DISCIPLINE COMMITTEE OF THE COLLEGE OF CHIROPODISTS OF ONTARIO

THE DISCIPLINE COMMITTEE OF THE COLLEGE OF CHIROPODISTS OF ONTARIO

IN THE MATTER OF a Hearing directed
by the Inquiries, Complaints and Reports Committee of
the College of Chiropodists of Ontario
pursuant to Section 26(1) of the *Health Professions Procedural Code*being Schedule 2 of the *Regulated Health Professions Act, 1991*,
S.O. 1991, c. 18, as amended.

BETWEEN:

COLLEGE OF CHIROPODISTS OF ONTARIO

- and -

JOHN INFANTI

PANEL MEMBERS:

Edward Chung Chair, Professional Member

Reshad Nazeer Public Member

Jannell Somerville Professional Member Shael Weinberg Professional Member

COUNSEL FOR THE COLLEGE: Debra McKenna

REPRESENTATIVE FOR THE

MEMBER: Self-represented

INDEPENDENT LEGAL Justin Safayeni

COUNSEL:

Hearing Date: February 9, 2024 February 9, 2024 February 9, 2024 February 16, 2024

DECISION & REASONS

- 1. This matter came on for hearing before a panel of the Discipline Committee on February 9, 2024. With the consent of the parties, this matter was heard electronically.
- 2. The panel was advised that the parties had reached an agreement and as such this matter proceeded as an uncontested hearing.

The Allegations

- 3. The allegations made against the Member were set out in a Notice of Hearing, dated September 30, 2021. The Notice of Hearing was marked as Exhibit 1 and the allegations are as follows:
 - 1. On or about June 11, 2019, John Infanti (the "**Member**") was first registered, in the chiropodist classification, as a member of the College.
 - 2. On October 18, 2021, a hearing was held before a panel of the Discipline Committee, at which time the Member was found by the panel to have engaged in professional misconduct. As a result, the discipline panel made a variety of penalty orders with which the Member was required to comply. The panel's written reasons were released on November 16, 2021.
 - 3. It is alleged that, during the period from May 24, 2022 to December 31, 2022 (the "**Relevant Period**"), the Member engaged in conduct that constitutes professional misconduct pursuant to the following:
 - (a) Clause 51(1)(b) of the *Health Professions Procedural Code*, being Schedule 2 to the *Regulated Health Professions Act, 1991*, and as defined in one or more of the following paragraphs of section 1 of the Professional Misconduct Regulation (O. Reg. 750/93) under the *Chiropody Act*, 1991:
 - (i) paragraph 1 contravening a term, condition or limitation imposed on the member's certificate of registration;
 - (ii) paragraph 2 failing to meet or contravening a standard of practice of the profession, specifically, the Patient Relations Standard and/or Records;
 - (iii) paragraph 30 contravening the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts;
 - (iv) paragraph 33 engaging in conduct or performing an act, in the course of practising the profession that, having regard to all the

- circumstances, would reasonably be regarded by members as disgraceful, dishonourable, or unprofessional;
- (v) paragraph 34 failing to reply within thirty days to any written enquiry from the College or its officers, employees or agents;
- (vi) paragraph 36 failing to comply with an order of the Complaints Committee, the Discipline Committee or the Fitness to Practise Committee; and/or
- (vii) paragraph 37 failing to carry out a requirement of the Complaints Committee, the Discipline Committee or the Fitness to Practise Committee or breaching an undertaking given to one of those committees or to the Registrar.

PARTICULARS OF THE ALLEGATIONS

- 1. On or about June 11, 2019, John Infanti (the "**Member**") was first registered, in the chiropodist classification, as a member of the College.
- 2. On October 18, 2021, the Member was found to have engaged in professional misconduct by a panel of the Discipline Committee. The panel's written reasons were released on November 16, 2021 ("**Discipline Decision**").
- 3. As a result of the findings of professional misconduct, the discipline panel made a number of orders, in accordance with a joint submission by the College and the Member, as penalty for the Member's misconduct (the "Penalty Order").
- 4. The Penalty Order included, among other orders, a suspension of the Member's certificate of registration for seven months (which commenced on November 8, 2021) and time-limited terms, conditions, and limitations ("TCLs") imposed on the Member's certificate of registration once the Member's suspension was lifted.
- 5. As outlined in the Discipline Decision, the TCLs required the following:
 - (a) Upon returning to practice, the Member was prohibited from imaging, casting, prescribing, constructing, fitting, dispensing and/or ordering the fabrication of orthotics and orthopaedic shoes for a period of six (6) months (the "Restricted Period"). The Member is additionally not entitled to assign these duties to anyone else at his clinic, regardless of whether he receives a fee, during the Restricted Period, but shall refer such duties to another chiropodist in good standing at another clinic not affiliated with the Member's clinic.
 - (b) At his own expense, the Member was required to receive supervision of his chiropody practice with a supervisor approved by the Registrar for a period of one (1) year from the date on which the Member returns to

