

# REGULATORY ANALYSIS FORM

For use in providing information to the Independent Regulatory Review Commission pursuant to Section 5 of the Regulatory Review Act and for providing information to the Governor's Task Force on Regulatory Relief pursuant to Executive Order 1982-2 and Section 612 of the Administrative Code.

## PART I: IDENTIFYING INFORMATION

(1) Agency PA Human Relations Commission	(2) ID No. (Use T orce No.) 52-011	Date Received by IRRC Harrison 2055
(3) Short Title Housing Accommodations/Commercial Property		
(4) Pa. Code Cite 16 PA. Code SubSection 45	(5) Agency Contact & Phone Number Nancy L. Gippert, Assistant Counsel (717) 783-8132	
(6) Type (check one) <input checked="" type="checkbox"/> Proposed <input type="checkbox"/> Final Order Adopting Regulation <input type="checkbox"/> Final-Omitted Regulation	(7) Is a 120 day Emergency Certification Attached: N/A <input type="checkbox"/> No <input type="checkbox"/> Yes: By the Attorney General <input type="checkbox"/> Yes: By the Governor	
(8) APPROVALS (Name & Date) Agency Head <i>Thomas C. Lloyd</i>	(Executive Agencies Only) Task Force _____	

## PART II: BASIC ANALYSIS MATERIAL (Required by Sec. 5(a) of the Regulatory Review Act)

(9) Briefly explain the proposed regulation. The purpose of this schedule of penalties, procedures for their imposition and procedures for appeal is to effectuate the provisions of 43 P.S. SubSection 959.3, as enacted by the legislature in Act 34 of 1997, by initiating a citation system and schedule of penalties. The purpose of this system is to create an efficient method to deal with violations of the advertising provisions of the PHRA in situations where no individual homeseeker was harmed by the unlawful advertisement.

(10) How does this regulation reduce costs of state and local government or private entities (business, consumers, etc.) within the Commonwealth? By providing an expedited format for handling allegations of unlawful discriminatory housing advertisements, possible respondents and complainants will not be required to expend as much time and funds in dealing with the alleged violation. Furthermore, since no individual will have alleged a violation of the Act, the penalties assessed for the violation will bear a closer relation to the actual harm caused.

**(11) What is the statutory or other authority under which the regulation is proposed? (For state law cite Act and P.S. for federal law cite Act and U.S.C. For federal regulations cite C.F.R. or Federal Register. Be sure to cite court decisions, or consent decrees or attach copies of unpublished documents.)** The PHRC's statutory authority for rulemaking is found at Section 7(d) and 9(g) of the PHRA, 43 P.S. SubSection 957(d) and 959(g). This schedule of penalties, guidelines for their imposition and procedures for appeal is published pursuant to the authorization 43 P.S. SubSection 959.3, Act 34 of 1997. Under that authority, this schedule of penalties, procedure for their imposition and procedures for appeal these regulations is to be promulgated as a regulation with two (2) years of the October 10, 1998 original publication of the Citation System as Guidelines/Statement of Policy.

**(12) Why is this regulation needed?** The proposed schedule of penalties, procedure for their imposition and procedures for appeal is authorized by Act 34 of 1997 and is needed to provide a mechanism to enforce the advertising provisions of the PHRA when a person not seeking housing or financing alleges a violation of those provisions. The system was developed with input from various stakeholders, including the Pennsylvania Association of Realtors, the Pennsylvania Newspapers Publishers Association and PHRC's reviewing Legislative Committees.

**(13) What legal, accounting or consultant procedure will be required by the proposed regulation and who must comply with these procedures?** The proposed schedule of penalties, procedure for their imposition and procedures for appeal will be imposed upon advertisers and/or publishers of housing advertisements that contain words, phrases or symbols which are violative of the PHRA as it relates to housing, when such advertisements are brought to the attention of the PHRC by a person or group not seeking such housing or financing. The procedures for issuing citations under the schedule are modeled on those developed by other Commonwealth Agencies, in particular the Bureau of Professional and Occupational Affairs (BPOA). Upon receipt of the citation, the party served will have the standard options of 1) Paying the civil penalty, 2) denying the charge and requesting a hearing. 3) taking no action and having a default judgment entered against them.

