BOOK REVIEW

Freedom of Religious Organizations

Jane Calderwood Norton

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I INTRODUCTION

In 2013, the issue of religious freedom took centre stage when the Anglican Bishop of Auckland denied ordination to Eugene Sisneros, a gay man living in an unmarried relationship with another man.[1] Media coverage of the case — in which the Human Rights Review Tribunal found that the Bishop was legally entitled to deny Mr Sisneros the opportunity for ordination — demonstrated that, although religious freedom litigation is rare in New Zealand, it is capable of igniting passion and debate.[2]

Freedom of Religious Organizations offers a productive analysis of how religions can operate within a liberal, secular state.[3] Dr Jane Calderwood Norton takes the secular state as her starting point. Nevertheless, she acknowledges the value that religion has in many lives and the role organisations play in providing and regulating that value. The result is a text that is rooted in liberal theory, but sensitive to the personal significance of faith.

Norton notes, somewhat understatedly, that "reconciling religious organizations with the general law is not always straightforward".[4] The central thesis of *Freedom of Religious Organizations* is that the law pertaining to religious organisations ought to be developed with reference to the promotion of individual autonomy. Autonomy is both a central tenet of the liberal state and a product of religious life. Thus, discrimination, employment and property laws should afford religious organisations

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1 *The Gay and Lesbian Clergy Anti-Discrimination Society Inc v The Bishop of Auckland* [2013] NZHRRT 36.

2 For various perspectives, see Peter O'Neill "Editorial: The right to discriminate" (21 May 2013) *Timaru Herald* <www.stuff.co.nz>; "Is the Church free to choose?" (8 May 2013) *Anglican Taonga* <www.anglicantaonga.org.nz>; and "New Zealand: Tribunal allows church to prevent gay man from becoming priest" (17 October 2013) *PinkNews* <www.pinknews.co.uk>.

3 Jane Calderwood Norton *Freedom of Religious Organizations* (Oxford University Press, Oxford, 2016).

4 At 191.

exceptions where doing so promotes their members' autonomy without disproportionate cost to the autonomy of others.

The book's primary purpose is to establish first principles. It does so in accessible language and at succinct length. The corresponding shortcoming is that the practical application of some of the book's principles is sometimes unclear. However, precisely because of its high-level framework, *Freedom of Religious Organizations* has wide application that is likely to be of interest to policymakers, lawyers, judges and academics throughout the common law world.

In its review of the book, this note will begin by summarising the substance of each chapter. Part III is an examination of Norton's "suggested approach"[5] — a framework proposed to respond to issues of appropriateness in bringing religious activity within the state's purview. In Part IV, the note considers the fine distinction between deferring to religious organisations and endorsing religious activity in the context of rights of exit. Part V is a discussion of the balancing act required of the state's decision-makers where harms to different parties will invariably arise. Finally, the note briefly considers the relevance of *Freedom of Religious Organizations* in the New Zealand context.

II SUMMARY

The scope of *Freedom of Religious Organizations*, as set out in Chapter 1, is limited. Norton acknowledges the vast existing body of literature on individual religious freedom and narrows her focus to less-travelled ground: the specific role religious *organisations* play in securing freedoms for individuals and groups. The book's aim is to explore:[6]

> … certain potential conflicts between the law and religious organizations, examining whether the current British response to these conflicts is justified, and then suggesting an approach for dealing with such conflicts.

The text focuses on the United Kingdom. Throughout the book, the author draws examples from other jurisdictions, particularly North America, only to support her argument or to illustrate contrasting approaches.

Chapter 1 succinctly summarises the doctrinal and theoretical foundations of religious freedom, paying particular attention to the value of autonomy. Norton surveys relevant United Kingdom[7] and European law,[8] demonstrating the human rights basis of religious freedom.[9] The chapter then

5 See 196.

6 At 1.

7 Toleration Act 1689 (Eng) Will & Mar c 16-18; Human Rights Act 1998 (UK); and Equality Act 2010 (UK) as cited in Norton, above n 3, at 14.

8 European Convention for the Protection of Human Rights and Fundamental Freedoms 213 UNTS 221 (opened for signature 4 November 1950, entered into force 3 September 1953) [ECHR], arts 9–11 and 14 as cited in Norton, above n 3, at 12–13.

