CALIFORNIA PRIVACY PROTECTION AGENCY BOARD TRANSCRIPTION OF RECORDED PUBLIC MEETING APRIL 14, 2023 SACRAMENTO, CALIFORNIA 8 | Present: JENNIFER M. URBAN, Chairperson LYDIA DE LA TORRE, Board Member VINHCENT LE, Board Member ALASTAIR MACTAGGART, Board Member ASHKAN SOLTANI, Executive Director ELIZABETH ALLEN, Moderator 16 | Transcribed by:

MS. ELIZABETH ALLEN: Okay, we have leveled off. We should start.

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MS. JENNIFER URBAN: Thank you very much, Ms. Allen. And to everyone: welcome. Good afternoon. I'm pleased to welcome you to this meeting of the California Privacy Protection Agency Board. It is April 14th, 2023, at 2:31PM. I'm Jennifer Urban and I'm the Chairperson of the Board. Before we get started with the substance of the meeting, as usual, I have some logistical announcements to make sure that everyone's on the same page with the meeting and can participate effectively if you would like.

First, I would like to ask that everyone please check that your microphone is muted when you are not speaking. Additionally, please note that this meeting is being recorded. The meeting will be run today according to the Bagley-Keene Open Meeting Act, which is required by law. After each agenda item, there will be an opportunity for questions and discussion by Board members. We have a designated time on the agenda for general public comments—that's agenda number four today. I will also ask for public comments on each specific agenda item. Each speaker will be limited to three minutes per agenda item. If you wish to speak on an item and you're using the Zoom webinar, please use the 'raise your hand' function, which, if you want to take a second to locate now, is in the reaction feature at the bottom of your Zoom screen. If you wish to speak on an item and are joining by phone, please press *9 on your phone and that will show the moderator that you are raising your hand. Our moderator will call your name when it is your turn, and request that you unmute yourself for comments at that time. Those using the webinar can use the unmute feature on the screen and

1 those dialing in by phone can press *6 to unmute. When your comment is completed, our moderator will mute you.

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It is helpful if you identify yourself, but this is voluntary, and you can input a pseudonym when you log into the meeting. The Board welcomes public comments on any agenda item, and it is our intent to ask for public comment prior to the Board voting on any agenda item. If for some reason I forget to ask for public comments on the agenda item and you wish to speak on that item, please just let us know by raising, using the 'raise your hand' functions, and the moderator will recognize you. You will then have the three minutes to speak on that item.

Relatedly, I would like to remind everyone of the rules of the road of Bagley-Keene. Both Board members and members of the public may discuss agendized items only. If you are speaking on an agenda item, both Board members and members of the public must contain $16 \parallel$ their comments to that agenda item. Items not on the agenda for today can be suggested for discussion at one of our future meetings when the Board takes up the agenda item designated for that purpose. It's number five today.

Today's meeting has a relatively brief agenda, but we will take breaks as needed. Please note that the sixth agenda item for today is a closed session item. The Board will leave this public session for that discussion, but we'll leave the public session open. And when we are finished with the closed session item, the Board will return to this public meeting in order to adjourn. My many thanks to our Board members for their service and to all the people working today to make the meeting possible. I'd like to thank by name the team supporting us today: Mr. Brian Soublet,

who's our meeting counsel today. Welcome, Mr. Soublet. Mr. Ashkan Soltani, who's here in our capacity as our executive director. And I would like to thank and welcome our moderator today, Ms.

Elizabeth Allen, and ask her to please, now, conduct the roll call.

MS. ALLEN: Yes. Board Member de la Torre?

MS. LYDIA DE LA TORRE: Present.

MS. ALLEN: de la Torre is present. Board Member Le?

MR. VINHCENT LE: Present.

MS. ALLEN: Board Member Le, present. Board Member Mactaggart? Mactaggart is not present. Chair Urban?

MS. URBAN: Present.

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MS. ALLEN: Urban, present. And with that, you have three out of four and you have quorum.

