



A BASIC GUIDE TO
**INTERNATIONAL
DIVORCE**



INTRODUCTION

In an increasingly globalised world, families often span multiple jurisdictions. South African citizens marry abroad, foreign nationals settle in South Africa, and children move across borders with their parents. These realities give rise to complex legal questions when family relationships break down. International family law has emerged as a critical field to address these challenges.



This guide has been developed to assist individuals navigating international divorce, parenting disputes, maintenance enforcement, and child relocation across borders. It is designed specifically for those who either reside in South Africa or have a legal or familial connection to South Africa, but are involved in family law disputes with an international dimension.



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INTRODUCTION

Why International Family Law Requires Specialised Attention

Domestic family law principles do not always provide clear answers when:

- One or both parties reside abroad;
- Children have been removed from South Africa or are living in another country;
- The couple is married under a foreign matrimonial property regime;
- A parent seeks to relocate with a child across international borders;
- A maintenance order needs to be enforced in or outside South Africa.

These scenarios require careful legal navigation of South African legislation alongside applicable international treaties, foreign legal systems, and procedural rules.

INTRODUCTION

How This Guide Will Help

This booklet provides a brief, practical overview of:

- Who can get divorced in South Africa where one or both spouses live abroad?
- The legal treatment of foreign marriage regimes and matrimonial property.
- The principles and procedures under the Hague Convention on the Civil Aspects of International Child Abduction;
- The legal framework governing the international relocation of children, whether consensual or contested.
- International maintenance matters, including enforcement under the Reciprocal Enforcement of Maintenance Orders Act;
- Key international treaties include the UN Convention on the Rights of the Child.

Each section concludes with guidance on when to seek legal advice and how Vermeulen Attorneys can resolve cross-border family law issues efficiently and lawfully.

We recommend scheduling a consultation with one of our attorneys for personal advice tailored to your circumstances.

**Nice people don't
necessarily fall in love
with nice people**

”

Jonathan Franzen

What Is an International Divorce?

An **international divorce** occurs when a marital relationship is dissolved through a legal process that involves two or more countries. This could be due to one or both spouses living outside South Africa, being citizens or residents of different countries, or having married under a foreign legal system.

These divorces often involve complex jurisdictional, procedural, and enforcement issues not typically encountered in domestic divorce matters. In such cases, the location of the parties, the law under which they were married, and the country in which they intend to pursue divorce proceedings all influence how the matter is handled.

COMMON SCENARIOS

South African courts frequently deal with international divorces in situations such as:

- One spouse resides in South Africa, the other abroad.

Example: A South African spouse remains domiciled in South Africa while their partner emigrates to the United Kingdom.

- Both spouses are living abroad but maintain legal ties to South Africa.

Example: South African expatriates living in Dubai wish to dissolve their marriage under South African law.

- Foreign nationals living in South Africa wish to divorce.

Example: A Canadian and a German citizen, married abroad, now reside in Cape Town and seek to divorce locally.

WHY INTERNATIONAL DIVORCE IS LEGALLY DISTINCT

International divorce involves:

- Jurisdictional complexity: Determining whether a South African court may legally entertain the divorce action.
- Conflict of laws: Where different countries' laws assign different rights and responsibilities in marriage and divorce.
- Procedural challenges: Difficulties in serving documents abroad, securing appearances, and ensuring legal compliance.
- Enforcement considerations: Ensuring orders granted in South Africa are enforceable in other jurisdictions.

When Is It Appropriate to Use the South African Courts?

South African courts may be used where one or both spouses are either domiciled in South Africa or have been ordinarily resident in South Africa for at least one year prior to the divorce being initiated. These jurisdictional requirements are examined in detail in the next section.

If you are unsure whether your divorce qualifies as an international divorce or whether the South African courts have jurisdiction, consult one of our attorneys to assess your position and plan a practical strategy.

WHO CAN GET DIVORCED IN SOUTH AFRICA?

Determining whether the South African courts have jurisdiction to hear a divorce matter is the critical starting point in any international divorce. Jurisdiction is governed primarily by Section 2(1) of the Divorce Act 70 of 1979, read with the Domicile Act 3 of 1992.

