



**TRANSPARENCY  
INTERNATIONAL**

the global coalition against corruption

EU OFFICE

# LOBBYING IN EUROPE

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**Hidden Influence, Privileged Access**



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# OUTLINE

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## 1. LOBBYING IN EUROPE

- DEFINITIONS
- FINDINGS
- POSSIBLE SOLUTIONS

## 2. WHAT CAN I DO?

- LEAD BY EXAMPLE
- USE INTEGRITY WATCH
- ADVOCATE FOR CHANGE

## 3. DISCUSSION

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# LOBBYING IN EUROPE

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# LOBBYING: OUR DEFINITION

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...Any **direct or indirect communication** with public officials or representatives with the purpose of influencing public decision-making...

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# LOBBYING IS NOT A PROBLEM...

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“Everyone shall have the right to **freedom of expression**; this right shall include freedom to seek, receive and impart information and ideas of all kinds...”

*International Covenant on Civil and Political Rights*

“Lobbying provides **useful information** and opinions to political representatives and public officials. It is not, therefore, a morally questionable activity, but **an important element of the democratic debate** and decision-making process.”

*Transparency International, 2009*

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# UNDUE INFLUENCE: OUR DEFINITION

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*...Undue influence occurs when particular individuals or groups gain an **unfair advantage over public decision-making at the expense of the public interest**. This can particularly occur when decision-making is **opaque**, when public officials or third parties **act unethically**, or when **access to political system** is skewed in favour of select interests...*

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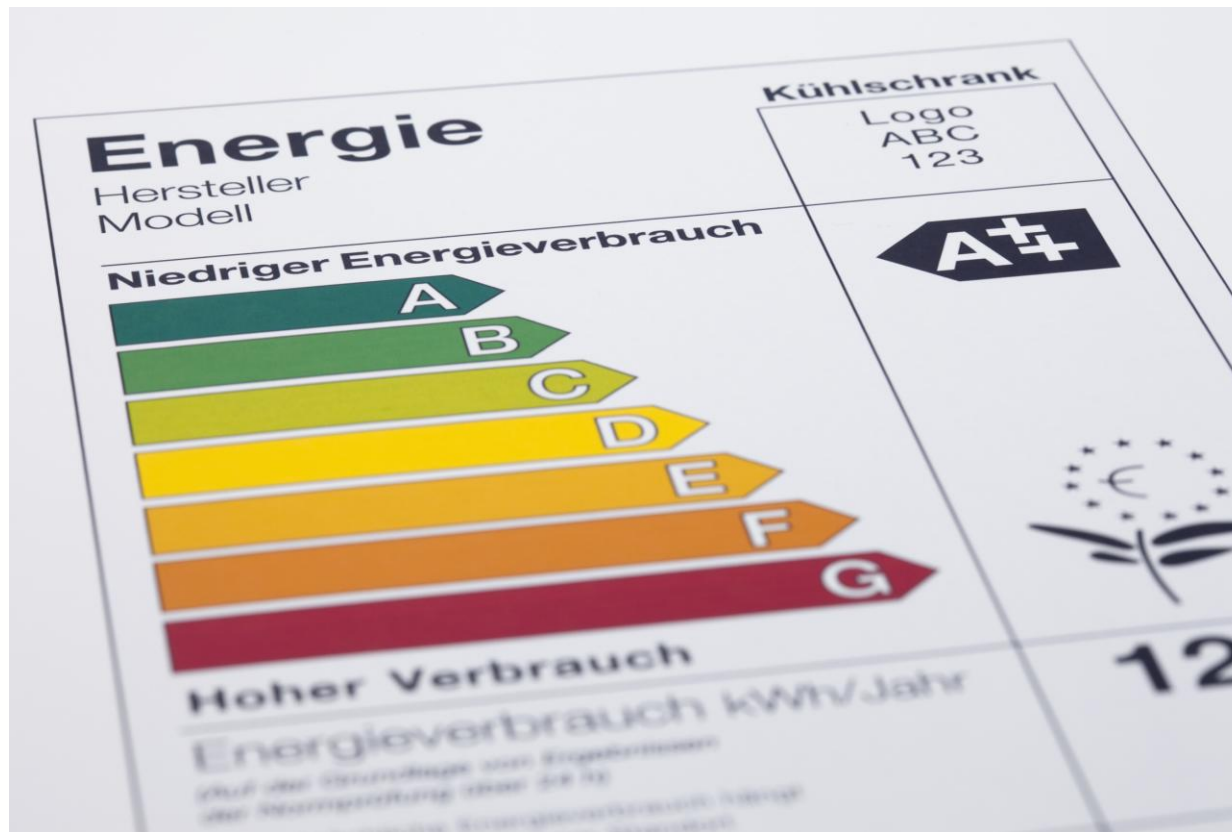
# NEW FORMS OF POLITICAL CORRUPTION

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- **unequal access** to decision-makers
  - **undue influence** of lobbyists
  - **revolving door** between public and private sector
  - **conflicts of interest** between multiple activities
- Loss of public trust + scandals

# CASE STUDY: CAR CO2 EMISSIONS





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# CASE STUDY: CAR CO2 EMISSIONS

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**B**



**F**

# CASE STUDY: CAR CO2 EMISSIONS



**E**



**F**

# CASE STUDY: CAR CO2 EMISSIONS



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# URGENCY OF REFORM

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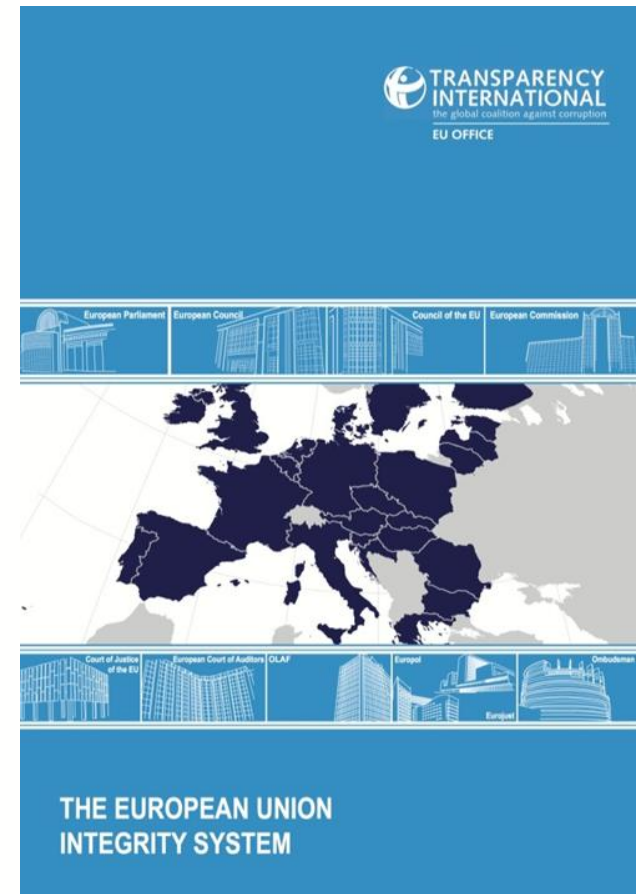
- **Multiple scandals at EU and national level** feed perception that lobbying is associated with corruption.
- **60% of citizens** across Europe consider their country's government being run to a large extent or entirely by a few big interests (TI GCB, 2013)
- **80% European companies** consider the links between business and politics being too close in their country and leading to corruption. (EU anti-corruption report, 2014)
- **80% legislators, 90% of lobbyists** think inappropriate influence peddling takes place, and 1 in 3 legislators consider it a frequent problem. (OECD report, 2014)

