

STATUS OF HUMAN RIGHTS & SANCTIONS IN MYANMAR

FEBRUARY 2022 REPORT

Summary. This report reviews the February 2022 developments relating to human rights in Myanmar.

- I. Coup, Crackdown on Protests and Civilian Resistance.....2**
- II. Political Developments.....3**
 - A. Rohingya Refugee Crisis.....3**
 - B. Corruption.....3**
 - C. International Community / Sanctions.....4**
- III. Civil and Political Rights.....4**
 - A. Freedom of Speech, Assembly and Association.....4**
 - B. Freedom of the Press and Censorship.....5**
- IV. Economic Development.....5**
 - A. Economic Development—Legal Framework, Foreign Investment.....5**
 - B. Economic Development—Infrastructure, Major Projects.....5**
 - C. Land Seizure.....6**
- V. Peace Talks and Ethnic Violence.....6**
 - A. Ethnic Violence.....6**
 - B. Peace Talks.....6**

I. Coup, Crackdown on Protests and Civilian Resistance

The Yangon Division Command of the parallel National Unity Government (“NUG”) launched bomb attacks on various military posts on February 1, the one-year anniversary of the military coup.¹ Over 40 troops were killed in mid-February when resistance groups attacked two bases of Pyu Saw Htee, a pro-military group of fighters, in Pale Township, Sagaing Region.² On February 23, the People’s Defense Force (“PDF”) conducted multiple raids and ambushes in 3 towns in Sagaing Region, resulting in the deaths of around 50 military personnel, according to the PDF.³

Around 100 soldiers and members of the pro-military Pyu Saw Htee group raided a defense force base in Thayet Kan.⁴ Six resistance fighters were killed, including the group’s leader, who was beheaded by soldiers.⁵ Troops also raided a base in neighboring Myinmu Township, killing two and arresting 10 resistance fighters.⁶

An increasing number of soldiers are defecting to the resistance. On February 24, news spread of a lieutenant colonel defecting from the army.⁷ His rank is one of the highest of those who have defected.⁸ Around 2,000 troops have defected from the military since the coup last February, according to Captain Lin Htet Aung, a member of the Civil Disobedience Movement.⁹

Regime troops targeted crude oil fields in Pauk and Myaing townships in Magway Region, demanding up to 500,000 kyats (USD\$280) from owners of these drilling operations to spare the fields.¹⁰ The troops burned hundreds of oil wells and killed six civilians from late January to early February.¹¹ Around the same time, troops attacked Thantlang, a town in Chin State, burning down almost 100 buildings.¹² Around six soldiers died during the clash between the military and resistance groups.¹³ In another township in Chin State, troops raided and set fire to medical equipment in Wanma Thu District Hospital on February 18 because they believed that the hospital was treating resistance fighters.¹⁴

On January 30, regime troops raided a village in Wetlet Township and forced residents to flee their homes.¹⁵ When villagers returned on February 3, they discovered the burned bodies of six villagers that had been detained by troops earlier that week.¹⁶

Around 100 troops raided Pu Tee village on February 5, looting homes, burning down rice fields and killing livestock.¹⁷ They then went to a neighboring village and burned down 20 houses.¹⁸ Also in Sagaing Region, five members of the local defense force were killed when the military raided a village in Kawlin Township on February 8. Troops also burned down six homes and four cars.¹⁹ In Pale Township, troops burned down around 270 houses in Chaung Oo village.²⁰

Troops targeted four villages in Taze Township, Sagaing Region during the first two weeks of February,²¹ forcing around 5,000 residents to flee the area.²² Almost 80 houses were burned down,²³ with about 39 destroyed in Taze Township from February 11 to 14.²⁴ Later in February, the military destroyed what was left of the village of In Pin Thar.