practice from the suspension. The supervision requirement included that:

- The supervisor would visit the Member in person on at least four (4) occasions – twice in the first six months and twice in the last six months;
- The visits with the supervisor would be unannounced;
- The supervisor would determine the length of each visit;
- In conducting the supervision, the supervisor would discuss ethics, practice management, record-keeping and compliance with the College's standards with the Member;
- The supervisor would provide a report to the Registrar after the second (2) visit and after the fourth (4) visit;
- The Member would seek and obtain consent from his patients to share personal health information with his supervisor in order to allow the supervisor to review client files and engage in review; and
- The Member would provide the supervisor with the Discipline Committee's decision and then provide written confirmation to the Registrar, signed by the supervisor, that the supervisor has received and reviewed the decision.
- 6. The Member's suspension was lifted on May 24, 2022. On that date, the College sent an email to the Member confirming the requirements of his supervision.
- 7. Among other things, the Member was informed that Murtaza Najmudin had been assigned by the College to be the Member's mentor. The Member was advised that Mr. Najmudin would be in contact with him and the College also provided the Member with Mr. Najmudin's contact information. Mr. Najmudin was also copied on the College's email to the Member.
- 8. In the College's email dated May 24, 2022, the Member was advised to contact the College if he had any questions about the process. The Member did not respond to the email and/or reach out to the College with any questions.
- 9. On or about June 15, 2022, Mr. Najmudin contacted the Member, via email, to make the arrangements for supervision of the Member's practice. Specifically, the Member was requested to provide the details relating to the Member's practice, including the days the Member was practising and his practice locations.
- 10. The Member did not respond to Mr. Najmudin's email and/or provide Mr. Najmudin and/or the College with the details that were requested.

- Additional emails and/or communications were subsequently sent to the Member by the College and/or Mr. Najmudin for the purpose of facilitating supervision of the Member's practice.
- Among other communications, the College emailed the Member on or about August 11, 2022, at which time the Member was directed to provide the College and Mr. Najmudin with a list of his practice locations and his schedule
- 13. In addition, by email dated September 7, 2022, the College directed the Member to provide Mr. Najmudin with his homecare schedule and to advise where the Member was storing his patient records.
- 14. At no time between the period from approximately May 24, 2022, to December 31, 2022, did the Member communicate to Mr. Najmudin and/or to the College about when and/or where he was seeing patients.
- 15. At no time between the period from approximately May 24, 2022, to December 31, 2022, did the Member meet with Mr. Najmudin (in person or otherwise), make himself available to meet with Mr. Najmudin, and/or disclose the necessary information to allow the College to supervise his practice, as was required.
- 16. Despite requests, during the period from May 24, 2022, to December 31, 2022, the Member failed to respond to inquiries from Mr. Najmudin and/or the College as to the location of his patient records.
- 17. Between the period from approximately May 24, 2022 to December 31, 2022, the Member impeded the College's efforts to supervise his practice, which was required by the Penalty Order and to ensure compliance with the TCLs.
- During the period from approximately May 24, 2022 to December 31, 2022, the Member saw at least five (5) patients for eleven (11) appointments, including on or about the following dates:
 - July 14, 2022 M.P.
 - August 11, 2022 F.M.
 - September 9, 2022 B.P.
 - September 22, 2022 M.P.
 - November 26, 2022 S.F.
 - November 26, 2022 T.F.
 - November 29, 2022 B.P.
 - December 14, 2022 M.P.
 - December 20, 2022 S.F.
 - December 20, 2022 T.F.

