Treasury Sanctions Over 40 Individuals and Entities Across Nine Countries Connected to Corruption and Human Rights Abuse

December 9, 2022

Sanctions Mark Human Rights Day and International Anti-Corruption Day

WASHINGTON – Today the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC), in recognition of International Anti-Corruption Day and Human Rights Day, is sanctioning a diverse array of over 40 individuals and entities that are connected to corruption or human rights abuse across nine countries.

Over the course of 2022, Treasury took numerous actions to promote accountability for human rights abusers and corrupt actors across the world, including sanctions on dozens of individuals and entities including in the Western Balkans, Belarus, Liberia, Guatemala, the Russian Federation, Burma, and Iran. Treasury utilized various tools and authorities — including Executive Order (E.O.) 13818, which builds upon and implements the Global Magnitsky Human Rights Accountability Act — to demonstrate the U.S. government’s focus on promoting respect for human rights and countering corruption.

“Corrupt actors and human rights abusers both rely on deficiencies in the international financial system to perpetrate their activities,” said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. “Over the past year, Treasury has made combatting corruption and serious human rights abuse a top priority, including through the use of financial sanctions and addressing vulnerabilities in the U.S. and international financial systems. By exposing the egregious behavior of these actors, we can help disrupt their activities, dismantle their networks, and starve them of resources.”

The United States is committed to taking actions consistent with its values and recognizes that respect for human rights is a prerequisite for global peace, security, and prosperity. Today OFAC also designated two individuals and the networks of entities that they control in
Today, OFAC is designating the DPRK’s Ministry of State Security Border Guard General Bureau (BGGB), which is responsible for security along the DPRK’s borders with China and Russia. People inside the DPRK reportedly are subjected to forced labor, torture, and other human rights violations and abuses at the hands of the government. Due to their dire circumstances, tens of thousands of North Koreans have fled the country in the past two decades. The journey to leave the DPRK is particularly treacherous due to attempts by state security agencies, including the BGGB, to thwart escapes through tight border controls, including land mines and shoot-on-sight orders that have resulted in the deaths of numerous North Koreans. The BGGB is designated pursuant to E.O. 13687 for being an agency, instrumentality, or controlled entity of the Government of North Korea or the Workers’ Party of Korea.

DPRK nationals are also often forced to work in foreign countries to generate foreign currency that is utilized to support the DPRK’s weapons of mass destruction (WMD) and ballistic missile programs. UN Security Council Resolution 2397, adopted on December 22,
2017, requires UN Member States to have repatriated DPRK nationals earning income in their jurisdictions by December 22, 2019, subject to limited exceptions. Foreign entities that are involved in the use of DPRK labor enable the continued poor treatment that these workers endure, which includes constant surveillance, being forced to work long hours, and having a significant portion of their wages confiscated by the regime. The DPRK government-run animation studio, SEK Studio (SEK), which was previously designated on December 10, 2021 pursuant to E.O. 13722, has been subcontracted by foreign companies to provide low-cost labor and has utilized its animation workers that are located in the DRRK and the PRC to fulfill these contracts. SEK has also evaded sanctions targeting the DPRK government using front companies.

Kim Myong Chol is a Paris-based representative of SEK and has facilitated payment transactions for SEK in 2022, including the collection of unpaid payments on contracts between European companies and SEK. Everlasting Empire Limited, Tian Fang (Hong Kong) Holdings Limited, Yancheng Three Line One Point Animation Co., Ltd., Quanzhou Yiyangjin Import and Export Trade Co., Ltd., and Fujian Nanan Import and Export Corporation have all facilitated financial transactions on behalf of SEK. Kim Myong Chol, Everlasting Empire Limited, Tian Fang (Hong Kong) Holdings Limited, Yancheng Three Line One Point Animation Co., Ltd., Quanzhou Yiyangjin Import and Export Trade Co., Ltd., and Fujian Nanan Import and Export Corporation are being designated pursuant to E.O. 13722 for having acted or purported to act for or on behalf of, directly or indirectly, SEK.

