Journal of Global Business

VOLUME 7

11TH GLOBAL BUSINESS CONFERENCE
ST. SCHOLASTICA'S COLLEGE-MANILA
March 3, 2018

ONLINE JOURNAL
ISSN No. 2350-7179

A Study on how to use Foreign Account Tax Compliance Act (FATCA) as a tool to strengthen the "Anti-Money Laundering Act

John Evan C. Miguel
De La Salle College of Saint Benilde
johnmiguel.lawyer@gmail.com

Abstract

This study aims to identify how the pertinent provisions of the Foreign Account Tax Compliance Act of the United States of America (FATCA) can be used as a tool to revise and amend Republic Act No. 9160, also known as the "Anti-Money Laundering Act of 2001, As Amended" (AMLA). In the advent of the fast paced developments in electronic commerce and digital economy, government regulators need to keep up and update its guard against the changing schemes of money launderers. The recent events in the country have shown the increasing role of ecommerce and of the internet as a platform for money laundering. It also shows that money launderers have extensive networks across different countries that enable them to launder funds. Thus, there is an urgent need to revise the existing law to give government regulators the increased capability and authority to address the loopholes of the Anti-Money Laundering Act. This study also targets to help identify and propose measures to address the limitations of the jurisdiction of the Anti - Money Laundering Act against Filipino money launderers. The common issues in money laundering include the country's territorial jurisdiction, the principle of comity, bank secrecy laws, shell companies and offshore accounts which are used as a means to launder money. This study endeavors to convince the House of Representatives and Senate of the Philippines to amend the Anti-Money Laundering Act by adopting the pertinent provisions of the Foreign Account Tax Compliance Act (FATCA) of the United States of America. The incorporation of the said provisions of the FATCA as part of the Anti-Money Laundering Act shall increase the powers and capability of the Philippine government to prevent the money laundering activities to prosper.

Keywords: *Money Laundering, FATCA, Financial Crimes, Offshore Accounts*

Introduction

Background of the Study

The study conducted examines how the pertinent provisions of the Foreign Account Tax Compliance Act of the United States of America (FATCA) can be used to strengthen the "Anti-Money Laundering Act of 2001, As Amended" (AMLA). This study reviews the different modes of money laundering with respect to Global finance and in relation to the Philippine Financial System. The study also aims to discuss the pertinent provisions of the AMLA and how it can be strengthened to prevent the commission of international money laundering activities.

Definition of Money Laundering

According to Joshi, Vyas and Joshi (2012), money laundering is defined as the practice of engaging in financial transactions to conceal the identity, source, and/or destination of illegally gained money to make it appear that the proceeds of crime came from a legitimate origin.

Daniali (2014) further stated in a study that dirty money that was illegally sourced can be divided into three groups: 1 - dirty money and dipped in blood, 2 - gray currencies, 3 - black money from smuggling.

The Financial Action Task Force

The "Anti-Money Laundering Act of 2001, As Amended" (AMLA), was enacted by the Philippines in compliance with the recommendations of the Financial Action Task Force on Money Laundering (FATF). The Philippines was one of the black listed Non - Cooperative Countries and Territories (NCCT's) that were identified by the FATF. Sanctions were to be imposed on the Non - Cooperative Countries and Territories if they would fail to comply with the aforementioned recommendations by the FATF.

The study published by Brillo (2011) posits that the FAFT demand that was sustained by the threat of sanctions, coupled with firmness of the deadline has left the Philippine Government with little or no choice but to legislate the AMLA.

Brillo (2010) further said that it was important for the Philippines to pass the anti-money laundering law before the FATF deadline and for the AMLA to conform to the (40+9) recommendations prescribed to the Philippines by the FATF.

The history of the FATF (www.fatf-gafi.org) that was published in their website states that:

In response to mounting concern over money laundering, the FATF was established by the G-7 Summit that was held in Paris in 1989. Recognizing the threat posed to the banking system and to financial institutions, the G-7 Heads of State or Government and President of the European Commission convened the Task Force from the G-7 member States, the European Commission and eight other countries.