9 At 13.

builds a theoretical justification for protection of religion based on personal autonomy, which is defined as "the capacity to self-direct or 'make' one's own life".[10] Religions offer individuals a range of comprehensive options through which they may self-direct. Because autonomy is essential to liberalism, and autonomy in turn requires religious freedom, Norton reasons that religious organisations — which regulate and provide religious ways of living — deserve recognition and protection by the liberal state.[11]

Chapters 2–6 examine subject areas where United Kingdom courts and policymakers have considered the rights of religious organisations. Each chapter sets out the legal position in the United Kingdom and then offers theoretical critique.

Chapter 2 focuses on membership. The relationship between a religious organisation and its members is symbiotic: the organisation requires a membership in order to exist and the members rely on the organisation to enable their religious life.[12] Membership is central to religious organisations and religious freedom. Accordingly, the chapter supports a high degree of deference — and legislated exceptions to discrimination law — in both the admission of new members and the treatment of admitted members. Conditions of consent and rights of exit qualify this deferential approach.[13]

Chapter 3 explores the issue of employment — in particular, employment discrimination. After establishing the relevant British legislative exceptions for religious organisations,[14] Norton suggests two categories of discrimination exceptions: first, where a religious practice does not conflict with the interests of another party (such as a prospective employee); and, secondly, where the state prefers a religious organisation's claim over that of another party.[15] The first category is justified where discrimination law inhibits the autonomy of the organisation's members, particularly where the law disproportionately affects the autonomy of the organisation's members as compared to a non-religious employer.[16] The second category is justified only where interference with the religious organisation causes harm that outweighs the state's justification for discrimination legislation.[17]

In Chapter 4, Norton turns to issues raised by property disputes. The chapter draws on cases where property disputes have arisen within religious

10 Joseph Raz *The Morality of Freedom* (Clarendon Press, Oxford, 1986) at 369 as cited in Norton, above n 3, at 17.

11 Norton, above n 3, at 16–19 and 28.

12 At 29.

13 At 58–62.

14 Consolidated version of the Treaty on the Functioning of the European Union [2012] OJ C326/47, arts 19 and 157; Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation [2000] OJ L303/16; Equality Act; Human Rights Act 1998 (UK); ECHR, art 18; and Directive 2006/54/EC on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast) [2006] OJ L204/23. See Norton, above n 3, at 67–83.

15 At 84.

16 At 86–87.

17 At 97.

organisations, often between competing factions disputing trust property. Whether the court will intervene or defer depends on balancing the autonomy value of self-regulation against the autonomy of those challenging the decision-making of the organisation.[18]

In Chapter 5, Norton explores issues associated with family law — a focus of recent significant media attention.[19] A central concern of the chapter is the recognition of relationship property and personal status decisions of religious arbitral tribunals, particularly Jewish Batei Din and Muslim Sharia Councils. United Kingdom courts have been willing to recognise these bodies and defer to their rulings in family matters, subject to the observance of fundamental human rights.[20] Norton generally supports this policy of non-interference, but notes that tribunals may "deprive vulnerable individuals of protections from injustices that they would ordinarily have under the state system or otherwise cause harm", particularly for women members of religious organisations with patriarchal norms.[21] Accordingly, the decisions of religious tribunals must remain open to judicial scrutiny to ensure that consent and rights of exit are observed.[22]

In Chapter 6, the final area Norton discusses is the provision of goods and services, with a central focus on the provision of social services. As in New Zealand, religious organisations in the United Kingdom are responsible for providing a wide range of services to their members as well as the general public.[23] Exceptions in discrimination law allow religious organisations to discriminate in the provision of goods and services on the basis of sex, religion or belief and sexual orientation.[24] These exceptions are limited where the organisation has a commercial purpose or contracts with a public authority.[25] Although generally supportive of the exceptions (and their limitations) on the grounds of autonomy enhancement, Norton criticises the first exception for its focus on the commercial nature of the organisation as a whole rather than the particular service.[26]

III THE SUGGESTED APPROACH

In the book's conclusion, Norton offers a broad "suggested approach"[27] to the question of "whether state law should apply to the activity of religious