Despite warnings from the military of criminal prosecution, many people participated in the silent strike on February 1 to mark the one-year anniversary of the military coup.²⁵ Streets

were empty and stores were closed across the country.²⁶ Small anti-military regime rallies also took place prior to the silent strike on the morning of February 1.²⁷

In Monywa, two women on motorcycles, who were distributing anti-regime flyers with other protestors, were rammed from behind by a car.²⁸ Five youths who participated in the protests were arrested.²⁹ The military also organized shopping trips and car or motorbike rides for residents to ensure there were people on the road and in markets during the strike.³⁰ There were even military-organized marathon and bicycle races, where motorists were given a liter of free gas if they were on the streets during the strike.³¹ Military supporters took to the streets to voice their support for the regime. During one of these processions, a grenade exploded and killed two people³² and injured 38 others.³³

The junta is increasingly confiscating the property of citizens who support the revolutionary movement after previously mainly seizing the homes of National League for Democracy members.³⁴ In Yangon, the junta sealed off the Thingangyun Township home of celebrity couple Lynn Lynn and Chit Thu Wai, who went into hiding after last year's coup, becoming some of the first celebrities to join the anti-regime movement.³⁵ The singers face arrest warrants for alleged incitement over their anti-regime activities.³⁶ The junta also confiscated the home of Ko Thalun Zaung Htet, editor-in-chief of Khit Thit Media, an independent group covering junta atrocities and the revolutionary movement.³⁷ Additionally, all property belonging to the Mahar Rescue group, which is providing free health care for COVID-19 patients in the city, was sealed off for allegedly associating with the PDF.³⁸ At least eight members of the group were detained during the raid.³⁹

II. Political Developments

A. Rohingya Refugee Crisis

Please see International Community / Sanctions below for an update on the International Court of Justice case regarding the alleged genocide of the Rohingya.

B. Corruption

Myanmar's junta filed an eleventh corruption charge against ousted leader Aung San Suu Kyi on February 3, the latest in a slew of indictments against the Nobel laureate who faces more than 150 years in prison factoring in all charges.⁴⁰ The regime alleges that Aung San Suu Kyi received US\$550,000 as a donation for a charity foundation named after her mother.⁴¹ The corruption charge carries a possible 15-year jail term.⁴²

Bago Region's ousted National League for Democracy ("NLD") chief minister, Win Thein, has been sentenced to 20 years' imprisonment with hard labor for corruption.⁴³ The junta accused Win Thein of misusing state funds, bribery and breaching financial procedures in managing regional development and preventing COVID-19 under the Anti-Corruption Law.⁴⁴ Win Thein was detained during the coup.⁴⁵

C. International Community / Sanctions

In its first appearance before the International Court of Justice (“ICJ”), the Myanmar junta urged the ICJ to drop the genocide case for the alleged persecution of the Rohingya brought by the Gambia and backed by the Organization of Islamic Cooperation, a 57-nation body that represents global Muslim interests, Canada and the Netherlands.⁴⁶ The Gambia dismissed an argument by Myanmar that the Gambia is acting as a proxy for the Organization of Islamic Cooperation and not as a “country in its own right” in the case against Myanmar.⁴⁷ Leading up to the proceedings, a crowd of protestors gathered in front of the ICJ to show their support for the victims of Myanmar military violence.⁴⁸

The European Union (“EU”) announced sanctions on 22 additional officials from Myanmar’s military junta and four companies over the ongoing crackdown on civilians following the 2021 coup.⁴⁹ Following the announcement, Human Rights Watch called on the EU and other countries to enforce additional sanctions targeting the Myanmar junta and the state-owned oil company, Myanmar Oil and Gas Enterprise.⁵⁰

According to a report from the United Nations (“UN”) Special Rapporteur on Myanmar, China, Russia and Serbia continue to supply the Myanmar junta with weapons that have been used to attack civilians since the coup in February 2021.⁵¹ Additionally, a Justice for Myanmar report identifies six ASEAN countries—Cambodia, Indonesia, the Philippines, Singapore, Thailand and Vietnam—that continue to supply arms, funds and investments to the Myanmar military.⁵²

On the one-year anniversary of the military coup in early February, numerous countries and international bodies, including the UN Security Council⁵³ and ASEAN⁵⁴, called for an immediate cessation of violence and expressed support for the Myanmar people’s struggle against the military.⁵⁵

UN Special Envoy Dr. Noeleen Heyzer received criticism following an interview in which she appeared to advocate for a power sharing arrangement with the junta as a path to peace.⁵⁶ The junta accused the UN of interfering in its affairs,⁵⁷ and 247 civil society organizations (“CSOs”) issued a joint statement condemning the notion. To address the CSOs’ concerns, Dr. Heyzer met with representatives of 20 CSOs during which the CSOs took a hard line stance against the inclusion of the Myanmar military in Myanmar’s politics.⁵⁸