The FATF website likewise explained that the FAFT as an inter-governmental body established in 1989 to set standards and promote effective implementation of legal, regulatory and operational measures for fighting money laundering.

Anti -Money Laundering Act (AMLA) of the Philippines

The Republic Act No. 9160 otherwise known as The Anti-Money Laundering Act of 2001 (AMLA) was enacted by congress and signed into law on September 29, 2001. The AMLA proscribes and penalizes the acts of money laundering in the Philippines.

Being criminal law in nature, AMLA offenses require that the quantum of proof beyond reasonable doubt must be proven for the same to be punished. Moreover, the limitation on territoriality of jurisdiction also applies to the commission of the offense.

Brillo (2010) sated in a published study that before the Philippine Government was prodded by the FATF, the country has shown its commitment to legislate the AMLA when it became a party to three global agreements – the 1988 Vienna Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substance, the 1998 United Nations Political Declaration and Action Plan against Money Laundering, and the 2000 United Nations Convention against Transnational Organized Crime.

The Supreme Court of the Philippines in the case of Republic of the Philippines, Represented by The Anti-Money Laundering Council (AMLC) vs Lilia Cheng (G.R. No. 174629, February 14, 2008) has clearly explicated the legal definition of money laundering:

Money laundering has been generally defined by the International Criminal Police Organization (Interpol) `as any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources. xxx Section 4 of the AMLA states that money laundering is a crime whereby the proceeds of an unlawful activity as [defined in the law] are transacted, thereby making them appear to have originated from legitimate sources. (Emphasis supplied)

Brillo (2011) also stated that in a study that out of the 47 countries 8 in 2001 were identified as NCCT's (FATF 2007). The country was one of the non- cooperative states recognized as not conforming to the FATF's global standard. As part of the black listed NCCT's, the Philippines was at the peril of suffering the consequences and countermeasures levied by the FATF.

As stated in the research of Vlcek (2011), the FATF's blacklist did not cover mobile money or foreign remittances. However, it represented a possible obstruction to the effective transfer of remittances provided and sent by Filipino migrant workers to the Philippines.

Anti – Money Laundering Act Council (AMLAC)

The Bangko Sentral ng Pilipinas (BSP), Insurance Commission and the Securities and Exchange Commission are the government institutions tasked to compose the Anti-Money Laundering Council (AMLAC).

The BSP (BSP Advocacies) has enumerated the powers and composition of the AMLAC, to wit:

In September 2001, the Anti-Money Laundering Act (AMLA) of 2001 was passed under Republic Act No. 9160. The legislation, among others, defines money laundering as a criminal offense, prescribes penalties for such crimes committed and forms the foundation of a central monitoring and implementing council called the Anti-Money Laundering Council (AMLC). To combat money laundering, this law imposes requirements on customer identification, record keeping, reporting of covered and suspicious transactions, relaxes strict bank deposit secrecy laws, and provides for freezing/seizure/forfeiture/recovery of dirty money/property as well as for international cooperation**.**

The AMLC is comprised of three (3) members: the Governor of the Bangko Sentral ng Pilipinas as the Chairman and the other two (2) members are the Commissioner of the Insurance Commission and the Chairman of the Securities and Exchange Commission. It acts unanimously in the discharge of its functions. AMLC is also referred to as the country's Financial Intelligence Unit (FIU) and is assisted by a Secretariat, otherwise known as the AMLC Secretariat (AMLCS), headed by an Executive Director. (Emphasis supplied)

The Supreme Court further elucidated the powers and authority of the AMLC in the case of Republic of the Philippines vs Lilia Cheng (G.R. No. 174629, February 14, 2008).