18 At 126.
19 For example, Owen Bennett "Boris Johnson: Sharia law is completely unacceptable in the UK" *Mirror Online* (online ed, United Kingdom, 24 March 2015). See Norton, above n 3, at 127–129.
20 See Norton, above n 3, at 130–141. See also *EM (Lebanon) v Home Secretary* [2008] UKHL 64, [2009] 1 AC 1198 as cited in Norton, above n 3, at 139; and *KC & NNC v City of Westminster Social and Community Service Department* [2008] EWCA Civ 198, [2009] Fam 11 as cited in Norton, above n 3, at 139.
21 At 147.
22 At 147–168.
23 For New Zealand, see, for example, the Salvation Army, City Mission and Presbyterian Support.
24 Equality Act, s 29 and schs 3(2) and 3(29).
25 At 178–189.
26 At 178–181.
27 See 196.

organizations".[28] She offers this approach with the important qualification that any answer to this question must be "deeply contextual" and that no "strict test" is possible.[29] Instead, three broad contextual categories are identified: (1) exceptions to generally applicable laws; (2) adjudication of internal disputes; and (3) activity otherwise left unregulated.[30]

In the first category, Norton anchors her approach in a utilitarian "autonomy-based harm principle"[31] whereby the harm that a generally applicable law (such as the Equality Act 2010) would cause to a religious organisation is weighed against the state's interest in the law's application.[32] The context of the religious activity affected may give rise to presumptions about the extent to which autonomy would be harmed. For example, legislation that affects an organisation's spiritual "epicentre", such as its core doctrine or clergy, would give rise to a presumption of substantial harm. However, harm to an organisation's secular activities would give rise only to limited concern. This harm can then be weighed against the power of the state's interest in, for example, avoiding discrimination and protecting vulnerable minorities. Norton cautiously suggests that presumptions can also be made depending on whether the context is the organisation's internal affairs or external activity. The state's interest may be weaker where the activity is internal (such as determination of membership) than where it is external (such as contracting with a public authority).[33]

In the second category — adjudication of internal disputes — Norton identifies the primary issue as whether it is appropriate for the state to "interfere" with the inner working of the religious organisation.[34] Drawing on earlier analysis — particularly the discussion of property in Chapter 4 — Norton proposes that a court seized with an internal dispute "ought to consider the extent to which it would be resolving a religious question for the organization rather than a legal one; the former would harm religious autonomy".[35] A court should defer to the group's internal norms and processes "provided they have complied with internal procedural rules such as rules of adjudication or constitutional change".[36] Where those norms are illiberal, the court will need to perform a balancing act similar to that suggested in respect of exceptions to generally applicable laws.[37]

The final category identified raises the question of whether state law should apply to "activity that is otherwise left unregulated by the state".[38] The operation of Sharia Councils, as discussed in Chapter 5, offers a pertinent example of such activity. Norton suggests that, in most cases,

28 At 197.
29 At 197.
30 At 198.
31 At 198.
32 At 198–199.
33 At 198–206.
34 At 206.
35 At 207.
36 At 207–208.
37 At 208–209.
38 At 209.

passing laws to specifically address currently unregulated activity will constitute an unjustified degree of intrusion upon personal autonomy. The state's role in these areas is limited to securing minimum rights of consent and exit, considering non-legislative means of encouraging "fairer" norms, and promoting awareness of complementary state-provided alternatives (such as secular courts).[39]

The final portion of *Freedom of Religious Organizations* discusses whether the "suggested approach" coheres with the actual practice of United Kingdom courts. The author considers that, with three caveats, it does.[40] First, she suggests that there is no principled justification for legislated discrimination exceptions on the grounds of belief, sex and sexual orientation, but not race.[41] Although this criticism may at first seem frivolous, it must be considered in the context of the United Kingdom Supreme Court's decision in *R (E) v Governing Body of JFS*.[42] In that case, the United Kingdom Supreme Court restricted the freedom of Jewish schools to determine their membership based on Orthodox Jewish matrilineal qualifications because the policy amounted to unlawful racial, rather than permissible religious, discrimination.[43] Norton interprets the case as an inappropriate example of a court adjudicating the substance of a religious organisation's internal norms, generating a result that was absurd.[44] Secondly, Norton suggests that courts should exercise greater caution and deference in determining group membership disputes so as not to undermine group autonomy. Again, she cites *JFS* — where the United Kingdom Supreme Court's decision cut across established religious tradition — as a cautionary tale.[45] Finally, drawing on the analysis provided in Chapter 4, Norton encourages courts to refer to internal norms more frequently in resolving property disputes, rather than applying a neutral standard between competing claims.[46]