Deepak Jadhav is an India based director of Funsaga Pte Ltd. and has entered a contract with SEK to produce an animation project, while providing payments to Quanzhou Yiyangjin Import and Export Trade Co., Ltd. and Yancheng Three Line One Point Animation Co., Ltd. A SEK official indicated that Deepak Jadhav sent over $15,000 to Quanzhou Yiyangjin Import and Export Trade Co., Ltd. and Funsaga Pte. Ltd. sent more than $50,000 to SEK, with part of the funds being transferred to Tian Fang (Hong Kong) Holdings Ltd. Kinoatis LLC has sent over $100,000 to Fujian Nanan Import and Export Corporation, which acted as an affiliate for SEK, to pay for an animation project. Deepak Jadhav, Funsaga Pte Ltd., and Kinoatis LLC are being designated pursuant to E.O. 13722 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, SEK.
CORRUPTION IN EL SALVADOR

Conan Tonathiu Castro Ramirez (Castro Ramirez), during his tenure as Presidential Legal Secretary, obstructed investigations into the misappropriation of public funds during the government’s response to the pandemic and used his office for personal financial gain.

Oscar Rolando Castro (Castro), Minister of Labor, engaged in corruption and misappropriated public funds for his personal benefit. As Minister, Rolando used his position to influence unions to align with the Ministry of Labor’s political interests, and engage in activities that benefitted him and his political allies in order to receive expedited processing of their credentials. Some of those who agreed received additional benefits, such as favored access for international travel, while some of those who refused to align with Castro faced harassment, retaliation, and delayed union certification.

OFAC is designating Castro Ramirez and Castro pursuant to E.O. 13818 for being foreign persons who are current or former government officials, or persons acting for or on behalf of such an official, who are responsible for or are complicit in, or have directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

CORRUPTION IN GUATEMALA

Allan Estuardo Rodriguez Reyes (Rodriguez) utilized his authority as President of Congress to award construction grants in exchange for financial kickbacks. Rodriguez has used his political influence to strike deals in exchange for bribes and facilitated bribes to others, including, for example, by allegedly offering bribes for votes on a state of emergency bill during a floor session of congress.

Jorge Estuardo Vargas Morales (Vargas) is a Guatemalan congressman and one of several individuals at the apex of a network designed to control contracts and operations at government-run ports for personal profit. He oversees project execution once contracts are awarded and pays out a percentage to board members who vote in favor. Additionally, Vargas controls employment at the port through his influence in the port labor unions and uses those unions to gain political leverage. He maintains loyalties by paying bribes in exchange
for unions creating blockades and strikes to advance political objectives.

Luis Alfonso Chang Navarro (Chang) was the Minister of Energy and Mines from 2016-2020; additionally, as Minister of Energy and Mines, Chang was the head of the board of Guatemala’s National Electrification Institute (INDE) and used his position to secure kickbacks. He solicited bribes and other favors in exchange for not revoking an oil exploitation license. Chang’s modus operandi was to use his position as Minister to “create problems” for a business and then offer a solution in exchange for bribes and other unlawful favors.

OFAC is designating Rodriguez, Chang, and Vargas pursuant to E.O. 13818 for being foreign persons who are current or former government officials, or persons acting for or on behalf of such an official, who are responsible for or are complicit in, or have directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural resources, or bribery.

SERIOUS HUMAN RIGHTS ABUSE IN GUINEA

OFAC is designating Alpha Conde (Conde), the former President of Guinea, who was ousted in a coup d’etat in September 2021. Under his presidency, security forces engaged in violence against supporters of Conde’s opposition leading up to a March 2020 constitutional referendum that enabled Conde to run for a third term. Violence against opposition members continued through and after the October 2020 Guinean presidential election.