# POLITICAL CORRUPTION



The TI EU toolkit:

- **Integrity System Studies**
- Regional Reports
- Policy Recommendations
- EU Integrity Watch



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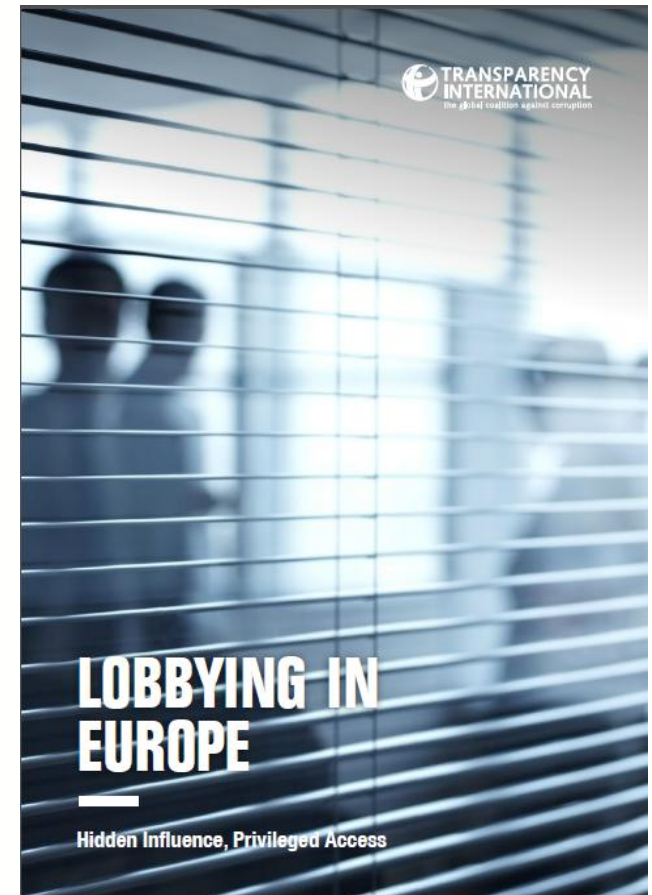
# POLITICAL CORRUPTION

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# POLITICAL CORRUPTION

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The TI EU toolkit:

- Integrity System Studies
- Regional Reports
- **Policy Recommendations**
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The logo is positioned in the top right corner of a blue rectangular area. Below the logo, a series of white footprints of varying sizes and orientations are scattered across the blue background, leading towards the bottom right.

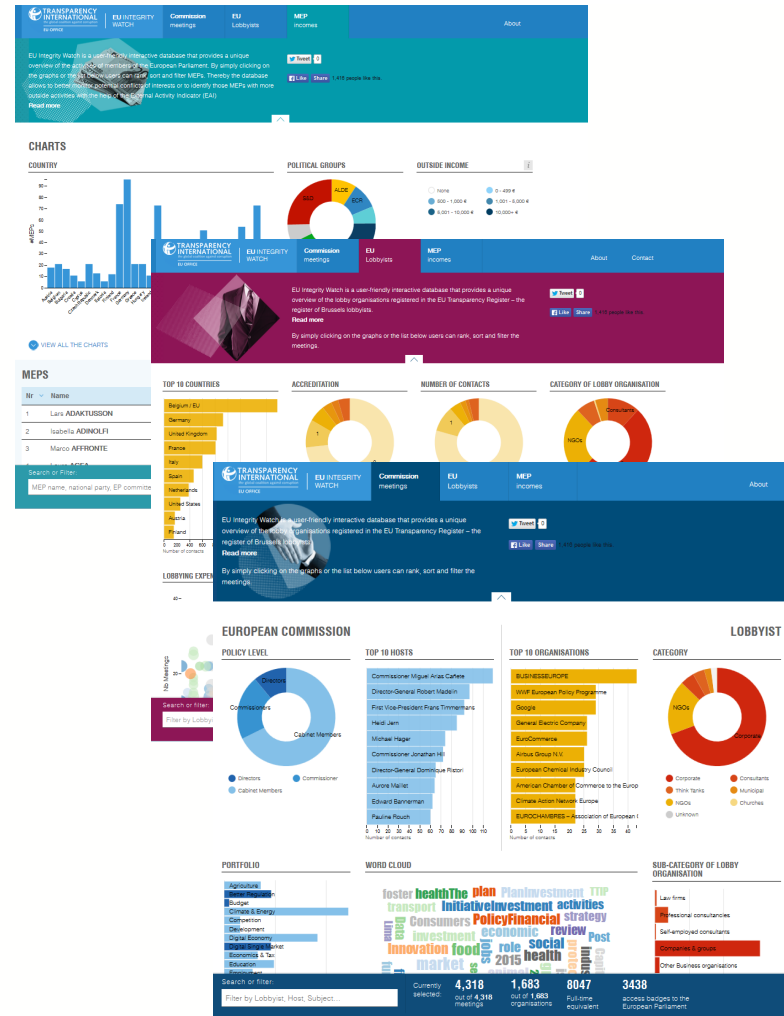
EU LEGISLATIVE FOOTPRINT  
What's the real influence of lobbying?

# POLITICAL CORRUPTION



The TI EU toolkit:

- Integrity System Studies
- Regional Reports
- Policy Recommendations
- **EU Integrity Watch**





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# 2015 REPORT: EU LOBBYING

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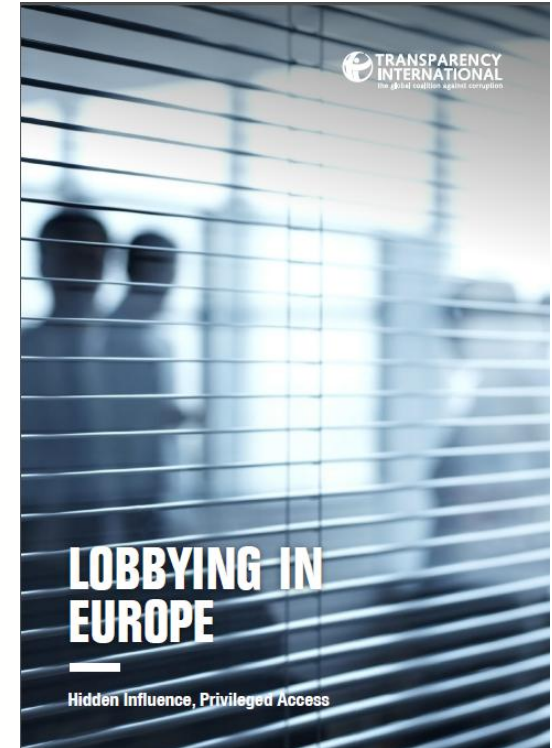
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# BACKGROUND

