



6-12-15

6-12-15

6-12-15

6-12-15

6-12-15

IN THE SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION
(SPECIAL ORIGINAL JURISDICTION)

Writ Petition No.312 of 2012

-AND-

IN THE MATTER OF:

An application under Article 44 and 102 of the Constitution of the People's Republic of Bangladesh.

--AND--

IN THE MATTER OF:

Campaign for Popular Education (CAMPE)
(গণস্বাক্ষরতা অভিযান) and another.

. Petitioners

-Versus-

Bangladesh, represented by the Senior Secretary,
Ministry of Education, Bangladesh Secretariat,
Ramna, Dhaka and others.

. Respondents

Ms. Sara Hossain, with
Mr. Ashraful Hadi, Advocates

.for the Petitioners

Mr. M.A. Moklesur Rahman, DAG with
Ms. Nusrat Jahan, AAG and
Dr. Md. Bashir Ullah, AAG

.for the respondents

Heard on 03.01.2013, 17.06.2013 and 03.10.2013

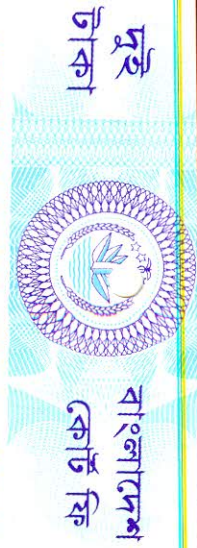
Judgment on 14.11.2014

Present:

Mr. Justice Naima Haider
and
Mr. Justice Zafar Ahmed

Naima Haider, J:

Campaign for Popular Education ("CAMPE") and the Bangladesh Legal Aid and Services Trust ("BLAST"), as petitioners, filed the writ petition under Article 102 of the Constitution, as Public Interest Litigation.



The petitioners, in the writ petition, challenged the imposition of fees and other charges as admission fees or in the form of compulsory donations for enrolment of students by various non-governmental private (primary, secondary and higher secondary) educational institutions across the country in violation of the law. The petitioners also challenged the failure of the respondents in the writ petition to comply with their statutory and constitutional duties to inquire into allegations of charging fees and other charges in excess of the prescribed ceiling fixed by the Ministry of Education under the নিম্নমাধ্যমিক/মাধ্যমিক/মাধ্যমিক ও উচ্চমাধ্যমিক পর্যায়ে বেসরকারি শিক্ষা প্রতিষ্ঠানসমূহে শিক্ষার্থী ভর্তির ক্ষেত্রে অনুসরণীয় নীতিমালা-২০১১; নং-শিম/শা১১/৮-৫৯(ভর্তি -নীতিমালা)/ ২০১১/ ৫৭৮, তারিখঃ ১৪ ডিসেম্বর, ২০১১ and to prosecute and punish those found responsible and provide redress to those affected.

A Division Bench issued Rule Nisi on the following terms by its order dated 09.01.2012:

"Let a Rule Nisi be issued, calling upon the respondents to show cause as to why (i) the impugned imposition of fees and charges in the form of donations and otherwise as set out in Annexure B Serie. in complete disregard for the Guidelines prescribed by the Ministry of Education dated 14.12.2011 by the various educational institutions, across the country and the failure of the respondents Nos. 1 to 14 to comply with their statutory and constitutional duties

23



to take immediate effective measures to prevent such imposition of fees for admission by the educational institutions, or to investigate such allegations, or to prosecute and punish those found in breach of the said Guidelines and/or the applicable laws should not be declared to be without lawful authority or of no legal effect and/or unconstitutional being in violation of fundamental rights guaranteed under Articles 15, 16, 17, 27 and 31 of the Constitution respectively, and/or as to why (ii) they should not be directed to take immediate action to investigate the incidents detailed in Annexure B Series and to take appropriate action against those responsible (iii) they should not be directed to take appropriate measures to a) provide a report to this Hon'ble Court on whether there has been any investigation into the allegations above, among others, regarding excessive charging of admission fees, and if so, whether and what action has been taken against those responsible; b) require schools inspectors to inspect non-Governmental private educational institutions in the country to assess the extent to which they are charging fees for admission; c) take necessary and exemplary action against the institutions found to be in violation of the prescribed ceiling on admission fees as provided for in the said Guidelines direct the respondents to cancel the registration of the schools/institutions and/or the MPO registration of the schools/institutions which have been found to be violating the said Guidelines dated 14.12.2011; d) adopt a clear and time-bound plan for regular monitoring of all