Section 7 creates the AMLC and defines its powers, which generally relate to the enforcement of the AMLA provisions and the initiation of legal actions authorized in the AMLA such as civil forfeiture proceedings and complaints for the prosecution of money laundering offenses. In addition to providing for the definition and penalties for the crime of money laundering, the AMLA also authorizes certain provisional remedies that would aid the AMLC in the enforcement of the AMLA. These are the "freeze order" authorized under Section 10, and the "bank inquiry order" authorized under Section 11. (Emphasis supplied)

Foreign Account Tax Compliance Act (FATCA) of the United States of America

Moss (2016), stated in her article that the Foreign Account Tax Compliance Act (FATCA), was enacted as part of the US Hiring Incentives to Restore Employment Act (HIRE) in 2010, has the purpose of catching affluent Americans who were not paying the correct income tax from various financial assets located in foreign jurisdictions.

The objectives of the FATCA that was published in the website of the Internal Revenue Service (IRS - FATCA) of the United States government which states the following:

The FATCA, which was passed as part of the HIRE Act, generally requires that foreign financial Institutions and certain other non-financial foreign entities report on the foreign assets held by their U.S. account holders or be subject to withholding on withhold able payments. The HIRE Act also contained legislation requiring U.S. persons to report, depending on the value, their foreign financial accounts and foreign assets.

The IRS website (IRS-Summary FATCA Reporting) also explained the effects and consequences of FATCA to the foreign accounts held by US Citizens abroad, to wit:

Under FATCA, certain U.S. taxpayers holding financial assets outside the United States must report those assets to the IRS on Form 8938, Statement of Specified Foreign Financial Assets. There are serious penalties for not reporting these financial assets. xxx FATCA will also require certain foreign financial institutions to report directly to the IRS information about financial accounts held by U.S. taxpayers or by foreign entities in which U.S. taxpayers hold a substantial ownership interest. The reporting institutions will include not only banks, but also other financial institutions, such as investment entities, brokers, and certain insurance companies. Some non-financial foreign entities will also have to report certain of their U.S. owners. (Emphasis supplied)

In relation to enforce the FATCA in Philippine jurisdiction, the governments of the Philippines and the United States, signed an Intergovernmental Agreement (IGA) entitled: "Agreement between the Government of the United States of America and the Government of the Republic of the Philippines to Improve International Tax Compliance and to Implement FATCA" This agreement would require Philippine institutions to comply and supply the information with respect to reportable accounts of US citizens under that are existing in their accounts.

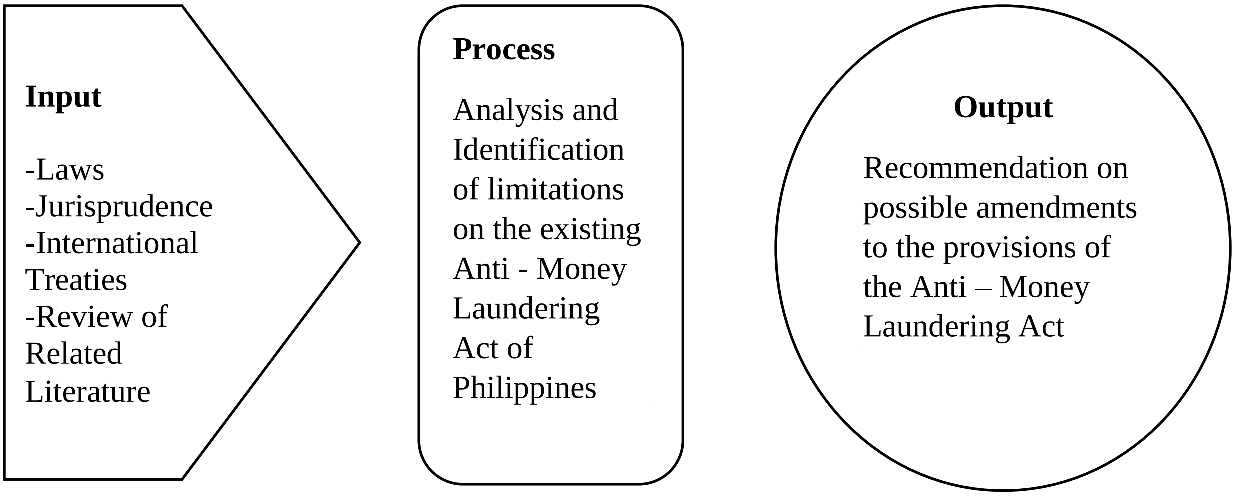
Moreover, American Citizens are also required under the FATCA to file with the Internal Revenue Service of the United States of America (IRS) Form 8938, Statement of Specified Foreign Financial Assets. This would allow the IRS to detect and identify any acts of concealment or evasion on the part of the American Citizen to disclose all his taxable income and assets with the IRS.