Jurisdictional Grounds

In terms of Section 2(1) of the Divorce Act, a South African court may hear a divorce action if:

- (a) either party is domiciled in the court's jurisdiction on the date of institution of the action; or
- (b) either party is ordinarily resident in the court's jurisdiction on the said date, and has been ordinarily resident in the Republic for a period of not less than one year immediately prior to that date.

In summary, jurisdiction may be established on the basis of:

- Domicile (place considered one's permanent legal home), or
- Ordinary residence for at least one year.

UNDERSTANDING DOMICILE

Domicile is a legal concept with two main forms:

Domicile of Origin

- Acquired at birth;
- Remains unless a domicile of choice is acquired.

Domicile of Choice

As defined in Section 1(2) of the Domicile Act, a person acquires a domicile of choice if they:

- Are lawfully present in a place, and
- Have the intention to settle there for an indefinite period.

This includes South African citizens living abroad who:

- Intend to return to South Africa, or
- Have not formed the intention to remain abroad permanently.

Intention must be inferred from facts such as work permits, property ownership, visa status, or family ties.



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PRACTICAL EXAMPLES OF JURISDICTION

Example 1: One Party Abroad, One in South Africa

H and W are married in community of property in South Africa. H takes a job in New Zealand but maintains an intention to return to South Africa. W remains in South Africa. The court in South Africa has jurisdiction, as H retains South African domicile.

Example 2: Both Parties Living in South Africa, Married Abroad

A couple married in England but have been ordinarily resident in South Africa for several years. The South African court has jurisdiction due to ordinary residence exceeding one year.

Example 3: Both Parties Abroad, No Domicile or Residence in South Africa

W and W were married in Cape Town under a civil union. Both now live in South Korea, a country that does not recognise their marriage. Neither is domiciled nor ordinarily resident in South Africa. The South African courts do **not** have jurisdiction.

WHAT IF YOU WERE MARRIED UNDER FOREIGN LAW?

The marriage doesn't need to have been concluded in terms of South African law for a South African court to grant a divorce. The key issue is jurisdiction, not where the marriage was celebrated.

Determining jurisdiction is often nuanced and fact-specific. If you are unsure about your eligibility to divorce in South Africa, we recommend consulting with an attorney experienced in international divorce law.

FOREIGN MATRIMONIAL PROPERTY REGIMES

When it comes to **dividing assets** in an international divorce, South African courts apply a principle known as the **lex domicilii matrimonii**—the law of the place where the husband was domiciled at the time the marriage was concluded. This principle determines the **proprietary consequences of a marriage** unless the couple has executed a valid antenuptial contract.

WHAT IS LEX DOMICILII MATRIMONII?

The term ***lex domicilii matrimonii*** means “the law of the domicile of the marriage.” Under this principle, the **matrimonial property system** applicable to a couple is governed by the law of the country where the husband was domiciled when the marriage was entered into, regardless of where the marriage was celebrated.

This means:

- If the husband was domiciled in England at the time of marriage, English law applies to the division of property—even if the couple now lives in South Africa.
- If the husband was domiciled in South Africa, South African matrimonial property law (such as community of property or accrual) will apply—unless excluded by antenuptial contract.

This principle has been confirmed by the courts, including in:

- Frankel’s Estate v The Master 1950 (1) SA 220 (A) at 244
- Sperling v Sperling 1975 (3) SA 707 (A) at 716F



CONSEQUENCES OF APPLYING FOREIGN MATRIMONIAL PROPERTY LAW

If South African courts determine that **foreign law applies**, they must consider that country's approach to:

- **Ownership of marital property**
- **Spousal maintenance claims**
- **Claims for redistribution or forfeiture**
- **Recognition of antenuptial contracts or marital agreements**

This often requires **expert evidence** to be led on the content and effect of the foreign legal system, making proceedings more complex and costly.



Gender Equality Concerns and Law Reform

The application of the **lex domicilii matrimonii** has been **criticised for perpetuating gender inequality**, particularly where the proprietary consequences are dictated by the husband's domicile regardless of the wife's status, contributions, or intentions.

In an era of constitutional equality and evolving international norms, the continued use of this principle has been flagged as potentially inconsistent with **Section 9 of the South African Constitution** (the right to equality).

Law reform in this area is anticipated, and the courts may be called upon to develop the common law. However, **as at the date of preparing this guide, the lex domicilii matrimonii** remains the law in South Africa and is applied by our courts.

