

Plausible Deniability *or How Leaders May Try to Conceal Their Roles*

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International Criminal Court/Office of the Prosecutor
ICC/OTP Guest Lecture, 18 May 2010

NB: The views expressed in this presentation are those of Professor Dorn and do not necessarily reflect ICC/OTP or Canadian government policy.

Overview

- I. Plausible Deniability: definition and scope
- II. Origins and Examples in US Intelligence
- III. Purposes and Methods
- IV. Challenging “Plausible Deniers”
- V. ICC applications

I. Definition and Scope

OED Definition

plausible deniability *n.* *Polit.* (the possibility of) denying a fact (esp. a discreditable action) without arousing suspicion; the method of achieving this.

1974 *Washington Post* 14 Sept. A2/3 Author David Wise also objected that the **secret** activities also required a policy of 'plausible deniability' on the part of **U.S.** officials when publicly questioned about them.

1987 *N. Y. Times* (Nexis) 8 Jan. A1/5 Investigators want to know..whether Mr. Reagan's open support for the **contras** was translated into action that he and other senior officials now find it convenient to repudiate... According to several Administration officials, the **White House** in the last few years had used the technique of 'plausible deniability'.

2001 *New Republic* 8 Oct. 8/2 So the Agency [sc. the **CIA**] tried to avoid direct involvement in the war, and to maintain plausible deniability... The U.S. provided the **mujahedin** only Eastern-bloc weaponry, so the rebels could claim they had captured it from Soviet troops rather than received it from Washington.

(Note: All three examples apply to deniability of US government.)

The Oxford Essential Dictionary of the U.S. Military

With respect to clandestine operations:

**the state of being capable of being denied
by those in authority.**

- “Plausible deniability.” *The Oxford Essential Dictionary of the U.S. Military*. 2001. Retrieved April 23, 2010 from Encyclopedia.com:
<http://www.encyclopedia.com/doc/1O63-plausibledeniability.html>

Spectrum of meaning

- **Capacity** to deny plausibly
- Capacity of **authorities/leaders** to deny plausibly actions of subordinates
- **Scheme** so authorities/leaders could deny plausibly actions of subordinates

Working Definition

A method or scheme to allow an authority to deny, in a plausible fashion, responsibility for illegal or discreditable acts performed by subordinates.

Before vs During a Trial

- “Plausible denial”
 - Legitimate objective of most defence teams
 - Not necessarily fraudulent or immoral
- “Plausible deniability”
 - Scheme concocted before, during or after a crime, to gain the capacity
 - Fraudulent when linked to a lie or deception. (Hiding a truth is not necessarily unlawful or immoral.)

Characteristics

- Plausible, though not necessarily convincing
 - Leaving “reasonable doubt”
 - Leaders may benefit from suspicion of responsibility
- Legally, leaders would rather admit being unaware than being responsible or involved
 - Being unaware not sufficient excuse under Rome Statute
 - For military commanders who “should have known”
 - For a superior who “consciously disregarded information” AND failed to take measures to prevent or redress.
- Range of means
 - From simple to sophisticated
 - From passive to active
- Big challenge for investigators and prosecutors

In the Legal Literature (mostly US)

- Military misconduct
- Private military contractor misuse
- Arms trafficking
- Investment fraud
- Medical malpractice
- Internet fraud
- Copyright evasion
- Sexual offences
- Questionable legal conduct in the courtroom

- International humanitarian law (IHL)
 - Strategy of genocidaires in the Rwandan genocide

Example: Privateers, 16th-19th Centuries

“because ***privateers*** were privately financed, and the vessels were not subject to traditional rules of naval discipline, privateering offered a way for governments to have ‘plausible deniability’ in situations where privateers exceeded the legal bounds of warfare at the time.”

– David J Bederman, *Max Planck Encyclopedia of Public International Law*, "Privateering"

Reference: http://www.mpepil.com/subscriber_article?script=yes&id=/epil/entries/law-9780199231690-e382&recno=1&searchType=Quick&query=%22plausible+deniability%22

Plausible Deniability in ICTY Proceedings (2010)

“All the Herceg-Bosna HVO leadership claims – either was or claimed – to be out of Mostar at the time?” [9 May 1993, during attack on Mostar] “Was there some sort of a discussion of some cover-up or plausible deniability ...”

