event,
24 the HR Department will provide a neutral observer who has completed at least two (2) hours
25 of EEO training, including anti-retaliation, to participate in the interview and provide a
26 neutral review of the panel's decision. Prior to finalizing the regulation, Defendant TUSD

1 will provide the State with a copy of the regulation for the State's review. The purpose of the
2 State's review is limited to determining if each of the minimum requirements for the
3 regulation set forth in the Consent Decree have been included in the regulation. The State
4 will return its comments in writing to Defendants' counsel within ten days of receipt of the
5 draft.

6 8. Within 120 days of the effective date of this Consent Decree, Defendant TUSD
7 agrees to publish the new or revised policy and regulation to its current employees. For
8 purposes of this Consent Decree, "publish" means to post the policy on the employees' page
9 of its website and an HR update notifying employees of the adoption of the new policy and
10 regulation as well as use any other methods currently in use for distributing new or revised
11 policies to its employees.

12 9. Within 90 days of the effective date of this Consent Decree, TUSD HR
13 employees who could be designated the "neutral observer" as contemplated in paragraph 7 of
14 this Consent Decree, including those involved in reviewing, advising, or supervising
15 departments about the hiring process, will attend a training that is at least two (2) hours and is
16 provided by an individual knowledgeable about state and federal protections against
17 retaliation, coercion and intimidation. The training will cover an overview of anti-retaliation
18 provisions of the ACRA, ADA, ADEA and Title VII, examples of activities protected by
19 these laws; types of prohibited adverse employment actions, and illustrations of conduct that
20 may constitute unlawful retaliation, coercion, or intimidation; TUSD's revised and new
21 policies outlined in paragraph 6 of this Consent Decree.

22 **MONETARY RELIEF**

23 10. Defendant TUSD will provide Townsend paid administrative leave from
24 September 1, 2011 through December 31, 2011 based on the same rate of pay that Townsend
25 is currently receiving, including any wage increases that she is entitled to at the time the leave
26 begins. Should Townsend's active employment end prior to September 1, 2011 for any

1 reason, Defendant TUSD will pay Townsend for four (4) months of paid administrative leave
2 beginning on the date her active employment ended.

3 11. Within 20 business days of the entry of the Consent Decree, Defendant TUSD
4 shall pay Townsend the sum of \$10,000 for settlement of claims of any and all claims for
5 emotional distress and issue a 1099 IRS form to her for the payment. The parties
6 acknowledge this amount is in settlement of Townsend's alleged emotional distress claims.

7 12. Within 20 business days of the effective date of the entry of the Consent Decree,
8 Defendant TUSD shall pay to the law firm of Ryan Turchik, P.C. the sum of \$10,000 for
9 settlement of Townsend's claim for attorney's fees and costs. The payment shall be made by
10 check payable to Ryan Turchik, P.C., and delivered to Ryan Turchik, P.C. at 300 N. Main
11 Ave., Ste. 106, Tucson, AZ 85701.

12 13. Within 20 business days of the effective date of the entry of the Consent Decree,
13 Defendant TUSD shall pay to the State the sum of \$2,000 for the enforcement of this Consent
14 Decree and civil rights in Arizona. The payment shall be made by check payable to the
15 Arizona Attorney General and delivered to Cathleen M. Dooley or Rose A. Daly-Rooney,
16 Assistant Attorneys General, at 400 W. Congress, South Building, Suite S-215, Tucson,
17 Arizona 85701 or their successors.

18 REPORTING BY DEFENDANT

19 14. Defendant TUSD shall provide the Attorney General's Office written reports,
20 verified under oath, beginning three months from the date of the entry of this Consent Decree
21 and thereafter for every three months for the duration of the Consent Decree. The Consent
22 Decree is a term of one year. The initial written report shall include copies of the checks
23 issued in payment to Ms. Townsend and Ms. Ryan, documentation of payment of paid leave,
24 the new or revised policies and electronic posting of the policies. Should Defendant TUSD
25 implement any changes to its discrimination or retaliation policies or procedures during the
26

1 term of this Consent Decree, it will report those changes to the Attorney General's Office in
2 the written report it provides under this Consent Decree following the changes.

3 **CONTINUING JURISDICTION OF THE COURT**

4 15. The Court shall retain jurisdiction over both the subject matter of this Consent
5 Decree and the State and Defendant TUSD for one year from the date of entry of the Decree
6 to effectuate and enforce this Decree. The State may, for good cause shown, petition this
7 Court for compliance with this Decree at any time during the period that this Court maintains
8 jurisdiction over this action. Should the Court determine that Defendant TUSD has not
9 complied with this Decree, appropriate relief, including extension of this Decree for such
10 period as may be necessary to remedy its non-compliance, may be ordered. In the event
11 either the State does not submit any petitions for compliance with the Decree or the Court
12 determines Defendant TUSD has complied with the Decree, the Decree shall automatically
13 expire and the Court shall lose jurisdiction over this action on the date one year after the entry
14 of this Consent Decree.