governmental and non-governmental private educational institutions for compliance with the admission fee ceiling; and e) direct the respondents to take immediate effective steps and ensure that the errant schools/institutions refund the excess fees/charges extracted from the guardians, and/or why such other or further order or orders, as this Court may deem fit and proper, should not be passed.”

Pending hearing of the Rule, the respondents Nos.1 to 13, being the Ministry of Education, Ministry of Primary and Mass Education, Directorate of Primary Education, Directorate of Secondary and Higher Education and all Education Boards, were directed to submit a report to this Court within three months on the measures taken by them to investigate, prosecute and punish educational institutions that had imposed fees and charges in the pretext of donations and otherwise in the alleged disregard to the Guidelines, prescribed by the Ministry of Education, dated 14.12.2011.

It appears that the Ministry of Education had fixed the ceiling of the admission fees vide its নীতিমালা bearing No. bs-wkg/kvr11/8-59 (ভর্তি নীতিমালা)/২০১১/৫৭৮ (নিম্নমাধ্যমিক /মাধ্যমিক /মাধ্যমিক ও উচ্চমাধ্যমিক পর্যায়ের বেসরকারি শিক্ষা প্রতিষ্ঠানসমূহে শিক্ষার্থী ভর্তির ক্ষেত্রে অনুসরণীয় নীতিমালা-২০১১) dated 14 December 2011. Clause 9 sets out the maximum allowable fees that can be charged by non-government educational institutions: “ভর্তির আবেদন ফরমের মূল্য ও ভর্তি ফি : ভর্তির আবেদন ফরমের জন্য সর্বোচ্চ

৫৫



১০০/- (একশত) টাকা গ্রহণ করা যাবে। সেশন চার্জসহ ভর্তি ফি সর্ব সাবুল্যে মফস্বল এলাকায় ৫০০/- (পাঁচশত)/পৌর (উপজেলা) এলাকায় ১০০০/- (এক হাজার)/ পৌর (জেলা সদর) এলাকায় ২০০০/- (দুই হাজার)/ ঢাকা ব্যতীত অন্যান্য মেট্রোপলিটন এলাকায় ৩০০০/- (তিন হাজার)/ ঢাকা মেট্রোপলিটন এলাকায় ৫০০০/- (পাঁচ হাজার) টাকার বেশি হবে না।” Clause 10 of the said নীতিমালা provides that failure to abide by the rules will prompt the Government to take action against the concerned educational institutions including cancellation of their receipt of Monthly Pay Order (MPO) from the Government in the following terms: “ভর্তির ফরম এবং ভর্তির ফি বাবদ সরকার কর্তৃক নির্ধারিত অর্থের চেয়ে অতিরিক্ত অর্থ আদায় করা যাবে না, করলে সরকার এমপিও বাতিলসহ আইনানুগ ব্যবস্থা গ্রহণ করবে।”

It was reported in national newspapers that many schools in Dhaka City alone are charging from Taka 8,000 upto Taka 32,000 as admission fees or as donations which are required to be paid as pre-requisite of admission. The petitioners, relying on newspaper publications drew our attention to different schools within Dhaka, such as Monipur School and College, Viqarinnisa Noon School and College, Willes Little Flower Higher Secondary School, Agrani School and College etc which are not complying with the নীতিমালা bearing No. bs-wkg/kvr11/8-59 (ভর্তি নীতিমালা)/২০১১/৫৭৮ (নিম্নমাধ্যমিক /মাধ্যমিক /মাধ্যমিক ও উচ্চমাধ্যমিক পর্যায়ের বেসরকারি শিক্ষা প্রতিষ্ঠানসমূহে শিক্ষার্থী ভর্তির ক্ষেত্রে অনুসরণীয় নীতিমালা-২০১১) dated 14 December

১৫



2011 issued by the Ministry of Education. It is in this context, the petitioners approached this Bench for necessary intervention and it is in this context, this Division was inclined to issue Rule Nisi and pass interim order, as set out above.