**(14) What additional reporting, record keeping and other paperwork will be required by the proposed regulation? (Attach copies of any available forms or reports which will be required in implementation of the proposed regulation.)** The proposed schedule of penalties, procedure for their imposition and procedures for appeal will require issuance of citation notices, letters and records of civil penalties, judgments and/or hearing action. An accounting system will be developed in order to maintain adequate accounting of outstanding penalties and those paid. This time required for this newly required paperwork and accounting will be offset by the fact that the comparable paperwork for an adversarial compliance proceeding will no longer be necessary.

**(15) What is the suggested timetable for public comment, hearings, implementation, and what are various conformity deadlines (i.e. permits, licenses, etc.)?** Because the Citation System has been in place pursuant to the Authority of Act 34, commentators have had the opportunity to become familiar with the system and provide comments to the PHRC, a 30 day comment period should suffice. The citation system is already in effect as guidelines/statement of policy.

**(16) What types of persons, businesses and organizations will be affected by the regulation?**

Advertisers and publishers as well as individual members of the public who read and utilize housing advertisements.

**(17) What other regulations and State agencies will be affected by the regulation?**

None

**PART III: REGULATORY FISCAL IMPACT (Required by Sec. 612 of the Administrative Code)**

**(18) Generally describe the costs imposed by this regulation upon state and local government.**

The proposed schedule of penalties, procedure for their imposition and procedures for appeal will require no additional costs to state and local government. Any costs will be offset by avoidance of adversarial compliance procedures.

**(19) Are there Revenue Losses? Yes/No** NO  
**(Attach Statement of method used to estimate)**

State ( ) Local ( ) \_\_\_\_\_ ( )

	FY	FY	FY	FY	FY	FY

**(20) Are there increased program costs? Yes/No** NO  
**(Attach Statement of method used to estimate)**

State ( ) Local ( ) \_\_\_\_\_ ( )

	FY	FY	FY	FY	FY	FY

**(21) What is the three-year expenditure history for programs affected by the regulation?**  
**(Attach statement of method used to estimate)** N/A

State ( ) Local ( ) \_\_\_\_\_ ( )


**(22) Has any increased cost been included in the current budget? Yes/No**  
**If no, how will funds be obtained?** N/A

**(23) Generally describe the costs imposed by this regulation on private entities. (e.g. consumers, business, etc.)** The proposed schedule of penalties, procedure for their imposition and procedures for appeal will eliminate adversarial procedures, thus creating an overall cost savings to persons alleged to have violated these particular provisions of the act. In addition, the cap on penalties is far lower than could have been imposed following a costly public hearing.

**(24) What is the amount of reasonably measurable private costs?** N/A

	FY	FY	FY	FY	FY	FY

**(25) Explain the types of benefits which arise from the regulations, and who receives these benefits.** Consumers of Housing Advertisements as well as those who publish housing advertisements will have an avenue to address violations of the advertising provisions of the Act at a cost significantly less and a process far simpler than the current adversarial provisions that currently exist.

**(26) If any of these benefits are measurable, what are their estimated value?** Not measurable

	FY	FY	FY	FY	FY	FY

**(27) Will the potential benefits outweigh the potential costs imposed? Explain.**

Yes. In place of a cumbersome and time consuming process which often involves high costs for everyone involved, the proposed schedule of penalties, procedure for their imposition and procedures for appeal is a quick and cost effective method of dealing with easily remedied violations of the Act.

**(28) Has the regulation been drafted in a manner which maximized the difference between potential benefits and potential costs? Explain.**

N/.A

**(29) List the alternative regulatory approaches which were considered and reasons for rejecting these alternatives.**

N/A

**(30) How will this regulation reduce or minimize paperwork, legal accounting, reporting or paperwork requirements?** While the forms that have been developed will require a certain amount of new paperwork, the elimination of the paperwork required for a full adversarial investigation far outweighs the new paperwork.

**(31) What provisions are included in the regulation to meet the special needs of affected groups or persons? If no such provisions are included, explain why.**

N/A

**(32) What plan has been developed to evaluate the effectiveness of the regulation after its implementation? What sunset date, if any, has been assigned?**

Evaluation will be ongoing.