III. Civil and Political Rights

A. Freedom of Speech, Assembly and Association

The Myanmar junta-appointed Union Election Commission (“UEC”) threatened the NLD and the Shan Nationalities League for Democracy (“SNLD”), two major political parties that won majorities in the 2020 general election, with disbandment if they did not comply with its order to submit their financial accounts for inspection by March 9.⁵⁹ The UEC ordered the NLD, the SNLD and two other parties to appear before it on February 14 to verify their financial accounts and expenses, but neither the NLD nor the SNLD appeared.⁶⁰ According to the UEC, the parties violated the law, which is punishable with a three-year suspension and disbandment.⁶¹

The junta cut internet access in the Sagaing Region, where an armed resistance is fighting the regime.⁶² Internet access was also cut last September in Ayadaw, Yinmabin, Kani, Pale, Ye-U, Taze and Budalin townships in the region. The lack of internet limits citizens' ability to avoid raids by the junta and to protect themselves from attacks.⁶³

The military has arrested and charged at least 109 people, mostly from Yangon Region, for their social media posts in support of the anti-regime movement throughout the week following the silent strike.⁶⁴

Eleven people, including several leaders from the NUG, a veteran student leader and social media influencers, had their citizenship revoked according to an announcement made on March 4.⁶⁵

The junta announced an amnesty for 814 prisoners to mark Union Day.⁶⁶ However, the amnesty did not include any political dissidents.⁶⁷ The prisoners were released on the condition that if they are convicted of another offense in the future, they will have to serve the remainder of their previous sentence in addition to any new one.⁶⁸ As of February 11, 9,087 people have been detained for anti-regime activities since last year's coup, according to the Assistance Association for Political Prisoners.⁶⁹ 703 of those have been convicted and imprisoned, with 45 of them, including two teenagers, given the death sentence.⁷⁰

B. Freedom of the Press and Censorship

There have been no material updates since the prior report.

IV. Economic Development

A. Economic Development—Legal Framework, Foreign Investment

Japanese beverage company Kirin Holdings is set to exit its Myanmar operations after it concluded it could not resolve a dispute with its military-backed partner, the company announced on February 14.⁷¹ Kirin will begin procedures to shut down its business in the country, which it operates as a joint venture with military-owned Myanmar Economic Holdings (“MEHL”). Although Kirin is considering options for the divestment of its interest in the venture, including sales to a third-party company, it is aiming to complete the deal by June.⁷²

The Myanmar military gave regulatory approval to the sale of Norwegian telecom giant Telenor Group's Myanmar operation to Lebanon's M1 Group on February 24 after months of stalling the process.⁷³ The Myanmar military initially blocked the sale when M1 was the sole buyer, but the Lebanese company agreed to transfer a controlling stake in the venture to a Myanmar firm called Shwe Byain Phyu, which has strong ties to the military.⁷⁴

B. Economic Development—Infrastructure, Major Projects

On January 21, the Kanbawza Group of Companies dissolved its subsidiary Nilar Yoma Gems Co. Ltd., which engaged in jade mining through a venture with military-owned MEHL.⁷⁵ The company operated the jade mine in Sagaing Region in partnership with MEHL for many

years.⁷⁶ Kanbawza Group is one of the largest privately owned diversified groups of companies in Myanmar, with interests in the mining, banking, aviation, insurance, manufacturing, real estate, trading and other industries.⁷⁷

C. Land Seizure

There have been no material updates since the prior report.