Interestingly, this writ petition had not been seriously contested by the respondents. On 14.01.2013, the respondent No.1- Ministry of Education filed its Affidavit in compliance informing us that the নীতিমালা dated 14.12.2011 was amended by Notification bearing Memo No. শিম/শাঃ১১/৮-৫৯(ভর্তি নীতিমালা)/২০১১/৬৮ dated 31.01.2012 titled “নিম্নমাধ্যমিক/মাধ্যমিক/মাধ্যমিক ও উচ্চমাধ্যমিক পর্যায়ে বেসরকারি শিক্ষা প্রতিষ্ঠানসমূহে শিক্ষার্থী ভর্তির ক্ষেত্রে অনুসরণীয় নীতিমালা-২০১১ এর সংশোধনী”. The said amendment Notification dated 31.01.2012 is as follows:

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
শিক্ষা মন্ত্রণালয়
বাংলাদেশ সচিবালয়, ঢাকা
নং-শিম/শাঃ১১/৮-৫৯(ভর্তি নীতিমালা)/২০১১/৬৮ তারিখঃ
৩১/০১/২০১২

বিষয় : নিম্নমাধ্যমিক/মাধ্যমিক/মাধ্যমিক ও উচ্চমাধ্যমিক পর্যায়ে বেসরকারি শিক্ষা প্রতিষ্ঠানসমূহে শিক্ষার্থী ভর্তির ক্ষেত্রে অনুসরণীয় নীতিমালা-২০১১ এর সংশোধনী।

সূত্র নং- শিম/শাঃ১১/৮-৫৯(ভর্তি নীতিমালা)/
২০১১/৫৭৮, তারিখ : ১৪/১২/২০১১

সূত্রস্থ স্মারকের অনুবৃত্তিক্রমে নির্দেশক্রমে জানানো যাচ্ছে যে, ঢাকা মেট্রোপলিটন এলাকায়

৬৫



অবস্থিত শিক্ষা প্রতিষ্ঠানে ২০১২ সনে শিক্ষার্থী ভর্তির ক্ষেত্রে নিম্নোক্ত সিদ্ধান্ত গ্রহণ করা হয়েছেঃ

(ক) ঢাকা মেট্রোপলিটন এলাকায় অবস্থিত এমপিওভুক্ত শিক্ষা প্রতিষ্ঠানসমূহ শিক্ষার্থী ভর্তির ক্ষেত্রে সরকার কর্তৃক ইতোপূর্বে নির্ধারিত ৫০০০/- (পাঁচ হাজার) টাকার অতিরিক্ত অর্থ আদায় করতে পারবে না। কোন প্রতিষ্ঠান এর অতিরিক্ত অর্থ আদায় করে থাকলে তা পরবর্তীতে মাসিক বেতনের সাথে সমন্বয় করতে হবে অথবা ফেরত দিতে হবে।

(খ) ঢাকা মেট্রোপলিটন এলাকায় অবস্থিত আংশিক এমপিওভুক্ত শিক্ষা, প্রতিষ্ঠানের উন্নয়ন এবং এমপিও বহির্ভূত শিক্ষকদের বেতন-ভাতা প্রদানের জন্য শিক্ষার্থী ভর্তির সময় মাসিক বেতন, সেশন চার্জ ও উন্নয়ন ফি সহ বাংলা মাধ্যমে সর্বোচ্চ ৮০০০/- (আট হাজার) টাকা এবং ইংরেজি মাধ্যমে সর্বোচ্চ ১০,০০০/- (দশ হাজার) টাকা গ্রহণ করতে পারবে। কোন প্রতিষ্ঠান এর অতিরিক্ত অর্থ আদায় করে থাকলে তা পরবর্তীতে মাসিক বেতনের সাথে সমন্বয় করতে হবে অথবা ফেরত দিতে হবে। উন্নয়ন খাতে কোন প্রতিষ্ঠান ৩০০০/- (তিন হাজার) টাকার বেশী আদায় করতে পারবে না।