**PART IV: OTHER INFORMATION (Required by Sec. 5(a) of the Regulatory Review Act and Executive Order 1982-2.)**

**(33) Is there a deadline for action? Why? If there is no deadline, when should the regulation be adopted and what are the consequences of delay. (Attach copies of documents supporting the need for a deadline.)**

The regulations are to be promulgated within two years of the effective date, October 10, 1998, of the schedule of penalties, guidelines for their imposition and procedures for appeal

**(34) Is this regulation mandated by federal law or court order? Yes/No (Attach copies of orders, consent decrees, settlement memos, federal regulations, letter or agreement, etc.)**

No

**(35) Upon what information is the need for this regulation based? What studies, hearings, or other research has been conducted?** This legislative recommendation was developed after extensive discussion, meetings and negotiations within the legislative process and public meetings held during the legislative development of Act 34 of 1997.

**(36) What steps, if any, were taken in the development of this regulation to provide public and legislative participation?** The idea was developed during legislative and public meetings. Minor changes have been made from the guidelines/statement of policy, based upon consultation with the State Government Committee Chair and Staff.

**(37) Will current litigation be affected by this regulation? Yes/No If so cite cases and explain.**

NO

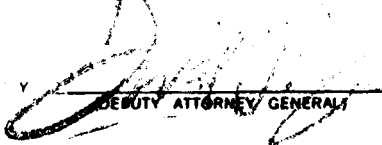


**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU**  
(Pursuant to Commonwealth Documents Law)

99 AUG 11 PM 12:29

#2055

DO NOT WRITE IN THIS SPACE

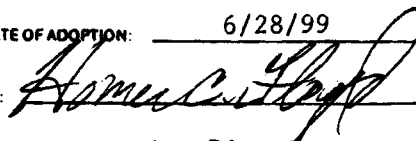
Copy below is hereby approved as to  
form and legality. Attorney General
  
 DEPUTY ATTORNEY GENERAL

 AUG 03 1999  
 DATE OF APPROVAL

 Check if applicable  
 Copy not approved. Objections  
 attached.
Copy below is hereby certified to be a true and correct copy  
of a document issued, prescribed or promulgated by:
 Pennsylvania Human Relations Commission  
 (AGENCY)

DOCUMENT/FISCAL NOTE NO. 52-011

DATE OF ADOPTION: 6/28/99

 BY: 

 TITLE: Executive Director  
 (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)
Copy below is hereby approved as to  
form and legality. Executive or Independent  
Agencies.
 BY: 

7-15-99

DATE OF APPROVAL

 (Deputy General Counsel)  
 (Chief Counsel, Independent Agency)  
 (Strike inapplicable title)

☐ Check if applicable. No Attorney General  
 approval or objection within 30  
 days after submission.
**PROPOSED REGULATIONS**

**PROPOSED SCHEDULE OF PENALTIES, PROCEDURE FOR THEIR IMPOSITION  
AND PROCEDURES FOR APPEAL**

Title 16 -COMMUNITY AFFAIRS  
Part 2 - GOVERNOR'S OFFICE  
Subpart A - HUMAN RELATIONS COMMISSION  
16 PA CODE Chapter 45

**HOUSING ACCOMMODATIONS/COMMERCIAL PROPERTY**

Notice is given hereby that the Pennsylvania Human Relations Commission ( PHRC), is proposing as a regulation the following schedule of penalties, procedure for their imposition and procedures for appeal, as set forth in Annex "A". The schedule of penalties, procedure for their imposition and procedure for appeal were originally published on October 10, 1998 as guidelines/statement of policy, in compliance with and pursuant to the authority of Act 34 of 1997, 43 P.S. §959.3. The schedule of penalties, procedure for their imposition and procedure for appeal was not subject to review pursuant to section 205 of the Act of July 31, 1968 and are effective as guidelines//statement of policy for a period not to exceed two (2) years from the effective date of their publication. On or before the expiration of the two year period, the schedule of penalties, procedure for their imposition and procedure for appeal shall expire and shall be replaced by a regulation which shall have been promulgated,

adopted and published as provided by law. This publication is to serve as this proposed regulation.

The purpose of this proposed regulation is to create a schedule of penalties, procedure for their imposition and procedure for appeal, for violations of 959 P.S. §955(h)(5), by advertisers and publishers, in instances where the complainant does not take action to secure housing accommodations or financing and is not denied housing accommodations or financing based on the alleged discriminatory language in the advertisement.