MS. URBAN: Thank you very much, Ms. Allen. The Board has established a quorum. We expect Mr. Mactaggart to come for part of 16 | the meeting, and we'll welcome him at that time. I would like to let Board members know that we will take a roll call vote if we have any action items today. With that, we will move to agenda item number two, which is an update from the chairperson. I have a couple of short updates. I realize that I may seem to roll this over every time, but it really does seem like our strategic planning consultant contract is almost done so I'm hoping that we can pick that up in earnest in our next meeting. It is positive movement. It's just taking a little while because the process does. I would like to congratulate Mr. Nelson Richards who has been 26 | appointed as the Agency's Assistant Chief Counsel. Mr. Richards came to the Agency from the Government Law Section at the California Department of Justice and has proved an invaluable

1 | resource to the team so I wanted to offer him warm congratulations and welcome to the new role. I'd also like to thank Mr. Brian Soublet, who is a familiar face for folks who've joined our meetings before, who's stepping in to reprise his role as acting general counsel while our general counsel, Mr. Philip Laird, is on paternity leave. So, we're happy for Mr. Laird, and we're glad to have Mr. Soublet with us today.

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I'm also delighted to announce that our rulemaking packagenow, the rulemaking package that many people in attendance probably commented on over the last months-that we approved as a Board in early February-has been approved by the Office of Administrative Law and filed with the Secretary of the State on March 29th. The rules are final and effective as of that date. We talked about the effort that went into this when we approved the package to go to OAL, but I do just want to reiterate my—and I'm sure the rest of $16 \parallel$ the Board's-many thanks to staff for being incredibly competent, careful, thoughtful, creative work and being responsive to the public. My many thanks to the public for an incredibly robust rulemaking process with a tremendous amount of information offered to the Agency to help us improve the rules. Very much appreciated. And my thanks to the Board. As we knew from the very beginning, we started with no staff; we have been lightly staffed; and we have an absolutely wonderful staff. At the same time, this Board has been very substantively involved, lent its expertise to this effort, and I'm very proud of what we have accomplished, and thank you all for that.

Next steps on rulemaking: I believe our executive director will say a little bit about that, but thanks to the public,

everyone who has submitted public comments in response to our initial request for comment on automated decision-making, risk assessments, and cybersecurity audits. I have my binders of public comments and I'm very excited about that. And I think Mr. Soltani is going to give an update on rulemaking efforts. To suffice to say, we are moving right along. So, thank you to the staff for that; the new rules subcommittee, which is Ms. de la Torre and Mr. Le, for their work; and to the public for what looked to be some very, again, extremely helpful comments. To keep up with our rulemaking work, staff has prepared an FAQ, which is at ccpa.ca.gov; regulations on the regulations page; and you can always sign up for our rulemaking email list in order to receive rulemaking communications directly. And there you can go to cppa.ca.gov and click on "Join Our Mailing List" on the front page.

So, those are my announcements. Are there any questions or comments from Board members?

MS. URBAN: No? Wonderful. Any public comments? Any questions or any comments from members of the public?

MS. ALLEN: We are on agenda item number two, the Chairperson Update. if you would like to make a comment, please raise your hand using the Zoom 'raise hand' feature or by pressing *9 on your phone. Your name will be called when it's your turn, and you'll be invited to unmute yourself. Those dialing in on a phone can press *6 to unmute, and you will have three minutes to make your comment.

Alright, again, if you would like to make a public comment on the chairperson's update, please go ahead and raise your hand or dial *6.

Chairperson Urban, I'm not seeing any hands at this time.

MS. URBAN: Alright, thank you very much, Ms. Allen. And with that, we will move to agenda item number three, which is an update from our executive director Mr. Ashkan Soltani. I'm asking him to join us. Thank you, Mr. Soltani. Welcome and please go ahead.

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MR. ASHKAN SOLTANI: Good afternoon. Thank you for the opportunity to provide a quick update today. This should be relatively short. First off, I want to echo the chair's praise for 8 both the Board and staff on our conclusion of our first substantive CPPA regulations that were approved on the 29th. Many may be aware that the Board started the process for rulemaking with a preliminary invitation for comments in September of 2021, prior to my appointment and there really being an agency, and that was great foresight.