V. Peace Talks and Ethnic Violence

A. Ethnic Violence

The Kachin Independence Army (“KIA”) attacked five Myanmar army bases in Kachin and northern Shan States on February 1—the anniversary of the country’s military coup—managing to “overrun and torch” one of the locations, a spokesperson for the organization said.⁷⁸ KIA forces reportedly attacked two bases in Kachin State’s Putao Township, accompanied by members of the Putao People’s Defense Force.⁷⁹ They set fire to a base jointly operated by the junta and a Myanmar army-allied militia.⁸⁰ A few miles away, the allied forces also attacked the Shin Gat Bum base near Ma Hsee Yang village.⁸¹

In northern Shan State’s Kutkai Township, the KIA also attacked the junta’s tactical hill on the same day.⁸² A Kutkai local said one civilian suffered a leg injury from a shell explosion as the military continued to fire artillery from the hill following the KIA retreat.⁸³ The KIA also attacked a junta base at Nam Hkaing bridge, some 20 miles northwest of Kutkai town and near Namkham Township and the Chinese border.⁸⁴ The junta has not released any information about recent clashes with the KIA in Kachin and northern Shan States.⁸⁵

Fighting between Myanmar junta troops and local militias has intensified along the border of Shan and Kayah States, leaving at least 10 civilians and 80 junta soldiers dead, with around 20 PDF fighters also killed in the clashes.⁸⁶

Local aid groups and other sources say fighting began on February 16 in the town of Moby in southern Shan State and spread to Nang Mae Khon in Kayah State, forcing more than 30,000 people to flee their homes.⁸⁷ A spokesman for the Karenni National Defense Force said that the fighting had been intense for eight days in a row.⁸⁸

B. Peace Talks

The Myanmar junta invited ethnic armed organizations (excluding those it has declared as “terrorist groups”) to attend preliminary peace talks on Union Day, February 12.⁸⁹ The junta has declared the parallel civilian NUG, its parliamentary body, the Committee Representing Pyidaungsu Hluttaw, and its armed wing, the People’s Defense Force, as terrorist groups.⁹⁰ Several ethnic armed groups have allied with civilian resistance forces to resist the junta’s rule and declined to attend.⁹¹ Representatives of only eleven ethnic armed organizations attended the event and most only sent liaison officers.⁹² The head of the Foreign Affairs Department of the Karen National Union, one of the major ethnic armed groups and a signatory to the NCA, said,

“The regime has already violated the NCA ... The military is the main enemy and destroyer of peace, and thus we have nothing to discuss with them.”⁹³

The Kachin Independence Army (“KIA”) urged the NUG to commit to implementing the 1947 Panglong Agreement and establish a federal democracy.⁹⁴ The KIA has been fighting the military regime alongside the People’s Defense Force.⁹⁵ The 1947 Panglong Agreement was signed ahead of independence from Britain, and its signatories included Aung San, the independence leader, and the leaders of various ethnic minorities, including a Kachin representative, who agreed to join the union in exchange for federal autonomy.⁹⁶ The deal offered ethnic minorities the possibility of seceding from the union if they were dissatisfied with the new nation.⁹⁷ However, the assassination of Aung San before independence and a military coup in 1962 crushed the promises made at Panglong.⁹⁸

1 Myanmar Now, February 2, 2022: <https://www.myanmar-now.org/en/news/nugs-forces-carry-out-bomb-attacks-across-yangon-on-coup-anniversary>.

2 The Irrawaddy, February 17, 2022: <https://www.irrawaddy.com/news/burma/regime-soldiers-and-pro-junta-militia-reportedly-killed-in-upper-myanmar-raids.html>.

3 *Id.*

4 Myanmar Now, February 22, 2022: <https://www.myanmar-now.org/en/news/five-resistance-fighters-killed-in-junta-raid-on-khin-u-township-defence-force-base>.

5 *Id.*

6 *Id.*

7 Myanmar Now, February 25, 2022: <https://www.myanmar-now.org/en/news/myanmar-army-lieutenant-colonel-defects-to-the-resistance>.

8 *Id.*

9 *Id.*; see also Mizzima, February 10, 2022: <https://mizzima.com/article/two-myanmar-junta-soldiers-desert-army-southern-shan-state>.

10 Myanmar Now, February 1, 2022: <https://www.myanmar-now.org/en/news/burned-corpses-found-in-magway-oil-drilling-region-amid-junta-arson-campaign>.

11 *Id.*

12 Myanmar Now, February 4, 2022: <https://www.myanmar-now.org/en/news/nearly-100-houses-torched-in-thantlang-during-three-days-of-fighting>.

13 *Id.*

14 Mizzima, February 21, 2022: <https://mizzima.com/article/myanmar-junta-troops-burn-medical-equipment-wanma-thu-district-hospital>.