In early 2020, Conde ordered ministers to create a police unit to respond to anti-Conde protesters, with violence if necessary. Reporting indicates that in 2020 the government arbitrarily arrested and detained opposition members. Around the October 2020 Guinean presidential election, security forces used excessive force to disperse opposition supporters. Among other incidents, security forces reportedly fired live bullets into crowds that had gathered to celebrate the victory announcement of Conde’s opposition and shot two minors, killing one, and shot another in the back as he ran away. After the October 2020 election, security forces reportedly killed over a dozen individuals, including individuals killed at close range who presented no immediate danger to the security forces.
Conde is designated pursuant to E.O. 13818 for being a foreign person who is or has been a leader or official of an entity, including any government entity, that has engaged in, or whose members have engaged in, serious human rights abuse relating to his tenure.

**SERIOUS HUMAN RIGHTS ABUSE IN IRAN**

Iran has experienced mass, countrywide protests following the death in custody of Mahsa Amini, who was arrested by Iran’s Morality Police in mid-September 2022 for allegedly improperly wearing a hijab. Iranian security forces have responded with violence to the protests, reportedly killing hundreds, including children, and arresting thousands. Since September, Treasury has issued five rounds of sanctions targeting the Morality Police, a range of Iranian security and government officials involved in the use of violence against Iranian protestors, prison officials involved in the detention of protestors, Iranian media officials associated with broadcasts of coerced confessions relating to the protests, and officials responsible for shutting down Iran's Internet to stifle freedom of expression online.

Today’s action targets **Ali Akbar Javidan (Javidan)**, the Law Enforcement Forces of the Islamic Republic of Iran (LEF) commander in Iran’s Kermanshah Province who has direct oversight over forces that have killed protesters, including children and the elderly. The LEF was designated in 2011 pursuant to E.O. 13553, an Iran human rights authority, for being responsible for or complicit in serious human rights abuses in Iran since the June 2009 disputed presidential election. The LEF has repeatedly used excessive force in response to protests in Iran in recent years, resulting in the deaths of hundreds of unarmed protesters. Javidan has made public statements justifying the police response to the ongoing protests while valorizing the LEF forces for suppressing them. Javidan also publicly vowed to punish so-called moral crimes, including the alleged improper wearing of the hijab, during a July 2022 roundup of 1700 people.

Javidan is designated pursuant to E.O. 13818 for being a foreign person who is or has been a leader or official of an entity, including any government entity, that has engaged in, or whose members have engaged in, serious human rights abuse relating to his tenure.

**Ebrahim Kouchakzaei (Kouchakzaei)** served as an LEF commander in Chabahar, in Iran’s Sistan and Baluchistan Province. Kouchakzaei is the alleged perpetrator of a mid-September 2022 rape of a 15-year-old girl. According to reports, the incident, which occurred shortly
after the death of Mahsa Amini, fueled major protests throughout the province in late September, leading to a violent backlash from security forces and the killings of more than 60 people.

Kouchakzaei is designated pursuant to E.O. 13553 for having acted or purported to act for or on behalf of, directly or indirectly, Iran’s LEF.

OFAC is also designating Allah Karam Azizi (Azizi), the warden of Iran’s notorious Rejaee Shahr Prison. Rejaee Shahr Prison is known to house political prisoners and those who protest against the regime. Those imprisoned there have suffered serious physical abuse at the hands of the prison’s guards. Azizi has personally ordered these abuses; under Azizi’s leadership, Rezaee Shahr Prison has remained a place rife with abuse, where prisoners suffer from physical abuse and medical neglect.

Azizi is designated pursuant to E.O. 13818 for being a foreign person who is or has been a leader or official of an entity, including any government entity, that has engaged in, or whose members have engaged in, serious human rights abuse relating to his tenure.