- December 29, 2022 B.P.
- 19. Among other professional misconduct (as outlined in the Statement of Allegations), it was a breach of the TCLs imposed on the Member's certificate of registration for the Member to practise unsupervised.
- 20. Such conduct by the Member, as outlined above, was also a violation of the Penalty Order.

Member's Plea

- 4. The Member admitted that he engaged in professional misconduct as described in the Notice of Hearing, as set out above.
- 5. The Panel conducted an oral plea inquiry and was satisfied that the Member's admissions were voluntary, informed, and unequivocal.

Agreed Statement of Facts

6. The evidence at the hearing proceeded by way of agreement. The parties tendered an Agreed Statement of Facts, which was marked as Exhibit 2, and which reads as follows:

THE COLLEGE AND THE REGISTRANT agree that the following facts may be accepted as true and proven by the Discipline Committee in this matter:

- 1. On or about June 11, 1990, John Infanti (the "**Registrant**") was first registered as a member of the College, in the chiropody classification.
- 2. On October 18, 2021, the Registrant was found to have engaged in professional misconduct by a panel of the Discipline Committee. The panel's written reasons were released on November 16, 2021 ("**Discipline Decision**").
- 3. As a result of the findings of professional misconduct, the discipline panel made a number of orders, in accordance with a joint submission by the College and the Registrant, as penalty for the Registrant's misconduct (the "Penalty Order").
- 4. The Penalty Order included, among other orders, a suspension of the Registrant's certificate of registration for seven months (which commenced on November 8, 2021) and time-limited terms, conditions, and limitations ("TCLs") imposed on the Registrant's certificate of registration once the Member's suspension was lifted.
- 5. As outlined in the Discipline Decision, the TCLs required the following:

- (a) Upon returning to practice, the Registrant was prohibited from imaging, casting, prescribing, constructing, fitting, dispensing and/or ordering the fabrication of orthotics and orthopaedic shoes for a period of six (6) months (the "Restricted Period"). The Registrant was additionally not entitled to assign these duties to anyone else at his clinic, regardless of whether he received a fee, during the Restricted Period, but was required to refer such duties to another chiropodist in good standing at another clinic not affiliated with the Registrant's clinic.
- (b) At his own expense, the Registrant was required to receive supervision of his chiropody practice with a supervisor approved by the Registrar for a period of one (1) year from the date on which the Registrant returned to practice from the suspension. The supervision requirement included that:
 - The supervisor would visit with the Registrant in person on at least four (4) occasions twice in the first six months and twice in the last six months;
 - The visits with the supervisor would be unannounced;
 - The supervisor would determine the length of each visit;
 - In conducting the supervision, the supervisor would discuss ethics, practice management, record-keeping and compliance with the College's standards with the Registrant;
 - The supervisor would provide a report to the Registrar after the second (2) visit and after the fourth (4) visit;
 - The Registrant would seek and obtain consent from his patients to share personal health information with his supervisor in order to allow the supervisor to review client files and engage in review; and
 - The Registrant would provide the supervisor with the Discipline Committee's decision and then provide written confirmation to the Registrar, signed by the supervisor, that the supervisor has received and reviewed the decision.
- 6. The Registrant's suspension was lifted on May 24, 2022. On that date, the College sent an email to the Registrant confirming the requirement of his supervision. The email was sent to the email address provided by the Registrant to the College for official communication with him. Attached as **Exhibit "A"** to this ASF is a copy of the College's email to the Registrant dated May 24, 2022.
- 7. Among other things, the Registrant was informed in Exhibit "A" that the College had assigned Murtaza Najmudin to be his supervisor. The Registrant was advised that Mr. Najmudin would be in contact with him, and the College also provided the Registrant with Mr. Najmudin's contact information. Mr. Najmudin was also copied on Exhibit "A".