We received incredible substantive pre-rulemaking comments through that process, and in July of 2022, we kicked off the formal $16 \parallel \text{rulemaking process.}$ I just want to express the thanks to the Board and the team for the tireless work. This is an incredible lift for a fledging agency, and I couldn't be more proud of the substance of the regs but also the process. I just want to thank DOJ, Department of Consumer Affairs, and all the other agencies that helped us on 20 || this journey. I think, again, it was a big lift, but I think we did a great job.

Along the second topic of pre-rulemaking, we also began a second invitation for pre-rulemaking comments on the topics of cybersecurity audits, risk assessments, and automated decisionmaking on February 10th of this year, and that just concluded on March 27, 2023. We received robust feedback in that process: 28 something like 50 comments over another thousand pages of comments. 1 And staff are now working to review those comments to help inform their work further, including the work of the new subcommittee and, ultimately, the Board. Our IT staff are also now processing those comments and they should be available on our website and in the coming weeks. I hope in the next week or two that we'll have those redacted and available for the public.

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And then finally, just quickly, staff are working actively on the topics that came up during the previous meetings prior to the rulemaking meetings, including additional topics for rulemaking; our budget change proposal, which we're currently still in negotiations with Finance including our cost-of-living adjustment; and additional topics such as the age-appropriate design working group.

And so, lastly, I appreciate the chair mentioning the FAQ. We're now in the process of updating our website to incorporate the updates as a result of the rules as well as the protections and responsibilities to California public, and so we should have iterative updates to the website in the coming weeks. And so, I'm happy to answer any questions, if there are any, otherwise, thank you all for getting us here.

MS. URBAN: Thank you so much, Mr. Soltani. Any comments or questions from the Board?

Alright, I will just reiterate thanks for an amazing job, an amazing effort, and keeping us on track. Ms. Allen, are there any comments from the public?

MS. ALLEN: Yes, we are on agenda item number three, the Executive Director's Update. If you would like to make a comment, please raise your hand using the Zoom 'raise hand' feature or by

pressing *9 on your phone. Your name will be called when it's your turn, and you'll be invited to unmute yourself. Those dialing in by phone can press *6 to unmute, and you will have three minutes to make your comment.

Again, if you would like to make a public comment, feel free to go ahead and raise your hand or dial *9 on your phone. We are on agenda item three, Executive Director's update.

Chair Urban, I'm seeing no hands.

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MS. URBAN: Thank you, Ms. Allen, and thank you, Mr. Soltani, for the update. With that, we'll turn to agenda item number four, which is our item for public comment on items not on the Agenda so this is an opportunity for members of the public to comment on things that we don't have on the agenda for today. Before we proceed with the public comments, please note that the only action the Board can take is to listen to comments and $16 \parallel \text{consider whether we'll discuss the topic at a future meeting. We}$ can take no other action on the item at this meeting. It can seem, I know, at times like Board members are not being responsive, but this is not the intent. We are listening. Rather following these guidelines is crucial to ensure that the rules of the Bagley-Keene Open Meeting Act are followed and to avoid compromising either the commenter's goals or the Board's mission.

So, with that, I would like to ask if there are any members of the public who would like to comment at this point?

MS. ALLEN: Yes, great, again we are on agenda item number four, Public Comment on Items Not on the Agenda. So, if you would like to make a comment, again, please raise your hand using the Zoom 'raise hand' feature or by pressing *9 on your phone. Your

1 | name will be called when it's your turn, and you'll be invited to unmute yourself. Those dialing in can press *6 to unmute, and you will have three minutes to make your comment. Alright, Jen, I am going to invite you to unmute yourself, and you have three minutes.

JEN: Hello. I hope you can hear me.

MS. ALLEN: Yes, we can hear you.

JEN: Okay. I do have a question, and I've been trying to find this on the webpage, the CTPA, another webpage is about the limitation on cell phone tracking mechanisms or cell phone tracking. What are the rules because that's part of geolocation?