15 Myanmar Now, February 8, 2022: <https://www.myanmar-now.org/en/news/burned-bodies-discovered-in-wetlet-township-village-occupied-by-junta-troops>.

16 *Id.*

17 Myanmar Now, February 10, 2022: <https://www.myanmar-now.org/en/news/junta-soldiers-burn-homes-crops-and-livestock-during-stay-at-village-in-taze>.

18 *Id.*

19 Myanmar Now, February 11, 2022: <https://www.myanmar-now.org/en/news/five-local-defence-force-members-killed-during-junta-raid-in-sagaing-kawlin-township>.

20 Mizzima, February 19, 2022: <https://mizzima.com/article/village-270-houses-sagaing-completely-destroyed-junta-arsonists>.

21 Myanmar Now, February 15, 2022: <https://www.myanmar-now.org/en/news/myanmar-army-troops-burn-dozens-of-homes-across-four-sagaing-villages>.

22 The Irrawaddy, February 11, 2022: <https://www.irrawaddy.com/news/burma/thousands-flee-as-myanmar-regime-raids-villages-in-sagaing-region.html>.

23 Myanmar Now, February 15, 2022: <https://www.myanmar-now.org/en/news/myanmar-army-troops-burn-dozens-of-homes-across-four-sagaing-villages>.

24 The Irrawaddy, February 16, 2022: <https://www.irrawaddy.com/news/burma/regime-forces-torch-houses-in-upper-myanmar-in-latest-arson-attack.html>.

25 The Guardian, February 1, 2022: <https://www.theguardian.com/global-development/2022/feb/01/silent-strike-empties-streets-in-myanmar-on-anniversary-of-coup>.

26 *Id.*

27 *Id.*

28 Myanmar Now, February 22, 2022: <https://www.myanmar-now.org/en/news/woman-has-miscarriage-after-crackdown-on-monywa-protest>.

29 *Id.*

30 The Irrawaddy, February 2, 2022: <https://www.irrawaddy.com/news/burma/despite-junta-threats-myanmar-people-mark-coup-anniversary-with-silent-strike.html>.

31 *Id.*

32 Reuters, February 1, 2022: <https://www.reuters.com/world/asia-pacific/myanmar-activists-vow-defy-junta-with-strike-coup-anniversary-2022-02-01/>.

33 The Irrawaddy, February 24, 2022: <https://www.irrawaddy.com/news/burma/two-killed-38-injured-at-rally-attack-on-myanmar-coup-anniversary.html>.

34 The Irrawaddy, February 16, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-seizes-anti-regime-celebrity-and-journalist-homes.html>.

35 *Id.*

36 *Id.*

37 *Id.*

38 *Id.*

39 *Id.*

40 The Irrawaddy, February 4, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-files-11th-corruption-charge-against-daw-aung-san-suu-kyi.html>.

41 *Id.*

42 *Id.*

43 The Irrawaddy, February 18, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-jails-ousted-nlds-bago-chief-minister-for-20-years.html>.

44 *Id.*

45 *Id.*

46 The Irrawaddy, February 22, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-asks-uns-top-court-to-drop-rohingya-genocide-case-at-hearing-in-the-hague.html>.