- Mr Kenneth Scott, OTP, 9 March 2010, www.icty.org/x/cases/prlic/trans/en/100309IT.htm

In ICTY Judgement (2009) re. Kosovo 1999

[For FRY and Serbian leadership]

The NATO bombing provided an opportunity to the members of the joint criminal enterprise—an opportunity for which they had been waiting and for which they had prepared by moving additional forces to Kosovo and by the arming and disarming process described above—to deal a heavy blow to the KLA [Kosovo Liberation Army] and to displace, both within and without Kosovo, enough Kosovo Albanians to change the ethnic balance in Kosovo and maintain control over the province. And now this could all be done with **plausible deniability** because it could be blamed not only upon the KLA, but upon NATO as well.

Case No. IT-05-87-T, Judgment of 26 February 2009, PROSECUTOR V. Milan Milutinović, Nikola Šainović, Dragoljub Ojdanić, Nebojša Pavković, Vladimir Lazarević, Sreten Lukić, www.icty.org/x/cases/milutinovic/tjug/en/jud090226-e3of4.pdf. (emphasis added)

II. Origins and Examples in US Intelligence Practice

US Government Directive, 1948

“A new Office of Special Projects shall be created within the Central Intelligence Agency to plan and conduct **covert operations** ...

“As used in this directive, ‘covert operations’ are understood to be all activities (except as noted herein) which are conducted or sponsored by this Government against hostile foreign states or groups or in support of friendly foreign states or groups but which are so **planned and executed that any US Government responsibility for them is not evident to unauthorized persons** and that if uncovered the US Government can **plausibly disclaim** any responsibility for them.

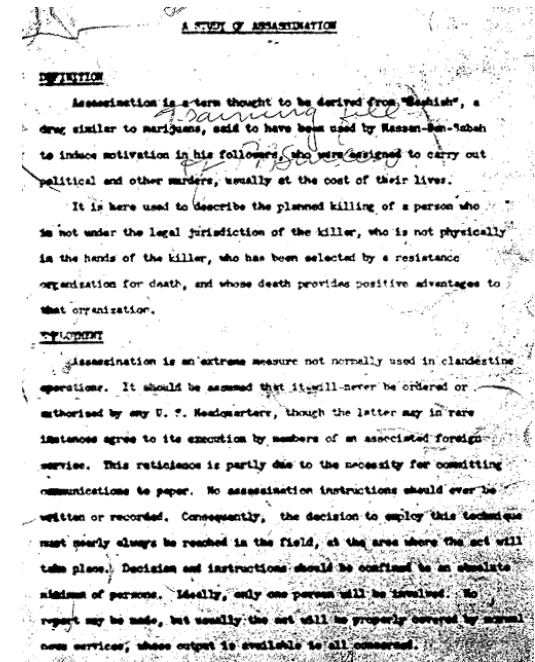
- National Security Council Directive on Office of Special Projects, Washington, June 18, 1948. NSC 10/2, FRUS, *Foreign Relations of the United States, 1945-1950*, “Emergence of the Intelligence Establishment,” Document 292.

Guatemala (1950s)

CIA Manual, "A Study of Assassination"



“No assassination instructions should ever be written or recorded. Consequently, the decision to employ this technique must nearly always be reached in the field, at the area where the act will take place. Decision and instructions should be confined to an absolute minimum of persons. Ideally, only one person will be involved.



Chile (1963-64)

- Covert support to President Eduardo Frei Montalva
- “Special Group” in the White House situation room authorized secret financing of campaign
- Funds “provided in a fashion causing Frei to infer United States origin of funds and yet permitting plausible denial,” so that the CIA could “achieve a measure of influence” over the party and its leader.
- Millions were spent on propaganda and activities to scare voters away from Salvador Allende's coalition.

Source: “CHILE 1964: CIA COVERT SUPPORT IN FREI ELECTION DETAILED; OPERATIONAL AND POLICY RECORDS RELEASED FOR FIRST TIME,” “National Security Archive Commends State Department, CIA for Declassification,” September 25, 2004, available at <http://www.gwu.edu/~nsarchiv/news/20040925>. And United States Senate Report, “Covert Action in Chile, 1963-1973,” U.S. Government Printing Office Washington. D.C., 1975.