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- **19** countries + **3** EU institutions
- **65** indicators measuring...
- **3** dimensions of lobbying: transparency, integrity and equality of access

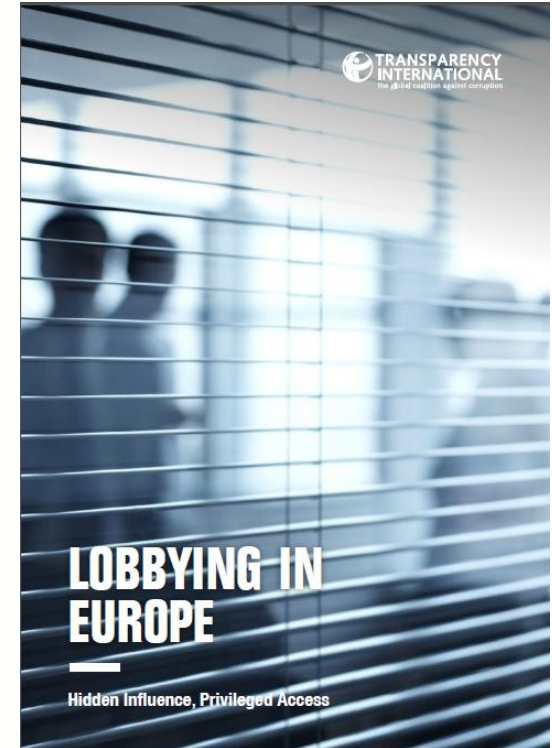


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# KEY FINDINGS

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- The lobbying landscape in Europe is **diverse and complex**
- Hidden and informal influence persists
- Lobbying **regulation is woefully inadequate**



# LOBBYING IN EUROPE

HOW PROTECTED IS EUROPE FROM UNDUE LOBBYING?

31%



TRANSPARENCY

26%



INTEGRITY

34%



EQUALITY OF ACCESS

33%



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# KEY FINDINGS

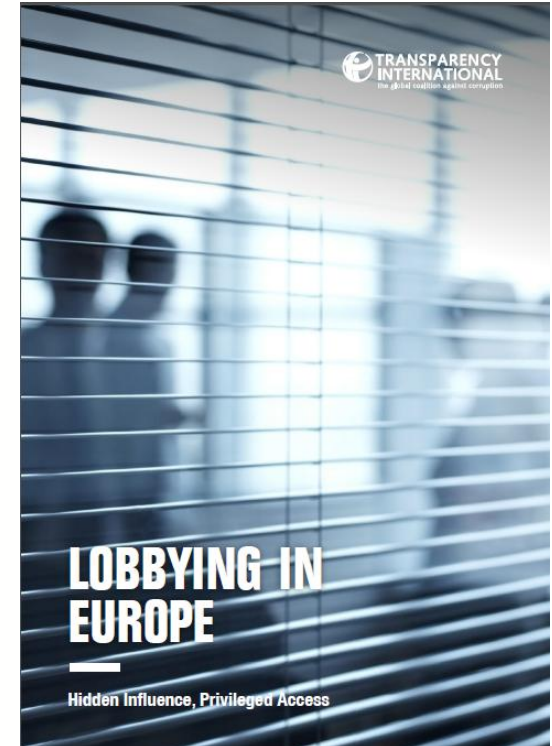
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**Transparency:** Citizens and interest groups have little opportunity to know who is influencing public decisions, on what issues and how.

**Integrity:** Neither lobbyists nor public officials are subject to clear and enforceable ethical rules regarding lobbying activity

**Equality of Access:** Public participation is inadequately protected, and certain groups are able to enjoy privileged access to decision-makers



0% 50% 100%

Scale 0-100, where 0 is the weakest and 100 is the strongest

Countries and institutions	Overall score
<b>Slovenia</b>	<b>55%</b>
<b>European Commission</b>	<b>53%</b>
<b>Lithuania</b>	<b>50%</b>
<b>United Kingdom</b>	<b>44%</b>
<b>Austria</b>	<b>40%</b>
<b>Ireland</b>	<b>39%</b>
<b>Latvia</b>	<b>39%</b>
<b>European Parliament</b>	<b>37%</b>
<b>Netherlands</b>	<b>34%</b>
<b>Poland</b>	<b>33%</b>
<b>Czech Republic</b>	<b>29%</b>

Countries and institutions	Overall score
<b>Estonia</b>	<b>29%</b>
<b>France</b>	<b>27%</b>
<b>Slovakia</b>	<b>26%</b>
<b>Bulgaria</b>	<b>25%</b>
<b>Germany</b>	<b>23%</b>
<b>Portugal</b>	<b>23%</b>
<b>Spain</b>	<b>21%</b>
<b>Italy</b>	<b>20%</b>
<b>Council of European Union</b>	<b>19%</b>
<b>Cyprus</b>	<b>14%</b>
<b>Hungary</b>	<b>14%</b>

**31%**  
Regional average

# LOBBYING REGISTERS COMPARED



How do existing lobbying registers in Europe measure up against each other?

Country/Institution	Registration and disclosure by lobbyists	Oversight of register and transparency rules	Overall score for lobbying registers
Slovenia	60	56	58
Ireland (draft law)	64	50	57
Lithuania	43	56	50
EU Transparency Register	50	38	44
Austria	57	19	38
France (National Assembly and Senate registers)	39	16	28
Poland	27	13	20
United Kingdom	33	25	19





= SOLUTIONS





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# TRANSPARENCY MEASURES

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- Lobby Register
- Legislative Footprint:  
meetings + written input



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# INTEGRITY MEASURES

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- Cooling off periods
- Codes of conduct for public officials
- Codes of conduct for lobbyists



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# EQUALITY OF ACCESS MEASURES

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- Equality in consultations for citizens, interest groups and corporate bodies
- Publish the results
- Publish all calls for applications to sit on advisory/expert groups