(গ) দরিদ্র, মেধাবী ও প্রতিবন্ধী শিক্ষার্থী ভর্তিতে নিম্নমাধ্যমিক/মাধ্যমিক/মাধ্যমিক ও উচ্চ মাধ্যমিক শিক্ষা প্রতিষ্ঠান উল্লেখিত ফি যতদূর সম্ভব মওকুফের প্রয়োজনীয় ব্যবস্থা গ্রহণ করবে।

২। এ সংশোধনী উপর্যুক্ত সূত্রে জারিকৃত নীতিমালার অবিচ্ছেদ্য অংশ মর্মে গণ্য হবে।

স্বাঃ (অপাঠ্য)

৩১.০১.১২

(মোহাম্মদ নাসির উদ্দীন)

সিনিয়র সহকারী সচিব

The respondent No.1- Ministry of Education informed this Bench

that pursuant to the direction of this Division, the Directorate of the

৩৭



Secondary and Higher Secondary Education had conducted an investigation and submitted a report dated 19.1.2012 to the Ministry of Education showing the amount of fees charged by different schools and colleges. The investigation was conducted in respect of 32 schools in Dhaka of which eight schools were found to have charged admission fees below TK. 5,000/- (within the prescribed limit), ten schools between Tk.5,000/- to Tk. 10,000/- and 14 schools in excess of Tk.10,000/-. On the basis of the above report, the Ministry of Education arranged a 'View Exchange Meeting' with the Secretary, Joint Secretary and Heads of Institutions. Key findings and decisions as noted in the meeting and stated in the report were as follows: (1) Schools/Institutions within Dhaka Metropolitan Area with MPO cannot charge more than Tk. 5000 as admission fees, (2) Schools/Institutions within Dhaka Metropolitan Area with partial MPO can charge a maximum of Tk. 8000 (Bangla version) and Tk. 10000 (English version) as admission fees, monthly fees, session charges and development fees, (3) No school/institution can charge more than Tk. 3000 for development purposes. We were also informed that the National Security Intelligence independently conducted an inquiry and submitted its report on 14.5.2012 showing the amount of fees and charges by different schools and colleges. The key findings of the report submitted by the National Security Intelligence were that: (1) 46 of the Non-Government Schools all over the country are charging 3% to 800% more admission fees than the maximum limit set by the Government, (2) parents faced certain difficulties in admitting their children in such schools, (3)

৫২



recommendations included imposing a penalty on schools which are not abiding these provisions. We were further informed that the Directorate of the Secondary and Higher Secondary Education formed another Inspection Team on the basis of the report dated 14.5.2012 which submitted its findings on 18.6.2012. This report contained detailed information from 17 schools of Dhaka regarding the amount of additional fees taken; the amount of additional fees already adjusted with the students' monthly fees and the refunded amount of additional fees.

The petitioners filed a Supplementary Affidavit on 13.06.2013 annexing copy of another নীতিমালা dated 13.11.2012 bearing No. নং- ৩৭.০০.০০০০.০৭২.৪৪.০৯০.১২-৭৯৭ and titled বেসরকারি স্কুল/স্কুল এন্ড কলেজে মাধ্যমিক, নিম্ন মাধ্যমিক ও সংযুক্ত প্রাথমিক স্তরে শিক্ষার্থী ভর্তি নীতিমালা-২০১২ issued by the respondent No.1, the Ministry of Education. Clause 10 and clause 22 of the said Notification dated 13.11.2012, read together provide that in the event of any educational institution's failure to abide by the Notifications, the Government shall take action against the concerned institution including cancellation the Monthly Pay Order (MPO) paid by the Government and cancellation of the school's registration or academic license. We set out below the relevant provisions (Clauses 9, 10 and 22) of the said Notification dated 13.11.2012:

“৯. ভর্তির আবেদন ফরমের মূল্য ও ভর্তি ফি :