Nixon's "Plumbers" (1972)

- Covert White House
“Special Investigations Unit”
 - though President's Counsel
- Watergate hotel, door locks taped: small error with big consequences
- Burglar with funds, bank account linked to “Committee to Re-Elect the President”
 - Attorney General John Mitchell controlled secret Republican fund to finance intelligence-gathering against the Democrats.
- FBI: Watergate part of a massive campaign of political spying and sabotage
- Nixon re-elected in landslide
- “Deep Throat” (Deputy FBI Director) pointed to Nixon aids
 - Anonymous source



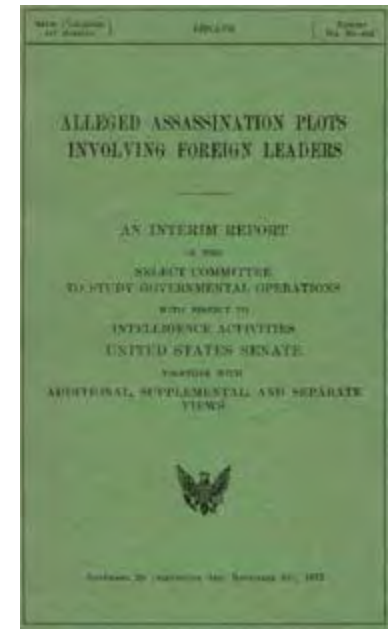
Watergate (1973-74)

- Nixon accepts resignation of two influential aides
 - fires White House Counsel John Dean, who become key witness
- Special prosecutor investigation
- White House tapes subpoenaed (18½ minute portion erased).
- Nixon-Haldeman plan to prevent release
 - claim national security to prevent release
 - use CIA to stop FBI investigations
 - "smoking gun" shows President had lied
- Congressmen switched to support impeachment



Church Committee (1974-75)

- CIA assassinations
 - Lumumba
 - “It is likely that President Eisenhower's ... strong ... concern about Lumumba...was taken by [CIA director] Allen Dulles as authority to assassinate Lumumba.”
 - CIA officials ordered a staff scientist (code-named "Joe") to prepare “toxic biological materials” that would "produce a disease...indigenous to that area [of Africa]" (p.13)
- “Plausible denial’ can also lead to the use of **euphemism and circumlocution**, which are designed to allow the President and other senior officials to deny knowledge of an operation should it be disclosed.
- “The converse may also occur; a President could communicate his desire for a sensitive operation in an indirect, circumlocutious manner. An additional possibility is that the President may, in fact, not be fully and accurately informed about a sensitive operation because he failed to receive the ‘circumlocutious’ message.”
 - Church Committee report, page 11



Contra Guerrillas: “Psychological Operations in Guerrilla Warfare” (1980s)

- CIA manual disseminated to Contras
- Existence revealed in 1984 (AP)
- CIA claimed manual was to “moderate” the extreme violence exhibited by the Contras
- “it is possible to neutralize [kill] carefully selected and planned targets, such as court judges, mesta judges, police and State Security officials, CDS chiefs, etc.”
- “kidnap all officials or agents of the Sandinista government.”
- violated President Ronald Reagan’s 1981 executive order banning political assassinations

Official Responses

- Claim: Manual written by an “overzealous” independent low-level employee under contract to the CIA
- Manual not cleared for publication
- Lower level CIA officials claimed responsibility but received little punishment

Nicaragua (1984)

“Unilaterally Controlled Latino Assets”:

Latino mercenaries, naturalized US citizens, with some military experience to conduct sabotage

e.g., mine Nicaraguan harbours, blow up pipelines and make it look like it was done by local rebels

Nicaragua v. US (1986)

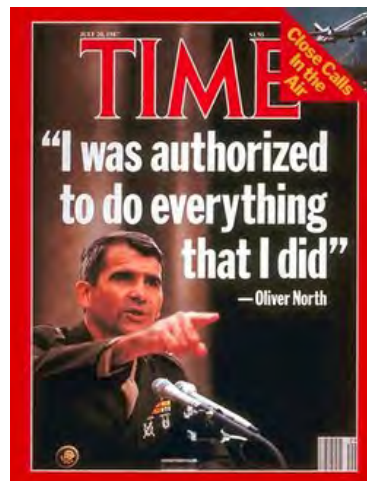
ICJ Judgment

- In producing and disseminating manual, USA *encouraged acts* contrary to IHL and to common Article 3 of the Geneva Conventions
- By training, arming, and supporting Contras, USA was “in breach of its obligation under customary international law not to intervene in the affairs of another State.”
- In section “The facts imputable to the United States”
 - “the **President** of the United States authorized a United States Government agency to lay **mines** in Nicaraguan ports.”
 - Also US failed to “issue any public and official warning to international **shipping** of the existence and location of the mines.”
- avalanche of international condemnation.
- US Congress passes Boland Amendment banning US support for Contras

Iran-Contra Affair (1986-87)

“I made a deliberate decision not to ask the President, so that I could insulate him from the decision and provide some future deniability for the President if it ever leaked out.”

