



**UNITED NATIONS APPEALS TRIBUNAL
TRIBUNAL D'APPEL DES NATIONS UNIES**

Judgment No. 2013-UNAT-366

**Abu Ghali
(Appellant)**
v.
**Commissioner-General
of the United Nations Relief and Works Agency
for Palestine Refugees in the Near East
(Respondent)**

JUDGMENT

Before: Judge Rosalyn Chapman, Presiding
Judge Luis María Simón
Judge Richard Lussick

Case No.: 2012-414

Date: 17 October 2013

Registrar: Weicheng Lin

Counsel for Mr. Abu Ghali:

Ghada A. Yasin

Counsel for Commissioner-General:

Anna Segall

1. The United Nations Appeals Tribunal (Appeals Tribunal) has before it an appeal filed by Mr. Iyad Mohammad Khalil Abu Ghali against Judgment No. UNRWA/DT/2012/024, rendered by the Dispute Tribunal of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA Dispute Tribunal or UNRWA DT, and UNRWA or the Agency, respectively) on 12 June 2012 in the case of *Abu Ghali v. Commissioner-General of the United Nations Relief and Works Agency for Palestine Refugees in the Near East*. Mr. Abu Ghali filed his appeal on 15 November 2012, and the Commissioner-General filed his answer on 3 February 2013.

Facts and Procedure

2. At the time of the incident underlying Mr. Abu Ghali's termination, he was employed by UNRWA under a fixed-term contract as an Assistant Mental Health Supervisor, Grade 12, Step 5, in UNRWA's Mental Health Department, located in the Rafah Area office of Gaza.

3. The Appeals Tribunal adopts the following findings of fact made by the UNRWA DT:¹

... On 9 April 2010, [Mr. Abu Ghali], in an UNRWA vehicle, set out for the home of his cousin, Imad Afana ("Afana").

... En route to the Afana home, [Mr. Abu Ghali] received a phone call from a member of the Afana household and was asked to pick up Afana and drive him from Rafah to Deir El Balah where the Afana family home is located.

... [Mr. Abu Ghali] went to Rafah, where he picked up Afana near Akram Zuruub's ("Zuruub") shop. Zuruub is an appliances dealer who smuggles items from Egypt into the Gaza Strip, via his own tunnel.

... When [Mr. Abu Ghali] arrived at the shop of Zuruub, Afana was accompanied by Ismael an-Nabrees ("Nabrees"). Afana and Nabrees had two large boxes of potato chips with them, which they loaded into [Mr. Abu Ghali's] UNRWA vehicle when they got in.

... Upon entering Deir El Balah, approximately 200-300 metres away from the Afana family home, Afana asked [Mr. Abu Ghali] to stop the car so he and Nabrees could get out, as they had to meet someone. [Mr. Abu Ghali] agreed to meet Afana near his house. Afana and Nabrees exited the car leaving the two boxes of potato chips in [his] vehicle.

... [Mr. Abu Ghali] started toward the Afana home but was then stopped by police, who proceeded to search the car and its contents. Upon search, it was discovered that the

¹ See paragraphs 4-13 of Judgment No. UNRWA/DT/2012/024. The Appeals Tribunal adopts the factual findings of the UNRWA DT for the reasons set forth below in paragraphs 34-39.

boxes of potato chips actually contained 120 boxes of Tramal, totalling 11,889 tablets of Tramal, a prohibited drug in the Gaza Strip.

... [Mr. Abu Ghali] was arrested. Afana and Nabrees were also arrested after attempting to sell Tramal tablets to an undercover police officer at the place where [Mr. Abu Ghali] had dropped them off. All three were taken to the Police Station by the Anti Drug Police. Nine tablets of Tramal were found on [Mr. Abu Ghali's] person when he was taken into custody.

... The accused, including [Mr. Abu Ghali], underwent interrogation by the Anti Drug Police on 9, 10 and 11 April 2010.

... On 10 April 2010, another UNRWA employee, Ashraf Al Jabali ("Al Jabali"), a subordinate of [Mr. Abu Ghali's], was arrested for the possession of 68.5 tablets of Tramal.

... On 10 April 2010, [Mr. Abu Ghali] and three others (Zuruub, Afana and Al Jabali) were charged for the unauthorised possession of a prohibited drug pursuant to articles 4 and 36 of Pharmacy Law number 41 of the year 1921 and articles 72 and 95 of Pharmacy Practice Regulation of the year 2006.