15 **MISCELLANEOUS PROVISIONS**

16 16. This Decree shall be binding on Defendant TUSD, its Governing Board,
17 employees, successors, assigns and all persons in active concert or participation with
18 Defendant TUSD.

19 17. The Defendants, the State, and Plaintiff-Intervenor represent that they have read
20 this Consent Decree in its entirety and are satisfied that they understand and agree to all its
21 provisions, and represent that they have freely signed this Decree without coercion. The
22 undersigned representatives for Defendants also warrant that they have express authority to
23 enter into the Consent Decree on behalf of Tucson Unified School District No. 1.

24 18. This Decree shall be governed in all respects by the laws of the State of
25 Arizona.

1 19. Except as specifically set forth to the contrary in this Decree, the State,
2 Defendants and Plaintiff-Intervenor shall bear their respective attorneys' fees and costs
3 incurred in this action up to the date of entry of this Decree. In any action brought to assess or
4 enforce Defendants' compliance with the terms of this Decree, the Court may in its discretion
5 award reasonable costs and attorneys' fees to the prevailing party.

6 **NOTICE**

7 20. When this Decree requires the submission of reports, notices or other materials
8 to the State, they shall be mailed to: Cathleen M. Dooley or Rose A. Daly-Rooney, Assistant
9 Attorneys General, Office of the Attorney General, Civil Rights Division, 400 West
10 Congress, Suite S-215, Tucson, Arizona 85701, or their successor(s).

11 **EFFECTUATING CONSENT DECREE**

12 21. The parties agree to the entry of this Decree upon final approval by the Court.
13 The effective date of this Decree shall be the date that it is entered by this Court.

14 **ENTERED AND ORDERED** this 6th day of May, 2011.

15
16 Paul E. Tang

17 _____
18 Honorable Paul Tang
19 Pima County Superior Court
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CONSENT TO ENTER INTO CONSENT DECREE

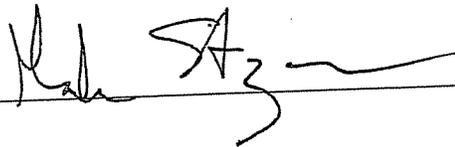
1. I, Mark Stegeman, in my capacity as President on the Tucson Unified School District Governing Board, acknowledge that the Tucson Unified School District Governing Board has reviewed and approved the foregoing Consent Decree, and is aware of the right to a trial in this matter and have waived that right.

2. TUSD further agrees to the jurisdiction of the Court, and consents to entry of this Consent Decree.

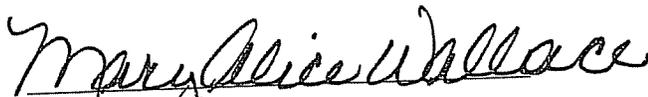
3. TUSD state that no promise of any kind or nature whatsoever (other than the terms of this Consent Judgment) was made to induce it to enter into this Consent Decree, that it has entered into this Consent Judgment voluntarily, and that this Consent Decree constitutes the entire agreement between the parties.

4. TUSD has been represented by counsel in this case, and that the terms of this Consent Judgment have been explained to the Governing Board to its satisfaction, and are fully understood by it.

DATED this 12th day of April, 2011.



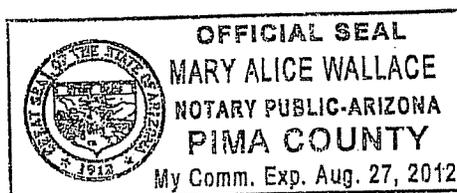
SUBSCRIBED AND SWORN to before me this 12th day of April, 2011,
by Mark Stegeman.



Notary Public

My Comm. Expires:

Aug. 27, 2012



CONSENT TO ENTER INTO CONSENT DECREE

1. I, Alyson Nielson, acknowledge that I have read the foregoing Consent Decree, and am aware of the right to a trial in this matter and have waived that right.
2. I agree to the jurisdiction of the Court, and consent to entry of this Consent Decree.
3. I state that no promise of any kind or nature whatsoever (other than the terms of this Consent Judgment) was made to induce it to enter into this Consent Decree, that I have entered into this Consent Judgment voluntarily, and that this Consent Decree constitutes the entire agreement between the parties.
4. I further state that I have been represented by counsel in this case, and that the terms of this Consent Judgment have been explained to me to my satisfaction, and are fully understood by it.