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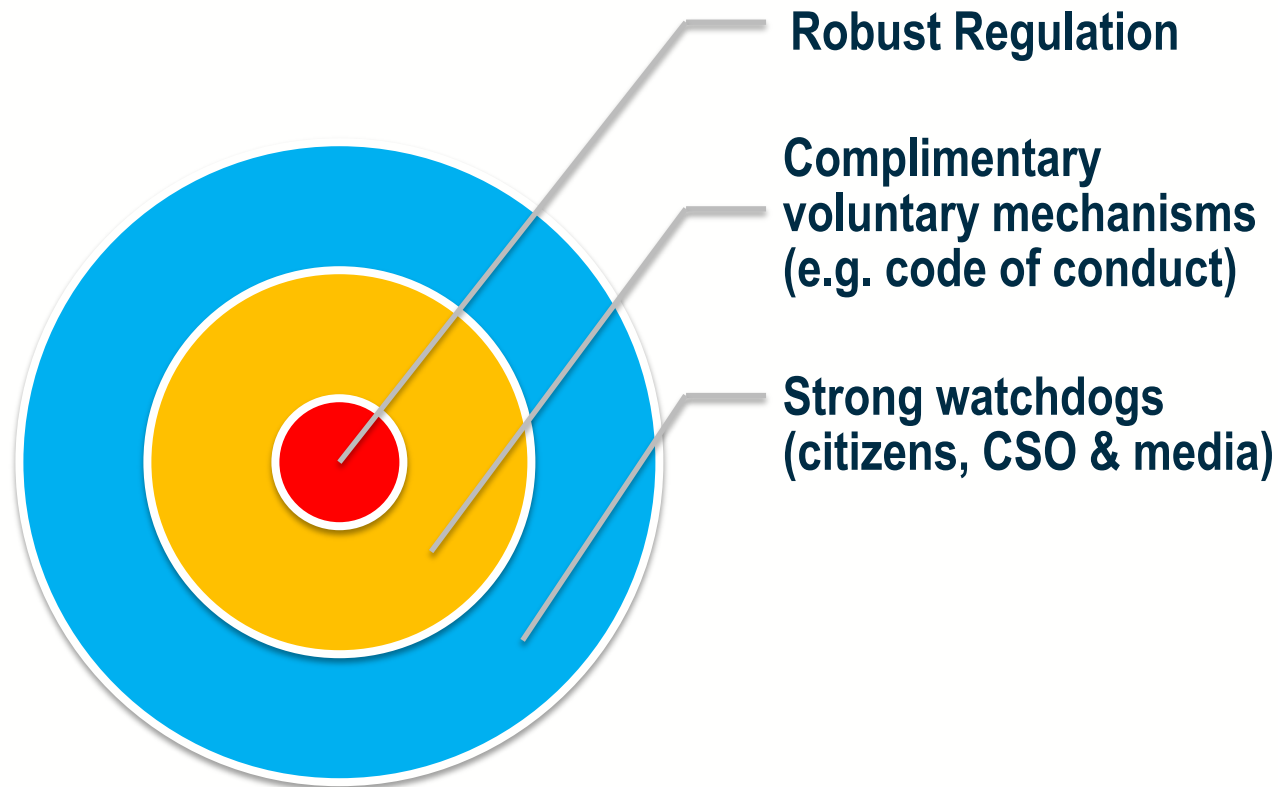
**WHAT CAN I DO?**

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# MANAGING RISKS

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# WHAT CAN I DO?

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- Lead by Example
- Use Watch Dog Tools
- Advocate for Change



# LEADING BY EXAMPLE



## TI EU MEETINGS

[Home](#)[About Us](#)[Focus Areas](#)[News](#)[Contact Us](#)[Support us](#)[TI Global](#)

### TI EU MEETINGS

#### OUR MEETINGS WITH EU DECISION-MAKERS

This list contains meetings between staff members of Transparency International EU and MEPs, Commissioners and other officials who are involved in the policy-making process. We report all meetings and contacts with EU officials where we have sought to influence the policy-making process. This list was started on 17 February 2015 and first published on 12 March 2015. Making our meetings with EU decision-makers public follows a new set of recommendations to the EU Institutions when it comes to making their meetings with lobbyists or interest representatives more visible. You can find all our recommendations on the EU Legislative Footprint [here](#).

In case you have any questions or comments please do not hesitate to contact:

Daniel Freund  
Policy Officer EU Integrity  
[dfreund@transparency.org](mailto:dfreund@transparency.org)  
+32 2 893 2459

DATE	INSTITUTION	NAME	POSITION	TI STAFF	SUBJECT
17.06.2015	Permanent Representation to the Republic of Latvia to the EU	Līga Renkmane; Inga Melnace	Head of Division Foreign Trade and Defence; Councillor for Criminal Law in Justice and Home Affairs	Carl Dolan, Irini Tseminidou, Agnija Jansone	Latvian Presidency, Establishment of the EPPO, PIF Directive and TTIP

# LEADING BY EXAMPLE



- Gifts & Hospitality
- Revolving Door & Conflicts of Interest
- Publication of meetings

## Code of Ethical Advocacy Board-approved, 5 June 2015

### Introduction

In order to achieve our vision of a world in which government, politics, business, civil society and the daily lives of people are free of corruption, Transparency International (TI) is actively advocating and routinely engaging with a wide range of individuals as well as public and private institutions globally. TI is a non-profit organisation, committed to the fight against corruption and to being transparent about our advocacy activities, as well as our policies, expenditure and the names of the individuals working for us.

TI is committed to ethical behaviour in all aspects of our work and this is reflected in our comprehensive [governance and ethics framework](#). TI has a number of specific policies which aim to ensure that we adhere to the highest ethical standards in our work. Among these is our [public disclosure policy](#), which outlines our commitment to proactively disclose information about the organisation and our activities, and our access to information policy more broadly, and our [conflict of interest policy](#). These policies are all rooted in our [Vision, Values and Guiding Principles](#) and based on our [Code of Conduct](#). TI is also a founding member and co-author of the [INGO Accountability Charter](#), which contains important commitments regarding responsible advocacy, including having explicit ethical policies to guide our choices of advocacy; a clear and published process for adopting public policy positions, as well as ensuring an evidence-based and responsible approach to public criticism.

This code of ethical advocacy aims to complement our existing ethics architecture by spelling out clearly our commitment to being open and ethical in our advocacy activities.

### Definitions

The term 'advocacy' generally encompasses a broad range of activities which seek to influence decision-making. These activities can include both mobilising public involvement to influence a decision-maker and directly engaging with a decision-maker. It is widely recognised that direct engagement by companies, associations, organisations and individuals with decision-makers can become distortive if it happens in secret, if it is conducted unethically or if disproportionate levels of influence exist. When safeguards for transparency and accountability are limited or non-existent, there is a risk of illegal, undue and unfair influence taking place.

For the purposes of this code, we are mostly concerned with advocacy through direct engagement with decision-makers. Hereafter advocacy refers to any communication which is made, managed or directed towards a decision-maker or person with influence (public or private sector) with the purpose of seeking to influence that person and their decisions. This includes the preparation, initiation and follow-up to the communications made. Targets of our advocacy include public decision-makers and representatives at national, supranational and subnational levels, representatives from the private sector and from other international organisations and associations.

### Scope of application

This Code explicitly outlines the commitment to ethical advocacy of TI-Secretariat (TI-S) and its senior leadership. It applies to TI-S staff, members of the international Board of Directors, TI-S formal Advisors and TI individual Members, TI-S volunteers and any representatives mandated by TI-S to speak on behalf of the organisation, hereafter referred to as 'we'. While the application of

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Transparency International  
Board of Directors Meeting  
3-5 June 2015 – Berlin, Germany

BoD\_20150630

this code does not extend to TI's National Chapters (unless a National Chapter representative is mandated to speak on behalf of TI-S), we hope that it will serve as an inspiration to the TI movement and encourage our national chapters to adopt similar codes, and we welcome the fact that several TI National Chapters have already done so.