IV DANGERS OF DEFERENCE: RIGHTS OF EXIT AND RISK OF REIFICATION

Freedom of Religious Organizations makes a persuasive case for deference to religious organisations based on a justification of individual autonomy and the need for organisations to regulate that autonomy. Such deference, if faithfully applied, will inevitably allow for illiberal practices to continue within religious organisations on some occasions. Norton readily

39 At 210.
40 At 211.
41 At 213–217.
42 *R (E) v Governing Body of JFS* [2009] UKSC 15, [2010] 2 AC 728 as cited in Norton, above n 3, at 208.
43 Race Relations Act 1976 (UK), ss 1(1)(a) and 17 as cited in Norton, above n 3, at 39–43.
44 At 216.
45 At 216–217.
46 At 217–218.

acknowledges this, but argues that certain autonomy-based conditions may render legal toleration of such practices appropriate.[47]

One such condition is the "right of exit" — "that a religious group member can always choose to leave and, if they do not, that is tacit acceptance of their situation".[48] Although this may hold at a theoretical level, rights of exit may be difficult to secure in practice. The nature of religious communities is such that they are closely tied to personal identity, family structure and communal support. In light of this, even if rights of exit are enumerated in the constitutions of religious organisations, a person may not *exit* without facing serious consequences. For example, a woman member of a patriarchal religious organisation, having access to a *formal* right of exit, may be practically unable to exit because of economic dependence, lack of practical training or unawareness of other options arising from religious inculcation.[49]

Norton acknowledges these practical challenges.[50] At times, however, the analysis seems glib. For example, Chapter 2 argues that "[m]ost religious groups in England … are relatively easy to leave".[51] The author considers the practical dimension of rights of exit a "socio-political" question, beyond the confines of the book.[52] Despite this modest claim, Norton provides some productive insight in the context of consent to arbitration by religious tribunals in Chapter 5. She identifies a minimum level of secular education for its members as a prerequisite for deference towards a religious organisation under the suggested approach, even where it may compromise other aspects of autonomy.[53] This is because autonomy cannot be realised unless an individual is aware of a sufficient range of options for living his or her life. Here, the application of theory to practical questions yields fruitful analysis which brings the "suggested approach" more clearly into focus.

Norton emphasises that even where rights of exit can be established and deference justified, this should not be confused with state endorsement of a religious organisation's religious practice. A right of exit will only provide justification for refusing to intervene in the affairs of a group.[54] It will not justify the enforcement of the group's illiberal norms via judicial imprimatur:[55]

47 At 55–58.
48 At 60.
49 This issue is widely discussed in political theory. See, for example, John Rawls *A Theory of Justice* (Belknap Press, Cambridge (Mass), 1971) at 246; Darlene M Johnston "Native Rights and Collective Rights: A Question of Group Self-Preservation" (1989) 2 CJLJ 19 at 32; Susan Moller Okin "Mistresses of their Own Destiny: Group Rights, Gender and Realistic Rights of Exit" (2002) 2 Ethics 205 at 215–217; and Leslie Green "Internal Minorities and their Rights" in Will Kymlicka (ed) *The Rights of Minority Cultures* (Oxford University Press, New York, 1995) 256 at 268.
50 "What constitutes a realistic exit and how it ought to be secured is complex." At 61.
51 At 61.
52 At 62.
53 At 158.
54 At 64.
55 At 65.