- 8. In Exhibit "A", the Registrant was further advised to contact the College if he had questions about the process. The Registrant did not respond to the email and/or reach out to the College with any questions.
- 9. The Registrant does not contest that he was sent Exhibit "A".
- 10. The Registrant acknowledges that, if called to testify in this matter, Mr. Najmudin's evidence would be that he attempted to contact the Registrant, via email, on June 15, 2022, to make arrangements for the supervision. As set out in in Mr. Najmudin's email, he requested the details relating to the Registrant's practice, including the days he was practising and his practice locations. Attached as **Exhibit "B"** to this ASF is a copy of Mr. Namudin's email dated June 15, 2022.
- 11. Due to his personal circumstances at the time, including difficulties with his health, the Registrant acknowledges that he was not checking his email inbox on a regular basis in June 2022. As a result, the Registrant is not confident to either admit or deny that he received Exhibit "B" at the time.
- 12. However, the Registrant does not contest that Exhibit "B" was addressed to him at his correct email address for official communications with the College and it was his professional responsibility to review his emails in a timely way, which he failed to do.
- 13. The Registrant also acknowledges that additional emails and/or communications were subsequently sent to him by Ms. Clarke and/or Mr. Najmudin for the purpose of facilitating supervision of his practice.
- 14. Among other communications, Ms. Clarke emailed the Registrant on August 11, 2022, at which time the Registrant was directed to provide the College and Mr. Najmudin with a list of his practice locations and his schedule. A copy of the College's email dated August 11, 2022, is attached as **Exhibit "C"**.
- 15. In addition, by email dated September 7, 2022, the College directed the Registrant to provide his homecare schedule and to advise where he was storing his patient records. A copy of the College's email dated September 7, 2022, is attached as **Exhibit "D"**.
- 16. The Registrant admits that, during the period from May 24, 2022, to November 17, 2022, the Registrant did not meet with Mr. Najmudin, as was required by the Penalty Order.
- 17. The Registrant also admits that, during the period from May 24, 2022, to November 17, 2022, the Registrant did not communicate with Mr. Najmudin or the College in timely or responsive fashion as to when and where he was

- seeing his patients or the location of his patient records, as was required by the Penalty Order and specifically requested in Exhibits "B", "C", and "D".
- 18. The Registrant acknowledges that his lack of responsiveness (in both timeliness and in substance) frustrated the process of implementing his supervision and Mr. `Najmudin withdrew as the Registrant's supervisor on November 17, 2023.
- 19. The Registrant further admits that his patient records were provided to the College after the Registrar's Investigation was commenced on December 9, 2022. As the Registrant had not disclosed to the College where his records were being stored, the College was required to request the records directly from the Registrant. As a result, the College was unable to independently confirm when the patient records were created, that the records had not been changed, and there were no additional patient records.
- 20. The Registrant admits that his failure to provide timely or responsive information to the College or Mr. Najmudin impeded the College's efforts to supervise him and ensure his compliance with the Penalty Order and the TCLs, including the restriction on prescribing orthotics.
- 21. During the period from May 24, 2022 to December 31, 2022, the Registrant saw and provided treatment to least five (5) patients at eleven (11) appointments, including on or about the following dates:
 - July 14, 2022 M.P.
 - August 11, 2022 F.M.
 - September 9, 2022 B.P.
 - September 22, 2022 M.P.
 - November 26, 2022 S.F.
 - November 26, 2022 T.F.
 - November 29, 2022 B.P.
 - December 14, 2022 M.P.
 - December 20, 2022 S.F.
 - December 20, 2022 T.F.
 - December 29, 2022 B.P.

- 22. Attached as **Exhibit "E"** is a copy of the Registrant's records for these patients.
- 23. The Registrant admits that it was a breach of the TCLs imposed on his certificate of registration to practise unsupervised and it was a breach of the Penalty Order.
- 24. Based on the facts set out above, the Registrant admits that he committed acts of professional misconduct within the meaning of the following paragraphs of section 1 of the *Professional Misconduct Regulation*, O. Reg. 750/93 under the *Chiropody Act*, 1991:
 - i. paragraph 1 contravening a term, condition or limitation imposed on the member's certificate of registration;
 - ii. paragraph 2 failing to meet or contravening a standard of practice of the profession; specifically, the Patient Relations Standard and/or Records;
 - iii. paragraph 30 contravening the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts;
 - iv. paragraph 33 engaging in conduct or performing an act, in the course of practising the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable, or unprofessional;
 - v. paragraph 34 failing to reply within thirty days to any written enquiry from the College or its officers, employees or agents;
 - vi. paragraph 36 failing to comply with an order of the Complaints Committee the Discipline Committee or the Fitness to Practise Committee; and or
 - vii. paragraph 37 failing to carry out a requirement of the Complaints Committee, the Discipline Committee or the Fitness to Practise Committee or breaching an undertaking given to one of those committees or to the Registrar.