4. On 11 April 2010, Christer Nordahl, then-Deputy Director of UNRWA Operations, Gaza (D/DUO/G), sent a letter to Mr. Abu Ghali informing him that, pursuant to Area Staff Rule 110.2,² he was being suspended without pay as of that date.

5. On 6 July 2010, the Court of Reconciliation (a trial court) found Mr. Abu Ghali guilty of possession of a prohibited drug, as charged against him in the bill of indictment. It sentenced him to three months incarceration, to be suspended for three years, and ordered him to pay a fine or be incarcerated for three months. Additionally, the Tramal tablets were ordered confiscated.

² Area Staff Rule 110.2 provides for suspension without pay pending an investigation by the Agency, as follows:

If a charge of misconduct is made against a staff member (for the purposes of paragraph 1 of rule 110.1) and the Commissioner-General considers that the charge is "prima facie" well founded or that the staff member's continuance in office pending an investigation of the charge would prejudice the interests of the Agency, then the staff member may be suspended from duty, with or without pay, pending investigation, the suspension being without prejudice to the rights of the staff member.

Area Staff Regulation 10.4 has identical provisions.

6. On 14 July 2010, the Court of First Instance (Court) (an appeals court) heard Mr. Abu Ghali's appeal from the Judgment of the Court of Reconciliation and reversed the conviction and acquitted him. In doing so, the Court initially determined that the police "were not legally entitled to stop and search citizens without following the legal procedures".

7. On 14 July 2010, the D/DUO/G sent a letter to Mr. Abu Ghali informing him that the Agency had "witness statements from several witnesses attesting to [his] involvement with Imad Afana in arranging for the smuggling of Tramal tablets into Gaza through the tunnels and their sale to others". The letter further stated:

If the Agency determines that you were involved in the possession and dealing of drugs, and that you used the UNRWA vehicle entrusted to you to further this illegality, it would consider this to be serious misconduct justifying severe disciplinary action, being an action inconsistent with your status as an [UNRWA] employee ... under Area Staff Regulation 1.4.

The D/DUO/G then afforded Mr. Abu Ghali seven days to provide his "comments on the above findings, to rebut the allegations and to present any countervailing evidence or mitigating factors".

8. Mr. Abu Ghali provided his written comments to the Agency on 20 and 21 July 2010.

9. On 14 December 2010, the Investigation Report was completed and sent to the D/DUO/G.

10. On 5 April 2011, Mr. Nordhahl, then-Acting Director of UNRWA Operations, Gaza (A/DUO/G), sent Mr. Abu Ghali a letter informing him that, pursuant to Area Staff Regulation 10.2 and Area Staff Rule 110.1, his employment with UNRWA was being terminated for misconduct, effective the date of his suspension (11 April 2010).

11. In the termination letter, the A/DUO/G explained:

While an appeal court may have acquitted you of any crime, UNRWA is required to consider whether the evidence before it proves that you have engaged in conduct unbecoming of an UNRWA staff member. In doing so, UNRWA is not required to apply the same standards as a criminal court would. We have examined all of the evidence provided to the police in this matter, as well as evidence that UNRWA has obtained from a number of witnesses. UNRWA is satisfied that this evidence proves that you were dealing in Tramal, a banned pharmaceutical substance in Gaza.

The A/DUO/G further explained:

The Agency takes behaviour of a criminal nature extremely seriously. Its finding that you were found in possession of, and were involved in the trade of, a substantial number of illegal drugs constitutes a failure to maintain the standards of conduct befitting of an UNRWA staff member. This is considered serious misconduct warranting disciplinary measures. Your responses of 20 and 21 July 2010 to the charges against you do not rebut the allegations made, nor provide countervailing evidence or demonstrate mitigating circumstances.

Furthermore, as a community mental health worker with UNRWA, you should be well aware of the negative impact that the rising levels of Tramal addiction has had on the mental and physical health of the people of Gaza. Your actions in dealing in such a drug have fundamentally destroyed my confidence in you as an assistant mental health supervisor with UNRWA and made it impossible for you to continue in such a position.

12. On 19 April 2011, Mr. Abu Ghali sought review of the administrative decision to terminate his service. The Deputy Commissioner-General denied his request on 16 May 2011.