If your marriage may be subject to a foreign property regime, it is essential to seek legal advice. Our attorneys can assist in assessing the applicable law, obtaining expert opinions where necessary, and structuring your divorce settlement accordingly.



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SERVICE OF DIVORCE DOCUMENTS ABROAD

In international divorce matters, the issue of serving legal documents across borders often presents a significant procedural hurdle. This is especially true in South Africa, where divorce summons must generally be personally served on the defendant, even when the defendant is outside the country.

Personal Service: The General Rule

In terms of South African procedure, divorce summons must be personally served on the defendant because they involve a change in the status of the parties. This applies regardless of where the defendant resides.

- If the defendant is in South Africa, personal service is effected by the sheriff.
- If the defendant is abroad, special court approval is required to serve process outside the Republic.



EDICTAL CITATION AND SUBSTITUTED SERVICE

When a party to a divorce is not physically present in South Africa, or cannot be served through normal methods, South African law provides for two procedural remedies:

Edictal Citation

This is an application to the court to allow service outside the borders of South Africa, typically through:

- Foreign sheriff or court official
- Embassy or consulate
- Registered international courier (where permitted)

Substituted Service

This allows for alternative methods of service within or outside South Africa, such as:

- Email
- WhatsApp
- Social media platforms (with court permission)
- Fax or other electronic means

Both applications must be brought on affidavit, setting out:

1. Why personal service is not possible or practical.
2. The last known whereabouts of the defendant.
3. The proposed method and why it is likely to bring the documents to the defendant's attention.

The court will issue an order directing how service may be effected, and this order must be strictly followed.

STEP-BY-STEP OVERVIEW

1. Prepare affidavit explaining the need for edictal or substituted service.
2. Issue motion application and lodge with the court.
3. Set the matter down for hearing.
4. Appear before the judge or magistrate (in most cases, in chambers).
5. Receive court order setting out how service is to be effected.
6. Serve the documents in accordance with the court's directions.
7. File proof of service to place the matter on the litigation roll.

PRACTICAL CONSIDERATIONS

- Where possible, try to obtain an address or online presence for the other party to support your application.
- Allow for delays when relying on foreign authorities or postal systems.
- Be aware of translation requirements in some jurisdictions.

Proper service is foundational to a valid divorce. Where the other party is outside South Africa, consult an attorney to ensure that edictal or substituted service is correctly obtained and executed.

ENFORCEMENT OF DIVORCE AND RELATED ORDERS INTERNATIONALLY

Securing a divorce order in South Africa is only part of the challenge in **international divorce** cases. When there are financial orders, parenting plans, or maintenance obligations that must be recognised or enforced in another country—or vice versa—additional legal mechanisms must be considered. This section outlines how such enforcement typically works.

CROSS-BORDER ENFORCEMENT CHALLENGES

Key questions often arise:

- Will a foreign court recognise the South African divorce order?
- Can spousal or child maintenance be enforced outside South Africa?
- How can a South African parenting plan be made binding in another jurisdiction?

Different countries follow different rules regarding:

- Recognition of foreign judgments
- Public policy exceptions
- Reciprocal enforcement treaties
- Jurisdictional scrutiny of the original order

Because South African courts do not have authority abroad, parties must rely on international instruments, diplomatic channels, and domestic recognition laws in the foreign country concerned.

THE HAGUE CONVENTION ON THE CIVIL ASPECTS OF INTERNATIONAL CHILD ABDUCTION

South Africa is a contracting party to the **Hague Convention of 1980**, which regulates:

- The **return of children** who have been wrongfully removed or retained across borders.
- **Access arrangements** for parents across different countries.

South Africa's designated **Central Authority** is the Chief Family Advocate, which assists with:

- Applications for the return of children wrongfully removed from or retained in South Africa;
- Requests from foreign countries for the return of children located in South Africa;
- Applications for **cross-border contact rights**.

This Convention is not an enforcement tool in the traditional sense, but it **facilitates cooperation** between countries to resolve cross-border child custody and access disputes swiftly and lawfully.



THE APOSTILLE CONVENTION

The **Hague Convention Abolishing the Requirement of Legalisation for Foreign Public Documents**, commonly known as the **Apostille Convention**, simplifies the process of authenticating documents (such as divorce orders or court affidavits) for use abroad.