Guiding principles of ethical advocacy



# EU INTEGRITY WATCH

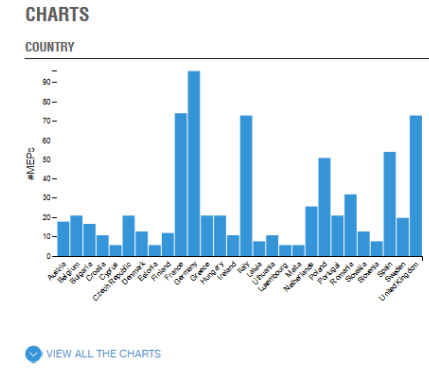


**EU INTEGRITY WATCH**
Commission meetings
EU Lobbyists
MEP incomes
About

EU Integrity Watch is a user-friendly interactive database that provides a unique overview of the activities of members of the European Parliament. By simply clicking on the graphs or the list below users can rank, sort and filter MEPs. Thereby the database allows to better monitor potential conflicts of interests or to identify those MEPs with more outside activities with the help of the External Activity Indicator (EAI).

[Read more](#)

Tweet 0



### MEPS

Nr	Name	Country
1	Lars ADAKTUSSON	Sweden
2	Isabella ADINOLFI	Italy
3	Marco AFFRONTI	Italy

Search or Filter:

You have currently selected **750** out of 750

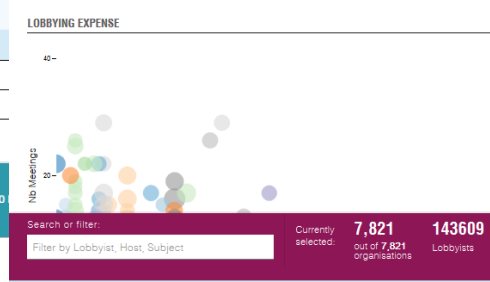
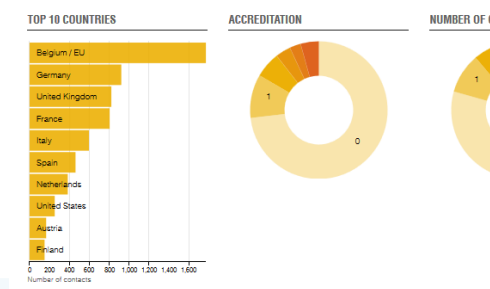
**EU INTEGRITY WATCH**
Commission meetings
EU Lobbyists
MEP incomes
About
Contact

EU Integrity Watch is a user-friendly interactive database that provides a unique overview of the lobby organisations registered in the EU Transparency Register – the register of Brussels lobbyists.

[Read more](#)

Like Share 1,418 people like this

By simply clicking on the graphs or the list below users can rank, sort and filter the meetings.



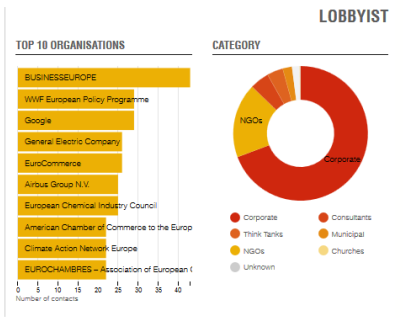
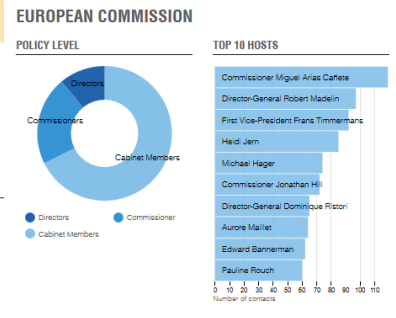
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### PORTFOLIO

### WORD CLOUD

### SUB-CATEGORY OF LOBBY ORGANISATION

Search or filter:

Currently selected: **4,318** out of 4,318 meetings

**1,683** out of 1,683 organisations

**8047** Full-time equivalent

**3438** access badges to the European Parliament



# MEP OUTSIDE INCOMES

# DECLARATIONS OF FINANCIAL INTERESTS



en [dropdown] News MEPs About Parliament Plenary Committees Delegations At your service EP TV More [dropdown]

European Parliament  
**MEPs**

Find your [input]

Search Full list Incoming / Outgoing Assistants Directory Search on [input]

**Martin SCHULZ** [speaker icon]

**SAD** Group of the Progressive Alliance of Socialists and Democrats in the European Parliament

Member

Germany  
Sozialdemokratische Partei Deutschlands  
Date of birth: 20 December 1955, Hehlraht

Home Parliamentary activities Curriculum vitae Declarations History of parliamentary service

**President**

- PE** European Parliament
- BURO** Parliament's Bureau
- BCPR** Conference of Presidents

**Chair**

- DMED** Delegation to the Parliamentary Assembly of the Union for the Mediterranean

**Member**

- CPDE** Conference of Delegation Chairs

URL [input]

### Erklärung der finanziellen Interessen der Mitglieder

Gemäss Anlage I zur Geschäftsordnung des Europäischen Parlaments betreffend den Verhaltenskodex für die Mitglieder des Europäischen Parlaments im Bereich finanzielle Interessen und Interessenkonflikte  
Den Präsidenten bis zum Ende der ersten Tagung nach der Wahl zum Europäischen Parlament oder innerhalb von 30 Tagen nach dem Antritt eines Mandats im Parlament während der laufenden Wahlperiode und innerhalb einer Frist von 30 Tagen nach Eintreten einer Änderung vorzulegen

**Familienname** : Schulz

**Vorname** : Martin

Ich, der/die Unterzeichnete, erkläre hiermit ehrenwörtlich und in voller Kenntnis der Geschäftsordnung, einschließlich des Verhaltenskodex für die Mitglieder, der dieser beigefügt ist, Folgendes:

(A) „Gemäß Artikel 4 Absatz 2 Buchstabe a des Verhaltenskodex erkläre ich meine Berufstätigkeit(en) während des Dreijahreszeitraums vor Antritt meines Mandats im Parlament und meine Mitgliedschaften in Leitungsorganen oder Ausschüssen von Unternehmen, nichtstaatlichen Organisationen, Verbänden oder sonstigen rechtmäßig geschaffenen Einrichtungen während dieses Zeitraums:“

Berufstätigkeit oder Mitgliedschaft <sup>1</sup>	Einkommenskategorien <sup>2</sup>			
	1	2	3	4
1. Mitglied des Europäischen Parlaments			X	
2.				
3.				
4.				
5.				

# EU INTEGRITY WATCH



## FUNCTIONS:

- Totals
- Filters
- Rankings
- Search
- External Activity Indicator



**EU INTEGRITY WATCH**

EU Integrity Watch is a user-friendly interactive database that provides a unique overview of the activities of members of the European Parliament. By simply clicking on the graphs or the list below users can rank, sort and filter MEPs. Thereby the database allows to better monitor potential conflicts of interests or to identify those MEPs with more outside activities with the help of the External Activity Indicator (EAI)

[Read more](#)

About Contact

[Tweet!](#) (717)

[Like](#) [Share](#) 1,278 people like this. Be the first of your friends to like this.

Filter the results by selecting a range in the charts, or by filling the filter box:

filter by MEP name, national party, EP committee...