13. On 5 June 2011, Mr. Abu Ghali filed an application before the UNRWA DT challenging his termination. Attached to his application were 16 annexes. The Commissioner-General filed his answer to the application on 5 March 2012.

14. On 9 August 2011, Mr. Abu Ghali requested expedited consideration of his application, and the UNRWA DT granted his request on 11 October 2011 in Order No. 003 (UNRWA/DT/2011).

15. On 20 September 2011, Mr. Abu Ghali filed a motion for the disclosure and production of evidence seeking:

(a) Full disclosure of all the documents pertaining to the investigation conducted by UNRWA ... on 19/4/2010 and 15/6/2010. The production of evidence to include, but not limited to, terms of reference of the assigned investigators, investigation report, supporting documents, witnesses' statements, documentary evidence, Subject interview, notes to the files, legal memos and opinions of appraisal of the investigation report as well as any documents and correspondences pertaining to the investigated misconduct and the course of investigations.

(b) Full disclosure of correspondences and documents that are shared[,] communicated, drafted and/or transmitted among key players[,] departments within UNRWA ... and between UNRWA/[Gaza] and UNRWA/HQ related to the subject of the contested administrative decision. The production of evidence to cover the period starting from the date

of the detention for possession of illegal medical drugs on April 11, 2010 until the date of the Agency's response to the request of decision review on May 16, 2011. The production of evidence to include, but not limited to, the decision making processes, deliberations and conclusions related to conducting investigation, suspension for a year without pay pending investigation and termination of contract for misconduct retroactively.

16. On 4 November 2011, the Commissioner-General filed a response or opposition to Mr. Abu Ghali's request for disclosure and production of evidence, contending *inter alia* that the request was overly broad, amounted to a "fishing expedition", and that some of the documents sought were privileged.

17. On 21 November 2011, the UNRWA DT issued Order No. 008 (UNRWA/DT/2011) finding Mr. Abu Ghali's request to be "overly broad and vague" and amounting to a "fishing expedition". Nevertheless, the UNRWA DT ordered the Commissioner-General to provide it with a copy of the Investigation Report for review *in camera* to determine whether: (a) Mr. Abu Ghali "was made fully aware of the allegations and evidence against him and was accorded the opportunity to rebut those allegations and to produce evidence in his defence[;] ... [and (b)] it [was] sufficient to enable the [UNRWA Dispute] Tribunal to render its Judgment on whether [Mr. Abu Ghali's] actions constituted misconduct and the Respondent had fully complied with the applicable Regulations, Rule[s] and Area Staff Personnel Directive when terminating [his] employment". On 28 November 2011, the Commissioner-General provided the UNRWA Dispute Tribunal with a redacted copy of the Investigation Report. Upon the request of the UNRWA DT, the Commissioner-General provided an unredacted copy of the report for review *in camera* on 24 February 2012.

18. On 27 February 2012, the UNRWA DT issued Order No. 006 (UNRWA/DT/2012) denying Mr. Abu Ghali's request for disclosure and production of evidence. The UNRWA Dispute Tribunal noted that it had reviewed *in camera* the Investigation Report, compared its contents to Mr. Abu Ghali's application and 16 annexes, and concluded "there is no relevant material" in the Investigation Report that Mr. Abu Ghali "does not already possess". The UNRWA Dispute Tribunal further concluded that "there is no additional material" in the Investigation Report that would assist it in addressing the merits of the application; thus, the UNRWA Dispute Tribunal removed the Investigation Report from the case file and stated it would "disregard" it in determining the merits.

19. On 12 June 2012, the UNRWA DT issued Judgment No. UNRWA DT/2012/024, dismissing Mr. Abu Ghali's challenge to his termination.

Submissions

Mr. Abu Ghali's Appeal

20. Mr. Abu Ghali contends that the UNRWA DT made an error of law or procedure when it failed to consider his claims that the Agency did not comply with the Detained Staff Policy (DSP), ST/AI/299 (10 December 1982), the 1946 Convention on the Privileges and Immunities of the United Nations (Convention) and the 1996 Agreement Between UNRWA and the Palestinian Authority (Agreement). More specifically, Mr. Abu Ghali asserts that the search of the UNRWA vehicle was illegal and UNRWA's failure to challenge the search constituted a breach of its obligations to him as a staff member. He also claims that UNRWA breached its duty to him under the DSP when it failed to request immediate access to him while he was in custody and to obtain information about the charges against him.