**CORRUPTION IN MALI**

Karim Keita (Keita) is the son of former Mali President Ibrahim Boubacar Keita and the former president of the Security and Defense Commission of Mali’s National Assembly. Keita oversaw Mali’s defense spending from February 2014 until August 2020, when the military overthrew his father. Keita allegedly used his position to receive bribes, assign contracts to affiliates who subsequently paid him kickbacks, and embezzle government funds by overpaying on contracts for materiel. Through his father, Keita allegedly arranged to remove from their positions officials who did not support his corruption. Keita also ostensibly arranged bribes to support his father’s re-election. After his father was ousted, Keita fled to Cote d’Ivoire, where he serves as the CEO of Konijane Strategic Marketing.

OFAC is designating Keita pursuant to E.O. 13818 for being a foreign person who is a current or former government official, or person acting for or on behalf of such an official, who is responsible for or is complicit in, or has directly or indirectly engaged in, corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related to government contracts or the extraction of natural
resources, or bribery. OFAC is also designating Cote d’Ivoire-based Konijane Strategic Marketing for being owned or controlled by Keita.

Separately, Keita is also alleged to have arranged the abduction, torture, and apparent murder of Birama Toure (Toure), a reporter who was investigating Keita’s involvement in corruption. Multiple witnesses claim to have seen Toure at a prison run by Mali’s intelligence service with clear signs of having been brutally tortured. At least one witness claimed to have seen Toure’s apparently lifeless body removed from the prison in Keita’s presence. Keita purportedly pressured a lawyer not to take up Toure’s case, while another witness claimed Toure had told him in prison that Toure had been arrested on Keita’s orders.

**SERIOUS HUMAN RIGHTS ABUSE IN THE PHILIPPINES**

For more than a decade, *Apollo Carreon Quiboloy (Quiboloy)* engaged in serious human rights abuse, including a pattern of systemic and pervasive rape of girls as young as 11 years old, as well as other physical abuse. In 1985, Quiboloy founded The Kingdom of Jesus Christ, The Name Above Every Name (KOJC) church in the Philippines. In 2021, a federal indictment alleged Quiboloy was involved in sex trafficking “pastorals” — young women within the KOJC selected to work as personal assistants for Quiboloy. Pastorals were directed to have “night duty,” which required them to have sexual intercourse with Quiboloy on a determined schedule. Quiboloy kept pastorals in various countries, including the Philippines and the United States.

Quiboloy exploited his role within the KOJC to rape his victims and subject them to other physical abuse, describing these acts as sacrifices required by the Bible and by God for the victims’ salvation. The pastorals, who were mostly minors when initially abused by Quiboloy, were told by him to “offer your body as a living sacrifice.” One female reported she lost count of the number of times she was forced to have sex with Quiboloy, as it was at least once a week even when she was a minor and in every country to which they traveled. Another woman reported she was forced to perform night duty at least 1,000 times.

Quiboloy also subjected pastorals and other KOJC members to other forms of physical abuse. Reports indicate Quiboloy personally beat victims and knew where to hit them so there would be no visible bruising. Pastorals and KOJC members who angered Quiboloy were at times sent to “Upper Six,” a walled compound used solely for punishment.
Quiboloy is designated pursuant to E.O. 13818 for being a foreign person who is responsible for or complicit in, or has directly or indirectly engaged in, serious human rights abuse. As noted above, Quiboloy was indicted in November 2021. Quiboloy is currently on the FBI’s Wanted List.

**THE RUSSIAN FEDERATION’S ABUSE OF HUMAN RIGHTS**

For years, the Government of the Russian Federation has engaged in anti-democratic conduct and human rights abuses.

In the months following Russia’s full-scale invasion of Ukraine, Russia’s forces and their proxies began instituting a process known as “filtration,” whereby Ukraine’s civilians are subjected to interrogations and searches and forced to hand over personal data, nominally in order to ascertain any connections to Ukraine’s military or government. There are also allegations of deportations, disappearances, and torture in connection with filtration, and areas adjacent to the grounds of one filtration center display characteristics of mass graves.

Today, OFAC sanctioned four individuals that were directly involved in Russia’s filtration operations.