- South Africa is a signatory.
- An Apostille certificate, issued by the **Department of International Relations and Cooperation (DIRCO)** or designated High Court officials, confirms the authenticity of the document.

This is often a prerequisite before foreign authorities will consider recognising or acting on a South African court order.

Enforcement Through Private International Law

In the absence of applicable treaties, enforcement may still be possible through:

- Recognition proceedings in the foreign court (mirror orders);
- Civil enforcement actions based on comity of nations;
- Registration of orders under local rules in the foreign jurisdiction.

Legal advice from attorneys in both jurisdictions is often required.

Enforcement across borders requires careful planning. Always consult a legal professional with experience in international family law to assess the enforceability of your order in the target jurisdiction.

HAGUE CONVENTION MATTERS

The **Hague Convention on the Civil Aspects of International Child Abduction**, 1980, is a multilateral treaty designed to address one of the most distressing consequences of international family disputes—the **wrongful removal or retention of children across borders**.

South Africa acceded to the Convention in 1996. Its provisions have since become a **cornerstone of international child abduction law** within the South African legal system.

Purpose of the Convention

The primary aim of the Convention is to:

- Secure the **prompt return** of children wrongfully removed to or retained in a contracting state; and
- Ensure that **custody and access rights** under the law of one contracting state are respected in other contracting states.

The Convention does not resolve long-term custody or guardianship disputes. It exists to ensure that disputes are adjudicated in the **correct forum**—i.e., the child's **country of habitual residence**.

Core Principles

- **Wrongful Removal or Retention:** Occurs when a child is taken across international borders or kept in another country without the consent of the parent who holds lawful custody or guardianship rights.
- **Habitual Residence:** The Convention mandates return to the country where the child was habitually resident before the abduction or retention occurred.
- **Expedited Process:** Proceedings under the Convention are intended to be expeditious, with central authorities and courts working together to minimise disruption to the child.

ROLE OF THE CENTRAL AUTHORITY IN SOUTH AFRICA

The **Office of the Chief Family Advocate** is South Africa's designated Central Authority for purposes of the Convention. Its functions include:

- Assisting with **incoming applications** (where a child has been taken to or retained in South Africa);
- Assisting with **outgoing applications** (where a child has been wrongfully removed from or retained outside South Africa);
- Facilitating **communication with foreign Central Authorities**;
- Supporting the location and safe return of abducted children;
- Coordinating **court proceedings** in South Africa and abroad.



APPLICATION PROCESS

- **Applicant parent** submits an application (with supporting documents) to the relevant Central Authority.
- The Central Authority verifies compliance with the Convention and initiates **judicial proceedings**.
- The South African court assesses:
 - Whether removal or retention was wrongful;
 - Whether any exceptions apply (e.g., grave risk to the child, consent, or settlement in the new country);
 - Whether to order the return of the child.

If a return order is granted, it is enforceable under the South African judicial system, and relevant logistical arrangements are made.



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EXCEPTIONS TO RETURN

The Convention provides for **limited exceptions** to mandatory return, such as:

- Grave risk of physical or psychological harm;
- The child objects to return and is of sufficient age and maturity;
- The applicant delayed proceedings for more than one year and the child has settled;
- The removal or retention was with the consent or acquiescence of the left-behind parent.

These exceptions are construed narrowly and require **clear and convincing evidence**.

RELEVANCE TO SOUTH AFRICAN PARENTS

The Hague Convention provides South African parents with:

- A **legal avenue** to secure the return of children wrongfully taken abroad;
- A mechanism to **resist removal** of children from South Africa;
- An established **framework for international cooperation** on parenting and access disputes.

If you suspect your child has been wrongfully removed from South Africa or you are involved in a cross-border custody dispute, it is essential to act quickly. Our attorneys can assist you with urgent applications under the Hague Convention.

INTERNATIONAL RELOCATION WITH CHILDREN

International relocation refers to the **permanent departure of a parent** or caregiver from South Africa with a minor child, typically to settle in another country. When both parents hold **parental responsibilities and rights**, relocation becomes a legally complex issue, especially when **consent is absent**.