21. Mr. Abu Ghali argues that the UNRWA DT made an error of law or procedure when it allowed the Commissioner-General to participate in the proceedings despite filing his reply or answer beyond the period allowed by Article 6 of the UNRWA DT Rules of Procedure and without an order from the UNRWA DT authorizing the late filing.

22. Mr. Abu Ghali further contends that the UNRWA DT made an error of law or procedure when it failed to grant his request for production of the Investigation Report and when it relied on the Investigation Report in making its findings in paragraphs 74, 76 and 77 of the Judgment, although it had ordered the Investigation Report removed from the case file.

23. Mr. Abu Ghali claims that the UNRWA DT made an error of fact when it determined that the facts upon which the sanction was based were reasonably established.

24. Finally, Mr. Abu Ghali argues that the UNRWA DT committed a procedural error when it failed to provide him with an Arabic translation of the Commissioner-General's reply to his application.

The Commissioner-General's Answer

25. The Commissioner-General submits that the UNRWA DT did consider Mr. Abu Ghali's claims under the DSP, as referenced in the Judgment. However, his claims under the Convention and Agreement are new claims that were not raised before the UNRWA DT and should not be considered on appeal.

26. The Commissioner-General contends that the UNRWA DT did not make an error of law or procedure by allowing him to participate in the proceedings. Rather, pursuant to Article 14 of its Rules, the UNRWA DT implicitly granted leave to the Commissioner-General to participate in the proceedings by accepting the late reply and not striking it. Moreover, allowing the Commissioner-General to participate in the proceedings served the interests of doing justice to the parties.

27. The Commissioner-General maintains that the UNRWA DT did not make an error of law or procedure by denying production of the Investigation Report to Mr. Abu Ghali because it did not rely on the Investigation Report in making its factual findings regarding the misconduct. Rather, the UNRWA DT admitted into evidence and relied on the statements of the witnesses made to the police immediately after their arrests, which it found to be more credible and reliable than subsequent statements made in the context of the Agency's investigation.

28. The Commissioner-General also contends that the UNRWA DT did not make an error of law or procedure when it concluded that the facts warranting Mr. Abu Ghali's termination had been established by clear and convincing evidence. Under Article 2(10)(e) of the Appeals Tribunal Statute (Statute), for an error of fact to be reversible error, it must "result ... in a manifestly unreasonable decision". That is not the present case. Mr. Abu Ghali merely takes exception to the relative weight the UNRWA DT placed on the various witness statements. Further, Mr. Abu Ghali has not produced any evidence showing that the Agency's investigation was tainted by procedural or other irregularities or his due process rights were violated.

29. Finally, the Commissioner-General submits that the UNRWA DT did not err when it refused to provide Mr. Abu Ghali with an Arabic translation of his reply. There is no statute or rule requiring an Arabic translation of any document other than the Judgment. In any event, he argues, this claim is not a ground for reversal of the Judgment under Article 2(10) of the Statute.

Considerations*Mr. Abu Ghali's Request for An Oral Hearing Is Not Well Taken*

30. On 20 March 2013, Mr. Abu Ghali filed a motion for an oral hearing, stating : “Due to the complexity of the events, we feel that the Tribunal would benefit greatly by taking oral evidence.”

31. An oral hearing and the taking of oral evidence are not the same thing under the Statute and the Appeals Tribunal Rules of Procedure (Rules). Oral hearings are governed by Article 8(3) of the Statute and Article 18(1) of the Rules; whereas, the taking of oral evidence is governed by Article 2(5) of the Statute, which *precludes* the Appeals Tribunal from taking oral testimony. This Tribunal, thus, infers that Mr. Abu Ghali is requesting an oral hearing.

32. Article 18(1) of the Rules provides that an oral hearing may be held “if such hearings ... would assist in the expeditious and fair disposal of the case”. This Tribunal does not find that an oral hearing would “assist in the expeditious and fair disposal of the case”. Thus, Mr. Abu Ghali’s request for an oral hearing is denied.