Russian Federation Presidential Administration officials Oleg Yuryevich Nesterov (Nesterov) and Yevgeniy Radionovich Kim (Kim) were directly involved in the planning for and implementation of filtration points in Russia-occupied Ukraine. For example, Nesterov and Kim oversaw the filtration of city government officials and other civilians from Mariupol, Ukraine, including through the filtration center in Manhush, Ukraine. Witnesses have reported insufficient food supplies, overcrowded cells, and beatings at the Manhush filtration center. One witness overheard Russia’s soldiers discussing shooting people who underwent filtration at Manhush.

Nesterov also helped coordinate the sham “accession referendum” held in Ukraine’s Zaporizhzhya Oblast in late September 2022.

Russian Federation national Marina Konstantinovna Sereda (Sereda) has worked with the so-called Donetsk People’s Republic (DNR) Ministry of Internal Affairs to manage filtration points in Russia-occupied Donetsk Oblast, Ukraine.

Aleksey Valentinovich Muratov (Muratov), an official of the so-called DNR, has coordinated
filtration point operations with so-called DNR leader Denis Pushilin. In particular, Muratov has spearheaded the procurement of necessary equipment and technology to support filtration points in Russia-occupied Donetsk Oblast, Ukraine. Muratov was previously designated on June 20, 2017, pursuant to Executive Order (E.O.) 13660 for being responsible or complicit in, or having engaged in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine and having acted or purported to act for or on behalf of, directly or indirectly, the DNR.

Nesterov, Kim, Sereda, and Muratov were designated today pursuant to E.O. 14024 for being responsible for or complicit in, or having directly or indirectly engaged or attempted to engage in, activities that undermine the peace, security, political stability, or territorial integrity of the United States, its allies, or its partners, for or on behalf of, or for the benefit of, directly or indirectly, the Government of the Russian Federation.

For more information, please see the National Intelligence Council's June 15, 2022, and September 6, 2022, unclassified assessments on Russia's filtration operations as well as the State Department's information page on Russia's filtration operations and forced relocations.

The Department of State also sanctioned Russian Federation nationals Ochur-Suge Terimovich Mongush and Lyudmila Nikolaevna Zaitseva, both of whom were reportedly implicated in human rights abuses against civilians in Ukraine. According to reports, Mongush engaged in torture while Zaitseva was involved in the kidnapping and forced relocation of children from Ukraine.

OFAC also sanctioned the Central Election Commission of the Russian Federation (Russia's CEC), alongside its 15 members. In September 2022, Russia’s CEC helped oversee and monitor sham referendums held in areas of Russia-controlled Ukraine that were rife with incidents of clear voter coercion and intimidation.

Additionally, Russia’s CEC conducts and oversees federal and local elections in Russia, including referendums. For years, Russia’s CEC has touted as clean and transparent elections in Russia that have been riddled with irregularities and credible accusations that the Kremlin has carefully managed the results.

Russia’s CEC is designated pursuant to E.O. 14024 for being a political subdivision, agency, or instrumentality of the Government of the Russian Federation.
The 15 members of Russia’s CEC that were sanctioned are:

- Chairperson Ella Aleksandrovna Pamfilova (Pamfilova)
- Deputy Chairperson Nikolay Ivanovich Bulaev (Bulaev)
- Secretary Nataliya Alekseevna Budarina
- Pavel Viktorovich Andreev
- Igor Borisovich Borisov
- Boris Safarovitch Ebzeev
- Elmira Abdulbarievna Khaimourzina
- Yevgeny Ivanovich Kolyushin
- Aleksandr Borisovich Kurdiumov
- Nikolay Vladimirovich Levichev (Levichev)
- Anton Igorevich Lopatin
- Liudmila Leonidovna Markina
- Konstantin Sergeevich Mazurevskii
- Yevgeny Aleksandrovich Shevchenko
- Andrey Yurievich Shutov

All 15 members of Russia’s CEC were designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of the Government of the Russian Federation. Pamfilova and Levichev have previously been sanctioned by Canada, the European Union (EU), Switzerland, and the United Kingdom (UK). Bulaev has previously been sanctioned by the EU, Switzerland, and the UK.