**Fiscal Impact:**

The Commission believes that the schedule of penalties, procedure for their imposition and procedure for appeal will result in no additional cost to the Commission or to the general public. Any costs which arise to advertisers or publishers due to a fine imposed upon them are more than offset by the absence of costs of the current adversarial method of case processing.

**Paperwork Requirements:**

Additional paperwork created by the system will be offset by the elimination of the paperwork created by the normal case processing system.

**Effective Date:**

The schedule of penalties, procedure for their imposition and procedure for appeal shall take effect as regulations upon final publication in the Pennsylvania Bulletin.

**Contact Person/Public Comments:**

Interested persons are invited to submit written comments regarding the proposed schedule of penalties, procedure for their imposition and procedure for appeal in writing to Nancy L. Gippert, Assistant Chief Counsel, Pennsylvania Human Relations Commission, 101 South Second Street, Suite 300, P.O. Box 3145, Harrisburg, PA 17101. Such comments should be submitted within 30 days of publication.

Homer C. Floyd,  
Executive Director

## **Annex A**

Title 16. Community Affairs

PART 2. Governor's Office

Subpart A. Human Relations Commission

### **CHAPTER 45. CITATION PROCEDURE**

Sec.

45.201 Purpose.

45.202 Initial Procedure.

45.203 Administrative Procedures.

45.204 Hearing.

45.205 Appeals.

45.206 Enforcement of orders/nonpayment of civil penalties/default judgment.

45.207 Schedule of civil penalties.

45.208 Form.

#### **§45.201. Purpose**

Advertisements covered under 43 P.S. §955(h) shall be subject to a schedule of civil penalties for violation of section 5(h)(5) by the advertiser and the publisher in instances where the complainant does not take action to secure housing accommodations or financing and is not denied housing accommodations or financing based on the alleged discriminatory language in the advertisement. 43 P.S. 955(h)(5) states that it is an unlawful act to:

"print, publish or circulate any statement or advertisement: (i) relating to the sale, lease or acquisition of any housing accommodation or commercial property or the loan of money, whether or not secured by mortgage, or otherwise for the acquisition, construction, rehabilitation, repair or maintenance of any housing accommodation or commercial property which indicates any preference, limitation, specification, or discrimination based upon race, color, familial status, age, religious creed, ancestry, sex, national origin, handicap or disability or because of the handicap or disability of an

individual with whom the person is known to have a relationship or association, or (ii) relating to the sale, lease or acquisition of any housing accommodation or commercial property which indicates any preference limitation, specification, or discrimination based upon use of a guide or support animal because of the blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals."

#### §45.202 Initial Procedure

When, within 180 days of the publication of the alleged unlawful advertisement, the Pennsylvania Human Relations Commission (PHRC) becomes aware of an unlawful advertisement, which is subject to a citation, from sources other than aggrieved person(s) seeking housing or commercial property or financing in connection therewith, the following procedures shall apply:

- (1) The advertisements shall be forwarded to the appropriate housing staff in their original form, where possible, with information regarding their publication;
- (2) Housing staff shall complete the PHRC Citation Form (see attached);
  - (i) The form shall be forwarded to appropriate housing staff for review and transmittal to the Executive Director/Designee;
  - (ii) The Executive Director/Designee shall review and, if approved, sign the citation.
- (3) A copy of the citation and the advertising regulations shall be sent to the parties cited and where appropriate to licensing and/or regulatory agencies. The citation letter shall set forth the following options:
  - (i) Admission of violation and payment of the appropriate civil penalty;
  - (ii) Denial of violation and request for formal hearing. Included in this option is the notice that failure to appear at the hearing will result in a default judgment.
  - (iii) Admission of some violations and payment of appropriate penalty and denial of others with a request for a formal hearing.
- (4) Failure to respond or take any of the above actions within fifteen (15) days of service of the citation will result in a default judgment for the full amount of the penalty.
- (5) Failure to pay a civil penalty could result in additional penalties, and/or a request for revocation, suspension or other disciplinary actions against licensees or other action including court proceedings which the Commission deems appropriate.