DATED this 14th day of April, 2011.

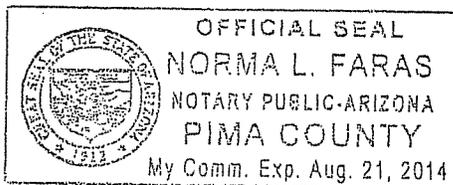
Alyson Nielson
ALYSON NIELSON

SUBSCRIBED AND SWORN to before me this 14 day of April, 2011, by Alyson Nielson.

Norma L. Faras
Notary Public

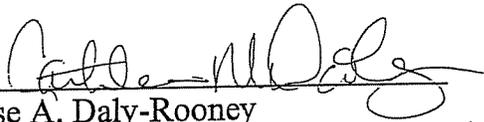
My Comm. Expires:

Aug 21, 2014



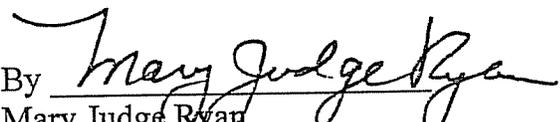
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THOMAS C. HORNE
Attorney General

By 
Rose A. Daly-Rooney
Cathleen M. Dooley
Assistant Attorneys General

Date 5/5/11

RYAN TURCHIK P.C.

By 
Mary Judge Ryan
Attorneys for Cheryl Townsend

Date 5/3/2011

MINIAT & WILSON, P.C.

By _____
Jerald Wilson
Attorney for Defendants Tucson Unified
School District and Alyson Nielson

Date _____

Copy of the foregoing mailed/hand-delivered
this ____ day of _____, 2011, to:

Jerald R. Wilson, Esq.
Miniat & Wilson, P.C.
550 West Ina Rd., Suite 101
Tucson, AZ 85704-4496

1 Attorneys for Defendants

2 Mary Judge Ryan

3 Ryan Turchik, P.C.

4 300 North Main, Suite 106

5 Tucson, AZ 85701

6 Attorney for Plaintiff-Intervenor

7 By _____

8 TUC #1585459v2

Approved as to form and content:

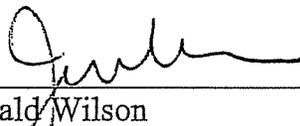
<p>THOMAS C. HORNE Attorney General</p> <p>By <u>Cathleen M. Dooley</u> Rose A. Daly-Rooney Cathleen M. Dooley Assistant Attorneys General</p> <p>Date <u>5/5/11</u></p>	<p>RYAN TURCHIK P.C.</p> <p>By <u>Mary Judge Ryan</u> Mary Judge Ryan Attorneys for Cheryl Townsend</p> <p>Date _____</p>
	<p>MINIAT & WILSON, P.C.</p> <p>By <u>Jerald Wilson</u> Jerald Wilson Attorney for Defendants Tucson Unified School District and Alyson Nielson</p> <p>Date _____</p>

Copy of the foregoing mailed/hand-delivered
this ____ day of _____, 2011, to:

<p>Jerald R. Wilson, Esq. Miniat & Wilson, P.C. 550 West Ina Rd., Suite 101 Tucson, AZ 85704-4496 Attorneys for Defendants</p>	<p>Mary Judge Ryan Ryan Turchik, P.C. 300 North Main, Suite 106 Tucson, AZ 85701 Attorney for Plaintiff-Intervenor</p>
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By _____

Approved as to form and content:

<p>THOMAS C. HORNE Attorney General</p> <p>By _____ Rose A. Daly-Rooney Cathleen M. Dooley Assistant Attorneys General</p> <p>Date _____</p>	<p>RYAN TURCHIK P.C.</p> <p>By _____ Mary Judge Ryan Attorneys for Cheryl Townsend</p> <p>Date _____</p>
	<p>MINIAT & WILSON, P.C.</p> <p>By  _____ Jerald Wilson Attorney for Defendants Tucson Unified School District and Alyson Nielson</p> <p>Date _____</p>

Copy of the foregoing mailed/hand-delivered
this ____ day of _____, 2011, to:

<p>Jerald R. Wilson, Esq. Miniat & Wilson, P.C. 550 West Ina Rd., Suite 101 Tucson, AZ 85704-4496 Attorneys for Defendants</p>	<p>Mary Judge Ryan Ryan Turchik, P.C. 300 North Main, Suite 106 Tucson, AZ 85701 Attorney for Plaintiff-Intervenor.</p>
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By _____