ACKNOWLEDGEMENTS

25. The Registrant understands the nature of the allegations that have been made against him and that, by voluntarily admitting these facts, he waives her right to require the College to otherwise prove these facts.

- 26. The Registrant understands that the panel of the Discipline Committee can accept the facts herein constitute professional misconduct and, in particular, can accept his admissions of professional misconduct.
- 27. The Registrant understands that the panel of the Discipline Committee can make orders as a result of a finding of professional misconduct, as described in the Notice of Hearing dated March 17, 2023.
- 28. The Registrant also understands that if the panel makes a finding or findings of professional misconduct against him, then the panel's decision and its reasons, and/or a summary of its reasons, including the facts contained herein, and the Registrant's name will be published, including but not limited to, in the College's publications, on the College's public register, on the College's website, and/or on CanLII (the website operated by the Canadian Legal Information Institute).
- 29. The Registrant confirms that he has had the opportunity to obtain independent legal advice and was encouraged to do so by the College. He further acknowledges that he is entering into this ASF freely and voluntarily, without compulsion or duress.

Sealing Order

- 7. Appendix "E" to the Agreed Statement of Facts (referenced at paragraph 22 of the Agreed Statement of Facts) consists of the Member's records for certain patients. These records were filed separately and marked as Exhibit 3 at the hearing.
- 8. College counsel sought a sealing order over Exhibit 3, such that Exhibit 3 would not be accessible by members of the public or otherwise made publicly available (though it would remain part of the record). The Member agreed that this type of sealing order was appropriate. The panel is satisfied that a sealing order over Exhibit 3 is appropriate, pursuant to section 45(2) and 45(3) of the *Health Professions Procedural Code* (being schedule 2 to the *Regulated Health Professions Act*), given that the records in question contain confidential patient health records and the nature of the Member's alleged misconduct can be understood and assessed by the public without accessing those records. The sealing order sought by College counsel is therefore granted.

Decision and Reasons

9. The panel carefully considered the evidence presented in this case as outlined in the Agreed Statement of Facts and the exhibits appended thereto. Based on the Member's admissions as set out in the Agreed Statement of Facts, and following its deliberations, the panel was satisfied that the Member engaged in professional misconduct as alleged in the Notice of Hearing. The panel found that members of

the profession would reasonably regard the conduct admitted as disgraceful, dishonourable or unprofessional.

Joint Submission on Penalty and Costs

10. The Panel received and considered a Joint Submission on Penalty and Costs from the parties (the "**Joint Submission**"), marked as Exhibit 4 at the hearing, which stated as follows:

THE COLLEGE AND THE REGISTRANT agree and jointly submit that the Discipline Committee make the following orders with respect to this matter:

- 1. An oral reprimand;
- 2. An order suspending the Registrant's certification of registration for a period of eight (8) months commencing on February 9, 2024 two months of which will be remitted upon the Registrant successfully completing, to the satisfaction of the Registrar, the remedial program set out in paragraph 3 below;
- 3. An order imposing terms, conditions and limitations on the Registrant's certificate of registration requiring the following:
 - At his own expense and during his suspension, the Registrant is required to successfully complete a remedial program conducted by a supervisor appointed by the Registrar;
 - b. The Registrant shall meet with the supervisor on four (4) occasions at a time and place directed by the supervisor;
 - c. The supervisor shall determine the length of each meeting;
 - d. In completing the remedial program, the Registrant is required to review, discuss, and complete any and all activities directed by the supervisor on the following topics: ethics, professional, responsibilities, record-keeping, and practice management;
 - e. The supervisor shall provide a written report to the Registrar about the Registrant's progress in completing the remedial program after the second (2nd) meeting and after the fourth (4th) meeting with the Registrant;
 - f. The Registrant, in consultation with the supervisor, shall determine whether the requirements of the program have been successfully completed by the Registrant; and
 - g. For greater certainty, the Registrant is required to successfully complete the program regardless of whether the two months of his suspension are

- remitted, and the Registrant will not be permitted to return to practice until he does complete the program.
- 4. An order that the Discipline Committee's decision be published, in detail with the Registrant's name, in the College's official publications, on the College's website and/or on the College's public register.
- 5. An order that the Registrant shall pay costs of \$20,000.00, which amount will be paid to the College on February 9, 2024, following the hearing.
- 6. The College and the Registrant agree that if the Discipline Committee accepts this Joint Submission on Penalty and Costs, there will be no appeal or judicial review of the decision or order to any forum.