- National Security Adviser John Poindexter



Congressional Hearings

- Sen. Sam Nunn (D-Ga.) to Adm. John Poindexter
- Nunn: “Admiral, you've used the term during the course of the last four or five days a good many times, the term `plausible deniability.’”
- Poindexter: “Correct.”
- Nunn: “Everybody I've talked to in the intelligence community and around town . . . tells me that the definition of that term is that when you set up plausible deniability for someone . . . **they know the facts in question, but they can deny the knowledge**, and that the denial is believable.”
 - PLAUSIBLE DENIABILITY Series: The Iran-Contra Hearings: The Tenth Week of Testimony

Recent Example

“The United States has long tried to maintain **plausible deniability** that it is behind drone warfare in Pakistan, a country that pollsters consistently find is one of the most anti-American in the world.”

- “Why the drones should come in from the cold,”
International Herald Tribune, 27 April 2010

III. Purposes and Methods of Plausible Deniability

Reasons to Create Plausible Deniability

Legal: evade national and international liability and justice

Institutional: protect the organization/group or government

Political: avoid fallout from acts but use suspicion of responsibility to create *fear* in opponents

- Affects morale to see leader issue abhorrent instructions

Personal: carry on pretention of not being involved;
protect the reputation (not admit to associates and self)

Religious/Conscience: lessen guilt (less directly responsible)

Methods: (1) Leaders deny crimes committed by their forces

- First level of denial
 - Deny perpetration
- Simple denial of facts (“fog of war”)
 - Allege hearsay, media manipulation/deception
- Sow deception in media
- Development of an alibi (“not present”) or a contrary narrative or perpetrator
- Frame another person or group else
 - “Katyn massacre”: Soviet claim killings during German occupation

Framing for Katyn by false “investigation”

- Mass murder of 22,000 Polish nationals by the Soviet secret police (NKVD) in April-May 1940 in Katyn Forest, Russia

Soviet Propaganda

- "Burdenko Commission"
 - Headed by Nikolai Burdenko, President of the Academy of Medical Sciences of the USSR
 - “Special Commission for Determination and Investigation of the Shooting of Polish Prisoners of War by German-Fascist Invaders in Katyn Forest“ (1944)
 - No foreign personnel allowed
 - Exhumed bodies
 - Items with dates from November 1940 to June 1941
- "The Truth about Katyn“ (Soviet Union, 24 January 1944)
 - “Irrefutable clarity” of German mass shootings of Polish prisoners
 - Soviet pathologists “proofs”
 - bodies could not have been dead longer than two years
 - documents on some bodies
 - Germans doctored the evidence.
 - letter and postcards, a pawn ticket receipted March-May 1941 after spring of 1940 (time of the alleged murder by the Soviets)