(ক) ভর্তির আবেদন ফরমের জন্য ঢাকা মেট্রোপলিটন এলাকার আংশিক এমপিওভুক্ত প্রতিষ্ঠানে সর্বোচ্চ ২০০/- (দুইশত) টাকা, সম্পূর্ণ এমপিওভুক্ত প্রতিষ্ঠানে সর্বোচ্চ

৯



১৫০ (একশত পঞ্চাশ) টাকা, এবং ঢাকা মেট্রোপলিটন এলাকা ব্যতীত দেশের সকল প্রতিষ্ঠানে সর্বোচ্চ ১০০/- (একশত) টাকা গ্রহণ করা যাবে।

(খ) সেশন চার্জসহ ভর্তি ফি সর্ব সাবুল্যে মফস্বল এলাকায় ৫০০/- (পাঁচশত)/পৌর(উপজেলা) এলাকায় ১০০০/- (এক হাজার)/পৌর (জেলা সদর) এলাকায় ২০০০/- (দুই হাজার)/ ঢাকা ব্যতীত অন্যান্য মেট্রোপলিটন এলাকায় ৩০০০/- (তিন হাজার) টাকার বেশি হবে না।

(গ) ঢাকা মেট্রোপলিটন এলাকায় অবস্থিত এমপিওভুক্ত শিক্ষা প্রতিষ্ঠানসমূহ শিক্ষার্থী ভর্তির ক্ষেত্রে ৫০০০/- (পাঁচ হাজার) টাকার অতিরিক্ত অর্থ আদায় করতে পারবে না। ঢাকা মেট্রোপলিটন এলাকায় অবস্থিত আংশিক এমপিওভুক্ত শিক্ষা প্রতিষ্ঠানের উন্নয়ন এবং এমপিও বহির্ভূত শিক্ষকদের বেতন-ভাতা প্রদানের জন্য শিক্ষার্থী ভর্তির সময় মাসিক বেতন, সেশন চার্জ ও উন্নয়ন ফি সহ বাংলা মাধ্যমে সর্বোচ্চ ৮০০০/- (আট হাজার) টাকা এবং ইংরেজি ভাষানে সর্বোচ্চ ১০,০০০/- (দশ হাজার) টাকা গ্রহণ করতে পারবে। উন্নয়ন খাতে কোন প্রতিষ্ঠান ৩০০০/- (তিন হাজার) টাকার বেশি আদায় করতে পারবে না।

(ঘ) দরিদ্র, মেধাবী ও প্রতিবন্ধী শিক্ষার্থী ভর্তিতে সংশ্লিষ্ট শিক্ষা প্রতিষ্ঠানসমূহ উল্লেখিত ফি তদদুর সম্ভব মওকুফের প্রয়োজনীয় ব্যবস্থা গ্রহণ করবে।

১০. ভর্তির ফরম এবং ভর্তির ফি বাবদ সরকার কর্তৃক নির্ধারিত অর্থের চেয়ে অতিরিক্ত অর্থ আদায় করা যাবে না, করলে সরকার এমপিও বাতিলসহ আইনানুগ ব্যবস্থা গ্রহণ করবে।

...