- 47 Frontier Myanmar, February 24, 2022: <https://www.frontiermyanmar.net/en/genocide-case-is-legitimate-gambia-tells-un-top-court/>.
- 48 Mizzima, February 24, 2022: <https://mizzima.com/article/protestors-voice-support-victims-myanmar-military-violence-hague-hearing>.
- 49 The Irrawaddy, February 22, 2022: <https://www.irrawaddy.com/news/burma/eu-adds-more-myanmar-companies-regime-officials-to-sanctions-list.html>.
- 50 Mizzima, February 25, 2022: <https://mizzima.com/article/eu-should-enforce-new-sanctions-myanmar-junta-says-ngo>.
- 51 The Irrawaddy: February 23, 2022: <https://www.irrawaddy.com/news/burma/china-russia-arming-myanmar-junta-un-rights-expert.html>.
- 52 The Irrawaddy: February 18, 2022: <https://www.irrawaddy.com/news/burma/asean-a-source-of-arms-investment-for-myanmar-junta-report.html>.
- 53 Mizzima, February 3, 2022: <https://mizzima.com/article/un-security-council-urges-immediate-end-myanmar-violence>.
- 54 Mizzima, February 3, 2022: <https://mizzima.com/article/asean-urges-immediate-end-myanmar-violence>.
- 55 Mizzima, February 2, 2022: <https://mizzima.com/article/countries-release-joint-statement-mark-myanmar-coup-anniversary>.
- 56 Mizzima, February 7, 2022: <https://mizzima.com/article/un-special-envoy-myanmar-ruffles-feathers-her-remarks-about-junta>.
- 57 Mizzima, February 4, 2022: <https://mizzima.com/article/myanmar-junta-slams-dictating-un-rights-chief>.
- 58 Mizzima, February 23, 2022: <https://mizzima.com/article/myanmar-csos-meet-un-special-envoy>.
- 59 The Irrawaddy, February 24, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-threatens-to-disband-two-major-parties-after-they-refuse-to-submit-financial-records.html>.
- 60 *Id.*
- 61 *Id.*
- 62 The Irrawaddy, March 7, 2022: <https://www.irrawaddy.com/news/burma/sagaing-region-internet-shut-down-amid-myanmar-junta-raids.html>
- 63 *Id.*
- 64 The Irrawaddy, February 3, 2022: <https://www.irrawaddy.com/news/burma/myanmar-regime-detains-over-100-people-for-supporting-silent-strike-online.html>.
- 65 The Irrawaddy, March 7, 2022: <https://www.irrawaddy.com/news/burma/myanmar-regime-revokes-citizenship-of-11-prominent-resistance-figures.html>.
- 66 The Irrawaddy, February 12, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-announces-union-day-prisoner-amnesty.html>.
- 67 The Irrawaddy, February 14, 2022: <https://www.irrawaddy.com/news/burma/myanmar-juntas-prisoner-amnesty-no-political-dissidents-released.html>.
- 68 *Id.*
- 69 *Id.*
- 70 *Id.*
- 71 Nikkei Asia, February 14, 2022: <https://asia.nikkei.com/Spotlight/Myanmar-Crisis/Kirin-makes-painful-decision-to-exit-Myanmar-over-human-rights>.
- 72 *Id.*
- 73 Myanmar Now, February 24, 2022: <https://www.myanmar-now.org/en/news/telenor-sale-gets-green-light-from-myanmar-juntas-telecoms-regulator>.
- 74 *Id.*
- 75 The Irrawaddy, January 27, 2022: <https://www.irrawaddy.com/news/burma/myanmars-kbz-group-dissolves-subsidiary-that-operated-jade-mine-with-military.html>
- 76 *Id.*
- 77 *Id.*
- 78 Myanmar Now, February 3, 2022: <https://myanmar-now.org/en/news/kia-attacks-multiple-junta-bases-on-coup-anniversary>.
- 79 *Id.*
- 80 *Id.*
- 81 *Id.*
- 82 *Id.*
- 83 *Id.*
- 84 *Id.*
- 85 *Id.*
- 86 Radio Free Asia, February 25, 2022, <https://www.rfa.org/english/news/myanmar/fighting-02252022154129.html>.
- 87 *Id.*
- 88 *Id.*
- 89 The Irrawaddy, February 7, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-invites-some-ethnic-armed-groups-to-preliminary-peace-talks.html>.
- 90 *Id.*
- 91 The Irrawaddy, February 11, 2022: <https://www.irrawaddy.com/news/burma/myanmar-juntas-union-day-peace-talks-in-doubt-as-most-eaos-wont-attend.html>.
- 92 The Irrawaddy, February 14, 2022: <https://www.irrawaddy.com/news/burma/myanmar-low-level-eao-representatives-attend-junta-union-day-event.html>.
- 93 The Irrawaddy, February 7, 2022: <https://www.irrawaddy.com/news/burma/myanmar-junta-invites-some-ethnic-armed-groups-to-preliminary-peace-talks.html>.
- 94 The Irrawaddy, February 14, 2022: <https://www.irrawaddy.com/news/burma/kia-chief-demands-myanmar-shadow-govt-commitment-to-federal-democracy.html>.
- 95 *Id.*
- 96 *Id.*

97 *Id.*

98 *Id.*