> … while the presence of an exit may mean that certain rights can be limited by the group … it does not provide validity to these norms or a reason to endorse those restrictions …

Yet the line between deference and endorsement may be a fine one. This is clear from the analysis of property disputes provided in Chapter 4. Norton accepts that deference may reify existing norms, conceding the decision-making role to "whoever [has] the raw power" within the group, reinforcing the status quo and stifling the evolution of internal norms.[56] Accordingly, interference in property disputes may be necessary in some situations.[57] In the discussion of religious tribunals in Chapter 5, Norton suggests that reification can be discouraged through informal engagement with religious organisations, so that their jurisdiction "supplement[s] and complement[s]" state law.[58]

The risk of reification is concerning. Where *Freedom of Religious Organizations* addresses this concern (such as in Chapter 5) it is convincing. However, the book lacks a systematic response to the issue, and it is not discussed in its conclusion. More sustained analysis would assist in allaying concerns that the "suggested approach" is a prescription for entrenching illiberal norms.

V THE BALANCING ACT

One central concern dominates much of the discussion throughout *Freedom of Religious Organizations*: what is the state to do when a legal exception would increase the autonomy of a religious organisation's members, but harm the autonomy of others? Exceptions could harm the interests of internal minority members (particularly women), employees or anyone interacting with the organisation. In practice, courts, legislators and policymakers are faced with a balancing act.

A difficulty of the suggested "autonomy-based harm principle" discussed above is that it often falls back on a murky utilitarian calculus. It attempts to assess who suffers a greater subjective harm and which outcome harms a greater number of people. This exercise is fraught with difficulty, particularly for a court presented with a narrow set of arguments and evidence. As Norton notes, "[i]t may be that we cannot compare which harm is greater. They may be incommensurable, the weight and preference of each depending on what one values."[59] Throughout the book, Norton offers various possibilities to avoid this approach. For example, in the context of

56 At 101. See also Jeremy Waldron "Minority Cultures and the Cosmopolitan Alternative" (1992) 25 U Mich JL Reform 751 at 761; and Chandran Kukathas "Are There Any Cultural Rights?" (1992) 20 Pol Theory 105 at 128.

57 At 111–121. Note that the "interpretivist" approach discussed at 112–121 may also reify particular norms by favouring one over another.

58 At 162.

59 At 97.

employment law, she suggests carving out broad subject areas for self-regulation, while ensuring that employment discrimination legislation is "'the least intrusive means'" of achieving the law's objectives.[60] In the book's conclusion, Norton offers a set of presumptions to guide decision-making based on broad factors that may arise in any given case.

Despite this guidance, the approach seems at times frustratingly imprecise. The hyper-contextual analysis of internal property disputes in Chapter 4 is one such instance.[61] Yet there are also passages where the high-level framework coalesces around tangible examples, such as the decision in *JFS*. The author's criticism of the decision cogently and specifically demonstrates how inappropriate interference with a group's internal governance can remove that group's ability to regulate the identity of its members. This, in turn, denies the group's members access to meaningful options and harms the group's autonomy.[62] Furthermore, the autonomy framework in Chapter 5 yields practical policy suggestions in respect of religious tribunals.[63] Perhaps the frustration of imprecision is better directed at the difficulty of the issues explored rather than the text, which admirably provides a thorough analysis in a relatively short volume.

VI RELEVANCE FOR NEW ZEALAND

New Zealand's religious character is shifting in two directions. On one hand, fewer New Zealanders count themselves among the faithful[64] and mainline church affiliation is in decline.[65] On the other hand, New Zealand has experienced rapid growth amongst minority faiths, with more followers of Islam,[66] Hinduism,[67] Buddhism,[68] Sikhism[69] and new churches.[70] The result is a country with greater religious diversity, but also a growing proportion of individuals unfamiliar with religious beliefs and practices. Indeed, one scholar has observed of secular culture in New Zealand that:[71]

60 Julian Rivers *The Law of Organized Religions: Between Establishment and Secularism* (Oxford University Press, Oxford, 2010) at 136 as cited in Norton, above n 3, at 98.

61 At 107–126.

62 At 39–43.

63 At 141–162.

64 The percentage of New Zealanders with no religious affiliation grew from 27.5 per cent in 2001, to 38.6 per cent in 2013. The statistics provided in n 64–70 are retrieved from "Religious affiliation (total responses) by age group and sex, for the census usually resident population count, 2001, 2006 and 2013 Censuses" NZ.Stat <http://nzdotstat.stats.govt.nz>. Statistics are rounded to one decimal place.

65 The number of New Zealanders affiliated to the four largest mainline Protestant churches fell from 31.8 per cent of the total population in 2001 to 22.3 per cent of the total population in 2013.