§45.203      Administrative Procedures

- (a) Upon receipt of a response to a citation, the housing staff shall record that response on the appropriate data base.
- (b) Procedures will be established by PHRC to:
  - (1) Process checks and forward them when violations are admitted.
  - (2) Process checks and forward them when some violations are admitted and other violations are denied.
- (c) Where violations are admitted and payment is made, the following shall apply:
  - (1) The fact shall be noted in the record;
  - (2) The record shall be closed; and
  - (3) A letter will be sent to party cited advising of closing.
- (d) When violations are denied, the following shall apply:
  - (1) The record shall note the denial;
  - (2) The hearing request will be forwarded to a Citation Officer;
  - (3) The party cited shall be advised; and
  - (4) Staff counsel shall prepare the matter for hearing.
- (e) In the event that there is no response, a request for a default judgment shall be made to the Citation Officer.
- (f) The conduct of the hearing by the Citation Officer in any of the above circumstances shall be governed by appropriate PHRC regulations/requirements and/or these procedures, or both.
- (g) All payments made as a result of a violation, whether the violation is admitted and payment made or the payment is made following an Order of the Citation Officer, shall be forwarded by the PHRC to the Department of Revenue.

§45.204.      Hearing

- (a) An order following a Hearing shall be issued by the Citation Officer who may:
  - (1) Order the payment of the amount of the citation.
  - (2) Modify the amount of payment.
  - (3) Dismiss the citation.
  - (4) Order remedial actions and/or reasonable costs.
  - (5) Order other appropriate equitable relief as authorized by the Act.
- (b) Orders affirming two or more violations shall be referred to any appropriate licensing and/or regulating agencies for such action as they deem appropriate.

**§45.205 Appeals**

A decision by the Citation Officer may be appealed by any party by filing an application for review with Pennsylvania Human Relations Commission within 30 days of the mailing date of the Order. An application for review shall set forth with specificity the grounds for appeal. The Commission will review the record established and in its discretion receive additional evidence.

**§45.206 Enforcement of orders/non-payment of civil penalties/default judgment.**

Requests for enforcement of non-payment of civil penalties/default judgment shall be made to the Commission and filed with the appropriate court when approved by the Commission.

**§45.207 SCHEDULE OF CIVIL PENALTIES**

A single advertisement shall be cited as a single citation regardless of the number of unlawful words and phrases within that single advertisement. An advertisement shall be cited only once, for the publication of the same advertisement, run a reasonable number of days in the course of the contract with the newspaper or other publication for that advertisement. Should the unlawful advertisement be placed again in a newspaper or other publication, or is not withdrawn reasonably upon service of citation, it may be cited a second time. Both the publisher and the advertiser are subject to liability.

(a) Penalties. The following penalties apply:

First Citation	\$250
Second Citation	\$500
Third Citation	Formal Process

(b) Formal Process: When, in the Commission's judgment, the action of a party in the event of a third citation warrants, the Commission shall have the following options:

1. To impose a maximum penalty on a multiple basis;
2. To file a Commission initiated complaint, or;
3. To seek legal recourse, including those under Section 11 "Penalties", of the Pennsylvania Human Relations Act, 43 P.S. §961.

§45.208

Form

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA HUMAN RELATIONS COMMISSION  
101 SOUTH SECOND STREET, SUITE 300  
HARRISBURG, PA 17101-2515

CITATION

RESPONDENT NAME		
1.		
RESIDENCE ADDRESS	CITY-TWP-BORO-COUNTY	STATE ZIP CODE
2.		
BUSINESS ADDRESS		
3.		
CHARGE		
4.		
DATES(S) OF PUBLICATION	MANNER OF PUBLICATION	COPY ATTACHED
5.	6.	YES___ NO___
STATUTE OR REGULATIONS	CIVIL PENALTY	TOTAL DUE \$
7.	8. \$	9.
I VERIFY THAT THE FACTS SET FORTH IN THIS CITATION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE OR INFORMATION AND BELIEF. THIS VERIFICATION IS MADE SUBJECT TO THE PENALTIES OF 18 PA.C.S § 4904, RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.		
SIGNATURE		
10. DATE_____		
REMARKS		
11.		
12. CITATION NO.		

READ THE ATTACHED PLEA AND THE EXPLANATION OF YOUR RIGHTS AND OBLIGATIONS FOR SETTLEMENT OF THIS MATTER. YOU MUST ELECT AN OPTION AND FOLLOW THE APPROPRIATE DIRECTIONS WITH FIFTEEN (15) DAYS TO AVOID FURTHER LEGAL ACTION AGAINST YOU.