MS. URBAN: Thank you very much. Again, I apologize, we can't respond substantively due of the rules that we're under but thank you for the question. It's important to know that that's a question that you still have after looking at the website, and we will take it under advisement. Thanks so much.

JEN: Thank you.

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MS. ALLEN: Alright, thank you so much. If anyone else has a public comment, please raise your hand using the Zoom 'raise hand' feature or by pressing *9 on your phone. Your name will be called when it's your turn, and you'll be invited to unmute yourself.

Alright, I'm seeing no other hands, Chair Urban,

MS. URBAN: Thank you, Ms. Allen, and thank you again to Jen for the comment. We will move on to Future Agenda Items, which is agenda item number five. This is our designated agenda item for a discussion of topics that we may discuss in future meetings. For the Board members, I will give you an idea of the running list that we have. So, strategic planning is on the list. Last meeting, we talked about a regularized calendar for rulemaking, and Ms. de la

1 | Torre and I, this sort of reconstituted process subcommittee, will, I presume, have an update about that, or staff will have an update, about that pretty soon. Ms. de la Torre and I, at some point, will have an update about the insurance analysis that that subcommittee is doing. In the next meeting, we expect to have an update from staff on regulation proposals and prioritization. There's a list of items that Board members have mentioned, for example, and there may 8 be an additional update. The new rules subcommittee, I assume, you 9 | let us know when you have an update, but we can expect that at some point in future meetings. And where we've really kind of worked through looking at our various sort of regularized topics that we need to talk about, but I anticipate in our next meeting we'll take a look at that as a whole, so that we have our sort of plan for our meetings on budgets and legislation, et cetera moving forward. Any 15 || additional agenda items, Ms. de la Torre or Mr. Le, that you would $16 \parallel \text{like me} - \text{that I missed} - \text{or that you'd like me to add to the list?}$ Ms. de la Torre?

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MS. DE LA TORRE: Thank you. There's an outstanding request from two Board members to add to the agenda an item for every meeting on discussing rules. I think this was made at least two meetings ago. And I am not sure why it's not in the list or why it was not added to the agenda today. My understanding of the rules of 23 | boards in California is that two members have the right to propose any item for both, and it seems logical to me that they should also have the right to propose an agenda item, and that that should be followed. So, if I could have an update on where that is or whether we will see it in the agenda for the next meeting, that would be 28 | helpful.

MS. URBAN: Yes, I'm aware of that, and the agenda for the next meeting should include the priorities discussion. My understandingwe did talk about this-is that in, during this item, anybody can bring up future agenda items, including rules that they would like to see discussed. So, after I consulted with staff afterwards, and perhaps we just had a misunderstanding, but our understanding was that was where anybody could suggest regulation for future discussion just as they would otherwise...

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MS. DE LA TORRE: I'm not sure if I asked or if Board member Mactaggart has joined, but my recollection is that there was a request to have an agenda item specific to discussing future rules.

MS. URBAN: Yes, we did discuss that, and we talked about whether we needed a specific agenda item or this agenda item would serve. And maybe we just misunderstood after I talked with staff $16 \parallel \text{later.}$ We thought that this agenda item would include that. I don't have any strong feeling about it one way or the other. So let me go back with staff and see if your thinking, Ms. de la Torre, is that we need something that specifically says "Future Rulemaking Items." I have no objection to that.

MS. DE LA TORRE: So, let me make sure that I understand. So, what I'm hearing is that we can have a discussion on rules under Future Agenda Items, is that what I'm hearing?

MS. URBAN: Anyone can propose a future agenda item, and that includes a rule. Even if we have a separate agenda item for mentioning rule topics, we couldn't discuss those in substance because they wouldn't have been noticed for discussion; they 28 would've just been something that was brought up in the meeting,

1 | right? So, it's functionally the same, and then, but if it helps, however everyone is thinking about it, I'm happy to have an agenda item that's named "Suggestions for Future Rules."