You have currently selected

# 751

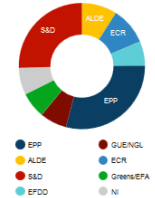
/751 MEPs

### Charts

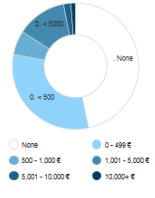
#### Country



#### Political Groups



#### Outside income



[VIEW ALL THE CHARTS](#)

### MEPs

Nr	Name	Country	Group	Attendance	Outside income	EAI
1	Guy VERHOFSTADT	Belgium	ALDE	67.02%	15005 € or more	51
2	Michèle ALLIOT-MARIE	France	EPP	84.56%	15002 € or more	45
3	Renaud MUSELIER	France	EPP	83.51%	12004 ~ 34491 €	30
4	Sylvie GOULARD	France	ALDE	91.23%	11002 € or more	42
5	Daniel BUDA	Romania	EPP	93.33%	10501 € or more	39
6	Renato SORU	Italy	S&D	70.53%	10501 € or more	32
7	Georg MAYER	Austria	NA/NI	96.14%	10100 ~ 10100 €	21
8	Rachida DATI	France	EPP	93.33%	10001 € or more	36
9	Bogdan Brunon WEINTA	Poland	EPP	98.95%	10001 € or more	36
10	Remo SERNAGIOTTO	Italy	EPP	97.54%	8500 ~ 8500 €	18

# EU INTEGRITY WATCH



## FINDINGS:

- **53%** with external activities
- Total: **5.8m to 18.3m** / year
- **9** MEPs earn **10,000+** EUR
- **1200** activities including “freelancer”, “consultant” and “MDNA”

**Guy VERHOFSTADT**

Country: Belgium  
EAI: 51  
Outside revenues: 15005 ~ Infinity €  
Monthly salary: 8020.53 € ~ 19.586 € depending on allowances  
Attendance: 67 %  
Group: ALDE  
Party: Open Vlaamse Liberalen en Democraten  
Age: 62  
Committee: AFCD  
Substitute:   
Delegation:   
Full profile: [European Parliament Website](#)  
Source: [Original declaration](#)  
Update: fetched on 22/09/2014

**Charts**

Country

**Declaration of Members' financial interests**

**A. Previous occupation**

Activity	Income Range
Europees Parlementlid + Vztl Alde Group	5001 ~ 10000
APG Nederland: Vice-Vztl Raad van Commissarissen	1001 ~ 5000
Exmar België: Bestuurder	1001 ~ 5000
Sofina: Bestuurder	10001 or more
EPA: Vztl van het Bestuur	1001 ~ 5000
Open VLD nationaal + Gent: lid partijbestuur	0 ~ 499 €
Centrum Maatsch. Informatie vzw: Bestuurder	0 ~ 499 €
Liberaal Studiecentrum vzw: Bestuurder	0 ~ 499 €
Libera vzw: Bestuurder	0 ~ 499 €

**B. Other mandates**

**C. Regular outside activity**

**D. Committee & Board memberships**

Activity	Income Range
Exmar België: Bestuurder	1001 ~ 5000
Sofina: Bestuurder	10001 or more
EPA: Voorzitter van het Bestuur	1001 ~ 5000
Open VLD Nationaal + Gent: Lid partijbestuur	0 ~ 499 €
Centrum Maascht. Informatie: Bestuurder	0 ~ 499 €
Liberaal Studiecentrum vzw: Bestuurder	0 ~ 499 €
Libera vzw: Bestuurder	0 ~ 499 €

**E. Occasional outside activity**

Activity	Income Range
Assemblee sprekersbureau Nederland	1001 ~ 5000
Speaker Bureau CALYA Consultants	1001 ~ 5000
The London Speaker Bureau Russia	500 ~ 1000
UBS International Center of Economics University of Zurich	500 ~ 1000

**F. Holdings**

**I. Additional information**

**MEPs**

Nr	Name	EAI
1	Guy VERHO	51
2	Michèle ALL	45
3	Renaud MU	30
4	Sylvie GOUL	42
5	Daniel BUDA	39
6	Renato SOR	32
7	Georg MAY	21
8	Rachida DAT	36
9	Bogdan Br	36
10	Remo SER	18
11	Jobbe MÉLI	18
12	Zdzisław KR	20

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# EU INTEGRITY WATCH

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## OUTCOMES:

- Over 100 updated declarations
- 25,000 visitors
- Press coverage
- Revision of rules planned

## RECOMMENDATIONS:

- More information
- Meaningful checks
- Sanctions



**CORRIERE DELLA SERA**

**Le Monde**



**ARD** <sup>1</sup>



**EL PAÍS**



# LOBBY MEETINGS & EU LOBBYISTS

# EC TRANSPARENCY INITIATIVE



EUROPEAN COMMISSION

English (en) Search

European Commission > The Commissioners >

PRESIDENT (2014-2019)

## Jean-Claude Juncker



> More pictures and videos

DEPARTMENTS:  
[Secretariat-General](#) | [Legal Service](#) | [Communication](#) | [European Political Strategy Group](#)

SHOW CONTACT DETAILS



### PAGE CONTENTS

- Role**
- Team**
- Announcements**
- Agenda**
- Biography**

## Role

The President is the head of the European Commission. According to the Treaties, he decides on the organisation of the Commission, reports to members of the Commission and can make changes at any time. The President also determines the Commission's policy agenda, and represents the Commission in general European interest. The President was elected by the European Parliament on the basis of his [Political Guidelines](#) that were adopted during his contacts with the parliamentary committees and the strategy for the Union presented by the European Council of 27 June 2014.

- [A New Boost for Jobs, Growth and Investment](#)



EUROPEAN COMMISSION

European Commission > The Commissioners > Jean-Claude Juncker >

### Meetings of President Jean-Claude Juncker with organisations and self-employed individuals

Navigation icons: back, forward, 1, 2, search

Date	Location	Entity/ies met	Subject(s)
08/05/2015	Brussels	ENGIE	Meeting with Etienne Davignon on political priorities of this Commission
06/05/2015	Brussels	Bundesverband Deutscher Zeitungsverleger	Speech on free and independent press in Europe
30/04/2015	Brussels	Joachim Bitterlich, Ambassadeur e.r., Professeur (affilié) à l'ESCP Europe Paris	Meeting with Joachim Bitterlich on political priorities and Investment Plan
17/04/2015	Brussels	Deutsche Bank	Meeting with Luc Frieden on Jobs and Growth agenda of the new Commission
24/03/2015	Brussels	Kofi Annan Foundation	Meeting with Kofi Annan
23/03/2015	Brussels	EUROPEAN TRADE UNION CONFEDERATION	Meeting with Bernadette Segol - General Secretary ETUC
20/03/2015	Brussels	Open Society European Policy Institute	Meeting with George Soros
02/03/2015	Berlin	Bundesverband der Deutschen Industrie e.V.	Speaker at BDI (German industry federation) gala dinner
26/02/2015	Brussels	European Publishers Council	Receives CEOs of European Publisher Groups
24/02/2015	Brussels	Jens-Peter Bonde	Meeting with Jens-Peter Bonde