The Termination of Mr. Abu Ghali's Appointment

33. Under the jurisprudence of the Appeals Tribunal, the UNRWA DT is required “to examine whether the facts on which the [termination] sanction is based have been established, whether the established facts qualify as misconduct [under Staff Regulations and Rules], and whether the sanction is proportionate to the offence”.³ Moreover, our jurisprudence requires that for termination the Agency must prove the facts underlying the alleged misconduct by “clear and convincing evidence”, which “means that the truth of the facts asserted is highly probable”.⁴

³ *Masri v. Secretary-General of the United Nations*, Judgment No. 2010-UNAT-098; *Sanwidi v. Secretary-General of the United Nations*, Judgment No. 2010-UNAT-084; *Haniya v. Commissioner-General of the United Nations Relief and Works Agency for Palestine Refugees in the Near East*, Judgment No. 2010-UNAT-024; *Mahdi v. Commissioner-General of the United Nations Relief and Works Agency for Palestine Refugees in the Near East*, Judgment No. 2010-UNAT-018.

⁴ *Molari v. Secretary-General of the United Nations*, Judgment No. 2011-UNAT-164.

i. Clear and Convincing Evidence Established That Mr. Abu Ghali Had Possession of, and Traded in, Tramal

34. The UNRWA Dispute Tribunal “admitted all of the witness statements into evidence”. These statements were made by Mr. Abu Ghali and the other arrestees: to the Anti Drug Police at the time of their arrests; during their interrogations on 9, 10 and 11 April 2010; during their criminal proceedings; and to the Agency’s Legal Aid Assistant, Gaza (LAA/G) during the Agency’s investigation “since the investigation was conducted within a reasonable time and without prejudice”.

35. The UNRWA DT found “many inconsistencies and contradictions in the individual statements”. It then proceeded to assess the credibility of the witnesses and their statements to ascertain the weight to give the various statements in finding the true facts underlying the termination. Certainly, the UNRWA Dispute Tribunal “has a broad discretion to determine ... the weight to be attached to ... evidence”.⁵

36. In assessing the credibility of the various witnesses and their statements, the UNRWA DT concluded that the statements “given to the Anti Drug police by [Mr. Abu Ghali] and the witnesses shortly after they were arrested, and before they could discuss their statements together and recant them” were more credible than their later statements to the police and the LAA/G during the Agency’s investigation, which were made after the witnesses “had ample time to talk to each other and deliver a standardized version of the events”. The UNRWA DT also found that Mr. Abu Ghali generally was not credible. The Appeals Tribunal agrees with the UNRWA DT’s credibility determinations.

37. The UNRWA Dispute Tribunal further noted: “Despite the web of contradictions and inconsistencies in the witness statements”, Mr. Abu Ghali does “not contest that on 9 April 2010, the Anti Drug Police found 120 boxes of a prohibited drug in the UNRWA vehicle [he] was driving, totaling 11,889 tablets of Tramal, and that he was alone at the time”.

38. The UNRWA DT found that Mr. Abu Ghali’s “repeated defence that he was unaware of the contents of the boxes” was “unconvincing”. It determined that he “knew or at the very least should have reasonably known that there were drugs in the boxes”. In reaching this conclusion, the UNRWA DT noted that “Afana is [Mr. Abu Ghali’s] cousin and friend and it is difficult to

⁵ *Messinger v. Secretary-General of the United Nations*, Judgment No. 2011-UNAT-123, para. 33.

believe that he was unaware of Afana's side business with Tramal". The UNRWA DT opined that "when [Mr. Abu Ghali] allowed in the UNRWA vehicle two men whom he picked up with boxes from a known smuggler's shop, he had a duty of care since he was driving an UNRWA vehicle to investigate what was in the boxes he was carrying, presuming of course he did not know about their contents".

39. The UNRWA DT concluded that clear and convincing evidence established that Mr. Abu Ghali possessed and traded in Tramal. This conclusion was based on the initial (and credible) statements to the police of Mssrs. Zuruub, Nabrees, and Al Jabali, in which each witness implicated Mr. Abu Ghali in the illegal trade of Tramal. The Appeals Tribunal agrees with the UNRWA Dispute Tribunal's analysis and conclusions, and accepts the factual findings made by the UNRWA DT.

ii. The Established Facts Show Misconduct

40. Area Staff Regulation 1.1 provides that UNRWA "[s]taff members, by accepting appointment, pledge themselves to discharge their functions with the interests of the Agency only in view". Area Staff Regulation 1.4 imposes the following additional duties, responsibilities and privileges on UNRWA staff members: "Staff members shall conduct themselves at all times in a manner befitting their status as employees of the Agency. They shall not engage in any activity that is incompatible with the proper discharge of their duties with the Agency."