Framework

The research shall discuss the current limitations under the current Anti – Money Laundering Act, namely: bank secrecy laws, territorial jurisdiction, use of shell companies and offshore accounts.

The proponent shall then discuss the salient provision of the FATCA that are relevant and can be adopted by the Philippines to amend, revise and strengthen the powers of the current Anti – Money Laundering Act.

Figure 1



Methodology

The research design used by the proponent was limited to the gathering secondary data and review of related literature. The proponent's materials were mainly original transcripts of laws, international treaties, government policies and statutes of Philippine and the United States of America. The researcher also made reference to case law and jurisprudence decided by the Supreme Court of the Philippines to understand the legal application of the aforesaid laws.

Discussion of Result

Bank Secrecy Laws of Foreign Currency Deposits

One limitation that restricts the powers of the AMLC to enforce the AMLA is the absolute confidentiality of foreign currency bank deposits. It was said that only the written permission of the depositor himself would allow the aforesaid foreign currency deposits to be examined and scrutinized by the government.

The rule on the bank secrecy of Foreign Currency Deposits was explained in the Supreme Court decision of the Philippine Savings Bank vs Senate Impeachment Court (G.R. No. 200238, February 9, 2012, Concurring Opinion, BRION, J), to wit:

RA No. 6426 provides for the absolute confidentiality of foreign currency deposits "The subject matter of the subpoenas issued by the Senate sitting as an Impeachment Court are five foreign deposit accounts with petitioner, all allegedly in the name of Renato C. Corona. Republic Act (RA) No. 6426, as amended, is the law applicable to foreign currency deposits. The law provides for the absolute confidentiality of foreign currency deposits, as stated in Section 8: Section 8. Secrecy of foreign currency deposits. All foreign currency deposits authorized under this Act, as amended by PD No. 1035, as well as foreign currency deposits authorized under PD No. 1034, are hereby declared as and considered of an absolutely confidential nature and, except upon the written permission of the depositor, in no instance shall foreign currency deposits be examined, inquired or looked into by any person, government official, bureau or office whether judicial or administrative or legislative, or any other entity whether public or private; xxx RA No. 6426 guarantees a clear right to the depositors and demands an exacting obligation from banks to maintain the absolute confidentiality of the foreign currency deposits."(Emphasis supplied)

Territorial Jurisdiction and the Principle of Comity

Another limitation to the powers of the AMLC to enforce the AMLA would be the "Principle Territorial Jurisdiction in criminal offenses. The AMLA being in nature a province of criminal law is subject to the limitations of the said principle.

Territorial Jurisdiction of criminal cases requires that that offense allegedly committed must be within the territorial jurisdiction of the court were the case if to be filed for trial. The court could not acquire the jurisdiction to try the said case of the offense or any of its essential ingredients were not committed in the territorial jurisdiction of the court.