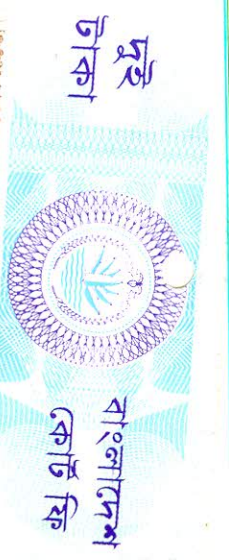
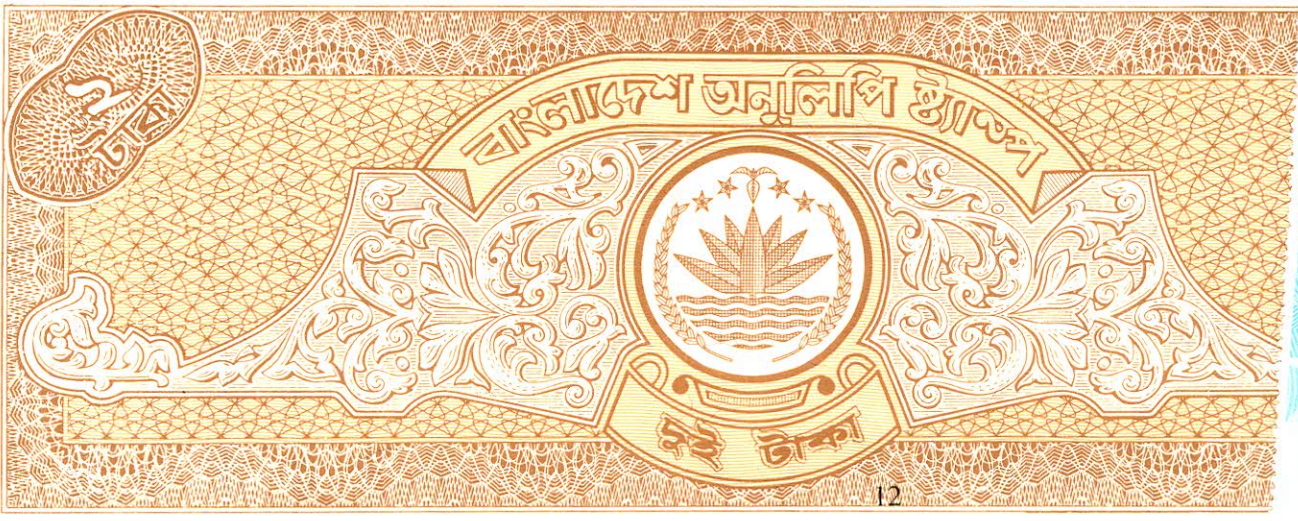
২২. এ নির্দেশনার কোনরূপ ব্যত্যয় ঘটানো হলে বেসরকারি শিক্ষা প্রতিষ্ঠানের ক্ষেত্রে পাঠদানের অনুমতি



বা একাডেমিক স্বীকৃতি বাতিলসহ প্রতিষ্ঠানের
এমপিওভুক্তি বাতিল করা হবে।”

Through the Supplementary Affidavit, the petitioners informed this Bench that though several schools continued to violate the provisions of the said notifications issued by the Ministry of Education by continuing to charge excessive admission fees, the respondents did not take any effective measures to stop the gross malpractice. The respondent No. 14- Bangladesh Madrasah Education Board, through Affidavit in Opposition informed this Bench that there has been no allegation of imposition of extra charge/fees in any Madrasah and accordingly the Rule was wrongly issued on it. On 28.07.2013, by another Affidavit In Compliance, the respondent No.1- Ministry of Education informed us that it had held enquiries against Motijheel Ideal School and College, and Viqarunnisa Noon School and College (English medium) and submitted its report on 14.5.2013. The findings of the Ministry of Education report are that Motijheel Ideal School failed to implement the নীতিমালা dated 27.11.2012 whereas Viqarunnisa Noon School and College (English medium) has implemented the said নীতিমালা dated 27.11.2012. Motijheel Ideal School and Viqarunnisa Noon School and College (English medium) issued letters on 14.7.2013 to Director General, Directorate of Secondary and Higher Education (DSHE) informing that it has partially adjusted excess admission fees as per নীতিমালা dated 27.11.2012. Monipur High School and College issued its letter dated 4.7.2013 to Director General, Directorate of Secondary and Higher Education (DSHE) informing that it has not charged any excess admission fees and has followed the নীতিমালা dated

11



27.11.2012. However, it appeared from the report that no action had been taken against any other schools in this connection.

It seems to us that the respondent No.1-Ministry of Education is empowered to make rules and regulations dealing with the admission fees etc. The power is conferred by the Rules of Business, in particular, Schedule 1 of the Rules of Business. Schedule 1 of the Rules of Business, 1996 provides as the allocated businesses of Ministry of Education, amongst others, educational policy and reforms (Secondary, Higher Secondary and University education), fees in respect of any subjects allotted to this Division except fees taken in courts.