*This section addresses both **consensual** and **contested** international relocations, focusing on the legal framework in South Africa and practical strategies for families navigating this sensitive issue.*

THE LEGAL FRAMEWORK

Under **Section 18(3)(c)(iii) of the Children's Act 38 of 2005**, a parent or guardian may not remove a child from South Africa permanently **without the consent of**:

- The child's other guardians;
- Anyone with parental responsibilities and rights in respect of care or contact;
- The child (if of sufficient age and maturity).

In the absence of consent, the relocating parent must apply to the **High Court** for permission. The overriding consideration is the **best interests of the child**.

RELOCATION WITH CONSENT

Where all holders of parental rights and responsibilities agree to the relocation:

- A **written agreement** should be signed and made an order of court;
- A **parenting plan** should be amended to address practical aspects such as:
 - Communication methods;
 - Holiday contact schedules;
 - Travel arrangements;
- A **mirror order** may be obtained in the destination country to ensure enforceability.

A mirror order is a foreign court order that replicates the terms of the South African court order, offering added protection for compliance in the new jurisdiction.

RELOCATION WITHOUT CONSENT

Where consent cannot be obtained, the parent must:

1. Launch a **relocation application** in the High Court;
2. Provide evidence that the move serves the **child's best interests**;
3. Address key considerations, including:
 - The child's relationship with both parents;
 - The reasons for the move;
 - The feasibility of maintaining meaningful contact with the left-behind parent;
 - Educational, cultural, and developmental impacts.

Courts are cautious in relocation cases, especially when the move may **sever or impair the child's bond** with the remaining parent.

LOSS OF JURISDICTION

If a child is permanently removed from South Africa without consent or court **authorisation**, South African courts may lose jurisdiction over:

- Parenting disputes;
- Care and contact matters;
- Enforcement of parenting plans.

This may complicate or even **invalidate proceedings** brought after relocation, unless the foreign jurisdiction recognises and enforces the South African orders.

PRACTICAL PLANNING FOR RELOCATION

- Engage in early dialogue with the other parent;
- Consider mediation to resolve disputes.
- Have a comprehensive parenting plan in place.
- Obtain legal advice regarding mirror orders and local enforcement mechanisms in the destination country.

Whether you are seeking to relocate or opposing a proposed move, our attorneys can guide you through the legal requirements and help craft a solution that protects your rights and the well-being of your child.

PRACTICAL TIPS FOR PARTIES FACING AN INTERNATIONAL DIVORCE

International divorce proceedings require **more planning, preparation, and legal strategy** than domestic divorce matters. Cross-border considerations—such as jurisdiction, enforceability, logistics, and treaty application—can significantly affect the outcome.

Below are key **practical tips** to help you navigate the process effectively:

MAINTAIN OR ESTABLISH JURISDICTION EARLY

- If you intend to institute divorce proceedings in South Africa, ensure you or your spouse are **either domiciled or ordinarily resident in the country** for the required period.
- Be aware that prolonged overseas residence could unintentionally shift your **domicile**—jeopardising your ability to use South African courts.

IDENTIFY THE APPLICABLE MATRIMONIAL PROPERTY REGIME

- Determine where the husband was domiciled at the time of marriage to establish the **governing law for the division of assets**.
- If foreign law applies, budget for the cost of obtaining **expert evidence**.
- Understand that this principle is still in effect, but is under scrutiny and may evolve in the future.

PLAN AHEAD FOR SERVICE OF DOCUMENTS

- If your divorce order or agreement must be used abroad, ensure it is **apostilled** or otherwise legally recognised in the receiving country.
- Ask your attorney to verify local requirements to avoid rejection of documents due to formal defects.

CONSIDER ENFORCEMENT FROM THE OUTSET

- If you expect to claim **maintenance** from a person abroad—or may need to enforce orders in another jurisdiction—ensure your attorney checks whether the foreign country is part of a **reciprocal enforcement agreement**.
- Where possible, incorporate jurisdiction and enforcement clauses in settlement agreements.

THINK BEYOND THE DIVORCE ORDER

- Consider parenting arrangements, relocation planning, and **mirror orders** in the other country.
- Address **long-term implications** of the divorce, including retirement benefits, child contact across borders, and education plans.