Navigation icons: back, forward, 1, 2, search

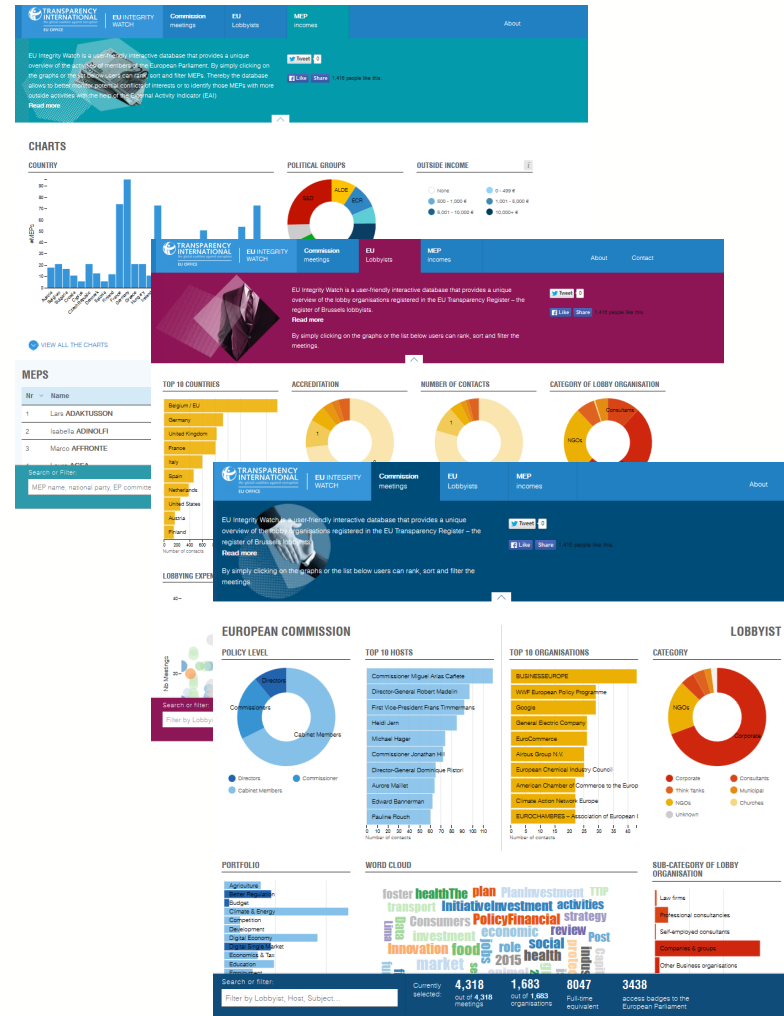


# EU INTEGRITY WATCH 2.0



## Key findings

- 4,547 Meetings
- 7,916 Lobby Organisations
- 10,000+ Lobbyists
- €1bn+ EU Lobby Budget