41. Area Staff Regulation 10.2 provides that "[t]he Commissioner-General may impose disciplinary measures on staff members who engage in misconduct".

42. Area Staff Personnel Directive No.A/10/Rev.1, Part I, sets forth Area Staff Rule 110.1, which pertains to disciplinary actions. Paragraph 4.1 provides that "[d]isciplinary measures will normally be imposed for wilful misconduct, irresponsible conduct, or wilful failure to perform assigned duties or to carry out specific instructions". Termination for misconduct is an approved disciplinary measure.

43. Misconduct based on underlying criminal acts does not depend upon the staff member being convicted of a crime in a national court. As the former United Nations Administrative Tribunal concluded, "different onuses and burdens of proof would arise in the ... domestic criminal proceedings than would arise under an investigation for misconduct under

the [Agency's] appropriate Regulations and Rules".⁶ Thus, UNRWA could properly determine that Mr. Abu Ghali's actions constituted misconduct despite his acquittal of the criminal charges brought against him.

44. A staff member's knowing possession of a large amount of a banned drug constitutes serious misconduct. Clearly, it is "activity that is incompatible" with the performance of an UNRWA staff member's duties and is not in the "interests" of the Agency. Since the UNRWA DT properly found that Mr. Abu Ghali knew, or reasonably should have known, that the boxes he possessed in the UNRWA vehicle contained Tramal, a banned substance, the Agency has shown serious misconduct on his part. Additionally, a reasonable presumption may be drawn that Mr. Abu Ghali participated in the illegal trade of Tramal, based on his possession of a large amount of the drug. This also constitutes serious misconduct for disciplinary purposes.

iii. The Sanction of Termination Is Proportionate

45. The UNRWA DT determined that termination is a proportionate sanction for Mr. Abu Ghali's misconduct because his post was, in part, to combat drug abuse:

[A]t the time of the material facts, [Mr. Abu Ghali] was employed by the Agency as an Assistant Mental Health supervisor. In other words, he was in a position of responsibility. He was expected, as such, to be a role model for his employees. In the exercise of his duties as Assistant Mental Health Supervisor, [he] was well aware that in recent years problems had arisen from misuse of Tramal throughout Gaza, and efforts were being made to combat the effects of this drug abuse. Actually, [his] own job, as he worded it[,] was 'to fight drug usage and trading ...' His position of responsibility can only aggravate his misconduct. Consequently, ... the disciplinary measure to terminate [his] employment was proportionate to the misconduct.

This Tribunal agrees. The UNRWA DT may properly consider the nature of the misconduct *vis-à-vis* the nature of the staff member's post in determining whether a sanction is proportionate.⁷

⁶ Former United Nations Administrative Tribunal Judgment No. 951, *Al Khatib* (2000), para. IV.

⁷ *Abu Jarbou v. Commissioner-General of the United Nations Relief and Works Agency for Palestine Refugees in the Near East*, Judgment No. 2013-UNAT-292.

Mr. Abu Ghali's Due Process Rights Were Not Violated

46. The UNRWA Dispute Tribunal determined that the Agency's investigation was not tainted by procedural irregularity, prejudice or other extraneous factors or error of law. Mr. Abu Ghali does not challenge this determination on appeal. Nevertheless, he raises multiple claims of legal or procedural error by the UNRWA DT – without explaining how these alleged errors prejudiced him or violated his due process rights. Even assuming *arguendo* these errors occurred, none of them would be a ground to reverse the Judgment. For this reason, there is no need for the Appeals Tribunal to address these claims.

Judgment

47. Judgment No. UNRWA/DT/2012/024 is affirmed and the appeal is dismissed.

Original and Authoritative Version: English

Dated this 17th day of October 2013 in New York, United States.

(Signed)

Judge Chapman, Presiding

(Signed)

Judge Simón

(Signed)

Judge Lussick

Entered in the Register on this 19th day of December 2013 in New York, United States.

(Signed)

Weicheng Lin, Registrar