Decision and Reasons for Penalty and Costs

- 11. The panel reviewed and considered the parties' Joint Submission on penalty and costs, together with submissions from College counsel. The panel recognized that the penalty should maintain high professional standards, preserve public confidence in the ability of the College to regulate its members, and, above all, protect the public. This is achieved through a penalty that considers the principles of general deterrence, specific deterrence and, where appropriate, rehabilitation and remediation of the Member's practice.
- 12. The panel is satisfied that the terms contained in the Joint Submission reflects these principles and approves it on that basis. The Joint Submission is reasonable, proportionate and sensitive to the aggravating and mitigating factors in this case.
- 13. The panel was concerned to hear the evidence outlined in the Agreed Statement of Facts, particularly as it related to the Member's failure to abide by past penalty orders made by a panel of the Discipline Committee. Still, the panel considered the fact that the Member admitted his misconduct, expressed remorse for his actions and cooperated with College counsel in bringing this matter to a resolution. In coming to its decision, the panel considered the evidence of this specific case, and weighed it against the case law established by this College in hearing other similar matters, the public protection that is achieved and served by ensuring adequate specific and general deterrence, and the fact that the matter came to this panel in an uncontested manner.
- 14. At the conclusion of the hearing, having confirmed that the Member waived any right to appeal, the Panel delivered an oral reprimand on the record. A copy of the reprimand is attached here at Appendix A.

I, Edward Chung, sign this decision and reasons as Chairperson of this Discipline panel and on behalf of the members of the Discipline panel as listed below:

St	STAN	February 15, 2024
Edward Chung, Chairperson		Date

Reshad Nazeer Jannell Somerville Shael Weinberg

APPENDIX A

COLLEGE OF CHIROPODISTS OF ONTARIO v. JOHN INFANTI

As you know, Mr. Infanti, as part of its penalty, this Discipline panel has ordered you be given an oral reprimand.

The fact that you have received this reprimand will be part of the public portion of the Register and, as such, part of your record with the College.

Although you will be given an opportunity to make a statement at the end of the reprimand, this is not an opportunity for you to review the decision made by the Discipline panel, nor a time for you to debate the merits of our decision.

The panel has found that you have engaged in professional misconduct in the following ways:

- You contravened a term, condition or limitation imposed on your certificate of registration
- 2. You failed to meet the standards of practice of the profession, namely the Patient Relations Standard and the Records standard
- 3. You contravened the *Chiropody Act, 1991, the Regulated Health Professions Act, 1991* or the regulations under either of those Acts
- You engaged in conduct which would reasonably be regarded by other members of this profession as disgraceful, dishonourable or unprofessional.
- 5. You failed to reply within 30 days to written inquiries from the College or its officers, employees or agents.
- 6. You failed to comply with an order of the Discipline Committee.
- 7. You failed to carry out the requirements of the Discipline Committee.

The fact that you engaged in professional misconduct is a matter of profound concern. You have brought discredit to the entire chiropody profession and to yourself. Public confidence in this profession has been put in jeopardy. The result of your misconduct is that you have let down the public, the chiropody profession, and yourself.

Your conduct is totally unacceptable to your fellow chiropodists and to the public. Of special concern to us is the fact that you failed to comply with a previous Penalty Order made by a Discipline Panel, which puts the integrity and effectiveness of the College's regulatory oversight function at risk.

We appreciate that you have taken responsibility here and that you were willing to admit misconduct. We certainly hope that means you have recognized the error of your ways and that you will not repeat this conduct in the future.

We also want to make it clear to you that while the penalty that this panel has imposed upon you is a fair penalty, a more significant penalty will likely be imposed by another Discipline panel in the event that you are ever found to have engaged in professional misconduct again.

As you heard earlier, you will now be given an opportunity to respond if you wish. Remember this is not an opportunity for you to review the decision or debate its correctness. Do you wish to make any comments?

Thank you for attending today. We are adjourned.