This was clearly explicated in the case of Hector Treas vs People of the Philippines (G.R.No.195002, January 25, 2012), that provides to wit:
The overarching consideration in this case is the principle that, in criminal cases, venue is jurisdictional. A court cannot exercise jurisdiction over a person charged with an offense committed outside its limited territory. In Isip v. People, this Court explained:

The place where the crime was committed determines not only the venue of the action but is an essential element of jurisdiction. It is a fundamental rule that for jurisdiction to be acquired by courts in criminal cases, the offense should have been committed or any one of its essential ingredients should have taken place within the territorial jurisdiction of the court. Territorial jurisdiction in criminal cases is the territory where the court has jurisdiction to take cognizance or to try the offense allegedly committed therein by the accused. Thus, it cannot take jurisdiction over a person charged with an offense allegedly committed outside of that limited territory. (Emphasis ours)

The "Principle of Comity" however is an exception to territorial jurisdiction. The Principle of Comity can empower courts to decide when to defer to foreign law out of respect for a foreign sovereign nation. At present the meaning of comity has also included the justification to enforce jurisdiction.

The meaning of comity was enunciated in the Supreme Court case of the Most Rev. Pedro D. Arigo, Vicar Apostolic of Puerto Princesa, et.al vs Scott H. Swift in his capacity as

Commander of the US. 7th Fleet, et.al (G.R. No. 206510, September 16, 2014, Concurring Opinion, SERENO, CJ), to wit:

Specifically, international comity has shifted in three distinct respects. First, the meaning of comity has shifted over time. Originally, international comity was a discretionary doctrine that empowered courts to decide when to defer to foreign law out of respect for foreign sovereigns. Comity has become a rule that obligates courts to· apply foreign law in certain circumstances. Second, the object of comity has changed. Whereas once comes justified applying foreign law out of deference to foreign sovereigns, courts later justified their decisions out of deference to the autonomy of private parties or to the political branches. Most recently, courts have justified limits on domestic law out of deference to the global market. Third, the function of comity has changed. <u>Comity is no longer merely a doctrine for deciding when to apply foreign law; it has become a justification for deference in a: wide range of cases concerning prescriptive, adjudicatory, and enforcement jurisdiction</u>. (Emphasis supplied)

Electronic Money Laundering

The Bangladeshi Central bank heist was one of the biggest electronic money laundering activities that happened in the Philippines. This incident caused an embarrassment to the Philippines and questioned the effectiveness of the AMLA and the capability of the AMLC to implement the law and prevent money laundering activities.

Daep and Lopez (2017) stated in their article that:

In 2016, the Philippine banking system was at the center of an unprecedented cyberheist where $81 million supposedly stolen from the Bangladesh Bank, the central bank of the country, ended up in the Philippine financial system and was eventually lost in the blossoming casino industry.

In a research study conducted by Daniali (2014), he described electronic money laundering with use of information technology over the internet will be vague due to the origin, route and destination. Daniali (2014) also stated in the research paper that Electronic Money launderers could be beyond the control of regulators as they circulate money in to the world market.

According to Scheau and Pop Zaharie (2017), new technology and the internet has changed the means of transmitting, storing and processing information. This has generated new economic challenges and created big problems.

Daniali (2014) has identified the 3 Electronic-Money Laundering Steps as follows: Electronic placement, Electronic layering and Electronic integrating.

Scheau and Pop Zaharie (2017), stated that "Electronic currency derivatives, especially since a large part of the online community believes that alternative currency will replace traditional units, being classified as cryptocurrencies."

Vlcek (2011) further stated in his study that "M-money falls into the domain characterized by the FATF as 'new payment technologies' and as such represents new avenues for money laundering and terrorist finance (FATF, 2006). "

Reporting between partner countries under the FATCA

One provision under the FATCA that would combat and prevent tax evasion is the requirement to exchange of information with respect to reportable accounts as provided under the Intergovernmental Agreement.

Article 2 of the "Agreement between the Government of the United States of America and the Government of the Republic of the Philippines to Improve International Tax Compliance and to Implement FATCA" provides that:

Subject to the provisions of Article 3 of this Agreement, each Party shall obtain the information specified in paragraph 2 of this Article with respect to all Reportable Accounts and shall annually exchange this information with the other Party on an automatic basis pursuant to the provisions of Article 26 of the Convention.