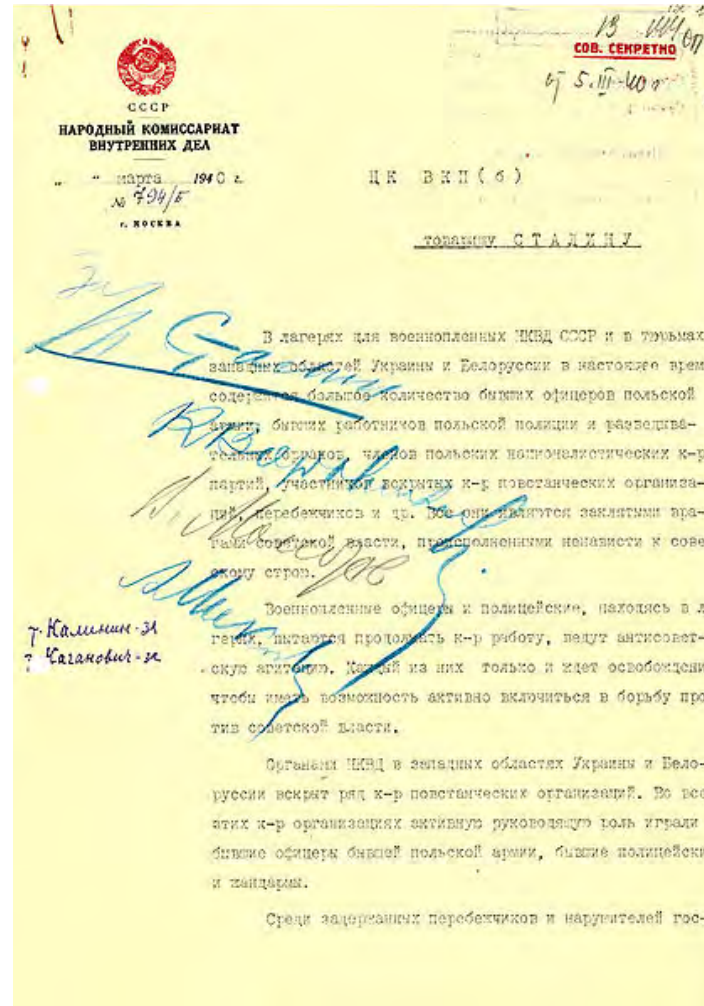


Framing for Katyn by false “trial”

- Soviet military court in Leningrad (Dec 1945-Jan 46)
 - seven servicemen of the German Wehrmacht were tried confessed to having taken part in burial (though not the execution) of 15-20 thousand; spared execution and was given 15 years of hard labor; recanted in 1954, claiming forced to confess
 - confession full of absurdities
- Nuremberg trials (1946)
 - Soviet General Roman Rudenko raised the indictment: "one of the most important criminal acts for which the major war criminals are responsible was the mass execution of Polish prisoners of war shot in the Katyn forest near Smolensk by the German fascist invaders"
 - failed to make the case and the US and British judges dismissed the charges

Katyn Execution Order

Signed by
Joseph Stalin,
Vyacheslav Molotov,
Kliment Voroshilov,
Anastas Mikoyan



Methods: (2) Leaders use abnormal communications with their forces

- Indirect orders/instructions
 - Not in writing
 - Using signals (euphemisms; code words; circumlocution; body signs)
 - Vague language
 - Tacit approval for a developing practice
 - Effect is to move overt responsibility downward

Euphemisms & Code Words

- “All the dirt has to be removed.”
- “kill”: waste, whack, eliminate, neutralize, even call for “executive action/outcome,” blow away, knock off, hit (as in “hit man”) or rub out
- Rwanda: *Inyenzi* (cockroaches) need to be exterminated

In practice, “**signals are orders**,” and are understood by subordinates as such. Language learned through experience, more difficult to prove in court.

Examples from Bosnia (ICTY)

- “Parcel”: captive people or prisoners
- “Screening”: marking for death
- “Distribute” (assembled villagers): kill
- “Escort”: murder

- “Ethnic cleansing” – involuntary transfer of people of one ethnic group from their homes and villages through force and terror
- “Liberate” villages
- “Exchange” move them from one area to another

- ICTY proceedings
- Especially for communications by unsecure phone or radio in the clear

Secret orders passed verbally: Hitler 1942

- Orders on handling captured English and American airmen
 - No longer granted the status of prisoners of war (POW) but considered criminals
 - Army ordered to refrain from protecting them against lynching by populace
 - Order from Himmler to all senior executive SS and Police officers “to make this instruction known to their subordinate officers **verbally**”
 - Hitler's top secret order, dated 18 October 1942, that commandos, regardless of condition, were "to be slaughtered to the last man" after capture
 - Secret orders, one of which was signed by Rudolf Hess, to be passed **orally** to civilians, that enemy fliers or parachutists were to be arrested or liquidated

Source: Justice Jackson, Opening Statement, Trial of Major War Criminals, International Military Tribunal Nuremberg, 21 November 1945

Methods: (3) Leaders use abnormal command and control (C2)

- Bypass official chain of command
- Create parallel systems (e.g., secret police, party instruments, “plumbers”)
- Use single channel/person for instructions (avoid large group decisions)
- Issued instructions several levels down
- Positive/negative reinforcement (rewards and punishments)
- Give latitude to subordinates
- Diffuse/dispersed leadership
 - Influence rather than command
- Trustworthy “fall guy” or expendable scapegoat
- Use “plausible deniability” as cover/excuse for “fall guy” to take blame
 - Admiral Poindexter