USE LEGAL EXPERTS IN BOTH JURISDICTIONS

- In many cases, it is beneficial to instruct a local attorney in the foreign country alongside your South African attorney.
- This helps anticipate complications in enforcement, recognition, and asset division.

DO NOT DELAY

- Time is often of the essence in international matters—especially when:
- A child has been wrongfully removed;
- You wish to secure jurisdiction in South Africa;
- You require urgent relief from the courts.

International divorce can be daunting, but with early legal advice and coordinated planning, you can protect your rights and those of your children. Vermeulen Attorneys has extensive experience in navigating these matters across borders.



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FREQUENTLY ASKED QUESTIONS (FAQS)

- This section addresses some of the most common questions received from individuals facing international divorce and family law issues. Each answer is general and should be verified against your specific facts with professional advice.

1. Can I get divorced in South Africa if my spouse is overseas?

Yes—provided that you are domiciled or have been ordinarily resident in South Africa for at least one year before filing. The South African courts do not require both parties to be present in the country.

2. Do I need to return to South Africa to get divorced here?

Not necessarily. If you are domiciled in South Africa, you may still initiate divorce proceedings while abroad.

However, physical appearance may be required in some cases, especially if the matter is contested.

3. What happens if my spouse refuses to accept service of documents abroad?

You may apply to court for edictal citation or substituted service, allowing documents to be served via email, WhatsApp, courier, or through foreign authorities. The court will consider whether the method is reasonably calculated to reach the other party

4. Does it matter where I was married?

No. South African courts may grant a divorce regardless of where the marriage was concluded, provided that the jurisdictional requirements under the Divorce Act are met

5. What if my spouse and I live in different countries?

Jurisdiction depends on whether one of you is domiciled or ordinarily resident in South Africa. If neither is, you may need to consider filing in another jurisdiction where one of you has legal standing.

6. Will my South African divorce order be recognised abroad?

Not automatically. Recognition depends on the laws of the foreign country. Many countries require the order to be apostilled or registered locally. Consult a legal expert in the destination country.

7. Can we settle everything even if we live in different countries?

Yes. Many international divorces are resolved through settlement agreements drafted by attorneys and signed electronically. These can be made court orders if both parties cooperate.

8. How do I claim maintenance from someone living overseas?

You may apply under the Reciprocal Enforcement of Maintenance Orders Act if the person resides in a proclaimed country. The order will be forwarded via diplomatic channels to the relevant authority abroad.

9. Can my child be relocated abroad without my consent?

No. A parent may not remove a child from South Africa permanently without the consent of all guardians or a High Court order. If this happens without consent, Hague Convention procedures may be invoked for return.

10. What is a mirror order, and why is it important?

A mirror order is a foreign court order that replicates a South African order—typically relating to parenting. It ensures that the order is enforceable in the new country, offering legal protection and continuity post-relocation.

If you are facing any of the situations described above, we strongly recommend scheduling a consultation with one of our attorneys. Early legal advice can help you avoid costly errors and ensure the best outcome for your family.

FINAL THOUGHTS AND PROFESSIONAL GUIDANCE

- Navigating international divorce and family law matters requires not only an understanding of South African legal principles but also an awareness of foreign legal systems, jurisdictional overlap, treaty obligations, and enforcement mechanisms.
- Whether you are:
 - Living abroad and unsure if you can still get divorced in South Africa;
 - Married under a foreign matrimonial property regime;
 - Attempting to relocate with your child to another country;
 - Seeking to enforce a maintenance order across borders; or
 - Concerned about child abduction under the Hague Convention,
- ...it is critical to obtain advice from attorneys who understand the intersection of local and international law.

WHY CONTACT VERMEULEN ATTORNEYS?

At Vermeulen Attorneys, we have significant experience in:

- Representing South African clients living abroad;
- Advising on multinational divorce settlements;
- Litigating and mediating cross-border parental disputes;
- Working with Central Authorities under international treaties; and
- Facilitating the enforcement of court orders in other jurisdictions.

We are solution-oriented, discrete, and committed to protecting the best interests of your family—locally and internationally.



Contact Us Today

To speak with an attorney who can advise on your unique circumstances:

☎ **Telephone: 010 109 1089**

🌐 **Website: www.vermeulenlaw.co.za**

📍 **Offices: Roodepoort & Ballito**

💻 **Consultations: In person or via MS Teams**

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