**SERIOUS HUMAN RIGHTS ABUSE IN THE TIBETAN AUTONOMOUS REGION OF THE PEOPLE’S REPUBLIC OF CHINA**

OFAC is designating two individuals involved in serious human rights abuse in the Tibetan Autonomous Region (TAR) of the People’s Republic of China (PRC). The PRC has targeted Tibetans under “social stability work” programs for decades. Tibetans have been subject to
serious human rights abuse in the TAR, including arbitrary detention, extrajudicial killings, and physical abuse, as part of the PRC’s efforts to severely restrict religious freedoms.

Wu Yingjie (Wu) was the TAR Party Secretary between 2016 and 2021. During this timeframe, Wu directed government officials to engage in “stability policies.” The implementation of these stability policies involved serious human rights abuse, including extrajudicial killings, physical abuse, arbitrary arrests, and mass detentions in the TAR. Additional abuses during Wu’s tenure include forced sterilization, coerced abortion, restrictions on religious and political freedoms, and the torture of prisoners.

Wu is designated pursuant to E.O. 13818 for being a foreign person who is responsible for or complicit in, or has directly or indirectly engaged in, serious human rights abuse.

Zhang Hongbo (Zhang) has been the director of the Tibetan Public Security Bureau (TPSB) since 2018 through at least November 2022. Zhang has worked to advance the PRC’s goals and policies in the TAR as “Tibet’s police chief.” During Zhang’s tenure, the TPSB engaged in serious human rights abuse, including at TPSB-run detention centers that were involved in the torture, physical abuse, and killings of prisoners, which included those arrested on religious and political grounds. Additional abuses perpetrated by security forces in Tibet include arbitrary arrests, persecution of religious and political freedoms, and mass detentions in the TAR.

Zhang is designated pursuant to E.O. 13818 for being a foreign person who is or has been a leader or official of the TPSB, an entity that has engaged in, or whose members have engaged in, serious human rights abuse relating to his tenure.

The designation of Zhang is complemented by the U.S. Department of State’s announcement of his designation, with associated visa restrictions, under Section 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act for his involvement in a gross violation of human rights. Pursuant to Section 7031(c), Zhang and his immediate family members are ineligible for entry into the United States.

**SANCTIONS IMPLICATIONS**

As a result of today’s action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons...
are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons, individually or in the aggregate Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC’s regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

The power and integrity of OFAC sanctions derive not only from OFAC’s ability to designate and add persons to the Department of the Treasury’s List of Specially Designated Nationals and Blocked Persons (SDN List), but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to OFAC’s Frequently Asked Question 897. For detailed information on the process to submit a request for removal from an OFAC sanctions list, please visit here.

GLOBAL MAGNITSKY

Building upon the Global Magnitsky Human Rights Accountability Act, E.O. 13818 was issued on December 20, 2017, in recognition that the prevalence of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, had reached such scope and gravity as to threaten the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.
INTERNATIONAL ANTI-CORRUPTION DAY

International Anti-Corruption Day has been observed annually on December 9 since the United Nations General Assembly adopted the United Nations Convention against Corruption (UNCAC) on October 31, 2003, to raise public awareness of the importance of anti-corruption initiatives in countering corruption and preventing it from undermining democratic institutions, eroding governmental stability, and slowing economic development. Treasury’s actions today are part of a whole-of-government effort, including hosting this year’s International Anti-Corruption Conference, that commemorate these events.

HUMAN RIGHTS DAY

Human Rights Day is observed annually on December 10, which marks the day the United Nations General Assembly adopted the Universal Declaration of Human Rights in 1948. That declaration enumerates human rights and fundamental freedoms, including freedoms of expression, religion or belief, association, and peaceful assembly, and the right to be free from arbitrary interference with privacy.

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