Methods:

(4) Leaders use other forces

- Proxy forces
 - Outside formal chain of command
 - Semi-autonomous (militia in Timor, Bosnia, Darfur)
 - Use unconventional forces
 - Influence not control
- Creation of autonomous systems/forces
 - Establish mechanism, ideology

East Timor Militia 1999

- Cowboy image
 - Threatening
 - Violently pro-Indonesian
 - “Security can no longer be guaranteed.”
- “Uncontrollable”
- Reign of terror (Sept 1999)
- Forced deportations



Indonesian soldiers stand with members of the *Besi Merah Putih* (Red and White Iron) and Aitarak militias in Dili



Tactical Means: Cover-up to Evade Leader Responsibility

- Shredding of incriminatory documents
 - Esp. re. leader involvement
- Hide corroborating facts
 - Creating false alibis and cover stories
- Planting misleading evidence
 - Money laundering
- Spread the responsibility/blame
 - Problem of more people “in the know”
- Show trials or punishments
 - Plead guilty with light sentence
 - Fall guy takes blame but receives no punishment

Leader denial progression

- “The crimes didn’t happen.”
- “If they happened, my forces didn’t do it.”
- “If my forces did it, I didn’t know about it.”
- “If I knew about it, I didn’t order it.”
- “If I ordered it, I have a good excuse!”

VI. Challenging “Plausible Deniers”

Understanding the Challenges for “Plausible Deniers”

Vulnerabilities

- Unofficial instructions
 - Vague and unclear
 - License to act independently
 - Could be misunderstood;
 - Unfavorable consequences; Acts the leader did not intend
 - Abuse of authority
- Unofficial subordinates
 - Difficulties of command and control
 - Abuse of authority
 - Loyalty must be bought or gained in unconventional fashion
 - Possible Frankenstein effect
- Cover-up may be required
 - Support of denial may require cover-up
 - Hiding information is not in itself a cover-up
 - “When a scandal breaks, the discovery of an attempt to cover up is often regarded as even more reprehensible than the original deeds.”
 - “Oh, what a tangled web we weave, when first we practice to deceive”
- If denial fails, it seriously discredits leaders invoking it as a defense. (Double offence)
- If denial succeeds, it creates the impression that the leader is not in control of subordinates (e.g., machinery of government).
- Loss of control is the “Achilles heal” of plausible deniers

Challenges to Identify Plausible Deniability

- Loyalty and institutional protection
 - Closing ranks, especially to protect leaders
 - Subordinates rewarded for playing along
 - Willing to take part of blame without fear of punishment
- Leaders have powers
 - Control of internal investigations
 - Ability for cover-up
 - Capable of forceful means, threats and intimidation
- Presumption of innocence

“Piercing the Veil”

- Uncover both *de facto* and *de jure* systems of command and control
 - Structures and relationships
 - Pattern analysis
 - Channels/means of communication and influence
 - Formal/informal calls, modern comms: emails (forensic IT)
 - Nations to provide intercepts (transcripts)?
 - Trace funding and rewards systems
- “Flip” lower level officials
 - When “fall guy talks”
 - Complicity in shielding
 - ICC: small caseload disadvantage
- Other means?

V. ICC Applications

OTP Focus on Leaders, Reasons:

- **Veracity**
 - Determine the truth at the top
 - Difficult for national authorities
 - Overcoming “plausible deniability” schemes of leaders
- **Accountability**
 - Generally, higher authorities bear greater responsibility
 - Victim consolation and reparations
 - Desire to see initiators and powerful persons receive justice
 - More powerful have more resources for reparations
- **Utility**
 - Removal of senior players
 - Actors with history of mass crimes removed from conflict dynamics
 - Example for future leaders contemplating mass crimes (prevention)
- **Complementarity**
 - National systems are challenged to prosecute leaders (conflicts of interest and influence of the powerful);
 - Bilateral immunities in international law large obstacle for nations
- **Capacity**
 - ICC limitations
 - Small number of persons can be brought to trial
 - Arbitrariness of choosing from large number of low-level perpetrators
 - Smaller number of leaders

Rome Statute: “Shielding”

State unwillingness to genuinely investigate/prosecute

- Proceedings or national decision “made for the purpose of *shielding* the person concerned from criminal responsibility” (Article 17)
- Likely to use a scheme for *plausible deniability* in national proceedings/decisions