66 An increase of 95.3 per cent between 2001 and 2013.

67 An increase of 125.9 per cent between 2001 and 2013.

68 An increase of 40.3 per cent between 2001 and 2013.

69 An increase of 369.1 per cent between 2001 and 2013.

70 The number of New Zealanders identifying as Latter-Day Saints, Pentecostals, or Non-Denominational Christians rose by 10.7 per cent between 2001 and 2013.

71 Douglas Pratt "Secular New Zealand and Religious Diversity: From Cultural Evolution to Societal Affirmation" (2016) 4(2) Social Inclusion 52 at 53.

> It can be very hard for religion to get any kind of exposure in the media, unless it is for all the wrong reasons … New Zealanders, I suggest, are arguably among the most studiously ignorant of religion; religion is a subject of discussion that is actively avoided and deemed better to ignore. As a result, misunderstanding and prejudice appears rampant.

In this context, it is vital to thoroughly consider emerging tensions between the secular New Zealand state and organised religious practices. Indeed, many of the issues Norton explores have begun to confront New Zealand courts. As early as the 1970s, the Court of Appeal was faced with a membership issue similar to that decided by the United Kingdom Supreme Court in *JFS*.[72] More recently, New Zealand courts have been called on to resolve issues relating to division of church property[73] and Sharia family law.[74] Ongoing challenges to religious education in public schools,[75] as well as legislative exemptions contained in ss 28 and 39 of the Human Rights Act 1993 and s 29 of the Marriage Act 1955,[76] provide potential for future litigation involving religious organisations.

The approach taken by the New Zealand courts thus far suggests they will follow the lead of English courts, as outlined and endorsed in *Freedom of Religious Organizations*. Indeed, in Mr Sisneros' case, the Tribunal explicitly recognised that it was performing a balancing act between "the jurisdiction of the secular courts and tribunals of New Zealand and the *autonomy* of religions to adopt, interpret and apply doctrine or rules".[77] It concluded that ultimately it must perform this balancing act with reference to the Human Rights Act 1993.[78] That Act contains exceptions to discrimination law similar to those found in United Kingdom legislation.[79] The role of the court is to apply that Act to the particular facts before it, not to evaluate a group's internal norms. Indeed, the Tribunal commented that it is not "the function of the Tribunal to serve as a forum for the exploration of the theological understanding" of a particular doctrine.[80] Provided it was acting within its constitution, deference is owed to the religious organisation — in this case, the Anglican Church.[81]

72 See *King-Ansell v Police* [1979] 2 NZLR 531 (CA). The Court of Appeal's decision is indirectly cited in *JFS*, above n 42, at [185].

73 See *Akau'ola v President of the Conference of the Methodist Church of New Zealand* HC Auckland CP183/SW01, 5 December 2001.

74 See *Sharif v Sami* HC Auckland CIV-2010-404-2306, 9 September 2010.

75 See for example *McClintock v Attorney-General* [2016] NZCA 274.

76 As amended by the Marriage (Definition of Marriage) Amendment Act 2013. Section 29 exempts ministers of religious organisations specified at sch 1 of the Act from solemnising marriages if doing so would contravene religious belief. Curiously, the list of organisations at sch 1 relate only to Christian and Jewish organisations. No Islamic, Hindu or Buddhist organisation is included.

77 *Bishop of Auckland*, above n 1, at [100] (emphasis added).

78 At [100].

79 Human Rights Act 1993, ss 28 and 39.

80 *Bishop of Auckland*, above n 1, at [100].