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MS. DE LA TORRE: Right, I don't disagree with your knowledge of how that should be said. Whatever you and the staff have identified as the requirement is perfectly fine with me. But my suggestion is that, if we as a Board have a conversation on priorities for rulemaking, it would be helpful for the public to see that reflected in the agenda because I'm not sure that it will be very intuitive to the public when they decide to attend one of these meetings that we're going to have such a discussion when they read "Future Agenda Items." But I obviously leave it up to you as a chair and with the advice of the staff to decide.

MS. URBAN: Yeah, so there are two steps: one is bringing it forward to being put on the agenda, and then one is discussing it $16 \parallel$ in substance or how we want to prioritize it alongside other things. The second part most definitely needs its own agenda item. My understanding was that for each agenda, there would be the possibility that Board meetings would say, "You know what, something has come up, and I would like to point out or propose that we put this on a future agenda for discussion." ...which would allow staff to do some research and so forth. And that can happen under this agenda item, or it can happen under something that's named "Potential Future Regulations." But that substantive discussion and our discussion of priorities can't really happen anyway without it a noticed agenda item. There's two steps.

MS. DE LA TORRE: I'm a little confused, but if we could just take the request that Mr. Mactaggart and myself made two meetings ago and make it possible to have that conversation, whatever that means for the agenda in the next meeting. I think it will be very appreciated.

MS. URBAN: Yes, absolutely. Absolutely. Mr. Le? Mr. Le?

MR. LE: Alright. I didn't catch the last of it. Did you call on me, Chair Urban?

MS. URBAN: I did.

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MR. LE: Okay, yeah, sorry. My internet is not great. Yes, as two points, I think right now, Ms. de la Torre, it would be the time for you to suggest the specific rules that you'd like to be discussed at the next meeting. This is how I understood...

MS. URBAN: That's right.

MR. LE: ...that's how I understood the process. My understanding was similar to Chairman Urban's. It's like if we had a specific rule that we would like to be discussed, now would be the time to $16 \parallel$ add it to the next Board meeting. And then my second point is a little unrelated, but to what Chair Urban raised, it is our hope that by the next Board meeting we can at least have some preliminary questions for the Board to discuss around the findings from the new rules committee and perhaps some threshold questions, assuming that we can get through all the comments in that time. But, yes, those are my two comments.

MS. URBAN: Wonderful. Thank you, Mr. Le. That's helpful. And I have. I've noted that down. The only clarification I would add with regards to proposing items for rulemaking is just that I know staff has a list of everything that has been brought up in previous meetings. So, we don't need to run through the whole list again every time or today. They're working on that. But if there are

additional items that either of you would like to go in the bucket $2 \parallel$ and then be discussed in a substantive item in the next meeting, this would be great time to propose them. And if not, that's fine too because I know there's a good list that's already gotten started.

Okay, are there public comments and, also, you can think well while we wait for public comments too. Is there public comment on this item?

MS. ALLEN: Yes, we are on agenda item number five, which is Future Agenda Items. If you would like to make a comment, please raise your hand using the Zoom 'raise hand' feature or by pressing 12 * 9 on your phone. Your name will be called when it's your turn and you'll be invited to unmute yourself. Those dialing in by phone can press *6 to unmute, and you will have three minutes to make your comment.

Again, if you are interested in making a comment on agenda item number five, Future Agenda Items, please use the 'raise hand' feature or press *9 on your phone, and you will have three minutes to make your comment.

Chair Urban, I see no hands.

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MS. URBAN: Thank you, Ms. Allen. Any further items from Board members?

Alright, I already did have the rule prioritization on the list, but I've highlighted it and also highlighted a note for myself to go back and clarify, again, just exactly what we're calling things on the agenda. And I've noted that the new rule subcommittee will, of course, let probably Mr. Soltani know, who 28 will let me know, if you need a spot on the next agenda. And

whenever we do have that discussion, I will look forward to it. With that, let's move to agenda item number six.