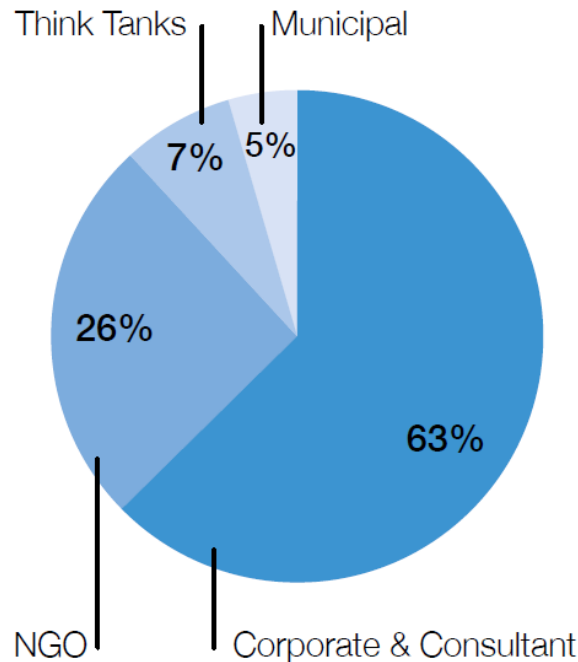


# KEY FINDINGS

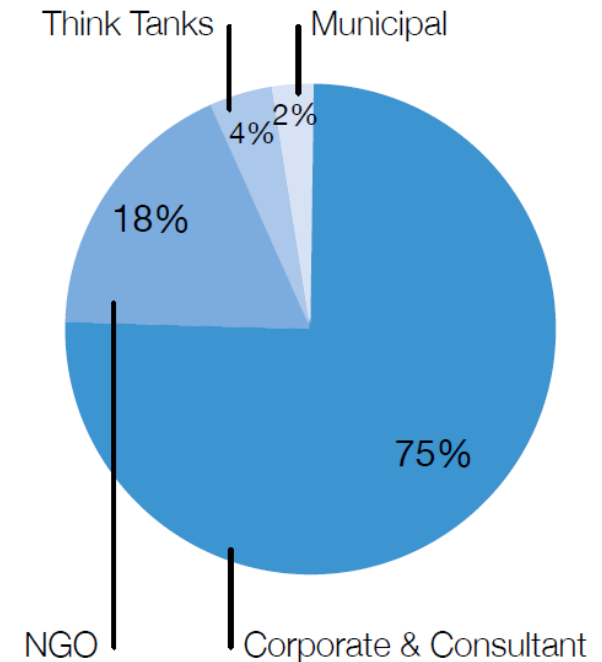


## Corporate Dominance

Share of registered lobbyists by type



Share of lobby meetings by type



# KEY FINDINGS



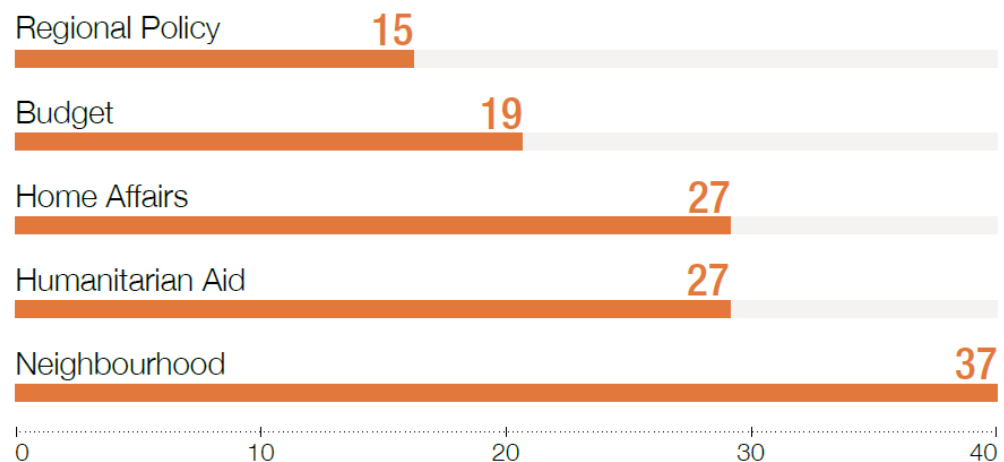
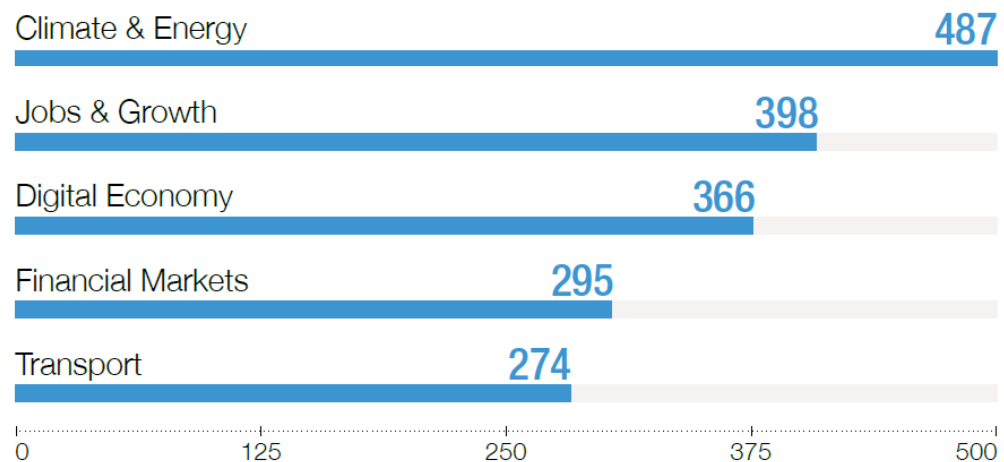
## Companies with highest lobby budgets

Rank	Name	Lobby Budget in €	Meetings	Lobbyists (FTE)	EP Badges
01	Microsoft Corporation	4,500,000	17	7	4
02	Shell Companies	4,500,000	6	7	7
03	ExxonMobil Petroleum & Chemical	4,500,000	5	8	5
04	Deutsche Bank AG	3,962,000	13	8	3
05	Dow Europe GmbH	3,750,000	6	6	3
06	Google	3,500,000	29	9	8
07	General Electric Company (GE)	3,250,000	26	9	4
08	Siemens AG	3,230,169	4	14	10
09	Huawei Technologies	3,000,000	7	6	6
10	BP	2,500,000	13	3	4
11	Electricité de France (EDF)	2,500,000	12	14	7
12	Daimler	2,500,000	8	8	5
13	Total SA	2,500,000	1	7	5



# KEY FINDINGS

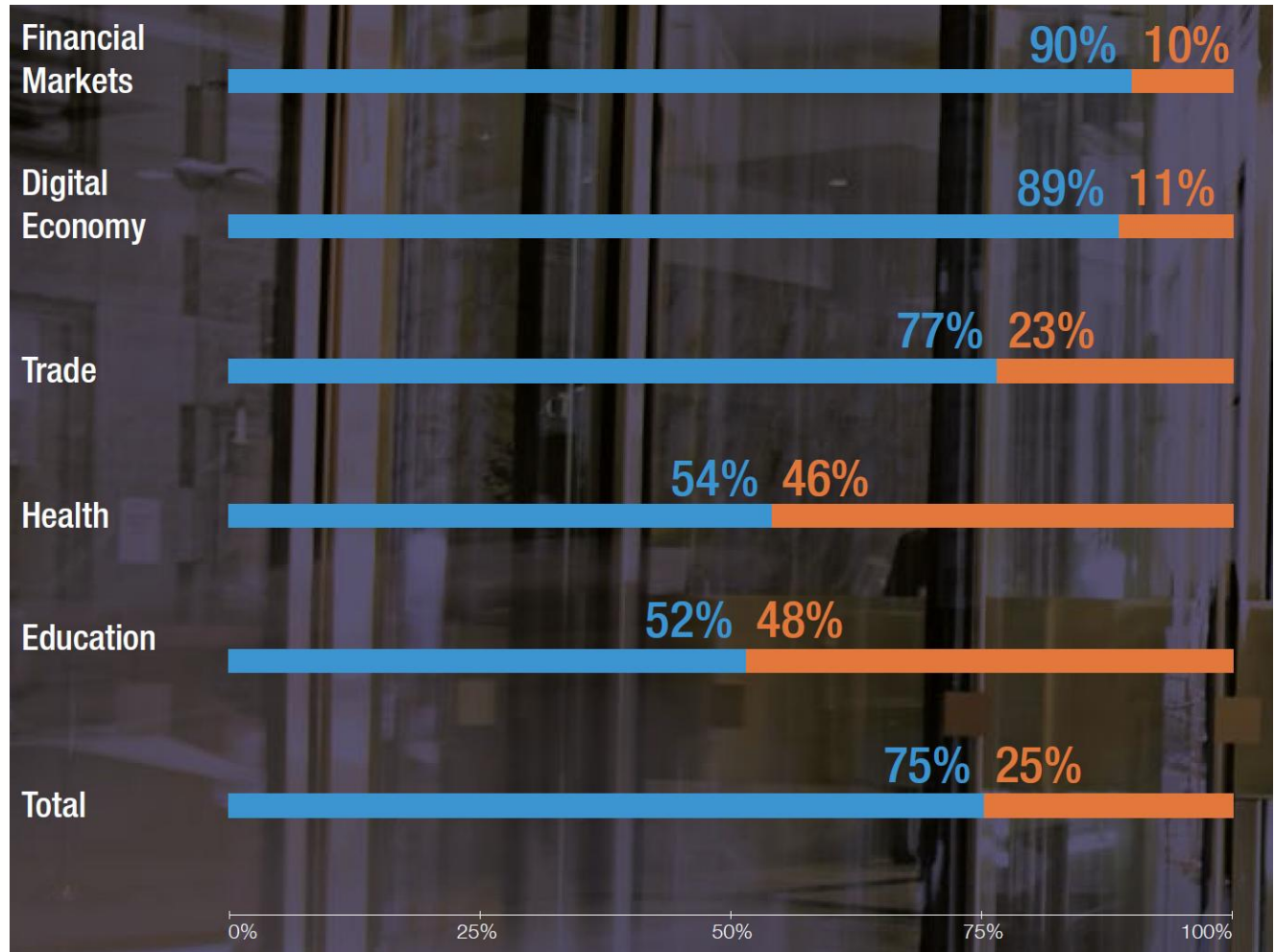
## Commission Hotspots



# KEY FINDINGS



## Equality of access by portfolio



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# KEY FINDINGS

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## The new transparency provisions

The European Commission's  
new transparency measures only  
cover the tip of the iceberg

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Only the top 1% of officials  
and the top 20% of lobbyists  
are covered by the new rules

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# KEY FINDINGS

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Still missing  
from the  
register

**14** / 20 biggest law-firms in the world

**3** of the world-leading public relations firms.

**15** / 100 biggest European companies.





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## KEY FINDINGS

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Poor data  
quality

**60%** of organisations lobbying on **TTIP** or **Capital Markets Union** do not declare that

**1/3** of all declarations are completely  
meaningless

# THANKS FOR YOUR TIME



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