Moss (2016) in a research study stated that:

The financial information to be reported with respect to reportable accounts includes all types of investment income (including interest, dividends, income from certain insurance contracts and other similar types of income) but also account balances and sales proceeds from financial assets.

In addition, Song (2015) in a stated in study that:

Automatic exchange of information has become the standard around the world, and various international regimes based on IGA Model I are being set up to this effect. So while FATCA is not an end-all legislation for combating tax avoidance, 195 it certainly drives the current global movement for automatic exchange of information, and complements a number of international initiatives that crack down on tax evasion.

Beneficial Ownership Disclosure

Beneficial Ownership and financial interest of a person has often been cloaked by the secrecy and protection of the veil of corporate fiction. Thus, the true owners of the corporation could not be determined since the person of the corporation is considered separate and distinct from the personality of the stockholders.

The research Radon and Mahima (2017), states that it has become progressively significant for the global community to revisit its work to make full and comprehensive beneficial ownership disclosure a factual reality to fight corruption and income leakages.

Current Gaps in the Anti-Money Laundering Act

The researcher was able to identify the following gaps and limitations in the Anti - Money Laundering Act of 2001, As Amended:

- The confidentiality of Foreign Currency Bank Deposits in the Philippines would make it difficult for the authorities to detect and investigate money laundering activities that are committed using foreign currency funds.
- The lack of jurisdiction of Philippine courts to prosecute money laundering cases if the elements of the predicate crime happened outside of Philippine jurisdiction.

- The advent of cryptocurrencies (i.e. Bitcoin, Ethereum, Litecoin and Ripple) as a means of electronic money laundering could make the offense beyond the coverage or legal definition of offenses under the current Anti - Money Laundering Act.
- The limited Intergovernmental Agreements that the Philippines has entered with other sovereign states, would not allow automatic reporting between partner countries, with regard to the financial information on reportable accounts, that are held by Filipinos and are situated outside of Philippine territory.

Conclusions

The researcher has made the following conclusions on how to adopt the salient features of the FATCA to revise the AMLA and increase the monitoring powers of the AMLAC.

To proponent endorses the following revisions and changes to the law:

1) Automatic Reporting between partner countries with Intergovernmental Agreements to report to partner countries foreign accounts of their respective citizens within their jurisdiction. The Philippine government should therefore strategically identify and have Intergovernmental Agreements with sovereign states wherein Filipinos have substantial foreign accounts.
2) To require all Filipino citizens holding foreign located financial assets outside of the Philippines to report all their foreign located financial assets with the AMLC.
3) Inclusion of Foreign Currency Denominated Deposits held by all depositors whether Filipino Citizens or foreigners under the AMLA coverage.
4) To require Filipino Citizens to disclose to the Bureau of Internal Revenue (BIR) by filing a Tax Return on all their shares of stocks, financial interests and beneficial ownership over foreign corporations registered in other countries. This return shall similar to the submission requirement of the Internal Revenue Service of the United States of America (IRS) Form 8938, Statement of Specified Foreign Financial Assets.
5) To include Electronic Money Laundering activities, crypto-currencies such as the Bitcoin, Ethereum, Litecoin and Ripple and other virtual financial assets or investments to be part of the coverage of the AMLA.

Limitations and Recommendations for future research

This legal study is limited to recommendations for the perusal of the House of Representatives and Senate of the Philippines to amend and revise the existing Anti-Money Laundering Act by adopting the pertinent provisions of the Foreign Account Tax Compliance Act (FATCA) of the United States of America as part of Philippine laws.

Also, this study is only limited on the jurisdictional issues that restrict the powers of the Anti – Money Laundering Act from being enforced outside the Philippine territory.
Future Research can be made on legal effects of making money laundering an international crime and thus making it fall under the jurisdiction of all sovereign countries.