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Agenda item number six is a closed session discussion of two items. The first is a discussion of the executive director's appointment of the deputy director of public affairs under authority of Government Code section 11126, subdivision (a)(1). And the second agenda item is pursuant to Government Code section 11126 subdivision (e)(1) and (2)(A). And for that the Board will meet in closed session to confer and receive advice from legal counsel regarding the following matter: California Chamber of Commerce vs. California Privacy Protection Agency et al., in the Superior Court 12 of the State of California, Sacramento County. The case number is on your agenda if you would like to refer to that. As a logistical matter, the Board, as I mentioned at the top of the meeting, will leave the public session and will go into a closed session to $16 \parallel \text{discuss}$ these items. During that time, we'll leave the public session here open. Members of the public, you are open to stay or to wander off or to leave since it's Friday afternoon. And we will return after we're done with the closed section to adjourn this session. Before we go into closed session, I'd like to ask if there's any public comment on these two items from anyone in the audience?

MS. ALLEN: Okay, we are on agenda item number six, the closed session for agenda items 6A or B. If you would like to make a comment, please raise your hand using the Zoom 'raise hand' feature or press *9 on your phone. Your name will be called when it's your turn, and you'll be invited to unmute yourself. Those dialing in by phone can press *6 to unmute, and you will have three minutes to

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Alright. David Riviera, you may unmute yourself. Again, you have three minutes. Please proceed.

DAVID RIVIERA: Thank you, Chairperson Urban. Just to clarify: when you come back from the closed session, no other topics will be discussed by this body? You'll just immediately adjourn?

MS. URBAN: We will just be adjourning. Yes.

DAVID RIVIERA: Okay, thank you.

MS. URBAN: Thank you.

MS. ALLEN: Okay, if anyone else would like to make a comment on agenda item number six, the Closed Session, please raise your hand using the Zoom 'raise hand' feature or by pressing *9 on your phone.

I see no other hands raised, Chair Urban.

MS. URBAN: Thank you very much, Ms. Allen. Thank you, Mr. $16 \parallel \text{Riviera}$, for the clarifying question, and thanks to everyone for attending this afternoon. The Board will now leave the public session for closed session discussion, and I'd like to invite Mr. Le and Ms. de la Torre to please do that. We will return when we are finished with those items in order to adjourn. Thanks everyone for joining us on a Friday afternoon.

MS. URBAN: Ms. Allen, I'm just letting you know that the Board is back, and we can reconvene the public session when you're ready and we are all here. I'm just checking... yes, we have everyone, so please let us know when to begin.

MS. ALLEN: Okay, go ahead and begin.

MS. URBAN: Thank you very much, Ms. Allen. And thanks again to all the members of the public who joined us today. Thank you to the

1 Board members for your time and expertise this afternoon. And of course, thank you very much to our expert staff for all of your contributions to the meeting and to our work. This is our last agenda item, number seven, and it is Adjournment. So, I will go 5 right ahead and ask if I may have a motion to adjourn the meeting. MS. DE LA TORRE: I move. 6 MS. URBAN: Thank you. I have a motion from Ms. de la Torre. Do 7 I have a second? 8 9 MR. ALASTAIR MACTAGGART: Second. 10 MS. URBAN: Thank you. Motion is on the table from Ms. de la 11 Torre, seconded by Mr. Mactaggart, to adjourn the meeting. Ms. Allen, would you please conduct the roll call vote? 13 MS. ALLEN: Yes, the motion is to adjourn. Board member de la 14 | Torre? 15 MS. DE LA TORRE: Aye. 16 MS. ALLEN: De la Torre, aye. Board member Le? 17 MR. LE: Aye. MS. ALLEN: Le, aye. Board member Mactaggart? 18 19 MR. MACTAGGART: Aye. MS. ALLEN: Mactaggart, aye. Chair Urban? 20 21 MS. URBAN: Aye. MS. ALLEN: Urban, aye. With that, the motion carries in a vote 22 23 four to zero. MS. URBAN: Thank you, Ms. Allen. By a vote of four to zero, 24 the motion carries to adjourn this meeting of the California Privacy Protection Agency Board, and we hereby stand adjourned. 27 Thanks very much everybody.

(End of recording)

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