Forms of Commission & *Plausible Deniability* (examples)

	Directly	Indirectly ("through another")
Individually ("As an individual")	Direct perpetration <i>Create an alibi</i>	Indirect perpetration <i>Hide/disguise relevant communications</i>
Jointly (common plan)	Direct co-perpetration <i>Present but for other reasons (not linked to crime)</i>	Indirect co-perpetration <i>Claim others made the decisions (designate "fall-guy")</i>

Modes of Liability & Modes of Plausible Deniability

Individual criminal responsibility - Art 25(3)		Plausible Deniability for Leaders (Examples)
Commission	(a) “as an individual, jointly with another or through another person”	<ul style="list-style-type: none"> - Deny facts systematically (Bemba in 2003 on MLC troop actions in CAR) - Not present/alibi (Bemba in CAR) - Frame others for crime (e.g., Soviet claim of German responsibility for Katyn massacre) - Allege steps taken to address the alleged crimes (Lubanga’s mock orders for demobilization of child soldiers) - Criminals not in chain of command (Ali Kshyrb, Bashir)
Instigation	(b) “orders, solicits or induces”	<ul style="list-style-type: none"> - Deny and dissimulate (disguise) crimes (Sudanese officials on Darfur) -
Assistance	(c) “aids, abets or otherwise assists”	<ul style="list-style-type: none"> - Front organizations/companies; circuitous financing and support - Claim arms shipments for law enforcement not criminal purposes
Contribution in any other way	(d) “intentional and with aim of furthering criminal activity or be made in knowledge of the intention.”	<ul style="list-style-type: none"> - Disguise intention (multiple purposes)
Incitement to genocide	(e) “directly and publically incites others”	<ul style="list-style-type: none"> - Use euphemisms - Use indirect words, e.g., euphemisms (RTLM)
Attempt and abandonment	(f) “commences its execution by means of a substantial step”	<ul style="list-style-type: none"> - Create other purposes (e.g., accidentally fall near legitimate military targets)

Modes of Liability & Modes of Plausible Deniability (Extra)

Command/superior responsibility - Art 28		Plausible Deniability for Leaders (Examples)
Military commander	(a) “failure to exercise control properly”	<ul style="list-style-type: none"> -Claim not under authority - ICTR (Bagasora?) - Bemba - Al Bashir
Superior	(b) “failure to exercise control properly”	<ul style="list-style-type: none"> -Make empty or ineffective responses to crimes - Claim force not under command and control (Milosevic and Serb militia in Bosnia)

Lubanga's Deception

- Sought plausible deniability in a simple fashion
- For political reasons, not expecting trial

- “announced **pacification** but sending troops to kill all the Lendus”
- “promised to **demobilise the child soldiers** and he was recruiting them at the same time”
 - Sham orders
- called for “establishment of an international criminal **tribunal** to investigate massacres in Ituri”
 - ICC Deputy Prosecutor Fatou Bensouda, Trial Transcript, 26 January 2009, ICC-01/04-01/06-T-107-ENG ET WT 26-01-2009 T 1-74 SZ T, 26 January 2009, Doc. ICC-01/04-01/06-T-107-ENG, 26 January 2009

More Sophisticated

- CAR (Bemba)
 - Orders direct to field commander
- Darfur
 - Al Bashir ignored ordinary hierarchy but gave criminal orders to major Janjaweed leaders
 - Harun (Min. Interior) directly ordered to Janjaweed
 - Orders different from military chain of command

Conclusions: Potential Utility?

- Conceptualization may help *identify* practice
- *Expose* systems of plausible deniability
 - Overcome denial mechanisms
 - Discovery of Plausible Deniability system shows evidence of *intent*
 - Fraud in addition to the crime
 - “Crack the code” to identify mechanism of crime
 - Intercepts and code words
 - Physical evidence: communications and linking materials

Utility?

- Help case selection, investigation and prosecution
 - Preliminary examination
 - How far up the chain of command?
 - Investigation
 - Formulate information/intelligence collection plans
 - Recognize patterns of behaviour
 - Build into case hypotheses
 - Trial
 - Collating circumstantial evidence into a coherent picture
 - Explain plausible deniability system to Chamber
 - Use by Chamber to describe the “plausible deniability” system (e.g., ICTY judgment)
- Bring leaders to justice

Thank you!

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