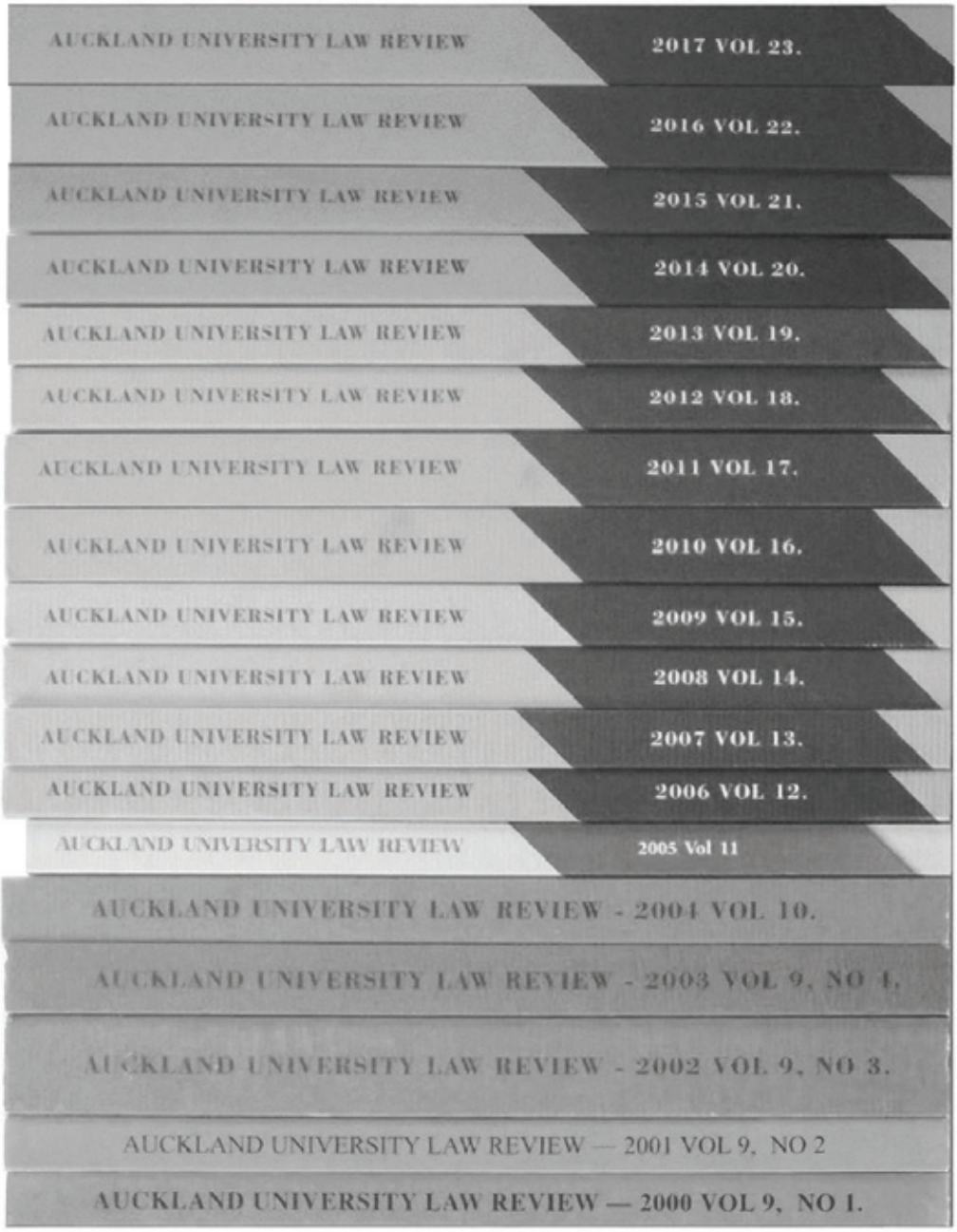
81 At [100].

VII CONCLUSION

Freedom of Religious Organizations is recommended for readers grappling with the challenges posed by religious freedom. In a field where there are no easy answers, the author suggests a framework that acknowledges the meaningful role religion plays in many lives. Norton's approach recognises that religious freedom is, in the words of the House of Lords, "an area in which a rigidly analytical approach, dividing the case into watertight issues … may not always be the best way forward".[82]

Despite its theoretical approach, *Freedom of Religious Organizations* provides several practical suggestions. In particular, it frames questions of religious freedom involving organisations as a calculus of state interests weighed against the potential autonomy-harms of state intervention. Although this framing may not produce a legal answer to every question, it will provide useful guidance in practical cases. Norton's text will be indispensable to practitioners and judges as New Zealand courts are called upon to adjudicate novel disputes at the interface of law and religion.

82 *R (Williamson) v Secretary of State for Education and Employment* [2005] UKHL 15, [2005] 2 AC 246 at [66] per Lord Walker as cited in Norton, above n 3, at 211.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