SHOULD YOU ELECT TO DEMAND A HEARING ON THIS MATTER, FOLLOW THE INSTRUCTIONS ON THE ATTACHED PLEA. YOUR HEARING DATE WILL BE SET BY A HEARING OFFICER. ALL HEARINGS ARE HELD IN HARRISBURG IN THE PENNSYLVANIA HUMAN RELATIONS COMMISSION CONFERENCE ROOM.

## NOTICE OF RIGHTS AND OBLIGATIONS

1. The original of this citation will be filed with the Housing Director of the Pennsylvania Human Relations Commission at Pennsylvania Human Relations Commission, Housing Division, 101 South Second Street - Suite 300, Harrisburg, PA 17105.
2. Within fifteen (15) days of the issuance or receipt of this citation, you must:
  - a. **ADMIT TO THE VIOLATION(S)** by signing the appropriate plea below and mailing the entire Citation along with an amount equal to the Total Due as specified on the Citation (attached) to the Housing Director, at the address listed above, or;
  - b. **DENY THE VIOLATION(S)**
    - i. in whole by signing the appropriate plea as specified in Section (b) of the Plea (attached) and mailing the Citation to the Housing Director at the address listed specified above.
    - ii. in part by signing the appropriate plea as specified in section "c" of the Plea (attached) below and mailing the Citation to the Housing Director at the address specified above.

If you deny the violation(s), a formal hearing will be scheduled in Harrisburg at which you may present evidence on your behalf.

3. All payments must be made by certified or cashier's check or money order and made payable to the "Commonwealth of Pennsylvania," and mailed to the Housing Director at the address specified above. Please place the Citation Number on certified or cashier's check or money order. Personal Checks WILL NOT be accepted.
  4. FAILURE TO RESPOND WITHIN THE TIME SPECIFIED ABOVE will result in the entry of a default judgment against you for the full amount of the civil penalty ("Total Due") as specified on the Citation. **Failure to pay a civil penalty could result in additional fines and the revocation, suspension or other disciplinary action against any license which you may hold.**
-



a. **I ADMIT** to the violation(s) on the reverse side of  
this Citation.....

Signature

Date

b. **I DENY** the violation(s) on the reverse side of  
this Citation.....

Signature

Date

c. **I ADMIT** to violations

Enter Violation Number(s) here

have enclosed the amount for these violations and **DENY** the remaining violation(s) on the reverse side of this  
Citation.....

Signature

Date

PLEASE PLACE THE CITATION NUMBER(S)  
ON YOUR CERTIFIED OR CASHIER'S CHECK OR MONEY ORDER

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**Note:** A copy of the Pennsylvania Human Relations Commission's guidelines and policy statement on advertising pursuant to Act 34 is attached and incorporated by reference here unto.

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE  
REGULATORY REVIEW ACT**

20 AUG 11 PM 12:29

**I.D. NUMBER:** 52-011

**SUBJECT:** Housing Accommodations/Commercial Property

**AGENCY:** Pennsylvania Human Relations Commission

**TYPE OF REGULATION**

  X   **Proposed Regulation**

       **Final Regulation**

       **Final Regulation with Notice of Proposed Rulemaking Omitted**

       **120-day Emergency Certification of the Attorney General**

       **120-day Emergency Certification of the Governor**

       **Delivery of Tolled Regulation**

    a.        **With Revisions**

    b.        **Without Revisions**

**FILING OF REGULATION**

DATE	SIGNATURE	DESIGNATION
8/11/99	<u>Norm E. Anderson</u>	<b>HOUSE COMMITTEE ON State Government</b>
8/11/99	<u>Jim B...</u>	
8-11	<u>Rachel Dutcher</u>	<b>SENATE COMMITTEE ON Labor &amp; Industry</b>
8	<u>Ed Seidel</u>	
8/11/99	<u>Kyler M. May</u>	<b>INDEPENDENT REGULATORY REVIEW COMMISSION</b>
		<b>ATTORNEY GENERAL</b>
8/11/99	<u>Cynthia J. Lee</u>	<b>LEGISLATIVE REFERENCE BUREAU</b>