Ms. Sara Hossain, the learned Advocate appearing on behalf of the petitioners has taken us through the writ petition and the documents filed by the respondents. Ms. Hossain submitted that the policies framed by the respondent No.1-Ministry of Education are binding on the schools. It was also pointed out that the respondent No.1-Ministry of Education is under an obligation to monitor the implementation of any rules, regulations and/or guidelines framed in exercise of powers conferred by the Rules of Business 1996. We agree Ms. Hossain's submission in this regard.

Ms. Hossain also submitted that impugned actions namely the excessive amount of admission fees imposed by the educational institutions constitute a breach of the provisions of the two নীতিমালা as amended and contravention of the applicable laws, under which the respondents have statutory duties to investigate and take appropriate actions which they have failed to do. It was also submitted that imposition of admission fees

১২



beyond the prescribed limit constitutes violation of the fundamental rights guaranteed under the Constitution and that as the guardians of the Constitution, we are required to intervene. We take a note of her submission.

In light of the affidavits filed by the respondent No.1-Ministry of Education, it appears that the Government has taken some steps to ensure that the policy is adhered to. We see that there had been compliance, if not full. The respondents did not argue that the Rule is not maintainable; rather through affidavits, the respondents have informed this Bench that steps are being taken and the process is continuous. We see substance in the arguments advanced by the respondent No.1- Ministry of Education through the learned Deputy Attorney General. However, we are not entirely convinced that all that was necessary was done. Accordingly, this Court is of the view that the respondent No.1 should be more proactive and should take rigorous steps to ensure that its decision is complied with.

Ms. Hossain took us through Articles 15 and 17 of the Constitution and placed before us the decision of the Supreme Court of India in the case of *Mohini Jain v. Karnataka*, AIR 1992 SC 1858 in which their Lordships held:

'17. ... every citizen has a 'right to education' under the Constitution. ... The State may discharge its obligation through State-owned or State-recognised educational institutions. When the State Government grants recognition to the private educational institutions it creates an agency to fulfill its obligation under the

13/3



Constitution. The students are given admission to the educational institutions - whether State-owned or State recognised in recognition of their 'right to education' under the Constitution. Charging capitation fee in consideration of admission to educational institutions is a patent denial of a citizen's right to education under the Constitution.'

Our attention had also been drawn to the Mahmudul Islam's commentary in *Constitution of Bangladesh* (Third edition, Page 213-214) which reads as follows:

'The fundamental principles of State policy of the Constitution in respect of education are similar to the directive principles of State Policy of the Indian Constitution. On the other hand, art. 31 is wider in scope than art.21 of the Indian Constitution. There is no reason why the decisions of the Indian Supreme Court in this regard shall not be applicable in our jurisdiction.'

In addition, it was submitted that the State has obligations under its international human rights treaty commitments to ensure the rights of all citizens to access to education.

Given that the Rule is not opposed and that the respondent No.1- Ministry of Education by affidavit informed this Bench that it has taken steps to implement the policy regarding admission fees, we do not feel that it is necessary for us to go into the detailed analysis as to whether education should be considered as a "fundamental right" or a right akin thereto. It is

14



also not necessary analyze whether there had been any violation of any constitutional position.

Simply put, in our opinion, the policies adopted by the Government (relied upon by the petitioner) have binding effect on the educational institutions and must be followed. Also in our opinion, the respondent No.1- Ministry of Education, should ensure, directly and/or through other organizations that the educational institutions follow its policy relating to admission fees and that if not followed, it should take steps against the concerned educational institutions for non compliance. This, the respondent No.1-Ministry of Education must do strictly.

We part the aforesaid observation and make the Rule absolute with a *continuing mandamus* upon the respondent No.1- Ministry of Education to ensure that its policy regarding admission fees are being followed strictly and that educational institutions are not allowed to take steps prejudicial to the interest of the students generally.

Before parting with the judgment we would like to extend our special gratitude to the Deputy Attorney General for providing all necessary assistance to us.

The Rule is made absolute, with the above direction without any order as to costs.

Naima Haider.

Zafar Ahmed, J:

I agree

Zafar Ahmed

Type by: A. Motin: 06.12.2015.

Read by: *[Signature]* 06/12/15

Exm. by: *[Signature]* 06.12.15

Readied by:

[Signature]
6.12.15
[Signature]

15