References

Agreement between the Government of the United States of America and the Government of the Republic of the Philippines to Improve International Tax Compliance and to Implement FATCA, Retrieved December 20, 2017, from https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Philippines-7-13-2015.pdf

Brillo, B. (2010). Policy Decisiveness, Public Regardedness, and Unity of Purpose: The FATF and the Policymaking Process for AMLA, Retrieved January 3, 2018, from https://ejournals.ph/article.php?id=5951

Brillo, B. (2011). The Financial Action Task Force and the AMLA of the Philippines: Dynamics between Veto Players and a Non Veto Player in Policymaking, Retrieved January 3, 2018, from https://ejournals.ph/article.php?id=10070

Bangko Sentral ng Pilipinas Advocacies. Retrieved December 20, 2017, from http://www.bsp.gov.ph/about/advocacies_anti.asp

Daniali, G (2014). E-money Laundering Prevention, Retrieved January 3, 2018, from EBSCO host database (Business Source Complete)

Daep, T. & Lopez, J (2017) Philippines: Money laundering liability. International Financial Law Review., p18-18. 1p. Retrieved January 30, 2018, from EBSCO host database (Business Source Complete)

Financial Action Task Force About (FATF). Retrieved January 20, 2017, from http://www.fatf-gafi.org/about/

Financial Action Task Force About History (FATF). Retrieved January 20, 2017, from http://www.fatf-gafi.org/about/historyofthefatf/

Hector Treas vs People of the Philippines G.R. No. 195002, January 25, 2012

Internal Revenue Services, Foreign Account Tax Compliance Act (IRS-FATCA) Retrieved January 20, 2017, from https://www.irs.gov/businesses/corporations/foreign-account-tax-compliance-act-fatca

Internal Revenue Services, Summary of FATCA Reporting for U.S. Taxpayers (IRS-Summary FATCA Reporting) Retrieved January 20, 2017, from https://www.irs.gov/businesses/corporations/summary-of-fatca-reporting-for-us-taxpayers

Joshi, D., Vyas, A. & Joshi, M. (2012). Money Laundering: An Overview, Retrieved December 18, 2017, from http://www.i-scholar.in/index.php/index/search/authors/view?firstName=Deepa&middleName=&lastName=Joshi

Moss, M. (2016). Panama papers highlight the urgency: From FATCA to the OECD CRS. Journal of Securities Operations & Custody. Summer2016, Vol. 8 Issue 3, p248-258. 11p., Retrieved Jan 26, 2018, from EBSCO host database (Academic Source Complete)

Most Rev. Pedro D. Arigo, Vicar Apostolic of Puerto Princesa, et.al vs Scott H. Swift in his capacity as Commander of the US. 7th Fleet, et.al G.R. No. 206510, September 16, 2014, Concurring Opinion, SERENO, CJ

Philippine Savings Bank vs Senate Impeachment Court, G.R. No. 200238, February 9, 2012, Concurring Opinion, BRION, J

Radon, J. & Achuthan, M. (2017). Beneficial Ownership Disclosure: The Cure for the Panama Papers Ills. Journal of International Affairs. Summer2017, Vol. 70 Issue 2, p85-108. 24p., Retrieved Jan 26, 2018, from EBSCO host database (Business Source Complete)

Republic of the Philippines, Represented by AMLC vs Lilia Cheng, G.R. No. 174629, February 14, 2008.

Scheau, M. & Pop Zaharie, S. (2017). Methods of Laundering Money Resulted from Cyber-Crime. Economic Computation & Economic Cybernetics Studies & Research. 2017, Vol. 51 Issue 3, p299-314. 16p., Retrieved January 7, 2018, from EBSCO host database (Business Source Complete)

Song, J (2015). The End of Secret Swiss Accounts? The Impact of the U.S. Foreign Account Tax Compliance Act (FATCA) on Switzerland's Status as a Haven for Offshore Accounts. Northwestern Journal of International Law & Business. Fall2015, Vol. 35 Issue 3, p687-718. 32p, Retrieved January 7, 2018, from EBSCO host database (Business Source Complete).

Appendix

Figure 1